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August 13, 2026

VIA E-PORTAL

Mr. Adam Teitzman
Commission Clerk
Florida Public Service Commission
2540 Shumard Oak Boulevard
Tallahassee, FL 32399-0850

Re: Docket No. 20260011-GU - In re: Natural gas facilities relocation cost recovery clause.

Dear Mr. Teitzman:

Attached for filing, please find Joint Prehearing Statement of Florida Public Utilities Company and Florida City Gas.

Thank you for your assistance with this filing. As always, please don't hesitate to let me know if you have any questions whatsoever.

Sincerely,

Beth Keating
Gunster, Yoakley & Stewart, P.A.
215 South Monroe St., Suite 601
Tallahassee, FL 32301

ENCL
CC:// (certificate of service)

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: **Natural gas facilities relocation cost recovery clause.**	DOCKET NO. 20260011-GU DATED: August 13, 2026

<u>JOINT PREHEARING STATEMENT OF FLORIDA PUBLIC UTILITIES COMPANY AND FLORIDA CITY GAS</u>

In accordance with the Order Establishing Procedure for this Docket, Order No. PSC-2026-0035-PCO-EI, issued February 6, 2026, Florida Public Utilities Company ("FPUC") and Florida City Gas ("FCG")(jointly, "Companies") hereby file this Joint Prehearing Statement.

A. APPEARANCES

Beth Keating
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(850) 521-1706

B. WITNESSES AND EXHIBITS

i. <u>All Known Witnesses</u>

Witness – Direct	**Subject**	**Issue**
Diana Williams	2025 Final True Up	2A and 2B
Solomon McCloskey	NG Relocation work performed in May – December 2025 Final True Up Period	1A, 2A, 1B, 2B
Diana Williams	2026 Estimated and 2027 Projection; Calculation of Factors	2A-8A; 2B-8B
Solomon McCloskey	SPP work to be performed in projection period	3A-4A; 3B-4B

ii. All Known Exhibits

Witness	Exhibit	Title	Issue
Williams	DW-1	FPUC NGRCRC Schedules 1X-1Y and Forms A and B	2B
	DW-2	FCG NGRCRC Schedules 1X-1Y and Forms A and B	2A
	DW-3	FPUC NGRCRC Schedules E and P	5B-7B
	DW-4[1]	FCG NGRCRC Schedules E and P	5A-7A

C. STATEMENT OF BASIC POSITION

. Companies' Statement of Basic Position

Companies: The factors proposed by each Company have been developed through projections and calculations made in accordance with Rule 25-7.150, F.A.C., and the associated depreciation expense has been calculated in accordance with the rates approved in the Companies' respective last approved depreciation studies. The factors are based upon actual, prudently incurred costs associated with "facilities relocations" as that term is defined in Section 366.99(1)(b), F.S.; thus, the costs incurred are consistent with "natural gas facilities relocation costs" as that term is defined in Section 366.99(1)(d), F.S. Projects and project costs for 2025 and 2026 are likewise consistent with the Commission's decision in Order No. PSC-2026-0052-TRF-GU, issued February 23, 2026. As such, the Companies ask that they be allowed to implement their proposed NGRCRC Factors for the January – December, 2027 period.

[1] Version with corrected labelling filed June 30, 2026.

D. POSITION ON THE ISSUES

FCG NGFRCRC Issues

ISSUE 1A: What natural gas facilities relocation projects and associated costs of FCG are eligible for recovery through the Natural Gas Facilities Relocation Cost Recovery Clause?

FCG: "Natural gas facilities relocation costs" are defined in Section 366.99(1)(d), F.S., as, "the costs to relocate or reconstruct facilities as required by a mandate, a statute, a law, an ordinance, or an agreement between the utility and an authority, including, but not limited to, costs associated with reviewing plans provided by an authority." As set forth in the statute, recoverable costs do not include costs already recovered in the utility's base rates, but does include depreciation expense on recoverable capital expenditures. For FCG, the costs associated with the following projects are eligible for recovery through the NGFRCRC:

Project List

Line	Project Title	Project Number	Authority	Overall Cost	Total Requested 2027 (1)
P	0361-DOT-OSLO RD RELO	431521-1-52-01	FDOT	$ 149,957	$ 115,147
P	Okeechobee Rd Relocation FDOT	423251-4-52-01	FDOT	$ 11,740,782	$ 11,418,647
1	DOT RELOC South Miami Bridge Demo -00101	00101#875400	FDOT-MIA	$ 41,373	$ 41,373
2	SW 33RDST _ SR7S US441_ 60TH AVE- MIRAMAR	429576-8-52-01	FDOT	$ 31,252	$ 31,252
3	780 Oak Park Dr. Relo		Brevard County	$ 10,000	$ 10,000
4	Espanola Baffle Box Gas Main Conflict	20120	City of Melbourne	$ 15,000	$ 15,000
	Total			$ 11,988,364	$ 11,631,419

(1) *Represents Costs Requested for Recovery in this Docket on Active Current Projects. Projects Previously Approved in Docket No. 20250121 and Completed Projects are not Reflected. Projects designated with a "P" were approved in the prior docket but remain open.*

ISSUE 2A: What amounts should the Commission approve as FCG's final prudently incurred costs and final true-up revenue requirement amounts for the Natural Gas Facilities Relocation Cost Recovery Clause for the period July 2024 through December 2025?

FCG: For 2025, FCG over-recovered $5,968.

ISSUE 3A: What amounts should the Commission approve as FCG's reasonably estimated 2026 costs and estimated true-up revenue requirement amounts for the Natural Gas Facilities Relocation Cost Recovery Clause?

FCG: As set forth in Order No. PSC-2026-0052-TRF-GU, FCG's total, approved revenue requirement to be recovered for 2026 is $971,338. With the prior period over-recovery applied, as well as the actual/estimated over-recovery of $433,478 for 2026, the appropriate amount to be recovered for 2026 is $531,892.

ISSUE 4A: What amounts should the Commission approve as FCG's reasonably projected 2027 costs and projected revenue requirement amounts for the Natural Gas Facilities Relocation Cost Recovery Clause?

FCG: FCG projects a revenue requirement of $1,686,279 for projects in 2027.

ISSUE 5A: What are the Natural Gas Facilities Relocation Cost Recovery Clause total cost recovery amounts, including true-ups, to be included in establishing 2027 Natural Gas Facilities Relocation Cost Recovery factors for FCG?

FCG: When the over-recoveries for 2025 and 2026 are subtracted from the projected revenue requirement, the amount to be recovered by FCG in 2027 is $1,246,833. Trued-up for taxes, the amount is $1,253,104.

ISSUE 6A: What depreciation rates should be used to develop the depreciation expense included in the total 2027 Natural Gas Facilities Relocation Cost Recovery Clause amounts for FCG?

FCG: For FCG, the appropriate depreciation rates are those approved by the Commission in Docket No. 20250035-GU.

ISSUE 7A: What are the appropriate 2027 Natural Gas Facilities Relocation Cost Recovery Clause factors for each rate class for FCG?

FCG:

RATE SCHEDULE	RELOCATION FACTORS PER THERM
RS-1	$0.05244
RS-100	$0.02704
RS-600	$0.01746
GS-1	$0.01160
GS-6000	$0.00726
GS-25000	$0.00700
GS-120K	$0.00538
GS-1250M	$0.00391
GS-11M	$0.00000
GS-25M	$0.00000

	RATE SCHEDULE	RELOCATION FACTORS PER THERM
Gas Lights		$0.00000
CSG, RSG		$0.00000

ISSUE 8A: What should be the effective date of the 2027 Natural Gas Facilities Relocation Cost Recovery Clause factors for billing purposes for FCG?

FCG: The effective date for FCG's cost recovery factors should be the first billing cycle for January 1, 2027, which could include some consumption from the prior month. Thereafter, customers should be billed the approved factors for a full 12 months, unless the factors are otherwise modified by the Commission.

ISSUE 9A: Should the Commission approve revised tariffs reflecting the 2027 Natural Gas Facilities Relocation Cost Recovery Clause factors determined to be appropriate in this proceeding for FCG?

FCG: Yes. The Commission should approve revised tariffs reflecting the NGFRCRC factors determined to be appropriate in this proceeding. The Commission should direct staff to verify that the revised tariffs are consistent with the Commission's decision.

ISSUE 10A: Should this docket be closed?

FCG: This is a continuing docket and should remain open.

FPUC NGFRCRC Issues

ISSUE 1B: What natural gas facilities relocation projects and associated costs of FPUC are eligible for recovery through the Natural Gas Facilities Relocation Cost Recovery Clause?

FPUC: "Natural gas facilities relocation costs" are defined in Section 366.99(1)(d), F.S., as, "the costs to relocate or reconstruct facilities as required by a mandate, a statute, a law, an ordinance, or an agreement between the utility and an authority, including, but not limited to, costs associated with reviewing plans provided by an authority." As set forth in the statute, recoverable costs do not include costs already recovered in the utility's base rates, but does include depreciation expense on recoverable capital expenditures. For FPUC, the costs associated with the following projects are eligible for recovery through the NGFRCRC:

Project List

Line	Project Title	Project Number	Authority	Overall Cost	Total Requested 2027 (1)
P	Australian Ave (Steel GM Replaced with PE GM)	2,021,827	Palm Beach County	$ 782,120	$ 734,322
P	MR PH4 CR491 Wide Road Prjt	FPID-434498-2-54-01	Citrus County	$ 111,143	$ (12,905)
P	SR39 James Redman Pkwy FR s of Rayburn RD to N of Golden Rule LN (Install 4" PE)	447235-1-52-01	FDOT	$ 10,000	$ 10,000
P	Spirit Lake Rd at Sheffield Rd (Install PE)	County Prjt #5400193	County	$ 100,000	$ 100,000
P	Fort Fraser Trail over SR 60 (Install 4" PE)	440272-1-52-01	FDOT	$ 10,000	$ 10,000
P	Pine Tree Lake Clarke Shore Bridge (PE GM Reloc)	450650-01-54-1	Lake Clarke Shores	$ 71,872	$ 5,490
P	Earman River Bridget Over the C-17 Canal Bridge #930003 (PE GM Reloc)	FDOT 442891-2-52-01	FDOT	$ 200,000	$ 211,814
1	Rifle Range Road		Polk	$ 68,814	$ 68,814

			County		
2	Tropic Isle Neighborhood Improvements	19-015	Delray Beach	$ 35,035	$ 35,035
3	SR 5/ US -1 From Camino Real to NE 8th Street/ Mizner Blvd BR	FDOT FPID 438386-5-52-01	FDOT	$ 80,000	$ 80,000
4	Federal Hwy and NE 20th St BR	FPID 451579-2-52-01	FDOT	$16,000	$ 16,000
5	Florida Mango Road - L-7 Culvert Replacement PBC# 2017517 Final Utility WPB	PBC#2017517	Palm Beach County	$ 250,000	$ 20,000
6	Englewood Estates Drainage Improvement Project LW	PBC#2021606	Palm Beach County	$ 65,000	$ 65,000
7	State Rd 544 Sidewalk Improvements	446535-1-52-01	FDOT	$ 10,000	$ 10,000
8	Prosperity Road SFWMD C-17 Canal Bridge	PBC#2018800	Palm Beach County	$ 300,000	$ 300,000
	Total			$ 2,109,984	$ 1,653,570

(1) *Represents Costs Requested for Recovery in this Docket on Active Current Projects. Projects Previously Approved in Docket No. 20250121 and Completed Projects are not Reflected. Projects designated with a "P" were approved in the prior docket but remain open*

<u>ISSUE 2B</u>: What amounts should the Commission approve as FPUC's final prudently incurred costs and final true-up revenue requirement amounts for the Natural Gas Facilities Relocation Cost Recovery Clause for the period July 2024 through December 2025?

<u>FPUC</u>: For 2025, FPUC over-recovered $5,027.

<u>ISSUE 3B</u>: What amounts should the Commission approve as FPUC's reasonably estimated 2026 costs and estimated true-up revenue requirement amounts for the Natural Gas Facilities Relocation Cost Recovery Clause?

<u>FPUC</u>: As also set forth in Order No. PSC-2026-0052-TRF-GU, FPUC's total, approved revenue requirement to be recovered for 2026 is $505,317. With the prior period over-recovery

applied, as well as the actual/estimated over-recovery of $13,108 for 2026, the appropriate amount to be recovered for 2026 is $487,182.

<u>ISSUE 4B</u>: What amounts should the Commission approve as FPUC's reasonably projected 2027 costs and projected revenue requirement amounts for the Natural Gas Facilities Relocation Cost Recovery Clause?

<u>FPUC</u>: The projected revenue requirement is $384,904 for 2027.

<u>ISSUE 5B</u>: What are the Natural Gas Facilities Relocation Cost Recovery Clause total cost recovery amounts, including true-ups, to be included in establishing 2027 Natural Gas Facilities Relocation Cost Recovery factors for FPUC?

<u>FPUC</u>: When the over-recoveries for 2025 and 2026 are subtracted from the projected revenue requirement, the amount to be recovered in 2027 for FPUC is $366,769. Trued-up for taxes, the amount is $368,614.

<u>ISSUE 6B</u>: What depreciation rates should be used to develop the depreciation expense included in the total 2027 Natural Gas Facilities Relocation Cost Recovery Clause amounts for FPUC?

<u>FPUC</u>: For FPUC, the appropriate depreciation rates are those approved by the Commission in Docket No. 20220067-GU.

ISSUE 7B: What are the appropriate 2027 Natural Gas Facilities Relocation Cost Recovery Clause factors for each rate class for FPUC?

FPUC:

RATE SCHEDULE	RELOCATION FACTORS PER THERM
RES-1 and REST-1	$0.01432
RES-2 and REST-2	$0.01014
RES-3 and REST-3	$0.00295
RES-SG and SGT	$0.01203
GS-1 and GTS-1	$0.00158
GS-2 and GTS-2	$0.00315
GS-3 and GTS-3	$0.00296
GS-4 and GTS-4	$0.00286
GS-5 and GTS-5	$0.00192
GS-6 and GTS-6	$0.00202
GS-7 and GTS-7	$0.00118
GS-8 A and GTS-8A	$0.00103
GS-8 B and GTS-8B	$0.00154
GS-8 C and GTS-8C	$0.00028
GS-8 D and GTS-8D	$0.00085
COM-INT and COM-INTT	$0.00137
COM-NGV amd COM-NGVT	$0.00212

RATE SCHEDULE	RELOCATION FACTORS PER THERM
COM-OL and COM-OLT	$0.00412
COM-SG and COM-SGT	$0.01089

<u>ISSUE 8B</u>: What should be the effective date of the 2027 Natural Gas Facilities Relocation Cost Recovery Clause factors for billing purposes for FPUC?

<u>FPUC</u>: The effective date for FPUC's cost recovery factors should be the first billing cycle for January 1, 2027, which could include some consumption from the prior month. Thereafter, customers should be billed the approved factors for a full 12 months, unless the factors are otherwise modified by the Commission.

<u>ISSUE 9B</u>: Should the Commission approve revised tariffs reflecting the 2027 Natural Gas Facilities Relocation Cost Recovery Clause factors determined to be appropriate in this proceeding for FPUC?

<u>FPUC</u>: Yes. The Commission should approve revised tariffs reflecting the NGFRCRC factors determined to be appropriate in this proceeding. The Commission should direct staff to verify that the revised tariffs are consistent with the Commission's decision.

<u>ISSUE 10B</u>: Should this docket be closed?

<u>FPUC</u>: This is a continuing docket and should remain open.

VI. OTHER

e. Stipulated Issues

While not a party to stipulations at this time, the Companies believe that it should be possible to reach a stipulation on each of the issues as they pertain to FPUC and FCG.

f. Pending Motions

The Companies have no pending motions at this time.

g. Pending Confidentiality Claims or Requests

The Companies have no pending motions at this time.

h. Objections to Witness Qualifications as an Expert

The Companies have no objections to any witnesses' qualifications at this time.

i. Request for Sequestration of Witnesses

The Companies have no pending request.

j. Compliance with Order No. PSC-2026-0035-PCO-GU

FPUC has complied with all requirements of the Order Establishing Procedure entered in this docket, as well as the subsequent orders issued modifying that Order.

RESPECTFULLY SUBMITTED this 13th day of August, 2026.

BY: Beth Keating

Beth Keating
Gunster, Yoakley & Stewart, P.A.
215 South Monroe St., Suite 601
Tallahassee, FL 32301
(850) 521-1706

Attorneys for Florida Public Utilities Company and Florida City Gas

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing has been furnished by Electronic Mail to the following parties of record this 13th day of August, 2026:

Carlos Marquez Shaw Stiller Florida Public Service Commission 2540 Shumard Oak Boulevard Tallahassee, FL 32399-0850 cmarques@psc.state.fl.us sstiller@psc.state.fl.us	Office of Public Counsel Walter Trierweiler/Charles Rehwinkel c/o The Florida Legislature 111 West Madison Street, Room 812 Tallahassee, FL 32399-1400 Trierweiler.walt@leg.state.fl.us Rehwinkel.Charles@leg.state.fl.us
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By: Beth Keating

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