FILED OCT 04, 2016 **DOCUMENT NO. 07987-16 FPSC - COMMISSION CLERK**

MACFARLANE FERGUSON & McMullen

ATTORNEYS AND COUNSELORS AT LAW

ONE TAMPA CITY CENTER, SUITE 2000 20! NORTH FRANKLIN STREET P.O. BOX (53) (ZIP 3360)) TAMPA, FLORIDA 33602 (813) 273-4200 FAX (813) 273-4396

www.mfmlegal.com EMAIL: info@mfmlegal.com

625 COURT STREET P.O. BOX (669 (ZIP 33757) CLEARWATER, FLORIDA 33756 (727) 44I-8966 FAX (727) 442-8470

IN REPLY REFER TO:

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

October 4, 2016

VIA E-PORTAL FILING

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

> Docket No. 160004-GU – Natural gas conservation cost recovery Re:

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,

AWjr/a Attachment

CC:

Parties of Record Ms. Kandi M. Floyd

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Natural gas conservation cost recovery.) DOCKET NO. 160004-GU) Submitted for filing: _) 10-4-16				
PEOPLES GAS SYSTEM'S PREHEARING STATEMENT							
Peoples Gas System ("PGS"), by its undersigned attorneys, submits the following							
Prehe	earing Statement fo	or the hearing	g scheduled	to be held in the above	docket		
comm	nencing November 1	, 2016.					
A.	WITNESSES						
	Witness		Subject Matt	<u>ter</u>	<u>Issues</u>		
	(Direct)						
	Kandi M. Floyd (PGS)		2015; Project and ECCR	5 - December cted expenses factors for uary through	1-5		
B.	<u>EXHIBITS</u>						
	<u>Exhibit</u>	<u>Witness</u>		<u>Description</u>			
	(Revised KMF-1)	Floyd		Conservation cost recovery true-up data (January 2015 - December 2015) consisting of Schedules CT-1 through CT-6			
	(KMF-2)	Floyd		Data for development of conservation cost recover factors (January 1 - Decen 2017), consisting of Scheoo-C-1 through C-5	nber 31,		

C. STATEMENT OF BASIC POSITION

PGS's Statement of Basic Position:

The Commission should approve PGS's final true-up amount of \$2,136,452 (overrecovery) for the period January 2015 through December 2015, and its projected conservation program expenses for the period January 1, 2016 through December 31, 2016, net of the estimated true-up.

The Commission should approve the following ECCR factors for the following rate classes for the period January 2017 through December 2017:

Rate Class	ECCR Factor (per therm)
Residential	\$0.07853
Residential Standby Generator	\$0.07853
Small General Service	\$0.04763
Commercial Standby Generator	\$0.02353
General Service 1	\$0.02353
General Service 2	\$0.01715
General Service 3	\$0.01414
General Service 4	\$0.01056
General Service 5	\$0.00776
Natural Gas Vehicle Service	\$0.01455
Commercial Street Lighting	\$0.01244

(Floyd)

D. STATEMENT OF ISSUES AND POSITIONS:

Generic Conservation Cost Recovery Issues

ISSUE 1: What are the final conservation cost recovery true-up amounts for the period January 2015 through December 2015?

PGS: \$2,136,452 overrecovery (Floyd)

<u>ISSUE 2</u>: What are the total conservation cost recovery amounts to be collected during the period January 2017 through December 2017?

PGS: \$13,102,649 (Floyd)

ISSUE 3: What are the conservation cost recovery factors for the period January

2016 through December 2016?

PGS:

Rate Class	ECCR Factor (per therm)
Residential	\$0.07853
Residential Standby Generator	\$0.07853
Small General Service	\$0.04763
Commercial Standby Generator	\$0.02353
General Service 1	\$0.02353
General Service 2	\$0.01715
General Service 3	\$0.01414
General Service 4	\$0.01056
General Service 5	\$0.00776
Natural Gas Vehicle Service	\$0.01455
Commercial Street Lighting	\$0.01244

(Floyd)

<u>ISSUE 4</u>: What should be the effective date of the new conservation cost recovery factors for billing purposes?

PGS: The factors should be effective beginning with the specified conservation cost recovery cycle and thereafter for the period January 2017 through December 2017. Billing cycles may start before January 1, 2017, and the last cycle may be read after December 31, 2017, so that each customer is billed for twelve months regardless of when the adjustment factor became effective. (Floyd)

ISSUE 5: Should the Commission approve revised tariffs reflecting the natural gas conservation cost recovery amounts and establishing natural gas conservation cost recovery factors determined to be appropriate in this proceeding?

PGS: Yes. The Commission should approve revised tariffs reflecting the natural gas cost recovery amounts and establishing natural gas conservation cost recovery 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. (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. <u>COMPLIANCE WITH ORDER ESTABLISHING PROCEDURE</u>

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

Dated this 4th day of October, 2016.

Respectfully submitted,

Ansley Watson, Jr.

Phone: (813) 273-4321 E-mail: aw@macfar.com

Macfarlane Ferguson & McMullen

P. O. Box 1531

Tampa, Florida 33601-1531

Fax: (813) 273-4396

Attorney for Peoples Gas System

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that true and correct copies of the foregoing Prehearing Statement has been furnished by electronic mail this 4th day of October, 2016, to the following:

Kelley Corbari / Leslie Ames, Esquire Office of General Counsel Florida Public Service Commission 2540 Shumard Oak Boulevard Tallahassee, FL 32399-0850 kcorbari@psc.state.fl.us lames@psc.state.fl.us

Office of Public Counsel
J.R. Kelly/Charles Rehwinkel
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 618 Tallahassee, FL 32301 bkeating@gunster.com

Mr. Jerry H. Melendy, Jr. Sebring Gas System, Inc. 3515 U.S. Highway 27 South Sebring, FL 33870-5452 imelendy@floridasbestgas.com

FPUC/ Indiantown/
Fort Meade/Chesapeake
Mike Cassel
1750 SW 14th Street, Suite 200
Fernandina Beach, FL 32034
mcassel@fpuc.com

Ms. Carolyn Bermudez Florida City Gas 933 East 25th Street Hialeah, FL 33013-3340 cbermude@aglresources.com

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

Paula M. Sparkman, Esquire Messer Law Firm P.O. Box 15579 Tallahassee, FL 32317 psparkman@lawfla.com

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

Debbie Stitt/ Charles A Shoaf St. Joe Natural Gas Company, Inc. P.O. Box 549 Port St. Joe, FL 32457 andy@stjoegas.com

Ansley Watson, Jr.