

**Dorothy Menasco**

**From:** Keating, Beth [BKeating@gunster.com]  
**Sent:** Monday, October 01, 2012 2:14 PM  
**To:** Filings@psc.state.fl.us  
**Cc:** 'Martin, Cheryl'; 'Ansley Watson, Jr.'; 'J.R. Kelly'; 'Christensen, Patty'; 'Norman H. Horton, Jr.'; 'Brian Sulmonetti'; 'Elizabeth Wade'; 'Carolyn Bermudez'; 'sshoaf@stjoenaturalgas.com'; 'Paula K. Brown'; Pauline Robinson; 'Jerry H. Melendy, Jr.'  
**Subject:** Docket NO. 120004-GU  
**Attachments:** 20121001135920982.pdf

Attached for electronic filing, please find the Preliminary Statement of Issues and Positions of Florida City Gas.

Beth Keating

**Gunster, Yoakley & Stewart, P.A.**

215 S. Monroe St., Suite 601

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 601

Tallahassee, FL 32301

[bkeating@gunster.com](mailto:bkeating@gunster.com)

Direct Line: (850) 521-1706

b. Docket No. 120004-GU - In re: Natural Gas Conservation Cost Recovery.

c. On behalf of: Florida City Gas

d. There are a total of pages: 3

e. Description: 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](#)

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10/1/2012

DOCUMENT NUMBER-DATE

06566 OCT-1 2012

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FLORIDA'S LAW FIRM FOR BUSINESS

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

October 1, 2012

**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. 120004-GU - Natural Gas Conservation Cost Recovery Clause.**

Dear Ms. Cole:

Attached for electronic filing, please find the Florida City Gas's Preliminary Statement of Issues and Positions in the referenced docket. 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

06566 OCT-1 2012

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

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

Docket No. 120004-GU  
Filed: October 1, 2012

FLORIDA CITY GAS  
PRELIMINARY STATEMENT OF ISSUES AND POSITIONS

The following is the preliminary statement of issues and positions filed on behalf of Florida City Gas, a division of Pivotal Utility Holdings, Inc.:

1. What are the final conservation cost recovery true-up amounts for the period January 2011 through December 2011?

Florida City Gas: An end-of-period under recovery of \$1,076,076, for an adjusted net true-up reflecting an over-recovery of \$532,733, including interest.

2. What are the total conservation cost recovery amounts to be collected during the period January 2013 through December 2013?

Florida City Gas: A total of \$4,956,394.

3. What are the conservation cost recovery factors for the period January 2013 through December 2013?

Florida City Gas: The appropriate factors are:

| <u>Rate Class</u>                                       | <u>Factor</u> |
|---|---------------|
| GS-1, GS-100, GS-220, RSG, CSG (Sales & Transportation) | \$0.14728     |
| GS-600 (Sales & Transportation)                         | \$0.07814     |
| GS-1200 (Sales & Transportation)                        | \$0.04650     |
| GS-6k (Sales & Transportation)                          | \$0.03830     |
| GS-25000 (Sales & Transportation)                       | \$0.03796     |

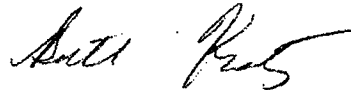
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|                                    |           |
|------------------------------------|-----------|
| GS-60000 (Sales & Transportation)  | \$0.03704 |
| Gas Lights                         | \$0.07407 |
| GS-120000 (Sales & Transportation) | \$0.02626 |
| GS-250000 (Sales & Transportation) | \$0.02535 |

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

Florida City Gas: The factors should be effective beginning with the specified conservation cost recovery cycle and thereafter for the period January 2013 through December 2013. Billing cycles may start before January 1, 2013 and the last cycle may be read after December 31, 2013, so that each customer is billed for twelve months regardless of when the adjustment factor became effective.

RESPECTFULLY SUBMITTED this 1st day of October, 2012.



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

Docket No. 120004-GU  
October 1, 2012

**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 1st day of October, 2012:

|  |   |
|--|---|
| Florida Public Utilities Company<br>Cheryl Martin<br>1641 Worthington Road, Suite 220<br>West Palm Beach, FL 33409-6703                        | MacFarlane Ferguson Law Firm<br>Ansley Watson, Jr.<br>P.O. Box 1531<br>Tampa, FL 33601-1531   |
| Messer Law Firm<br>Norman H. Horton, Jr.<br>P.O. Box 15579<br>Tallahassee, FL 32317  | Office of Public Counsel<br>J.R. Kelly/Patricia Christensen<br>c/o The Florida Legislature<br>111 West Madison Street<br>Room 812<br>Tallahassee, FL 32399-1400 |
| Peoples Gas System<br>Paula Brown<br>P.O. Box 111<br>Tampa, FL 33601-0111  | St. Joe Natural Gas Company, Inc.<br>Mr. Stuart L. Shoaf<br>P.O. Box 549<br>Port St. Joe, FL 32457-0549   |
| Sebring Gas System, Inc.<br>Jerry H. Melendy, Jr.<br>3515 U.S. Highway 27 South<br>Sebring, FL 33870   | AGL Resources Inc.<br>Elizabeth Wade/Brian Sulmonetti<br>Ten Peachtree Place<br>Location 1470<br>Atlanta, GA 30309  |
| Florida City Gas<br>Carolyn Bermudez<br>933 East 25 <sup>th</sup> Street<br>Hialeah, FL 33013-3498   | Jennifer Crawford/Pauline Robinson<br>Florida Public Service Commission<br>2540 Shumard Oak Boulevard<br>Tallahassee, FL 32399                                  |
| Florida Division of Chesapeake<br>Utilities Corporation<br>Cheryl Martin<br>1641 Worthington Road, Suite 220<br>West Palm Beach, FL 33409-6703 |   |



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