



(850)521-1713  
gmunson@gunster.com

October 4, 2016

E-PORTAL/ELECTRONIC FILING

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

RE: Docket No. 160004-GU – Conservation Cost Recovery

Dear Ms. Stauffer:

Attached for electronic filing, please find the Prehearing Statement of Florida City Gas in the referenced docket.

Thank you for your assistance with this filing. As always, please don't hesitate to let me know if you have any questions whatsoever.

Sincerely,

A handwritten signature in cursive script that reads "Greg M. Munson for".

Gregory M. Munson

GMM

cc: Parties of Record

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Conservation Cost Recovery ) Docket No. 160004-GU  
Clause )  
\_\_\_\_\_ ) Filed: October 4, 2016

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

Pursuant to the requirements of the Order on Procedure, Order No. PSC-16-0101-PCO-GU, as modified by Order No. PSC-16-0265-PCO-PU, and Order No. 16-0394-PCO-PU, Florida City Gas hereby submits its Prehearing Statement.

**A. Known Witnesses**

Florida City Gas intends to offer the testimony of Miguel Bustos filed on May 2, 2016, as well as the Testimony of Mr. Bustos submitted on August 18, 2016.

Miguel Bustos (Direct) Issues: 1 - 5

**B. Known Exhibits**

Florida City Gas intends to sponsor the following exhibits:

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

Bustos (Direct) MB-2 Schedules C-1, C-2, C-3, and C-5<sup>2</sup>

**C. Basic Position**

The Company's true-up amounts and conservation cost recovery factors as shown in Issues 1 through 5 are appropriate and should be approved.

<sup>1</sup> Omitted Schedule filed on July 22, 2016.

<sup>2</sup> Amended October 4, 2016.

D. – F. Issues

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

Florida City Gas: An over-recovery of \$129,132,<sup>3</sup> calculated based upon an end-of-period net true up over-recovery of \$378,334

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

Florida City Gas: A total of \$5,082,136 in conservation costs.

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

Florida City Gas: The appropriate factors are:

RATE CLASS	RATE/\$ PER THERM
GS-1, GS-100, GS-220, RSG, CSG (Sales & Transportation)	\$0.15168
GS-600 (Sales & Transportation)	\$0.07245

RATE CLASS	RATE/\$ PER THERM
GS-1200 (Sales & Transportation)	\$0.04464
GS-6k (Sales & Transportation)	\$0.03712
GS-25000 (Sales & Transportation)	\$0.03673
GS-60000 (Sales & Transportation)	\$0.03515
Gas Lights	\$0.07147
GS-120000 (Sales & Transportation)	\$0.02549
GS-250000 (Sales & Transportation)	\$0.02374

---

<sup>3</sup> FCG's Preliminary Statement of Issues and Positions stated that the final conservation cost recovery true-up amount for the period January 2015 through December 2015 was an over recovery of \$129,312. This amount was a scrivener's error and the correct amount (\$129,132) is shown above.

Issue 4: Should the Commission approve revised tariffs reflecting the natural gas conservation cost recovery amounts and establishing natural gas conservation cost recovery factors determined to be appropriate in this proceeding?

Florida City Gas: Yes. The Commission should approve revised tariffs reflecting the natural gas conservation cost recovery amounts and establishing 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.

Issue 5: 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 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.

**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 4th day of October, 2016.

A handwritten signature in cursive script, appearing to read "Gregory M. Munson", is written over a horizontal line.

Gregory M. Munson  
Gunster, Yoakley & Stewart, P.A.  
215 South Monroe St., Suite 601  
Tallahassee, FL 32301  
(850) 521-1706  
*Attorneys for Florida City Gas*

## CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing has been furnished by electronic or US Mail to the following parties of record this 4th day of October, 2016:

Florida Public Utilities Company/Florida Division of Chesapeake Utilities/Indiantown Mike Cassel 1750 S.W. 14th Street, Suite 200 Fernandina Beach, FL 32034 <a href="mailto:mcassel@fpuc.com">mcassel@fpuc.com</a>	MacFarlane Ferguson Law Firm Ansley Watson, Jr. /Andrew Brown P.O. Box 1531 Tampa, FL 33601-1531 <a href="mailto:aw@macfar.com">aw@macfar.com</a> ; <a href="mailto:AB@macfar.com">AB@macfar.com</a>
Messer Law Firm Paula Sparkman P.O. Box 15579 Tallahassee, FL 32317 <a href="mailto:psparkman@lawfla.com">psparkman@lawfla.com</a>	Office of Public Counsel J.R. Kelly/Charles Rehwinkel/Patricia Christensen c/o The Florida Legislature 111 West Madison Street Room 812 Tallahassee, FL 32399-1400 <a href="mailto:Kelly.JR@leg.state.fl.us">Kelly.JR@leg.state.fl.us</a> <a href="mailto:Christensen.Patty@leg.state.fl.us">Christensen.Patty@leg.state.fl.us</a> <a href="mailto:Rehwinkel.Charles@leg.state.fl.us">Rehwinkel.Charles@leg.state.fl.us</a>
Peoples Gas System Paula Brown Kandi Floyd P.O. Box 111 Tampa, FL 33601-0111 <a href="mailto:regdept@tecoenergy.com">regdept@tecoenergy.com</a> <a href="mailto:kfloyd@tecoenergy.com">kfloyd@tecoenergy.com</a>	St. Joe Natural Gas Company, Inc. Mr. Andy Shoaf P.O. Box 549 Port St. Joe, FL 32457-0549 <a href="mailto:Andy@stjoegas.com">Andy@stjoegas.com</a>
Sebring Gas System, Inc. Jerry H. Melendy, Jr. 3515 U.S. Highway 27 South Sebring, FL 33870 <a href="mailto:jmelendy@floridasbestgas.com">jmelendy@floridasbestgas.com</a>	AGL Resources Inc. Elizabeth Wade Ten Peachtree Place Location 1470 Atlanta, GA 30309 <a href="mailto:ewade@aglresources.com">ewade@aglresources.com</a>
Florida City Gas Carolyn Bermudez 933 East 25 <sup>th</sup> Street Hialeah, FL 33013-3498 <a href="mailto:cbermude@aglresources.com">cbermude@aglresources.com</a>	Kelley Corbari Florida Public Service Commission 2540 Shumard Oak Boulevard Tallahassee, FL 32399 <a href="mailto:kcorbari@psc.state.fl.us">kcorbari@psc.state.fl.us</a>

DOCKET NO. 160004-GU  
PREHEARING STATEMENT

AGL Resources Inc. Blake O’Farrow Ten Peachtree Place Location 1686 Atlanta, GA 30309 <a href="mailto:bofarrow@aglresources.com">bofarrow@aglresources.com</a>	
---	--



---

Gregory M. Munson  
Gunster, Yoakley & Stewart, P.A.  
215 South Monroe St., Suite 601  
Tallahassee, FL 32301