



**GUNSTER**  
ATTORNEYS AT LAW

Writer's E-Mail Address: bkeating@gunster.com

September 1, 2022

**VIA E-PORTAL**

Mr. Adam Teitzman  
Commission Clerk  
Florida Public Service Commission  
2540 Shumard Oak Boulevard  
Tallahassee, FL 32399-0850

**Re: Docket No. 20220004-GU – Natural Gas Conservation Cost Recovery**

Dear Mr. Teitzman:

Attached for filing in the above-referenced docket, please find Florida Public Utilities Company's corrected Preliminary Statement of Issues and Positions.

Should you have any questions whatsoever, please do not hesitate to contact me. Thank you for your assistance in this matter.

Sincerely,

*/s/Beth Keating*

Beth Keating  
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215 South Monroe St., Suite 601  
Tallahassee, FL 32301  
(850) 521-1706

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BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Natural Gas )  
Conservation Cost Recovery )  
Clause )  
\_\_\_\_\_ )

Docket No. 20220004-GU  
Filed: September 1, 2022

**CORRECTED CONSOLIDATED PRELIMINARY STATEMENT OF ISSUES AND POSITIONS FOR FLORIDA PUBLIC UTILITIES COMPANY, FLORIDA DIVISION OF CHESAPEAKE UTILITIES CORPORATION AND FLORIDA PUBLIC UTILITIES-INDIANTOWN DIVISION**

Florida Public Utilities Company (“FPUC”), the Florida Division of Chesapeake Utilities Corporation (“CUC”), Florida Public Utilities Company-Indiantown Division (“Indiantown”), and Florida Public Utilities – Fort Meade (“Fort Meade”), referred to jointly herein as “Consolidated Companies,” hereby submit their Consolidated Preliminary Statement of Issues:

**ISSUE 1. What are the final conservation cost recovery adjustment true-up amounts for the period January 2021 through December 2021?**

Consolidated Companies: The Consolidated Companies over-recovered \$748,861, as compared to the estimated over-recovery of \$326,412, resulting in an adjusted end of period total true up amount of an over-recovery of \$422,449.

**ISSUE 2: What are the appropriate conservation adjustment actual/estimated true-up amounts for the period January 2022 through December 2022? [Current year true-up amount]**

Consolidated Companies: The projected true-up for the period January 2021 through December 2021 is an under-recovery of \$430,359.

**ISSUE 3: What are the appropriate total conservation adjustment true-up amounts to be collected/refunded from January 2023 through December 2023?**

Consolidated Companies: The projected net true-up is an under-recovery of \$7,910.

**ISSUE 4. What are the total conservation cost recovery amounts to be collected during the period January 2023 through December 2023?**

Consolidated Companies: A total of \$4,728,310 remains to be recovered during the period January 1, 2023 through December 31, 2023

**ISSUE 5. What are the conservation cost recovery factors for the period January 2023 through December 2023?**

<u>Rate Class</u>		<u>Adjustment Factor</u> <u>(dollars per therm)</u>
RESIDENTIAL (FPU, Fort Meade)	\$	0.08852
COMMERCIAL SMALL (FPU, Fort Meade)( Gen Srv GS1 & GS Transportation <600)	\$	0.05352
COMMERCIAL SMALL (FPU, Fort Meade) (Gen Srv GS2 & GS Transportation >600)	\$	0.04181
COMM. LRG VOLUME (FPU, Fort Meade) (Large Vol & LV Transportation <,> 50,000 units)	\$	0.03467
Natural Gas Vehicles	\$	0.01483
TS1 (INDIANTOWN DIVISION)	\$	0.09466
TS2 (INDIANTOWN DIVISION)	\$	0.01188
TS3 (INDIANTOWN DIVISION)	\$	0.01178
TS4 (INDIANTOWN DIVISION) <sup>1</sup>	\$	0.0000
<b><u>CHESAPEAKE</u></b>		
FTS-A	\$	0.20323

<sup>1</sup> The Consolidated Companies note that the customers in this class are no longer on the system; therefore, the rate is appropriately reflected as \$0.

FTS-B	\$	0.16565
FTS-1	\$	0.14368
FTS-2	\$	0.08328
FTS-2.1	\$	0.06057
FTS-3	\$	0.05038
FTS-3.1	\$	0.03687
FTS-4	\$	0.03123
FTS-5	\$	0.02755

<u>Rate Class</u>		<u>Adjustment Factor (dollars per therm)</u>
FTS-6	\$	0.02035
FTS-7	\$	0.01484
FTS-8	\$	0.01366
FTS-9	\$	0.01167
FTS-10	\$	0.00964
FTS-11	\$	0.00965
FTS-12	\$	0.00794
FTS-NGV	\$	0.01563

The Consolidated Companies also seek approval of the following experimental per bill Conservation Cost Recovery Adjustment (Experimental) factors for Chesapeake:

<b>Rate Class</b>	<b>ECCR Factor (\$ per bill)</b>
FTS-A	\$1.38

FTS-B	\$1.77
FTS-1	\$2.24
FTS-2	\$4.32
FTS-2.1	\$6.04
FTS-3	\$15.59
FTS-3.1	\$21.66

**ISSUE 6: Should the Commission approve revised tariffs reflecting the energy conservation cost recovery amounts and establishing energy conservation cost recovery factors determined to be appropriate in this proceeding?**

Consolidated Companies: Yes. The Commission should approve revised tariffs reflecting the natural gas conservation cost recovery amounts and establishing 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

**ISSUE 7: What should be the effective date of the conservation cost recovery factors for billing purposes?**

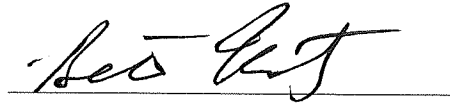
Consolidated Companies: The factors should be effective beginning with the specified conservation cost recovery cycle and thereafter for the period January 2023 through December 2023. Billing cycles may start before January 1, 2023 and the last cycle may be read after December 31, 2023, so that each customer is billed for twelve months regardless of when the adjustment factor became effective.

**ISSUE 8: Should this docket be closed?**

Consolidated Companies: This is an ongoing proceeding; however, upon the conclusion of this year’s proceeding, this docket should be closed and a new docket should be opened to address cost recovery for 2023.

Docket No. 20220004-GU  
September 1, 2022

RESPECTFULLY SUBMITTED this 1st day of September, 2022.

A handwritten signature in black ink, appearing to read "Beth Keating", is written over a horizontal line.


Beth Keating  
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(850) 521-1706

*Attorneys for Florida Public Utilities  
Company, Florida Public Utilities Company-  
Indiantown Division, Florida Public Utilities  
Company – Fort Meade, and the Florida  
Division of Chesapeake Utilities Corporation*

**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that a true and correct copy of the foregoing, has been furnished by Electronic Mail to the following parties of record this 1st day of September, 2022:

Florida Public Utilities Company Mike Cassel 208 Wildlight Ave. Yulee, FL 32097 <a href="mailto:mcassel@fpuc.com">mcassel@fpuc.com</a>	<u>Ausley Law Firm</u> <u>J. Wahlen/M. Means/V. Ponder</u> <u>P.O. Box 391</u> <u>Tallahassee FL 32302</u> <u><a href="mailto:jwahlen@ausley.com">jwahlen@ausley.com</a></u> <u><a href="mailto:mmeans@ausley.com">mmeans@ausley.com</a></u> <u><a href="mailto:vponder@ausley.com">vponder@ausley.com</a></u>
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