

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Natural Gas Conservation)
Cost Recovery Clause.)
_____)

Docket No. 150004-GU
Filed: October 9, 2015

**SEBRING GAS SYSTEM INC.' S
PREHEARING STATEMENT**

Sebring Gas System, Inc. ("Sebring"), by and through its undersigned counsel, submits its prehearing statement in connection with the hearing that is scheduled for November 2 – 5, 2015, in the above-styled docket.

A. WITNESS

<u>Witness</u>	<u>Subject Matter</u>	<u>Issues</u>
Jerry H. Melendy, Jr.	Conservation cost recovery factor	1 - 5

B. EXHIBITS

<u>Exhibit Number</u>	<u>Witness</u>	<u>Description</u>
JHM-1	Melendy	Schedules CT-1, CT-2, CT-3, CT-4, CT-5, CT-6, filed May 5, 2015. and Schedules C-1, C-2, C-3, and C-4, filed August 25, 2015.

C. BASIC POSITION

Sebring has properly projected its costs and calculated its true-up amounts and conservation cost recovery factors. Those amounts and factors should be approved by the Commission.

D. STATEMENT OF ISSUES AND POSITIONS

Issue 1: What are the final conservation cost recovery true-up amounts for the period January 2014 through December 2014?

Sebring's Position: \$15,466.00 (underrecovery).

Issue 2: What are the total conservation cost recovery amounts to be collected during the period January 2016 through December 2016?

Sebring's Position: \$28,775.00 to be recovered.

Issue 3: What are the conservation cost recovery factors for the period January 2016 through December 2016?

Sebring's Position:

TS-1	\$0.10326 /therm
TS-2	\$0.05260/therm
TS-3	\$0.02942/therm
TS-4	\$0.02582/therm

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

Sebring's Position: The conservation cost recovery factors should be effective for the period January 2015 through December 2015, and to billings thereafter until other conservation cost recovery factors are approved by the Commission.

Issue 5: Should the Commission approve revised tariffs reflecting the natural gas conservation cost recovery factors determined to be appropriate in this proceeding?

Sebring's Position: Yes. The Commission should approve revised tariffs reflecting the natural gas cost recovery amounts and establishing natural gas conservation cost recovery factors determined to be appropriate in this proceeding. The Commission should direct staff to verify that the revised tariffs are consistent with the Commission's decision.

E. QUESTIONS OF LAW

None.

F. POLICY QUESTIONS

None.

G. STIPULATED ISSUES

None.

H. PENDING MOTIONS

None.

I. PENDING CLAIMS OF CONFIDENTIALITY

None.

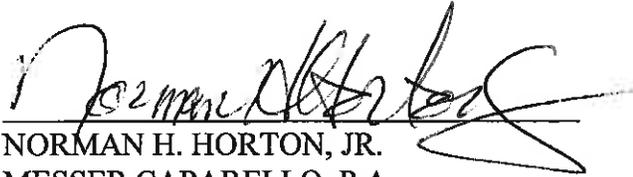
J. OBJECTIONS TO EXPERT WITNESS QUALIFICATIONS

None

K. ANY REQUIREMENT THAT CANNOT BE COMPLIED WITH

None.

Respectfully submitted this 9th day of October, 2015.



NORMAN H. HORTON, JR.
MESSER CAPARELLO, P.A.

Post Office Box 15579

Tallahassee, Florida 32317

nhorton@lawfla.com

Phone: 850-222-0720

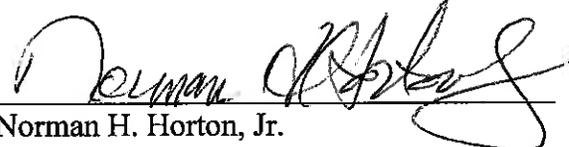
Facsimile: 850-224-4359

Attorney for Sebring Gas System, Inc.

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing Motion to Extension of Time has been delivered by Electronic Mail to the following parties of record this 9th day of October, 2015.

<p>Florida Public Utilities Company/Florida Division of Chesapeake Utilities/Indiantown Mike Cassel 1750 SW 14th Street, Suite 200 Fernandina Beach, FL 32034 mcassel@fpuc.com</p>	<p>MacFarlane Ferguson Law Firm Ansley Watson, Jr./Andrew Brown/Ashley Kellgren P.O. Box 1531 Tampa, FL 33601-1531 aw@macfar.com</p>
<p>Beth Keating Gunster, Yoakley & Stewart, P.A. 215 South Monroe Street, Suite 601 Tallahassee, FL 32301 bkeating@gunster.com</p>	<p>Office of Public Counsel J.R. Kelly/Charles Rehwinkel/Patricia Christensen c/o The Florida Legislature 111 West Madison Street, Rm 812 Tallahassee, FL 32399-1400 Jr.kelly@leg.state.fl.us</p>
<p>Peoples Gas System Paula Brown Kandi Floyd P.O. Box 111 Tampa, FL 33601-0111 regdept@tecoenergy.com</p>	<p>St. Joe Natural Gas Company, Inc. Mr. Charles A. Shoaf P.O. Box 549 Port St. Joe, FL 32457-0549 andy@stjoegas.com</p>
<p>AGL Resources, Inc. Elizabeth Wade/Shannon Pierce Ten Peachtree Place Location 1470 Atlanta, GA 30309 ewade@aglresources.com</p>	<p>Florida City Gas Carolyn Bermudez 933 East 25th Street Hialiah, FL 33013-3498 cbermude@aglresources.com</p>
<p>Kelley Corbari/Leslie Ames Florida Public Service Commission 2540 Shumard Oak Boulevard Tallahassee, FL 32399 kcorbari@psc.state.fl.us</p>	<p>Jerry H. Melendy, Jr. Sebring Gas System, Inc. 3515 U.S. Highway 27 South Sebring, FL 33870-5452 jmelendy@floridabestgas.com</p>


 Norman H. Horton, Jr.
 Messer Caparello, P.A.
 2618 Centennial Place
 Tallahassee, FL 32308
 850-222-0720