Diamond Williams

From:

Ansley Watson, JR. [AW@macfar.com]

Sent:

Monday, October 03, 2011 3:35 PM

To:

Filings@psc.state.fl.us

Cc:

Jennifer Crawford; 'Floyd, Kandi M.'

Subject:

Docket No. 110004-GU

Attachments: 110004 - PGS - Prelim Issues and Positions.pdf

a. Ansley Watson, Jr.

Macfarlane Ferguson & McMullen

P. O. Box 1531

Tampa, Florida 33601 Phone: (813) 273-4321 Fax: (813) 273-4396 E-Mail: aw@macfar.com

- b. Docket No. 110004-GU Natural Gas Conservation Cost Recovery
- c. Peoples Gas System
- d. Total of 3 pages
- e. Attached document is Peoples' Preliminary List of Issues and Positions in the above docket.

Ansley Watson, Jr.

Macfarlane Ferguson & McMullen

One Tampa City Center P.O. Box 1531 Tampa, FL 33601 201 N. Franklin Street Suite 2000 Tampa, FL 33602

Main: (813)273-4200 Direct: (813)273-4321 Mobile: (813)695-5900 Fax: (813)273-4396 aw@macfar.com V Card ◆ Bio

Please visit www.mfmlegal.com for more information about our Firm



Macfarlane Ferguson & McMullen

Attorneys & Counselors At Law

This electronic message transmission contains information from the law firm of Macfarlane Ferguson & McMullen and is intended only for the use of the individual or entity to which it is addressed and may contain information that is privileged, confidential and exempt from disclosure under applicable law. If the reader of this message is not the intended recipient, you are hereby notified that any dissemination or distribution of this communication to other than the intended recipient is strictly prohibited. If you have received this communication in error, please notify us immediately by collect telephone at (813) 273-4200 or electronic mail (info@mfmlegal.com). Thank you

IRS Circular 230 Disclosure: Any tax advice in this communication is not intended or written by Macfarlane Ferguson & McMullen to be used, and cannot be used, by a client or any other person or entity for the purpose of (i) avoiding penalties that may be imposed under the Internal Revenue Code or (ii) promoting, marketing or recommending to another party any transaction or other matter addressed herein.

DOCUMENT NUMBER - DATE

07183 oct-3 =

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Natural gas conservation cost)	DOCKET NO. 110004-GU
recovery.)	Submitted for filing:
)	10-3-11

PEOPLES GAS SYSTEM'S PRELIMINARY LIST OF ISSUES AND POSITIONS

Peoples Gas System ("PGS"), by its undersigned attorneys, submits the following Preliminary List of Issues and Positions:

Generic Conservation Issues

ISSUE 1: What are the final conservation cost recovery true-up amounts for the period January 2010 through December 2010?

PGS: \$1,356,551 overrecovery

<u>ISSUE 2</u>: What are the total conservation cost recovery amounts to be collected during the period January 2012 through December 2012?

PGS: \$6,135,793

ISSUE 3: What are the conservation cost recovery factors for the period January 2012 through December 2012?

PGS:

Rate Class	ECCR Factor (per therm)
Residential	\$0.03324
Residential Standby Generator	\$0.03324
Small General Service	\$0.02511
Commercial Standby Generator	\$0.01210
General Service 1	\$0.01210
General Service 2	\$0.00891
General Service 3	\$0.00731
General Service 4	\$0.00553
General Service 5	\$0.00405
Commercial Street Lighting	\$0.00648
Natural Gas Vehicle Service	\$0.00728

COCUMENT NUMBER-DATE

07183 oct - 3 =

<u>ISSUE 4</u>: 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 2012 through December 2012. Billing cycles may start before January 1, 2012, and the last cycle may be read after December 31, 2012, so that each customer is billed for twelve months regardless of when the adjustment factor became effective.

Respectfully submitted,

Ansley Watson, Jr.

Macfarlane Ferguson & McMullen

andly water

P. O. Box 1531

Tampa, Florida 33601-1531 Phone: (813) 273-4321

Fax: (813) 273-4396 E-mail: aw@macfar.com

Attorneys for Peoples Gas System

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that true and correct copies of the foregoing Preliminary List of Issues and Positions has been furnished by U. S. Mail this 3rd day of October, 2011, to the following:

Jennifer Crawford, Esquire
Office of General Counsel
Florida Public Service Commission
2540 Shumard Oak Boulevard
Tallahassee, FL 32399-0850

Office of Public Counsel J.R. Kelly/Charles Rehwinkel c/o The Florida Legislature 111 West Madison St., Room 812 Tallahassee, FL 32399-1400

Beth Keating, Esquire Gunster Law Firm 215 South Monroe St. Suite 618 Tallahassee, FL 32301

Mr. Stuart L. Shoaf St. Joe Natural Gas Company, Inc. P. O. Box 549 Port St. Joe, FL 32457-0549

Mr. Thomas A. Geoffroy Mr. Jason Van Hoffman Florida Public Utilities Company/ Indiantown Division P.O. Box 3395 West Palm Beach, FL 33402-3395

Elizabeth Wade/David Weaver AGL Resources Inc. Ten Peachtree Place Location 1470 Atlanta, GA 30309 Mr. Melvin Williams Florida City Gas 933 East 25th Street Hialeah, FL 33013-3403

Ms. Paula K. Brown Regulatory Affairs Peoples Gas System P. O. Box 111 Tampa, FL 33601-0111

Norman H. Horton, Jr., Esquire Messer Law Firm P.O. Box 15579 Tallahassee, FL 32317

Mr. Jerry H. Melendy, Jr. Sebring Gas System, Inc. 3515 U.S. Highway 27 South Sebring, FL 33870-5452

Mr. Thomas A. Geoffroy Florida Division of Chesapeake Utilities Corporation P. O. Box 3395 West Palm Beach, FL 33402-3395

Ansley Watson, Jr.