


MACFARLANE FERGUSON & MCMULLEN

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

August 28, 2020

VIA E-PORTAL FILING

Mr. Adam J. Teitzman
Commission Clerk
Florida Public Service Commission
2540 Shumard Oak Boulevard
Tallahassee, Florida 32399-0850

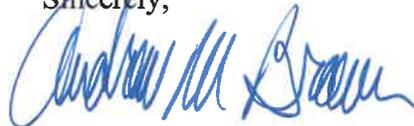
Re: Docket No. 20200003-GU – Purchased gas adjustment (PGA) true-up

Dear Mr. Teitzman:

Attached for electronic filing in the above docket on behalf of Peoples Gas System, please find its Preliminary List of Issues and Positions.

Your assistance in this matter is greatly appreciated.

Sincerely,



Andrew M. Brown

AB/plb
Attachment

cc: Parties of Record
Ms. Kandi M. Floyd
Ms. Karen Bramley

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Purchased Gas Adjustment (PGA)
True-Up)
_____)

DOCKET NO. 20200003-GU
FILED: August 28, 2020

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

Peoples Gas System ("PGS"), but 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 2019 through December 2019?

PGS: \$3,844,599 over-recovery

ISSUE 2: What are the actual/estimated purchased gas adjustment true-up amounts for the period January 2020 through December 2020?

PGS: \$2,556,956 under-recovery

ISSUE 3: What are the total purchased gas adjustment true-up amounts to be collected during the period from January 2021 through December 2021?

PGS: \$1,287,643 over recovery

ISSUE 4: What are the levelized purchased gas cost recovery (cap) factors for the period January 2021 through December 2021?

PGS: \$1.03639 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 purchased gas cost recovery cycle and thereafter for the period January 2021 through December 2021. Billing cycles may start before January 1, 2021, and the last cycle may be read after December 31, 2021, so that each customer is billed for 12 months regardless of when the factor 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 new purchased gas adjustment charges 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 7: Should this docket be closed?

PGS: Yes, Docket No. 20200003-GU should be closed once the Commission's decisions on all of the issues in the docket have become final and the Commission has concluded that the docket has otherwise met the requirements for closure.

DATED this 28th day of August 2020.

Respectfully submitted,

/s/ Andrew M. Brown, Esq.

Andrew M. Brown

Phone: (813) 273-4209

E-mail: ab@macfar.com

Thomas R. Farrior

Phone: (813) 273-4396

E-mail: trf@macfar.com

Macfarlane Ferguson & McMullen

P. O. Box 1531

Tampa, Florida 33601-1531

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 28th day of August, 2020, to the following:

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

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
christensen.patty@leg.state.fl.us

Mike Cassel
Florida Public Utilities Company
208 Wildlight Avenue
Yulee, FL 32097
mcassel@fpuc.com

Kurt Howard
Florida City Gas
700 Universe Boulevard
Juno Beach, FL 33408
Kurt.howard@nexteraenergy.com

Beth Keating, Esquire
Gunster Law Firm
215 South Monroe St. Suite 601
Tallahassee, FL 32301
bkeating@gunster.com

Karen L. Bramley/ Paula K. Brown
Regulatory Affairs
Peoples Gas System
P. O. Box 111
Tampa, FL 33601-0111
klbramley@tecoenergy.com
regdept@tecoenergy.com

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

Christopher T. Wright
Florida Power & Light Company
700 Universe Boulevard
Juno Beach, FL 33408
Christopher.Wright@fpl.com

/s/ Andrew M. Brown, Esq.
Andrew M. Brown