

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In Re: Purchased gas adjustment
(PGA) true-up

DOCKET NO. 20190003-GU
FILED: October 8, 2019

PREHEARING STATEMENT OF THE OFFICE OF PUBLIC COUNSEL

The Citizens of the State of Florida, through the Office of Public Counsel, pursuant to the Order Establishing Procedure in this docket, Order PSC-2019-0081-PCO-GU issued February 26, 2019 submit this Prehearing Statement.

APPEARANCES:

PATRICIA A. CHRISTENSEN, Esquire
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Deputy Public Counsel
c/o The Florida Legislature
111 West Madison Street, Room 812
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On behalf of the Citizens of the State of Florida.

A. **WITNESSES:**

None.

B. **EXHIBITS:**

None.

C. **STATEMENT OF BASIC POSITION**

The utilities bear the burden of proof to justify the recovery of costs they request in this docket. The utilities must carry this burden regardless of whether or not the Interveners provide evidence to the contrary. Further, the utilities bear the burden of proof to support their proposal(s) seeking the Commission's adoption of policy statements (whether new or changed) or other affirmative relief sought. Even if the Commission has previously approved a program,

recovery of a cost, factor, or adjustment as meeting the Commission's *own* requirements, the utilities still bear the burden of demonstrating that the costs submitted for final recovery meet any statutory test(s) and are reasonable in amount and prudently incurred. Further, recovery of even prudently incurred costs is constrained by the Commission's obligation to set fair, just, and reasonable rates. Further, pursuant to Section 366.01, Florida Statutes, the provisions of Chapter 366 must be liberally construed to protect the public welfare.

D. STATEMENT OF FACTUAL ISSUES AND POSITIONS

GENERIC PURCHASED GAS ADJUSTMENT ISSUES

ISSUE 1: What are the final purchased gas adjustment true-up amounts for the period January 2018 through December 2018?

OPC: No position at this time.

ISSUE 2: What are the appropriate purchased gas adjustment actual/estimated true-up amounts for the period January 2019 through December 2019?

OPC: No position at this time.

ISSUE 3: What is the total purchased gas adjustment true-up amounts to be collected during the period January 2020 through December 2020?

OPC: No position at this time.

ISSUE 4: What are the levelized purchased gas cost recovery (cap) factors for the period January 2020 through December 2020?

OPC: No position at this time.

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

OPC: No position at this time.

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

OPC: No position at this time.

E. **STIPULATED ISSUES:**

None.

F. **PENDING MOTIONS:**

None.

G. **REQUESTS FOR CONFIDENTIALITY**

Citizens have no pending requests for claims for confidentiality.

H. **OBJECTIONS TO QUALIFICATIONS**

None.

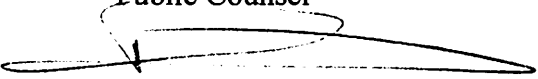
I. **REQUIREMENTS OF ORDER**

There are no requirements of the Order Establishing Procedure with which the Office of Public Counsel cannot comply.

Dated this 8th day of October, 2019.

Respectfully submitted,

J.R. Kelly
Public Counsel



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CERTIFICATE OF SERVICE
20190003-GU

I HEREBY CERTIFY that a true and correct copy of the Office of Public Counsel's Prehearing Statement has been furnished by electronic mail on this 8th day of October, 2019, to the following:

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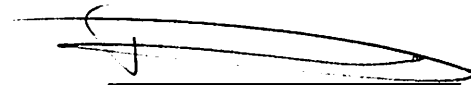
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