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October 15, 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 Amended 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  
AMENDED: October 15, 2020

**AMENDED PREHEARING STATEMENT  
OF PEOPLES GAS SYSTEM**

**A. APPEARANCES:**

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

**B. WITNESSES:**

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

**C. EXHIBITS:**

<b>Witness</b>	<b>Proffered By</b>	<b>Exhibit #</b>	<b>Description</b>
<b>Direct</b>			
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 \$343,120, 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 under-recovery of \$807,578, 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	0.01603

(Witness: Bramley)

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 15<sup>th</sup> day of October, 2020.

Respectfully submitted,

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

Andrew M. Brown, Esq.  
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**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that a true and correct copy of the foregoing Amended Prehearing Statement filed on behalf of Peoples Gas System, has been furnished by electronic mail this 15<sup>th</sup> day of October 2020, to the following:

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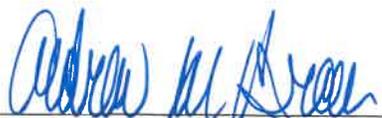
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