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October 7, 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. 20200004-GU – Natural gas conservation cost recovery

Dear Mr. Teitzman:

Attached for electronic filing in the above docket on behalf of Peoples Gas System, please find its Prehearing Statement.

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: Natural Gas Conservation)
Cost Recovery Clause.)
_____)

DOCKET NO. 20200004-GU
FILED: October 7, 2020

**PREHEARING STATEMENT
OF PEOPLES GAS SYSTEM**

A. APPEARANCES:

Andrew M. Brown
Thomas R. Farrior
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P. O. Box 1531
Tampa, Florida 33601-1531
On behalf of Peoples Gas System

B. WITNESSES:

Witness	Subject Matter	Issues #
Direct		
Karen L. Bramley	Conservation Cost Recovery True-Up and Projection; Peoples Gas System's company specific issues	1-8

C. EXHIBITS:

Witness	Proffered By	Exhibit #	Description
Direct			
Karen L. Bramley	Peoples Gas System	KLB-1, filed May 1, 2020	Schedules supporting cost recovery factor, actual January 2019 – December 2019
Karen L. Bramley	Peoples Gas System	KLB-2, filed August 7, 2020	Schedules supporting conservation costs projected for the period January 2021 – December 2021

D. STATEMENT OF BASIC POSITION

Peoples Gas System's Statement of Basic Position:

The Commission should determine that Peoples Gas System has properly calculated its conservation cost recovery true-up and projections and the natural gas conservation cost recovery factors set forth in the testimony and exhibits of Witness Karen L. Bramley during the period January 2021 through December 2021.

E. STATEMENT OF ISSUES AND POSITIONS

GENERIC CONSERVATION COST RECOVERY ISSUES

ISSUE 1: What are the final conservation cost recovery true-up amounts for the period January 2019 through December 2019?

PGS: An adjusted net true-up under-recovery of \$3,101,867, including interest. (Witness: Bramley)

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

PGS: An over-recovery of \$1,951,169, including interest. (Witness: Bramley)

ISSUE 3: What are the appropriate total conservation adjustment true-up amounts to be collected/refunded from the period January 2021 through December 2021?

PGS: A collection of \$1,150,698, including interest. (Witness: Bramley)

ISSUE 4: What are the total conservation cost recovery amounts to be collected during the period January 2021 through December 2021?

PGS: \$18,782,204 (including current period estimated true-up). (Witness: Bramley)

ISSUE 5: What are the conservation cost recovery factors for the period January 2021 through December 2021?

PGS: For the period January 2021 through December 2021 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	0.09591
SGS	0.06210
GS-1 & CS-SG & CS-GHP	0.03043
GS-2	0.02224
GS-3	0.01840
GS-4	0.01353
GS-5	0.00996
NGVS	0.01957
CSLS (Witness: Bramley)	0.01603

ISSUE 6: Should the Commission approve revised tariffs reflecting the energy conservation cost recovery amounts and establishing energy conservation cost recovery factors determined to be appropriate in this proceeding?

PGS: Yes, the Commission should approve revised tariffs reflecting the energy conservation cost recovery amounts and establishing energy conservation cost recovery factors determined to be appropriate in this proceeding. (Witness: Bramley)

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

PGS: The factors should be effective beginning with the specified conservation 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 long as each customer is billed for 12 months regardless of when the factors became effective. (Witness: Bramley)

ISSUE 8: Should this docket be closed?

PGS: Yes, Docket No. 20200004-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. (Witness: Bramley)

COMPANY-SPECIFIC CONSERVATION COST RECOVERY ISSUES

Peoples Gas System has no company-specific conservation cost recovery issues at this time.

F. STIPULATED ISSUES

Peoples Gas System is not aware of any stipulated issues as of this date.

G. PENDING MOTIONS

Peoples Gas System is not aware of any pending motions as of this date.

H. PENDING CONFIDENTIALITY CLAIMS OR REQUESTS

Peoples Gas System has no pending confidentiality claims or requests at this time.

I. OBJECTIONS TO WITNESS QUALIFICATIONS AS AN EXPERT

Peoples Gas System has no objections to any witness' qualifications as an expert in this proceeding.

J. COMPLIANCE WITH ORDER NO. PSC-2019-0083-PCO-GU

Peoples Gas System has complied with all requirements of the Order Establishing Procedure entered in this docket.

DATED this 7th day of October, 2020.

Respectfully submitted,

/s/ Andrew M. Brown, Esq.

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Attorneys for Peoples Gas System

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing Prehearing Statement filed on behalf of Peoples Gas System, has been furnished by electronic mail this 7th day of October 2020, to the following:

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