

Writer's Direct Dial Number: (850) 521-1706
Writer's E-Mail Address: bkeating@gunster.com

October 9, 2018

Electronic Filing

Ms. Carlotta Stauffer, Clerk
Florida Public Service Commission
2540 Shumard Oak Boulevard
Tallahassee, FL 32399-0850

Re: DOCKET NO. 20180154-GU - Petition for limited proceeding to consider the tax impacts associated with the Tax Cuts and Jobs Act of 2017 for Florida City Gas.

Dear Ms. Stauffer:

Attached for filing in the above-referenced docket, please find the Joint Motion by Florida City Gas, the Office of Public Counsel, and the Federal Executive Agencies to Suspend Procedural Schedule. The Stipulation and Settlement for which the Joint Movants request approval is included as Attachment A to the Joint Motion.

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

Kind regards,



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

cc:// (Service List)

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

Re: Petition for limited proceeding to consider the tax impacts associated with the Tax Cuts and Jobs Act of 2017 for Florida City Gas.

DOCKET NO. 20180154-GU

FILED: October 9, 2018

JOINT MOTION BY FLORIDA CITY GAS, THE OFFICE OF PUBLIC COUNSEL AND FEDERAL EXECUTIVE AGENCIES TO SUSPEND PROCEDURAL SCHEDULE

Florida City Gas (“FCG” or “Company”), the Office of Public Counsel (“OPC”), and Federal Executive Agencies (“FEA”), (collectively, “Joint Movants”) by and through their undersigned attorneys, respectfully move the Florida Public Service Commission (“Commission” or “FPSC”) to temporarily suspend all remaining due dates scheduled in this proceeding. The Joint Movants make this request in light of the Stipulation and Settlement (“2018 EADIT Agreement”) submitted contemporaneously in this proceeding, under separate cover. The Joint Movants anticipate that the need for testimony and a full hearing will be avoided if the Commission approves the Joint Motion to Approve Stipulation and Settlement. In further support of this request to temporarily suspend the schedule, the Joint Movants state:

The Commission’s Order Establishing Procedure, Order No. 2018-0472-PCO-GU, issued September 24, 2018, provides that a full evidentiary hearing is scheduled to take place in this proceeding on February 5 through February 8, 2019. The Order further provides dates for utility, intervenor, and Commission Staff testimony in this proceeding, as well as a discovery schedule.

As noted, contemporaneous with this Joint Motion, the Joint Movants have filed a Joint Motion to Approve Stipulation and Settlement. Approval by the Commission of the 2018 EADIT Agreement would resolve all issues in this docket. Thus, the Joint Movants respectfully request a temporary suspension of all remaining events and due dates scheduled herein pending

Commission consideration of the 2018 EADIT Agreement. Temporary suspension of the schedule will save substantial administrative resources for all parties, as well as Commission staff.

The Joint Movants also request that the Commission consider the 2018 EADIT Agreement at the Commission's December 2018 Agenda Conference. This timing would enable this matter to proceed to the current February 2019 hearing dates in the event the Commission rejects the 2018 EADIT Agreement. In the event that a hearing is required, the Joint Movants commit to work together and with Commission Staff to develop a proposed schedule that would enable this matter to proceed to hearing expeditiously.

Each of the Joint Movants agrees with and supports this Joint Motion to Suspend Procedural Schedule.

WHEREFORE, FCG, OPC, and FEA respectfully request that the Commission enter an order temporarily suspending all remaining events and due dates, pending a ruling on the Joint Motion to Approve Stipulation and Settlement.

Respectfully submitted this 9th day of October 2018 by:

/s/ Patricia A. Christensen

Virginia Ponder
Bar No. 99947
Patricia A. Christensen, Esquire
Bar No. 989789
Office of Public Counsel
c/o The Florida Legislature
111 West Madison Street; Room 812
Tallahassee, FL 32399-1400
(850) 488-9330
ponder.virginia@leg.state.fl.us
Attorneys for the Citizens of the
State of Florida

Beth Keating

Beth Keating, Esquire
Bar No. 0022756
Gunster, Yoakley & Stewart, P.A.
215 South Monroe St., Suite 601
Tallahassee, FL 32301
(850) 521-1706
bkeating@gunster.com
Attorneys for Florida City Gas

Andrew J. Unsicker

Major Andrew J. Unsicker
AFLOA/JACE-ULFSC
139 Barnes Drive, Suite 1
Tyndall AFB, FL 32403
Andrew.unsicker@us.af.mil

CERTIFICATE OF SERVICE

Docket No. 20180154-GU

I **HEREBY CERTIFY** that a true and correct copy of the foregoing has been furnished by electronic mail on this 9th day of October 2018 to the following:

Lauren Davis, Esq.
Johana Nieves, Esq.
Florida Public Service Commission
2540 Shumard Oak Blvd.
Tallahassee, FL 32399-0850
ladavis@psc.state.fl.us
jnieves@psc.state.fl.us

Ms. Carolyn Bermudez
Florida City Gas
4045 N.W. 97th Avenue
Doral FL 33178
Carolyn.Bermudez@nexteraenergy.com

Virginia Ponder
Bar No. 99947
Office of Public Counsel
c/o The Florida Legislature
111 West Madison Street; Room 812
Tallahassee, FL 32399-1400
(850) 488-9330
ponder.virginia@leg.state.fl.us

Federal Executive Agencies
A.J. Unsicker/L.L. Ziemann/N.A.
Cepak/R.K. Moore
c/o AFLOA/JACE-ULFSC
139 Barnes Drive, Suite 1
Tyndall AFB FL 32403
andrew.unsicker@us.af.mil
ULFSC.Tyndall@US.AF.MIL
lanny.ziemann.1@us.af.mil
natalie.cepak.2@us.af.mil
ryan.moore.5@us.af.mil
Thomas.jernigan.3@us.af.mil
Ebony.payton.ctr@us.af.mil



Beth Keating, Esquire
Bar No. 0022756
Gunster, Yoakley & Stewart, P.A.
215 South Monroe St., Suite 601
Tallahassee, FL 32301
(850) 521-1706
bkeating@gunster.com
Attorneys for Florida City Gas