

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Natural Gas Conservation)
Cost Recovery Clause.)
_____)

DOCKET NO. 20230004-GU
FILED: October 6, 2023

**PREHEARING STATEMENT
OF PEOPLES GAS SYSTEM, INC.**

A. APPEARANCES:

J. Jeffry Wahlen
Malcolm N. Means
Virginia Ponder
Ausley McMullen
123 S. Calhoun St.
Tallahassee, Florida 32301-1517
On behalf of Peoples Gas System, Inc. (“Peoples,” “PGS,” or the “company”)

B. WITNESSES:

Witness	Subject Matter	Issue #
Direct		
Charles T. Morgan II	Conservation Cost Recovery True-Up and Projection	1-7

C. EXHIBITS:

Witness	Proffered By	Exhibit #	Description	Issue #
Direct				
Charles T. Morgan II	PGS	CTM-1, filed May 2, 2023	Schedules supporting conservation costs recovery factor, actual January 2022 – December 2022	1
Charles T. Morgan II	PGS	CTM-2, filed August 4, 2023	Schedules supporting conservation costs projected for the period January 2024 – December 2024	2-7

D. STATEMENT OF BASIC POSITION

PGS' Statement of Basic Position:

The Commission should determine that the company has properly calculated its conservation cost recovery true-up and projections and the natural gas conservation cost recovery factors set forth in the testimony and exhibits of witness Charles T. Morgan II for the period January 2024 through December 2024.

E. STATEMENT OF ISSUES AND POSITIONS

GENERIC CONSERVATION COST RECOVERY ISSUES

ISSUE 1: What are the final conservation cost recovery adjustment true-up amounts for the period January 2022 through December 2022?

PGS: An adjusted net true-up under-recovery of \$1,970,805, including interest. (Morgan)

ISSUE 2: What are the appropriate conservation adjustment actual/estimated true-up amounts for the period January 2023 through December 2023?

PGS: An under-recovery of \$10,460,672, including interest. (Morgan)

ISSUE 3: What are the appropriate total conservation adjustment true-up amounts to be collected/refunded for the period January 2024 through December 2024?

PGS: A collection of \$12,431,477, including interest. (Morgan)

ISSUE 4: What are the total conservation cost recovery amounts to be collected during the period January 2024 through December 2024?

PGS: \$44,755,074, including current period estimated true-up. (Morgan)

ISSUE 5: What are the conservation cost recovery factors for the period January 2024 through December 2024?

PGS: For the period January 2024 through December 2024, the cost recovery factors are as follows:

<u>Rate Schedule</u>	<u>Cost Recovery Factors</u> <u>(Dollars per Therm)</u>
RS & RS-SG & RS-GHP	0.21579
SGS	0.12933
GS-1 & CS-SG & CS-GHP	0.06667
GS-2	0.05036
GS-3	0.04243
GS-4	0.03134
GS-5	0.02183
CSLS	0.04347
(Morgan)	

ISSUE 6: Should the Commission approve revised tariffs reflecting the natural gas conservation cost recovery amounts determined to be appropriate in this proceeding?

PGS: Yes. The Commission should approve revised tariffs reflecting the natural gas conservation cost recovery amounts determined to be appropriate in this proceeding. (Morgan)

ISSUE 7: 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 2024 through December 2024. Billing cycles may start before January 1, 2024, and the last cycle may be read after December 31, 2024, so long as each customer is billed for 12 months regardless of when the factors became effective. (Morgan)

ISSUE 8: Should this docket be closed?

PGS: Yes. Docket No. 20230004-GU should be closed once the Commission's decisions on all of the issues in the docket have become final and the Commission has concluded that the docket has otherwise met the requirements for closure.
(Morgan)

COMPANY-SPECIFIC CONSERVATION COST RECOVERY ISSUES

Peoples has no company-specific conservation cost recovery issues as of this date.

F. STIPULATED ISSUES

The company is not aware of any stipulated issues as of this date.

G. PENDING MOTIONS

The company is not aware of any pending motions as of this date.

H. PENDING CONFIDENTIALITY CLAIMS OR REQUESTS

The company has no pending confidentiality claims or requests as of this date.

I. OBJECTIONS TO WITNESS QUALIFICATIONS AS AN EXPERT

The company has no objections to any witness's qualifications as an expert in this proceeding.

J. COMPLIANCE WITH ORDER ESTABLISHING PROCEDURE

The company has complied with all requirements of the Order Establishing Procedure entered in this docket.

DATED this 6th day of October, 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 Prehearing Statement filed on behalf of Peoples Gas System, has been furnished by electronic mail this 6th day of October 2023, to the following:

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