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October 14, 2024

VIA E-PORTAL

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

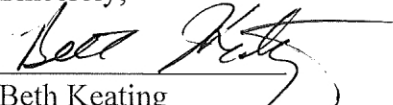
Re: Docket No. 20240003-GU – Purchased Gas Adjustment (PGA) True Up.

Dear Mr. Teitzman:

Attached for filing, please find Florida Public Utilities Company's and Florida City Gas's Joint 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

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Purchased Gas Adjustment)
(PGA) True-up)
_____)

Docket No. 20240003-GU

Filed: October 14, 2024

**FLORIDA PUBLIC UTILITIES COMPANY’S AND FLORIDA CITY GAS’S JOINT
PREHEARING STATEMENT**

Pursuant to the requirements of the Order Establishing Procedure, Order No. PSC-2024-0029-PCO-GU, issued on February 6, 2024, as modified by Order No. PSC-2024-0213-PCO-GU, issued June 20, 2024, Florida Public Utilities Company (“FPUC”) and Florida City Gas (“FCG”) (jointly, herein “Companies”) hereby submit this Joint Prehearing Statement.

A. Appearances

Beth Keating
Gunster, Yoakley & Stewart, P.A.
215 South Monroe St., Suite 601
Tallahassee, FL 32301
(850) 521-1706
On behalf of Florida Public Utilities Company and Florida City Gas

B. Known Witnesses

Michelle D. Napier (FPUC only)	Issue 1
Miguel Bustos (FCG only)	Issue 1
Stacy Laster (FCG and FPUC)	Issues 2 – 8
Jeffrey B. Bates ¹ (FCG and FPUC)	Issues 3 and 4

C. Known Exhibits

The Companies intend to sponsor the following exhibits:

Napier MDN-1 (FPUC only) (Final Fuel Over/Under Recovery (Schedule A-7) Issue 1

¹ See Errata submitted October 8, 2024.

Bustos MB-1 (FCG only) (Final Fuel Over/Under Recovery (Schedule A-7)	Issue 1
SKL-1 (Schedules E-1, E-1/R, E-2, E-3, E-4, E-5)(consolidated: FPUC/FCG)	Issues 3-6
SKL-2 (Schedules E-1, E-1/R, E-2, E-3, E-4, E-5)(separate: FPUC and FCG)	Issues 3-6

D. Basic Position

The Companies have appropriately calculated their true-up amounts and purchased gas adjustment factor as shown in the Companies' joint positions on Issues 1-6 and ask that the Commission approve the Companies' proposed consolidated PGA Factor for 2025.

E. –G Issues

The Companies' positions on the issues identified for hearing are as follows:

Issue 1: What are the final purchased gas adjustment true-up amounts for the period January 2023 through December 2023?

Companies: The final true-up amount for the period January 2023 through December 2023, including interest, is an over-recovery \$7,467,718. (FCG \$2,096,549 + FPUC \$5,371,169)(Bustos, Napier)

Issue 2: What are the actual/estimated purchased gas adjustment true-up amounts for the period January 2024 through December 2024?

Companies: The actual/estimated true up amount for 2024 is an expected under-recovery of \$4,156,132 inclusive of interest. (Laster)

Issue 3: What are the total purchased gas adjustment true-up amounts to be collected (refunded) during the period January 2025 through December 2025?

Companies: In total, the Companies have calculated an over-recovery of \$3,311,586, to be refunded over the January – December 2025 period. (Laster, Bates)

Issue 4: What are the levelized purchased gas cost recovery (cap) factors for the period January 2025 through December 2025?

Companies: The appropriate PGA factor is 100.15¢ per therm. (Laster, Bates)

Issue 5: What should be the effective date of the new purchased gas adjustment charge for billing purposes?

FPUC: The factors should be effective for all meter readings on or after January 1, 2025 and should apply for bills rendered for meter readings taken between January 1, 2025 and December 31, 2025. (Laster)

Issue 6: Should the Commission approve revised tariffs reflecting the new purchased gas adjustment charges determined to be appropriate in this proceeding?

FPUC: Yes. The Commission should approve revised tariffs reflecting the new purchased gas adjustment charges 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. (Laster)

Issue 7: Should this docket be closed?

FPUC: This is a continuing cost recovery docket and should remain an active and ongoing proceeding. As such, a new docket number should be established annually to reflect the new calendar year. (Laster)

Company-specific Issue (FCG and FPUC)

ISSUE A: Should FPUC and FCG be authorized to consolidate their purchased gas costs and recovery amounts?

COMPANIES: Yes. The Companies should be allowed to consolidate their gas purchasing functions, as well as the costs incurred by each entity, to then be allocated across each company's separate rate schedules based on their share of the total therms sold each rate provides to the Companies. (Laster)

G. Stipulated Issues

While not a party to stipulations at this time, the Companies believe that it should be possible to reach a stipulation on each of the issues as they pertain to FPUC and FCG.

H. Pending Motions

None at this time.

I. Pending Confidentiality Requests

None.

J. Compliance With Order on Procedure

Florida Public Utilities Company and Florida City Gas have fully complied with the requirements of Order No. PSC-2024-0029-PCO-GU, issued on February 6, 2024, as modified by Order No. PSC-2024-0213-PCO-GU, issued June 20, 2024.

K. Objections to Witness Qualifications

The Companies have no objection to the qualifications of any expert witness.

RESPECTFULLY SUBMITTED this 14th day of October, 2024.



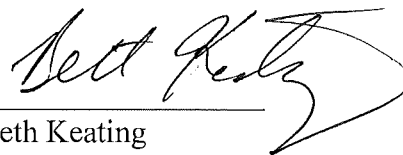
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*Attorneys for Florida Public Utilities
Company and Florida City Gas*

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 14th day of October, 2024:

<p>Florida Public Utilities Company Mike 208 Wildlight Ave Yulee, Florida 32097 mcassel@fpuc.com</p>	<p>Cas J. Jeffry Wahlen Malcolm Means Virginia Ponder Ausley & McMullen P.O. Box 391 Tallahassee, FL 32302 jwahlen@ausley.com mmeans@ausley.com vponder@ausley.com</p>
<p>Daniel Dose, Esquire Florida Public Service Commission 2540 Shumard Oak Boulevard Tallahassee, FL 32399 ddose@psc.state.fl.us discovery-gcl@psc.state.fl.us</p>	<p>Office of Public Counsel Walter Trierweiler/ /Patricia Christensen// c/o The Florida Legislature 111 West Madison Street, Room 812 Tallahassee, FL 32399-1400 christensen.patty@leg.state.fl.us</p>
<p>Peoples Gas System Paula Brown/Karen Bramley P.O. Box 111 Tampa, FL 33601-0111 regdept@tecoenergy.com klbramley@tecoenergy.com</p>	<p>St. Joe Natural Gas Company, Inc. Andy Shoaf/Debbie Stitt P.O. Box 549 Port St. Joe, FL 32457-0549 Andy@stjoegas.com dstitt@stjoegas.com</p>
<p>Miguel Bustos, Manager/Regulatory Florida City Gas 4045 NW 97th Ave. Doral, FL 33178 mbustos@chpk.com</p>	<p>Michelle D. Napier Director, Regulatory Affairs Distribution Florida Public Utilities Company 1635 Meathe Drive West Palm Beach, Florida 33411 mnapier@fpuc.com</p>



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