

## Crystal Card

---

**From:** Keating, Beth <BKeating@gunster.com>  
**Sent:** Wednesday, October 09, 2013 12:58 PM  
**To:** Filings@psc.state.fl.us  
**Cc:** Kelley Corbari  
**Subject:** Docket No. 130004-GU  
**Attachments:** FCG Prehearing Statement (04).PDF; Conservation Prehearing Statement (13).DOC

Attached for electronic filing, please find the Prehearing Statement of Florida City Gas. As always, please don't hesitate to contact me if you have any questions. Thank you for your assistance.

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. 130004-GU - In re: Natural Gas Conservation Cost Recovery.

c. On behalf of: Florida City Gas

d. There are a total of pages:

PDF – 5 pages  
Word DOC – 4 pages

e. Description: Prehearing Statement



**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](#)

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/>

**BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION**

In re: Conservation Cost Recovery Clause	)	Docket No. 130004-GU
	)	
	)	Filed: October 9, 2013

**FLORIDA CITY GAS COMPANY'S  
PREHEARING STATEMENT**

Pursuant to the requirements of the Order on Procedure, Order No. PSC-13-0088-PCO-GU, Florida City Gas hereby submits its Prehearing Statement.

**A. Known Witnesses**

Florida City Gas intends to offer the testimony of Miguel Bustos filed on April 29, 2013, as revised by the second revised filing on July 24, 2013, as well as the Testimony of Mr. Bustos submitted on September 10, 2013.

Miguel Bustos	(Direct)	Issues: 1 - 4
---------------	----------	---------------

**B. Known Exhibits**

Florida City Gas intends to sponsor the following exhibits:

Bustos (Direct)	MB-1 <sup>1</sup>	Schedules CT-1, CT-2, CT-3, and CT-6
-----------------	-------------------	--------------------------------------

Bustos (Direct)	MB-2	Schedules C-1, C-2, C-3, and C-5
-----------------	------	----------------------------------

**C. Basic Position**

The Company's true-up amounts and conservation cost recovery factors as shown in Issues 1 through 4 are appropriate and should be approved.

---

<sup>1</sup> Second revised filed July 24, 2013.

**D. – F.      Issues**

1.      What are the final conservation cost recovery true-up amounts for the period January 2012 through December 2012?

Florida City Gas:      An end-of-period over-recovery of \$1,417,403, calculated based upon an end-of-period net true up over-recovery of \$997,839.

2.      What are the total conservation cost recovery amounts to be collected during the period January 2014 through December 2014?

Florida City Gas:      A total of \$4,235,123.

3.      What are the conservation cost recovery factors for the period January 2014 through December 2014?

Florida City Gas:      The appropriate factors are:

<u>Rate Class</u>	<u>Factor</u>
GS-1, GS-100, GS-220, RSG, CSG (Sales & Transp.)	\$0.13084
GS-600 (Sales & Transportation)	\$0.06551
GS-1200 (Sales & Transportation)	\$0.03874
GS-6k (Sales & Transportation)	\$0.03212
GS-25000 (Sales & Transportation)	\$0.03189
GS-60000 (Sales & Transportation)	\$0.03134
GS-120000 (Sales & Transportation)	\$0.02208
GS-250000 (Sales & Transportation)	\$0.01997
Gas Lights	\$0.06213

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 2014 through December 2014. Billing cycles may start before January 1, 2014 and the last cycle may be read after December 31, 2014, so that each customer is billed for twelve months regardless of when the adjustment factor became effective.

**G. Stipulated Issues**

Florida City Gas is not a party to any stipulations at this time, although it believes that it should be possible to reach a stipulation on each of the above issues as they relate to Florida City Gas.

**H. Pending Motions**

Florida City Gas has no pending motions or other matters requiring attention at this time.

**I. Pending Confidentiality Requests**

None.

**J. Compliance With Order on Procedure**

Florida City Gas believes that this Prehearing Statement fully complies with the requirements of the Order on Procedure.

**K. Objections to Witness Qualifications**

Florida City Gas has no objection to the qualifications of any expert witness.

RESPECTFULLY SUBMITTED this 9th day of October, 2013.

\_\_\_\_\_  
/Beth Keating

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

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 9th day of October, 2013:

Florida Public Utilities Company/Florida Division of Chesapeake Utilities Corporation Cheryl Martin 1641 Worthington Road, Suite 220 West Palm Beach, FL 33409-6703	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. Andy Shoaf P.O. Box 549 Port St. Joe, FL 32457-0549
Sebring Gas System, Inc. Jerry H. Melendy, Jr. 3515 U.S. Highway 27 South Sebring, FL 33870	AGL Resources Inc. Elizabeth Wade/Brian Sulmonetti Ten Peachtree Place Location 1470 Atlanta, GA 30309
Florida City Gas Carolyn Bermudez 933 East 25 <sup>th</sup> Street Hialeah, FL 33013-3498	Kelly Corbari/Lee Eng Tan Florida Public Service Commission 2540 Shumard Oak Boulevard Tallahassee, FL 32399

/Beth Keating

Beth Keating  
Gunster, Yoakley & Stewart, P.A.  
215 South Monroe St., Suite 601  
Tallahassee, FL 32301