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October 7, 2022

**BY E-PORTAL**

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

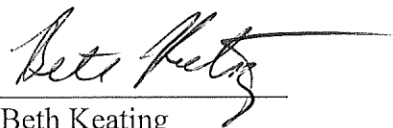
***Re: Docket No. 20220004-GU – Natural Gas Conservation Cost Recovery Clause***

Dear Mr. Teitzman:

Attached for filing, please find Florida City Gas's Prehearing Statement.

Thank you for your assistance with this filing. As always, please don't hesitate to let me know if you have any questions whatsoever.

Sincerely,



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

MEK  
cc: Parties of Record

**BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION**

In re: Natural Gas Conservation Cost  
Recovery

Docket No. 20220004-GU

Filed: October 7, 2022

**FLORIDA CITY GAS  
PREHEARING STATEMENT**

Florida City Gas (“FCG” or “the Company”) hereby submits this Prehearing Statement pursuant to Order Establishing Procedure, Order No. PSC-2022-0054-PCO-GU and states as follows:

**1. KNOWN WITNESSES**

FCG intends to offer the following testimonies sponsored by FCG witness Miguel Bustos into the evidentiary record in this proceeding:

<b>Witness</b>	<b>Subject Matter</b>	<b>Issue No.</b>
<b>Direct</b>		
Miguel Bustos	Supports FCG’s final Natural Gas Conservation Cost Recovery (“NGCCR”) true-up amount related to the twelve-month period ended December 31, 2021	1
Miguel Bustos	Presents the Actual/Estimated True-Up amount (based on actual data for six months and projected data for six months) for the current period January 2022 through December 2022; presents FCG’s projection of total NGCCR costs for the period January 2023 through December 2023; and presents the development of NGCCR Factors to be charged during 2023	2-8

**2. KNOWN EXHIBITS**

FCG intends to offer the following exhibits sponsored by FCG witness Miguel Bustos into the evidentiary record in this proceeding:

<b>Witness</b>	<b>Proffered By</b>	<b>Exhibit No.</b>	<b>Description</b>	<b>Issue No.</b>
<b>Direct</b>				
Miguel Bustos	FCG	MB-1	Calculation of FCG's final NGCCR true-up amount related to the twelve-month period ended December 31, 2021	1
Miguel Bustos	FCG	MB-2	Commission prescribed forms supporting calculation of FCG's Actual/Estimated True-Up amount for the current period January 2022 through December 2022 and FCG's proposed 2023 NGCCR Factors	2-8

In addition to the above pre-filed exhibits, FCG reserves the right to utilize any exhibit introduced by any other party. FCG additionally reserves the right to introduce any additional exhibit necessary for cross-examination or impeachment at the final hearing.

**3. STATEMENT OF BASIC POSITION**

FCG has appropriately calculated its true-up amounts and NGCCR Factors as shown in the Company's positions on Issue Nos. 1 through 7 below. The Company's final true-up amount for 2021, Actual/Estimated True-Up amount for 2022, and proposed 2023 NGCCR Factors are consistent with the Commission's methodology for calculating the net true-up and recovery factors for the natural gas conservation programs and, therefore, should be approved. FCG submits that the proposed 2023 NGCCR Factors are appropriate for application to customers' bills beginning the first billing cycle in January 2023 through the last billing cycle in December 2023 and continuing until modified by subsequent order of the Commission.

**4. STATEMENT OF ISSUES AND POSITIONS**

FCG's statement of issues and positions in this proceeding are as follows:

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

**Florida City Gas:** The final net true-up amount (including interest, adjustments, and the estimated under-recovery) for the period January 2021 through December 2021 is an under-recovery of \$469,106. *See* FCG Exhibit MB-1. (*FCG witness Bustos*)

ISSUE 2: What are the appropriate conservation adjustment actual/estimated true-up amounts for the period January 2022 through December 2022?

**Florida City Gas:** The Actual/Estimated True-Up (based on actual data for six months and projected data for six months) for the current period January 2022 through December 2022 is an over-recovery of \$67,504. *See* FCG Exhibit MB-2, Schedule C-3, page 4, line 8. (*FCG witness Bustos*)

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

**Florida City Gas:** The total net true-up (inclusive of the final true-up for 2021, the Actual/Estimated True-Up for 2022, and interest) to be collected from January 2023 through December 2023 is an under-recovery of \$404,512. *See* FCG Exhibit MB-2, Schedule C-3, page 4, line 12. (*FCG witness Bustos*)

ISSUE 4: What are the total conservation cost recovery amounts, net of the true-up amount, to be collected during the period January 2023 through December 2023?

**Florida City Gas:** Applying the total net true-up results in a total of \$7,012,004 of energy conservation program costs to be collected during the period January 2023 through December 2023. *See FCG Exhibit MB-2, Schedule C-1. (FCG witness Bustos)*

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

**Florida City Gas:** The appropriate factors are:

<u>Rate Class</u>	<u>CCR Factor (\$/per therm)</u>
RS-1	\$0.25615
RS-100	\$0.16795
RS-600	\$0.09486
GS-1	\$0.05986
GS-6K	\$0.04463
GS-25K	\$0.04452
Gas Lights	\$0.07066
GS-120K	\$0.02987
GS1250K	\$0.01939
GS-11M – GS-25M	\$0.0

*(FCG witness Bustos)*

ISSUE 6: 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?

**Florida City Gas:** Yes. The Commission should approve revised tariffs reflecting the new 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. The Commission should grant Staff authority to administratively approve revised tariffs reflecting the new conservation cost recovery factors determined to be appropriate in this proceeding. *(FCG witness Bustos)*

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

**Florida City Gas:** The new conservation cost recovery factors should be effective beginning the first billing cycle in January 2023 through the last billing cycle in December 2023 and continuing until modified by subsequent order of this Commission. *(FCG witness Bustos)*

ISSUE 8: Should this docket be closed?

**Florida City Gas:** No. While a separate docket is assigned each year for administrative convenience, this is a continuing docket and should remain open. *(FCG witness Bustos)*

5. STIPULATED ISSUES

FCG is not a party to and is not aware of any stipulations at this time. However, FCG remains willing to work with all parties to resolve any outstanding issues, and believes it should be possible to reach a stipulation on each of the above-listed issues as they relate to FCG.

6. **PENDING MOTIONS**

FCG is not aware of any motions currently pending before the Commission for disposition.

7. **REQUESTS/CLAIMS FOR CONFIDENTIALITY**

FCG has no pending requests or claims for confidentiality.

8. **OBJECTIONS TO WITNESS QUALIFICATIONS**

FCG has no objections to the qualifications of any witness, and further states that it is not aware of any objections or challenges to the qualifications of any FCG witness.

9. **REQUEST FOR SEQUESTRATION OF WITNESSES**

FCG has no pending requests for sequestration of any witness, and further states that it is not aware of any such request related to any FCG witness.

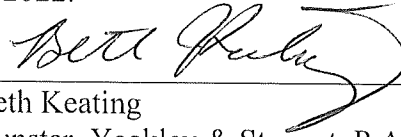
10. **COMPLIANCE WITH ORDER ESTABLISHING PROCEDURE**

FCG states that it believes it is in full compliance with the Commission's Order

Docket No. 20220004-GU

Establishing Procedure.

Respectfully submitted this 7th day of October 2022.



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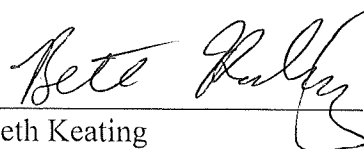
*Attorneys for Florida City Gas*



**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 7th day of October 2022:

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