

## Diamond Williams

---

**From:** Keating, Beth [BKeating@gunster.com]  
**Sent:** Monday, October 03, 2011 4:44 PM  
**To:** Filings@psc.state.fl.us  
**Cc:** 'Martin Cheryl'  
**Subject:** 110004-GU  
**Attachments:** 20111003163652534.pdf; Consolidated Preliminary List of Issues (conservation).DOC

Attached for electronic filing, please find the Consolidated Preliminary Statement of Issues and Positions for FPUC, FPUC-Indiantown, and the Florida Division of Chesapeake Utilities in the referenced docket.

Beth Keating  
**Gunster, Yoakley & Stewart, P.A.**  
215 S. Monroe St., Suite 618  
Tallahassee, FL 32301  
[bkeating@gunster.com](mailto:bkeating@gunster.com)  
Direct Line: (850) 521-1706

a. Person responsible for this electronic filing:

Beth Keating  
**Gunster, Yoakley & Stewart, P.A.**  
215 S. Monroe St., Suite 618  
Tallahassee, FL 32301  
[bkeating@gunster.com](mailto:bkeating@gunster.com)  
Direct Line: (850) 521-1706

b. Docket No. 110004-GU - In re: Natural Gas Conservation Cost Recovery.

c. On behalf of: Florida Public Utilities Company, Florida Public Utilities-Indiantown Division, and Florida Division of Chesapeake Utilities Corporation

d. There are a total of PDF filed: 7 pages.  
Word file: 6 pages

e. Description: Consolidated Preliminary Statement of Issues and Positions



**GUNSTER**

FLORIDA'S LAW FIRM FOR BUSINESS

Beth Keating | Attorney  
Governmental Affairs  
215 S. Monroe Street, Suite 601  
Tallahassee, FL 32301  
P 850-521-1706 C 850-591-9228  
[gunster.com](http://gunster.com) | [View my bio](#)

DOCUMENT NUMBER-DATE

07196 OCT-3 =

FPSC-COMMISSION CLERK

10/3/2011

---

**Tax Advice Disclosure:** To ensure compliance with requirements imposed by the IRS under Circular 230, we inform you that any U.S. federal tax advice contained in this communication (including any attachments), unless otherwise specifically stated, was not intended or written to be used, and cannot be used, for the purpose of (1) avoiding penalties under the Internal Revenue Code or (2) promoting, marketing or recommending to another party any matters addressed herein. Click the following hyperlink to view the complete Gunster IRS Disclosure & Confidentiality note.

<http://www.gunster.com/terms-of-use/>



**GUNSTER**  
FLORIDA'S LAW FIRM FOR BUSINESS

Writer's Direct Dial Number: (850) 521-1706  
Writer's E-Mail Address: bkeating@gunster.com

October 3, 2011

**VIA E-MAIL FILINGS@PSC.STATE.FL.US**

Ms. Ann Cole  
Commission Clerk  
Florida Public Service Commission  
2540 Shumard Oak Boulevard  
Tallahassee, FL 32399-0850

Re: Docket No. 110004-GU – Natural Gas Conservation Cost Recovery Clause

Dear Ms. Cole:

Attached for electronic filing, please find the Consolidated Preliminary Statement of Issues and Positions in the referenced docket for Florida Public Utilities Company, Florida Public Utilities Company –Indiantown Division, and the Florida Division of Chesapeake Utilities Corporation. Also attached is a copy of the Preliminary Statement in Word format.

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

Sincerely,

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

MEK

DOCUMENT NUMBER-DATE

07196 OCT-3 =

FPSC-COMMISSION CLERK

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Natural Gas )  
Conservation Cost Recovery )  
Clause )  
\_\_\_\_\_ )

Docket No. 110004-GU  
Filed: October 3, 2011

CONSOLIDATED PRELIMINARY STATEMENT OF ISSUES AND POSITIONS  
FOR FLORIDA PUBLIC UTILITIES COMPANY, FLORIDA DIVISION OF  
CHESAPEAKE UTILITIES CORPORATION AND FLORIDA PUBLIC UTILITIES-  
INDIANTOWN DIVISION

The following is the preliminary statement of issues and positions filed on behalf of Florida Public Utilities Company ("FPUC"), the Florida Division of Chesapeake Utilities Corporation ("CUC"), and Florida Public Utilities Company-Indiantown Division ("Indiantown"):

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

CUC: An over-recovery of \$144,163, including interest.

FPUC: An over-recovery of \$168,015, including interest.

FPUC-Indiantown: An over-recovery of \$17,000, including interest.

2. What are the total conservation cost recovery amounts to be collected during the period January 2012 through December 2012?

CUC: A total of \$803,696.

FPUC: A total of \$3,396,557.

FPUC-Indiantown: A total of \$3,326.

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

CUC: The appropriate factors are:

<b>Rate Class</b>	<b>ECCR Factor</b>
FTS-A	15.415 cents/therm
FTS-B	12.021 cents/therm
FTS-1	10.472 cents/therm
FTS-2	9.031 cents/therm
FTS-2.1	4.724 cents/therm
FTS-3	5.016 cents/therm
FTS-3.1	3.152 cents/therm
FTS-4	2.646 cents/therm
FTS-5	2.281 cents/therm
FTS-6	1.970 cents/therm
FTS-7	1.317 cents/therm
FTS-8	1.196 cents/therm
FTS-9	1.189 cents/therm
FTS-10	0.922 cents/therm
FTS-11	0.807 cents/therm
FTS-12	0.602 cents/therm

The Company also seeks approval of the following experimental per bill

**Conservation Cost Recovery Adjustment (Experimental) factors:**

<b>Rate Class</b>	<b>ECCR Factor (\$ per bill)</b>
FTS-A	\$ 1.21
FTS-B	\$ 1.61
FTS-1	\$ 2.04
FTS-2	\$ 3.33
FTS-2.1	\$ 5.54
FTS-3	\$ 12.07
FTS-3.1	\$ 18.39

FPUC: The appropriate factors are:

<b><u>Rate Class</u></b>	<b><u>Adjustment Factor (dollars per therm)</u></b>
Residential	\$0.11041
General Service & GS Transportation (GS1)	\$0.06767
General Service & GS Transportation (GS2)	\$0.05631
Large Volume Service	\$0.04395
LV Service & LV Transportation <50,000	\$0.04395
LV Transportation >50,000	\$0.04395

Indiantown: The appropriate factors are:

<b>Rate Class</b>	<b>ECCR Factor</b>
TS-1	0.648 cents/therm
TS-2	0.106 cents/therm
TS-3	0.364 cents/therm
TS-4	0.046 cents/therm

4. What should be the effective date of the conservation cost recovery factors for billing purposes?

CUC: 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.

FPUC: 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.

FPUC-Indiantown: 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 this 3rd day of October, 2011.



---

Beth Keating  
Gunster, Yoakley & Stewart, P.A.  
215 South Monroe St., Suite 618  
Tallahassee, FL 32301  
(850) 521-1706

*Attorneys for Florida Public Utilities  
Company, Florida Public Utilities  
Company-Indiantown Division, and the  
Florida Division of Chesapeake Utilities  
Corporation*

Docket No. 110004-GU  
October 3, 2011

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing has been furnished by electronic mail or U.S. Mail to the following parties of record this 3rd day of October, 2011:

Florida Public Utilities Company Cheryl Martin P.O. Box 3395 West Palm Beach, FL 33402-3395	MacFarlane Ferguson Law Firm Ansley Watson, Jr. P.O. Box 1531 Tampa, FL 33601-1531
Messer Law Firm Norman H. Horton, Jr. P.O. Box 15579 Tallahassee, FL 32317	Office of Public Counsel J.R. Kelly/Patricia Christensen c/o The Florida Legislature 111 West Madison Street Room 812 Tallahassee, FL 32399-1400
Peoples Gas System Paula Brown P.O. Box 111 Tampa, FL 33601-0111	St. Joe Natural Gas Company, Inc. Mr. Stuart L. Shoaf P.O. Box 549 Port St. Joe, FL 32457-0549
TECO Energy, Inc. Javier Cuebas P.O. Box 111 Tampa, FL 33601-0111	AGL Resources Inc. Elizabeth Wade/David Weaver Ten Peachtree Place Location 1470 Atlanta, GA 30309
Florida City Gas Melvin Williams 933 East 25 <sup>th</sup> Street Hialeah, FL 33013-3498	Jennifer Crawford Florida Public Service Commission 2540 Shumard Oak Boulevard Tallahassee, FL 32399

Docket No. 110004-GU  
October 3, 2011

Florida Division of Chesapeake Utilities Corporation Thomas A. Geoffroy P.O. Box 960 Winter Haven, FL 33882-0960	
Sebring Gas System, Inc. Jerry H. Melendy, Jr. 3515 U.S. Highway 27 South Sebring, FL 33870	



Beth Keating  
Gunster, Yoakley & Stewart, P.A.  
215 South Monroe St., Suite 618  
Tallahassee, FL 32301  
(850) 521-1706