

10:59 AM
L...
ORIGINAL
FILE COPY

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In Re: Conservation Cost)
Recovery Clause)
_____)

DOCKET NO. 950002-EG
FILED: FEBRUARY 13, 1995

PEOPLES GAS SYSTEM'S PREHEARING STATEMENT

Peoples Gas System, Inc. ("Peoples," "the Company"), pursuant to Commission Order No. PSC-95-0066-PCO-EG, hereby files this its prehearing statement and says as follows.

A. All Known Witnesses

Vernon I. Krutsinger: All Issues Pertaining to Peoples Gas System, Inc.

B. All Known Exhibits

- Exhibit ____ (VIK-1): Conservation Cost Recovery True-Up Data.
- Exhibit ____ (VIK-2): ECCR Program and Cost Data and ECCR Factor Calculations.
- Exhibit ____ (VIK-3): TECO Advertising and Promotional Materials (Exhibit to Mr. Krutsinger's 1/25/95 testimony).
- Exhibit ____ (VIK-4): Composite Rebuttal Exhibit (Exhibit to Mr. Krutsinger's 2/1/95 rebuttal testimony).

FILED

C. Statement of Basic Position

Brady-5
1
4

Peoples Gas System's Statement of Basic Position:

The Commission should approve Peoples' final end-of-period true-up amount of \$321,678 for the period October 1, 1993 through September 30, 1994, and the projected conservation program expenses for the full annual period ending March 31, 1995.

WAS _____
OTH _____

RECEIVED & FILED
DOCUMENT NUMBER-DATE
FPSC-BUREAU OF RECORDS 41686 FEB 13 95
FPSC-RECORDS/REPORTING

The Commission should approve the following ECCR factors for the following rate classes to be applied to bills rendered for meter readings taken between April 1, 1995 and March 31, 1996.

Residential	5.800 cents per therm
Comm'l Street Lighting	0.710 cents per therm
Small Commercial	5.325 cents per therm
Commercial	2.072 cents per therm
Comm'l Large Volume 1	1.678 cents per therm
Comm'l Large Volume 2	1.221 cents per therm
Natural Gas Vehicle Svc.	0.526 cents per therm

The Commission should approve Peoples' recovery of the full amount (\$6,852.50) of advertising expenses charged to ECCR for the current period.

D-F. Peoples Gas System - Company-Specific Conservation Cost Recovery Issues

ISSUE 1: What is the appropriate adjusted net true-up amount for Peoples Gas System, Inc. for the period October 1, 1993 through September 30, 1994?

PEOPLES: Over-recovery of \$321,678. (Krutsinger)

ISSUE 2: What are the appropriate conservation cost recovery factors for Peoples Gas System for the period April 1995 through March 1996?

PEOPLES:

Residential	5.800 cents per therm
Comm'l Street Lighting	0.710 cents per therm
Small Commercial	5.325 cents per therm
Commercial	2.072 cents per therm
Comm'l Large Volume 1	1.678 cents per therm
Comm'l Large Volume 2	1.221 cents per therm
Natural Gas Vehicle Svc.	0.526 cents per therm

(Krutsinger)

ISSUE 3: Should Peoples Gas System, Inc. be permitted to recover its advertising expenses charged to Energy Conservation Cost Recovery for the period October 1993 through September 1994?

PEOPLES: Yes. The amount of advertising expenses charged to Energy Conservation Cost Recovery that Peoples seeks to recover is \$6,852.50. (Krutsinger)

ISSUE 4: Should PGS's incentive expense be reduced \$47,490 to remove allowance payments provided to builders who installed either water heating or home heating prior to May 1994 when the Commission approved PGS's program modification to permit allowance payments for a single appliance?

(Staff's Preliminary Issue No. 16)

PEOPLES: No. Peoples' incentive expense should not be reduced. These incentives were paid to builders while Peoples sought and obtained the Commission's approval (by Order No. PSC-94-0567-FOF-EG, issued May 12, 1994) of a modification to its approved energy conservation program to expressly permit such incentive payments for installations that included either gas space heating or gas water heating, but not both. As confirmed by the Commission's approval of this program modification, these incentives are cost-effective and consistent with the purposes of Peoples' Commission-approved energy conservation program. (Krutsinger)

ISSUE 5: Has Tampa Electric Company engaged in false and misleading advertising? If so, what penalty is appropriate?

PEOPLES: Yes. Tampa Electric has engaged in misleading advertising that attempts to portray natural gas in a bad light in violation of the Commission's fuel neutrality policy. No position as to the penalty to be imposed. (Krutsinger)

Generic Energy Conservation Cost Recovery Issues

ISSUE 6: Should the Commission open a docket to establish advertising standards for the numerous variables such as energy efficiency, energy consumption, equipment costs, etc. used by utilities when comparing different fuel types and applications?

PEOPLES: No position at this time. (Krutsinger)

G. Stipulated Issues

Peoples is not aware of any stipulated issues at this time.

H. Statement of Pending Motions

Peoples is not aware of any pending motions at this time.

I. Requirements of Order on Procedure

Peoples is not aware of any requirements of Order No. PSC-95-0066-PCO-EG with which it is unable to comply.

Respectfully submitted this 13th day of February, 1995.



Robert Scheffel Wright
LANDERS & PARSONS
310 West College Avenue
Post Office Box 271
Tallahassee, Florida 32302
(904) 681-0311

Attorneys for Peoples Gas System, Inc.

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing has been served by hand delivery (*) or by United States Mail, postage prepaid, on the following individuals this 13th day of February, 1995:

Sheila Erstling, Esquire*
Division of Legal Services
Florida Public Service Commission
101 East Gaines Street
Fletcher Building, Room 212
Tallahassee, Florida 32399-0860

Lee L. Willis, Esquire
James D. Beasley, Esquire
Macfarlane, Ausley, Ferguson &
McMullen
227 S. Calhoun Street
Tallahassee, Florida 32301

Jack Shreve, Esquire
John Roger Howe
Deputy Public Counsel
Office of Public Counsel
c/o The Florida Legislature
111 West Madison Street
Room 812
Tallahassee, Florida 32399-1400

Wayne L. Schiefelbein
Gatlin, Woods, Carlson & Cowdery
1709-D Mahan Drive
Tallahassee, Florida 32308

Jeffrey A. Stone, Esquire
G. Edison Holland, Esquire
Beggs & Lane
P.O. Box 12950
Pensacola, FL 32576-2950

Joseph A. McGlothlin, Esquire
Vicki Gordon Kaufman, Esquire
McWhirter, Reeves, et al.
315 S. Calhoun St., # 716
Tallahassee, FL 32301

John W. McWhirter, Jr., Esq.
McWhirter, Reeves, et al.
Post Office Box 3350
Tampa, FL 33601

Floyd R. Self, Esquire
Messer, Vickers, et al.
215 S. Monroe Street
Suite 701
Tallahassee, FL 32301

Debbie Stitt
Energy Conservation Analyst
St. Joe Natural Gas Company
Post Office Drawer 549
Port St. Joe, FL 32456

James A. McGee, Esquire
Florida Power Corporation
Post Office Box 14042
St. Petersburg, FL 33733

Charles Guyton, Esquire*
Steel, Hector & Davis
215 S. Monroe St., Ste. 601
Barnett Bank Bldg.
Tallahassee, FL 32301


ROBERT SCHEFFEL WRIGHT