## MACFARLANE FERGUSON & MCMULLEN

ATTORNEYS AND COUNSELORS AT LAW

ONE TAMPA CITY CENTER, SUITE 2000
20I NORTH FRANKLIN STREET
P.O. BOX 1531 (ZIP 33601)
TAMPA, FLORIDA 33602
(813) 273-4200 FAX (813) 273-4396

www.mfmlegal.com
EMAIL: info@mfmlegal.com

625 COURT STREET
P.O. BOX 1669 (ZIP 33757)
CLEARWATER, FLORIDA 33756
(727) 441-8966 FAX (727) 442-8470

IN REPLY REFER TO:

Ansley Watson, Jr. P.O. Box 1531 Tampa, Florida 33601 e-mail: aw@macfar.com

September 27, 2016

### **VIA E-PORTAL FILING**

Ms. Carlotta S. Stauffer Commission Clerk Florida Public Service Commission 2540 Shumard Oak Boulevard Tallahassee, Florida 32399-0850

Re: Docket No. 160004-GU - Natural gas conservation cost recovery

Dear Ms. Stauffer:

Attached for filing in the above docket on behalf of Peoples Gas System, please find its Preliminary Statement of Issues and Positions. The document has been provided in Word format to Staff Counsel for the above docket.

Thank you for your usual assistance.

Sincerely,

ANSLEY WATSON, JR.

AWjr/a Enclosure

cc: Pa

Parties of Record

### BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Natural gas conservation cost	)	DOCKET NO. 160004-GU
recovery.	)	Submitted for filing:
	)	9-27-16

## PEOPLES GAS SYSTEM'S PRELIMINARY LIST OF ISSUES AND POSITIONS

Peoples Gas System ("PGS"), by its undersigned attorneys, submits the following Preliminary List of Issues and Positions:

## **Generic Conservation Issues**

ISSUE 1: What are the final conservation cost recovery true-up amounts for the period January 2015 through December 2015?

PGS: \$2,136,452 over-recovery

ISSUE 2: What are the total conservation cost recovery amounts to be collected during the period January 2017 through December 2017?

PGS: \$13,102,649

ISSUE 3: What are the conservation cost recovery factors for the period January 2017 through December 2017?

### PGS:

Rate Class	ECCR Factor (per therm)
Residential	\$0.07853
Residential Standby Generator	\$0.07853
Small General Service	\$0.04763
Commercial Standby Generator	\$0.02353
General Service 1	\$0.02353
General Service 2	\$0.01715
General Service 3	\$0.01414
General Service 4	\$0.01056
General Service 5	\$0.00776
Commercial Street Lighting	\$0.01244
Natural Gas Vehicle Service	\$0.01455

# <u>ISSUE 4</u>: 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 2017 through December 2017. Billing cycles may start before January 1, 2017, and the last cycle may be read after December 31, 2017, so that each customer is billed for twelve months regardless of when the adjustment factor became effective.

Respectfully submitted,

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

Attorney for Peoples Gas System

## CERTIFICATE OF SERVICE

I HEREBY CERTIFY that true and correct copies of the foregoing Preliminary List of Issues and Positions has been furnished by electronic mail this 27th day of September, 2016, to the following:

Kelley Corbari / Leslie Ames, Esquire Office of General Counsel Florida Public Service Commission 2540 Shumard Oak Boulevard Tallahassee, FL 32399-0850 kcorbari@psc.state.fl.us

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

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

Mr. Jerry H. Melendy, Jr. Sebring Gas System, Inc. 3515 U.S. Highway 27 South Sebring, FL 33870-5452 jmelendy@floridasbestgas.com

FPUC/ Indiantown/
Fort Meade/Chesapeake
Mike Cassel
1750 SW 14th Street, Suite 200
Fernandina Beach, FL 32034
mcassel@fpuc.com

Ansley Watson, Jr.,/ A.M. Brown Macfarlane Law Firm P.O. Box 1531 Tampa, FL 33601-1531 aw@macfar.com Ms. Carolyn Bermudez Florida City Gas 933 East 25<sup>th</sup> Street Hialeah, FL 33013-3340 cbermude@aglresources.com

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

Paula M. Sparkman, Esquire Messer Law Firm P.O. Box 15579 Tallahassee, FL 32317 psparkman@lawfla.com

Elizabeth Wade
AGL Resources Inc.
Ten Peachtree Place
Location 1470
Atlanta, GA 30309
ewade@aglresources.com

Debbie Stitt/ Charles A Shoaf St. Joe Natural Gas Company, Inc. P.O. Box 549 Port St. Joe, FL 32457 andy@stjoegas.com

Ansley Watson, Jr.

incluy Watton