



ATTORNEYS & COUNSELORS AT LAW EST. 1884

One Tampa City Center, Suite 2000
201 N. Franklin Street
P.O. Box 1531 (33601)
Tampa, FL 33602
813.273.4200 Fax: 813.273.4396

WWW.MFMLEGAL.COM
EMAIL: INFO@MFMLEGAL.COM

625 Court Street, Suite 200
P.O. Box 1669 (33757)
Clearwater, FL 33756
727.441.8966 Fax: 727.442.8470

September 10, 2018

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. 20180003-GU – Purchased Gas Adjustment (PGA) true-up

Dear Ms. Stauffer:

Attached is Peoples' Preliminary Statement of Issues and Positions which is hereby submitted for filing.

If you have any questions or comments, do not hesitate to contact me.

Sincerely,

Andrew M. Brown

AB/tlk
Attachment

cc: Parties of Record
Ms. Kandi M. Floyd
Ansley Watson, Jr., Esq.

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Purchased gas adjustment)
(PGA) true-up.)
_____)

DOCKET NO. 20180003-GU
Submitted for filing:
9-10-18

**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 Purchased Gas Adjustment Issues

ISSUE 1: What are the final purchased gas adjustment true-up amounts for the period January 2017 through December 2017?

PGS: \$669,716 over-recovery

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

PGS: \$1,596,468 over-recovery

ISSUE 3: What are the total purchased gas adjustment true-up amounts to be refunded during the period January 2019 through December 2019?

PGS: \$2,266,183 over-recovery

ISSUE 4: What are the levelized purchased gas cost recovery (cap) factors for the period January 2019 through December 2019?

PGS: \$1.02968 per therm

ISSUE 5: What should be the effective date of the new purchased gas adjustment charge for billing purposes?

PGS: The charge should be effective beginning with the specified purchased gas 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 twelve months regardless of when the adjustment charge became effective.

ISSUE 6: Should the Commission approve revised tariffs reflecting the new purchased gas adjustment charges determined to be appropriate in this proceeding?

PGS: Yes. The Commission should approve revised tariffs reflecting the purchased gas adjustment charges determined to be appropriate in this proceeding.

Respectfully submitted,

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

Andrew M. Brown
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
ab@macfar.com

Attorneys 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 10th day of September, 2018, to the following:

Jennifer Crawford/ Kurt Schrader
Office of General Counsel
Florida Public Service Commission
2540 Shumard Oak Boulevard
Tallahassee, FL 32399-0850
kschrader@psc.state.fl.us
jcrawford@psc.state.fl.us

Ms. Carolyn Bermudez
Florida City Gas
955 East 25th Street
Hialeah, FL 33013-3340
cbermude@aglresources.com

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

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

Beth Keating/Greg Munson
Gunster Law Firm
215 South Monroe St. Suite 601
200Tallahassee, FL 32301
bkeating@gunster.com
Gmunson@gunster.com

Mike Cassel
Florida Public Utilities Company
1750 S 14th Street, Suite
Fernandina Beach, FL 32034
mCassel@fpuc.com

Mr. Charles A. Shoaf
St. Joe Natural Gas Company, Inc.
P. O. Box 549
Port St. Joe, FL 32457-0549
andy@stjoegas.com



Andrew M. Brown