FILED OCT 09, 2015 DOCUMENT NO. 06379-15 FPSC - COMMISSION CLERK

# MACFARLANE FERGUSON & MCMULLEN

ATTORNEYS AND COUNSELORS AT LAW

ONE TAMPA CITY CENTER, SUITE 2000
20I NORTH FRANKLIN STREET
P.O. BOX 1531 (ZIP 33601)
TAMPA, FLORIDA 33602
(BI3) 273-4200 FAX (BI3) 273-4396

www.mfmlegal.com

EMAIL: info@mfmlegal.com

625 COURT STREET
P.O. BOX 1669 (ZIP 33757)
CLEARWATER, FLORIDA 33756
(727) 441-8966 FAX (727) 442-8470

IN REPLY REFER TO:

Ansley Watson, Jr. P.O. Box 1531 Tampa, Florida 33601 e-mail: <u>aw@macfar.com</u>

October 9, 2015

# **VIA WEB-BASED E-FILING**

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

Re: Docket No. 150003-GU - Purchased gas adjustment (PGA) true-up

Dear Ms. Stauffer:

Attached for electronic filing in the above docket on behalf of Peoples Gas System, please find Peoples' Prehearing Statement.

We appreciate your usual assistance.

Sincerely.

Ansley Watson, Jr

AWjr/a Attachment

cc: Parties of Record

Ms. Kandi M. Floyd

# BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Purchased gas adjustment	)	DOCKET NO. 150003-GU
(PGA) true-up.	)	Submitted for filing:
		10-9-15

# PEOPLES GAS SYSTEM'S PREHEARING STATEMENT

Peoples Gas System ("PGS"), by its undersigned attorneys, submits the following Prehearing Statement for the hearing scheduled to be held in the above docket commencing October 19, 2015.

# A. <u>WITNESSES</u>

<u>Witness</u>	Subject Matter	<u>Issues</u>
(Direct)		
Kandi M. Floyd (PGS)	Projected gas costs, therm sales and weighted average cost of gas ("WACOG"); final PGA true-up amount for January 2014 - December 2014; estimated PGA true-up amounts for January 2015 – December 2015; total PGA true-up amount for January 2015 – December 2015; and levelized PGA cost recovery (cap) factor for January 2016 – December 2016	1-6

# B. <u>EXHIBITS</u>

Exhibit	Witness	Description
(KMF-1)	Floyd	Calculation of final true-up for January 2014 – December 2014 (Schedule A-7)
(KMF-2)	Floyd	Calculation of estimated true-up for January 2015 – December 2015; total

true-up for January 2015 – December 2015); calculation of PGA factor for January 2016 – December 2016 (Schedules E-1 through E-5)

# C. STATEMENT OF BASIC POSITION

# PGS's Statement of Basic Position:

The Commission should approve PGS's final PGA true-up amount of \$1,442,494 under-recovery for the period January 2014 through December 2014; its actual/estimated PGA true-up amount of \$2,256,948 over-recovery for the period January 2015 through December 2015; and its levelized PGA (cap) factor of \$0.96064 per therm for the period January 2016 through December 2016. (Floyd)

# D. STATEMENT OF ISSUES AND POSITIONS

# Generic Purchased Gas Adjustment Issues

<u>ISSUE 1</u>: What are the final purchased gas adjustment true-up amounts for the period January 2014 through December 2014?

PGS: \$1,442,494 under-recovery (Floyd)

ISSUE 2: What are the actual/estimated purchased gas adjustment true-up amounts for the period January 2015 through December 2015?

PGS: \$2,256,948 over-recovery (Floyd)

ISSUE 3: What are the total purchased gas adjustment true-up amounts to be collected during the period January 2016 through December 2016?

PGS: \$814,458 over-recovery (Floyd)

ISSUE 4: What are the levelized purchased gas cost recovery (cap) factors for the period January 2016 through December 2016?

PGS: \$0.96064 per therm (Floyd)

<u>ISSUE 5</u>: What should be the effective date of the new purchased gas adjustment charge for billing purposes?

PGS: The charge should be effective beginning with the specified purchased gas cost recovery cycle and thereafter for the period January 2016 through December 2016. Billing cycles may start

before January 1, 2016, and the last cycle may be read after December 31, 2016, so that each customer is billed for twelve months regardless of when the adjustment charge became effective. (Floyd)

# ISSUE 6: Should the Commission approve revised tariffs reflecting the new purchased gas adjustment charges determined to be appropriate in this proceeding?

<u>PGS</u>: Yes. The Commission should approve revised tariffs reflecting the new purchased gas adjustment charges 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. (Floyd)

# E. STIPULATED ISSUES

None as to PGS.

# F. PENDING MOTIONS

None as to PGS.

# G. PENDING CONFIDENTIALITY CLAIMS OR REQUESTS

PGS has no pending confidentiality claims or requests at this time.

#### H. COMPLIANCE WITH ORDER ESTABLISHING PROCEDURE

PGS has complied with all requirements of the Order Establishing Procedure in this docket.

# Dated this 9th day of October, 2015.

Respectfully submitted,

Ansley Watson Jr.

Phone: (813) 273-4321 E-mail: <u>aw@macfar.com</u>

Ashley R. Kellgren Phone: (813) 273-4247 E-mail: ark@macfar.com

Macfarlane Ferguson & McMullen

P. O. Box 1531

Tampa, Florida 33601-1531

Fax: (813) 273-4396

Attorneys for Peoples Gas System

#### **CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that true and correct copies of the foregoing Prehearing Statement have been furnished by electronic mail this 9th day of October, 2015, to the following:

Kyesha Mapp, Esquire
Office of General Counsel
Florida Public Service Commission
2540 Shumard Oak Boulevard
Tallahassee, FL 32399-0850
kyoung@psc.state.fl.us

Office of Public Counsel J.R. Kelly/Patricia Christensen c/o The Florida Legislature 111 West Madison St., Room 812 Tallahassee, FL 32399-1400 Kelly.jr@leg.state.fl.us

Beth Keating, Esquire
Gunster Law Firm
215 South Monroe St. Suite 601
Tallahassee, FL 32301
bkeating@gunster.com

Mr. Charles Shoaf St. Joe Natural Gas Company, Inc. P. O. Box 549 Port St. Joe, FL 32457-0549 Andy@stjoegas.com Ms. Carolyn Bermudez Florida City Gas 933 East 25<sup>th</sup> Street Hialeah, FL 33013-3340 cbermude@aglresources.com

Paula K. Brown/Kandi M. Floyd Regulatory Affairs Peoples Gas System P. O. Box 111 Tampa, FL 33601-0111 regdept@tecoenergy.com

Cheryl Martin
Florida Public Utilities Company
1641 Worthington Road, Suite 220
West Palm Beach, FL 33409-6703
Cheryl martim@fpuc.com

Elizabeth Wade
AGL Resources Inc.
Ten Peachtree Place
Location 1470
Atlanta, GA 30309
ewade@aglresources.com

Ansley Watson, Jr.