

Shawna Senko

From: Keating, Beth <BKeating@gunster.com>
Sent: Wednesday, October 02, 2013 11:41 AM
To: Filings@psc.state.fl.us
Cc: Brian Sulmonetti; 'Elizabeth Wade'; 'Martin, Cheryl'; 'AW@macfar.com'; 'nhorton@lawfla.com'; 'Christensen, Patty'; 'Floyd, Kandi M.'; 'Andy Shoaf'; 'Jerry Melendy'; Carolyn Bermudez; Kelley Corbari; Lee Eng Tan; rehwinkel.charles@leg.state.fl.us
Subject: Docket No. 130004-GU
Attachments: AGL Preliminary List (04).PDF

Attached for electronic filing, please find the Preliminary Statement of Issues and Positions of Florida City Gas. As always, please don't hesitate to contact me if you have any questions. Thank you for your assistance.

Beth Keating
Gunster, Yoakley & Stewart, P.A.
215 S. Monroe St., Suite 601
Tallahassee, FL 32301
bkeating@gunster.com
Direct Line: (850) 521-1706

a. Person responsible for this electronic filing:

Beth Keating
Gunster, Yoakley & Stewart, P.A.
215 S. Monroe St., Suite 601
Tallahassee, FL 32301
bkeating@gunster.com
Direct Line: (850) 521-1706

b. Docket No. 130004-GU - In re: Natural Gas Conservation Cost Recovery.

c. On behalf of: Florida City Gas

d. There are a total of pages: 3

e. Description: Preliminary Statement of Issues and Positions



GUNSTER
FLORIDA'S LAW FIRM FOR BUSINESS

Beth Keating | Attorney
Governmental Affairs
215 S. Monroe Street, Suite 601
Tallahassee, FL 32301
P 850-521-1706 C 850-591-9228
gunster.com | [View my bio](#)

Tax Advice Disclosure: To ensure compliance with requirements imposed by the IRS under Circular 230, we inform you that any U.S. federal tax advice contained in this communication (including any attachments), unless otherwise specifically stated, was not intended or written to be used, and cannot be used, for the purpose of (1) avoiding penalties under the Internal Revenue Code or (2) promoting, marketing or recommending to another party any matters addressed herein. Click the following hyperlink to view the complete Gunster IRS Disclosure & Confidentiality note.

<http://www.gunster.com/terms-of-use/>

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Natural Gas)
Conservation Cost Recovery)
Clause)
_____)

Docket No. 130004-GU
Filed: October 2, 2013

FLORIDA CITY GAS
PRELIMINARY STATEMENT OF ISSUES AND POSITIONS

The following is the preliminary statement of issues and positions filed on behalf of Florida City Gas, a division of Pivotal Utility Holdings, Inc.:

1. What are the final conservation cost recovery true-up amounts for the period January 2012 through December 2012?

Florida City Gas: An end-of-period over-recovery of \$1,417,403, calculated based upon an end-of-period net true up over-recovery of \$997,839.

2. What are the total conservation cost recovery amounts to be collected during the period January 2014 through December 2014?

Florida City Gas: A total of \$4,963,376.

3. What are the conservation cost recovery factors for the period January 2014 through December 2014?

Florida City Gas: The appropriate factors are:

<u>Rate Class</u>	<u>Factor</u>
GS-1, GS-100, GS-220, RSG, CSG (Sales & Transp.)	\$0.13084
GS-600 (Sales & Transportation)	\$0.06551
GS-1200 (Sales & Transportation)	\$0.03874
GS-6k (Sales & Transportation)	\$0.03212
GS-25000 (Sales & Transportation)	\$0.03189
GS-60000 (Sales & Transportation)	\$0.03134


Docket No. 130004-GU
October 2, 2013

GS-120000 (Sales & Transportation)	\$0.02208
GS-250000 (Sales & Transportation)	\$0.01997
Gas Lights	\$0.06213

4. What should be the effective date of the conservation cost recovery factors for billing purposes?

Florida City Gas: The factors should be effective beginning with the specified conservation cost recovery cycle and thereafter for the period January 2014 through December 2014. Billing cycles may start before January 1, 2014 and the last cycle may be read after December 31, 2014, so that each customer is billed for twelve months regardless of when the adjustment factor became effective.

RESPECTFULLY SUBMITTED this 2nd day of October, 2013.



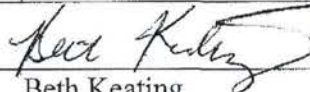
Beth Keating
Gunster, Yoakley & Stewart, P.A.
215 South Monroe St., Suite 601
Tallahassee, FL 32301
(850) 521-1706

Docket No. 130004-GU
October 2, 2013

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing, has been furnished by electronic or US Mail to the following parties of record this 2nd day of October 2013:

Florida Public Utilities Company Cheryl Martin 1641 Worthington Road, Suite 220 West Palm Beach, FL 33409-6703	MacFarlane Ferguson Law Firm Ansley Watson, Jr. P.O. Box 1531 Tampa, FL 33601-1531
Messer Law Firm Norman H. Horton, Jr. P.O. Box 15579 Tallahassee, FL 32317	Office of Public Counsel J.R. Kelly/Patricia Christensen c/o The Florida Legislature 111 West Madison Street Room 812 Tallahassee, FL 32399-1400
Peoples Gas System Paula Brown Kandi Floyd P.O. Box 111 Tampa, FL 33601-0111	St. Joe Natural Gas Company, Inc.* Mr. Andy Shoaf P.O. Box 549 Port St. Joe, FL 32457-0549
Sebring Gas System, Inc. Jerry H. Melendy, Jr. 3515 U.S. Highway 27 South Sebring, FL 33870	AGL Resources Inc. Elizabeth Wade/Brian Sulmonetti Ten Peachtree Place Location 1470 Atlanta, GA 30309
Florida City Gas Carolyn Bermudez 933 East 25 th Street Hialeah, FL 33013-3498	Kelley Corbari/Lee Eng Tan Florida Public Service Commission 2540 Shumard Oak Boulevard Tallahassee, FL 32399
Florida Division of Chesapeake Utilities Corporation Cheryl Martin 1641 Worthington Road, Suite 220 West Palm Beach, FL 33409-6703	



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