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August 31, 2018

VIA ELECTRONIC FILING

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

Re: DOCKET NO. 20180004-GU - Natural gas conservation cost recovery

Dear Ms. Stauffer:

Attached for filing in the above docket is Peoples Gas System's Preliminary List of Issues and Positions.

Thank you for your assistance in connection with this matter.

Sincerely,

Andrew M. Brown

AB/plb
Attachment

cc: Parties of Record (w/attachment)
Mr. Mark R. Roche

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

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

DOCKET NO. 20180004-GU

FILED: August 31, 2018

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

Peoples Gas System ("PGS" or "the company"), hereby submits its Preliminary List of the Issues and Positions to be taken up at the hearing scheduled to commence on November 5, 2018 in the above docket.

GENERIC CONSERVATION COST RECOVERY ISSUES

ISSUE 1: What are the final conservation cost recovery adjustment true-up amounts for the period January 2017 through December 2017?

Peoples Gas System's Position: An under-recovery of \$2,498,433, including interest.
(Witness: Roche)

ISSUE 2: What are the appropriate total conservation adjustment actual/estimated true-up amounts for the period January 2018 through December 2018?

Peoples Gas System's Position: An over-recovery of \$1,063,767, including interest.
(Witness: Roche)

ISSUE 3: What are the appropriate total conservation adjustment true-up amounts to be collected/refunded from the period January 2019 through December 2019?

Peoples Gas System's Position: A collection of \$1,434,666, including interest. (Witness: Roche)

ISSUE 4: What are the total conservation cost recovery amounts to be collected during the period January 2019 through December 2019?

Peoples Gas System's Position: \$18,488,090. (Witness: Roche)

ISSUE 5: What are the conservation cost recovery factors for the period January 2019 through December 2019?

Peoples Gas System's Position: For the period January 2019 through December 2019 the cost recovery factors are as follows:

Cost Recovery Factors

<u>Rate Schedule</u>	<u>(Dollars per Therm)</u>
RS & RS-SG & RS-GHP	0.10655
SGS	0.06399
GS-1 & CS-SG & CS-GHP	0.03147
GS-2	0.02303
GS-3	0.01897
GS-4	0.01407
GS-5	0.01034
NGVS	0.02071
CSLS	0.01665

(Witness: Roche)

ISSUE 6: 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?

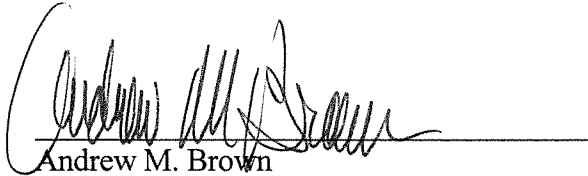
Peoples Gas System's Position: Yes, the Commission should approve revised tariffs reflecting the natural gas conservation cost recovery amounts and establishing natural gas conservation cost recovery factors determined to be appropriate in this proceeding. (Witness: Roche)

ISSUE 7: What should be the effective date of the new conservation cost recovery factors for billing purposes?

Peoples Gas System's Position: The factors should be effective beginning with the specified conservation cost recovery cycle and thereafter for the period January 2019 through December 2019. Billing cycles may start before January 1, 2019, and the last cycle may be read after December 31, 2019, so that each customer is billed for 12 months regardless of when the factor became effective. (Witness: Roche)

DATED this 31st day of August 2018.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Andrew M. Brown", is written over a horizontal line.

Andrew M. Brown
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ATTORNEYS FOR PEOPLES GAS SYSTEM

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true copy of the foregoing Preliminary List of Issues and Positions, filed on behalf of Peoples Gas System, has been furnished by electronic mail on this 31st day of August 2018 to the following:

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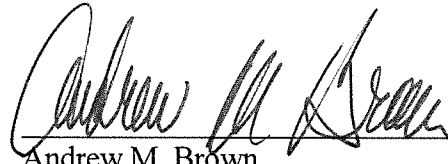
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