

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

Petition for Rate Increase by Peoples Gas System, Inc.	DOCKET NO. 20230023-GU
Peoples Gas System's Petition for Rate Approval of 2022 Depreciation Study	DOCKET NO. 20220219-GU
Peoples Gas System's Petition for Approval of Depreciation Rate and Subaccount for Renewable Natural Gas Facilities Leased to Others	DOCKET NO. 20220212-GU FILED: April 4, 2023

**PEOPLES GAS SYSTEM INC.'S
MOTION TO CONSOLIDATE DOCKETS**

Peoples Gas System, Inc. ("Peoples" or "the company"), pursuant to Rules 28-106.204 and 28-106.108, Florida Administrative Code ("F.A.C."), requests that the Florida Public Service Commission ("Commission") enter an Order consolidating Docket Nos. 20230023-GU, 20220219-GU, and 20220212-GU, and for all purposes, and in support thereof says:

1. On December 15, 2022, Peoples filed a petition seeking approval of a new depreciation rate and subaccount for renewable natural gas facilities leased to others. *See* Docket No. 20220212-GU ("RNG Depreciation Docket").
2. On December 28, 2022, Peoples filed a petition seeking approval of the Company's 2022 Depreciation Study. *See* Docket No. 20220219-GU ("Depreciation Study Docket").
3. On February 2, 2023, Peoples filed a "test year notification" informing the Commission that the company intends to file a petition for a base rate increase on or about April 4, 2023, using a 2024 projected test year. *See* Docket No. 20230023-GU ("Rate Case Docket").

4. On April 4, 2023, Peoples filed a petition, pre-filed direct testimony, and minimum filing requirement (“MFR”) schedules in the Rate Case Docket.

5. By this motion, Peoples seeks to consolidate the issues to be decided in its pending Rate Case Docket, with those to be decided in the company’s pending Depreciation Study Docket and RNG Depreciation Docket.

6. Rule 28-106.208, F.A.C., allows for consolidation when separate matters “involve similar issues of law or fact, or identical parties” and when consolidation “would promote the just, speedy, and inexpensive resolution of the proceedings and would not unduly prejudice the rights of a party.”

7. Consolidating these three dockets is appropriate because they involve similar issues of law or fact. For instance, depreciation expense is included in the Rate Case Docket MFRs and the company’s proposed depreciation study, depreciation rates, and level of depreciation expense will be supported by the testimony of Peoples’ Rate Case Docket witnesses. Furthermore, the new depreciation subaccount and rate requested in the RNG Depreciation Docket are related to a project that is presented and explained in the company’s Rate Case Docket testimony and exhibits.

8. An Order granting this Motion to Consolidate would also promote “the just, speedy, and inexpensive resolution of the proceedings.” Consolidation will facilitate the orderly and efficient consideration and disposition of inter-related issues across the dockets; provide for a clear unified evidentiary record; and conserve the costs and labor borne by the affected parties and the Commission.

9. Granting this motion will not unduly prejudice the rights of the parties. This is evidenced by the fact that Peoples consulted with counsel for the Office of Public Counsel, which is a party to the Rate Case Docket and the Depreciation Study Docket, and with counsel for the Florida

Industrial Power Users Group, which is currently a party to the Rate Case Docket, and obtained authorization to represent that they do not object to this motion.

10. Based on the above, Peoples' Motion to Consolidate is consistent with the requirements of Rule 28-106.208, F.A.C.

11. In addition to the consistency of this request with Rule 28-106.208, F.A.C., consolidation is appropriate because the parties to Peoples' last base rate case contemplated consolidation of the current Rate Case and Depreciation Study Dockets.

12. Peoples last filed a general base rate case and a depreciation study in 2020. The Commission later consolidated those dockets for the purpose of hearing. *See* Order No. PSC-2020-0198-PCO-GU, issued June 22, 2020 in Docket Nos. 20200051-GU and 20200166-GU. The parties to the 2020 proceedings ultimately entered into a Commission-approved stipulation and settlement agreement ("Settlement Agreement") that resolved all issues in those dockets.¹

13. Paragraph 4 of that Settlement Agreement required Peoples to "file a depreciation study no more than one year nor less than 90 days before the filing of its next general rate proceeding...such that there is a reasonable opportunity for the Consumer Parties to review, analyze, and potentially rebut depreciation rates or other aspects of such depreciation study contemporaneously with the company's next general rate proceeding."(emphasis added).

14. Consolidation will accordingly allow for contemporaneous review and analysis of the requested rate increase and proposed depreciation study as contemplated by the parties to the 2020 Settlement Agreement.

¹ Order No. PSC-2020-0485-FOF-GU, issued December 10, 2020, in Docket Nos. 20200051-GU, 20200166-GU, and 20200178-GU.

15. As mentioned previously, Peoples conferred with counsel for the Office of Public Counsel and the Florida Industrial Power Users Group and is authorized to represent that they do not object to this motion.

16. If this motion is granted, Peoples suggests that the Rate Case Docket could be identified as the primary docket and all future filings in the Depreciation Study and RNG Depreciation Dockets could be made in the Rate Case Docket.

WHEREFORE, Peoples submits the foregoing Motion to Consolidate and respectfully requests that the Commission enter an Order consolidating Docket Nos. 20220212-GU, 20220219-GU, and 20230023-GU for all purposes.

DATED this 4th day of April, 2023.

Respectfully submitted,



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ATTORNEYS FOR PEOPLES GAS SYSTEM, INC.

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing Motion to Consolidate, filed on behalf of Peoples Gas System Inc., has been served by electronic mail on this 4th day of April, 2023 to the following:

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