

## Crystal Card

---

**From:** Ansley Watson, JR. <AW@macfar.com>  
**Sent:** Wednesday, October 09, 2013 1:21 PM  
**To:** Filings@psc.state.fl.us  
**Cc:** 'Floyd, Kandi M.'; Kelley Corbari  
**Subject:** Docket No. 130004-GU  
**Attachments:** 130004 - prehearing stat-PGS.doc

- 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](mailto:aw@macfar.com)
- b. Docket No. 130004-GU – Natural gas conservation cost recovery
- c. Peoples Gas System
- d. Total of 5 pages
- e. The attached document is Peoples' Prehearing Statement in the 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](mailto:aw@macfar.com)  
[V Card](#) ♦ [Bio](#)

Please visit [www.mfmlegal.com](http://www.mfmlegal.com) for more information about our Firm



*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](mailto: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.

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Natural gas conservation cost )  
recovery. )  
\_\_\_\_\_ )

DOCKET NO. 130004-GU  
Submitted for filing:  
10-9-13

**PEOPLES GAS SYSTEM'S  
PREHEARING STATEMENT**

Peoples Gas System ("PGS"), by its undersigned attorneys, submits the following Prehearing Statement for the hearing scheduled to be held in the above docket commencing November 4, 2013.

A. WITNESSES

<u>Witness</u>	<u>Subject Matter</u>	<u>Issues</u>
(Direct)		
Kandi M. Floyd (PGS)	True-up for period January 2012 - December 2012; Projected expenses and ECCR factors for period January through December 2014	1-4

B. EXHIBITS

<u>Exhibit</u>	<u>Witness</u>	<u>Description</u>
_____ (KMF-1)	Floyd	Conservation cost recovery true-up data (January 2012 - December 2012) consisting of Schedules CT-1 through CT-6
_____ (KMF-2)	Floyd	Data for development of conservation cost recovery factors (January 1 - December 31, 2014), consisting of Schedules

C. STATEMENT OF BASIC POSITION

PGS's Statement of Basic Position:

The Commission should approve PGS's final true-up amount of \$1,339,254 (underrecovery) for the period January 2012 through December 2012, and its projected conservation program expenses for the period January 1, 2014 through December 31, 2014, net of the estimated true-up.

The Commission should approve the following ECCR factors for the following rate classes for the period January 2014 through December 2014:

<u>Rate Class</u>	<u>ECCR Factor (per therm)</u>
Residential	\$0.08253
Residential Standby Generator	\$0.08253
Small General Service	\$0.05567
Commercial Standby Generator	\$0.02613
General Service 1	\$0.02613
General Service 2	\$0.01900
General Service 3	\$0.01574
General Service 4	\$0.01180
General Service 5	\$0.00866
Commercial Street Lighting	\$0.01385
Natural Gas Vehicle Service	\$0.01713

(Floyd)

D. STATEMENT OF ISSUES AND POSITIONS:

Generic Conservation Cost Recovery Issues

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

PGS: \$1,339,254 underrecovery (Floyd)

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

PGS: \$13,476,152 (Floyd)

**ISSUE 3: What are the conservation cost recovery factors for the period January**

**2014 through December 2014?**

PGS:

<u>Rate Class</u>	<u>ECCR Factor (per therm)</u>
Residential	\$0.08253
Residential Standby Generator	\$0.08253
Small General Service	\$0.05567
Commercial Standby Generator	\$0.02613
General Service 1	\$0.02613
General Service 2	\$0.01900
General Service 3	\$0.01574
General Service 4	\$0.01180
General Service 5	\$0.00866
Commercial Street Lighting	\$0.01385
Natural Gas Vehicle Service	\$0.01713

(Floyd)

**ISSUE 4: 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 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. (Floyd)

E. STIPULATED ISSUES

None as to PGS.

F. PENDING MOTIONS

None as to PGS.

G. PENDING CONFIDENTIALITY CLAIMS OR REQUESTS

PGS has no pending confidentiality claims or requests at this time.



H. COMPLIANCE WITH ORDER ESTABLISHING PROCEDURE

PGS has complied with all requirements of the Order Establishing Procedure in this docket.

Dated this 9th day of October, 2013.

Respectfully submitted,

s/Ansley Watson, Jr.  
Ansley Watson, Jr.  
Macfarlane Ferguson & McMullen  
P. O. Box 1531  
Tampa, Florida 33601-1531  
Phone: (813) 273-4321  
Fax: (813) 273-4396  
E-mail: [aw@macfar.com](mailto:aw@macfar.com)

Attorneys for Peoples Gas System

## CERTIFICATE OF SERVICE

I HEREBY CERTIFY that true and correct copies of the foregoing Prehearing Statement has been furnished by U. S. Mail this 9th day of October, 2013, to the following:

Kelley Corbari / Theresa Tan, Esquire  
Office of General Counsel  
Florida Public Service Commission  
2540 Shumard Oak Boulevard  
Tallahassee, FL 32399-0850

Ms. Carolyn Bermudez  
Florida City Gas  
933 East 25<sup>th</sup> Street  
Hialeah, FL 33013-3340

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

Kandi M. Floyd / Paula K. Brown  
Regulatory Affairs  
Peoples Gas System  
P. O. Box 111  
Tampa, FL 33601-0111

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

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

Brian Sulmonetti/Elizabeth Wade  
AGL Resources Inc.  
Ten Peachtree Place  
Location 1470  
Atlanta, GA 30309

Florida Public Utilities /  
FPUC Indiantown Division  
Cheryl M. Martin/Aleida Socarras  
1641 Worthington Rd., Suite 220  
West Palm Beach, FL 33409-6703

s/Ansley Watson, Jr.  
Ansley Watson, Jr.