



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

In Reply Refer to:
Tampa
ab@macfar.com

September 14, 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 Revised Preliminary List of Issues and Positions. The revisions are necessary to reflect the impact of the Federal Tax Law changes on conservation costs recovery projections.

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

REVISED: September 14, 2018

**PEOPLES GAS SYSTEM'S
REVISED 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:

<u>Rate Schedule</u>	<u>Cost Recovery Factors</u> <u>(Dollars per Therm)</u>
RS & RS-SG & RS-GHP	0.10655
SGS	0.06397
GS-1 & CS-SG & CS-GHP	0.03147
GS-2	0.02302
GS-3	0.01897
GS-4	0.01406
GS-5	0.01034
NGVS	0.01982
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

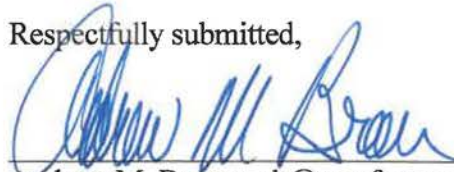
conservation cost recovery factors determined to be appropriate in this proceeding. (Witness: Roche)

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 14th day of September 2018.

Respectfully submitted,



Andrew M. Brown, ab@macfar.com; 813-273-4321
Ansley Watson, Jr., aw@macfar.com, 813-273-4209
Macfarlane Ferguson & McMullen
Post Office Box 1531
Tampa, Florida 33601-1531
ATTORNEYS FOR PEOPLES GAS SYSTEM

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing Petition, filed on behalf of Peoples Gas System, has been furnished by electronic mail on this 14th day of September 2018, to the following:

Ms. Lee Eng Tan
Senior Attorney
Office of General Counsel
Florida Public Service Commission
Room 390Q – Gerald L. Gunter Building
2540 Shumard Oak Boulevard
Tallahassee, FL 32399-0850
ltan@psc.state.fl.us

Mr. John T. Butler
Ms. Maria J. Moncada
Florida Power & Light Company
700 Universe Boulevard (LAW/JB)
Juno Beach, FL 33408-0420
john.butler@fpl.com
maria.moncada@fpl.com

Ms. Patricia A. Christensen
Associate Public Counsel
Office of Public Counsel
111 West Madison Street, Room 812
Tallahassee, FL 32399-1400
christensen.patty@leg.state.fl.us

Mr. Matthew R. Bernier
Duke Energy Florida, LLC
106 E. College Avenue, Suite 800
Tallahassee, FL 32301-7740
matthew.bernier@duke-energy.com

Ms. Dianne M. Triplett
Duke Energy Florida, LLC
299 First Avenue North
St. Petersburg, FL 33701
dianne.triplett@duke-energy.com

Mr. Kenneth Hoffman
Vice President, Regulatory Relations
Florida Power & Light Company
215 South Monroe Street, Suite 810
Tallahassee, FL 32301-1858
Ken.Hoffman@fpl.com

Mr. Robert L. McGee, Jr.
Regulatory and Pricing Manager
Gulf Power Company
One Energy Place
Pensacola, FL 32520-0780
rlmcgee@southernco.com


Mr. Jon C. Moyle, Jr.
Moyle Law Firm
118 N. Gadsden Street
Tallahassee, FL 32301
jmoyle@moylelaw.com

Ms. Beth Keating
Gunster, Yoakley & Stewart, P.A.
215 South Monroe Street, Suite 601
Tallahassee, FL 32301-1839
bkeating@gunster.com

Mr. Mike Cassel
Regulatory and Governmental Affairs
Florida Public Utilities Company
Florida Division of Chesapeake Utilities Corp.
1750 SW 14th Street, Suite 200
Fernandina Beach, FL 32034
mcassel@fpuc.com

Mr. Jeffrey A. Stone
Mr. Russell A. Badders
Mr. Steven R. Griffin
Beggs & Lane
Post Office Box 12950
Pensacola, FL 32591-2950
jas@beggslane.com
rab@beggslane.com
srg@beggslane.com

Mr. James W. Brew
Ms. Laura A. Wynn
Stone Mattheis Xenopoulos & Brew, PC
1025 Thomas Jefferson Street, NW
Eighth Floor, West Tower
Washington, D.C. 20007-5201
jbrew@smxblaw.com
laura.wynn@smxblaw.com



Andrew M. Brown
Ansley Watson, Jr.