



GUNSTER
ATTORNEYS AT LAW

August 25, 2021

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VIA E-PORTAL

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

Re: Docket No. 20210004-GU – Natural Gas Conservation Cost Recovery Clause

Dear Mr. Teitzman:

Attached for electronic filing, please find Florida City Gas's Preliminary Statement of Issues and Positions.

Thank you for your assistance with this filing. As always, please don't hesitate to let me know if you have any questions or concerns.

Sincerely,

Beth Keating
Gunster, Yoakley & Stewart, P.A.
215 South Monroe St., Suite 601
Tallahassee, FL 32301
(850) 521-1706

MEK
cc: Parties of Record

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Natural Gas Conservation Cost
Recovery

Docket No. 20210004-GU
Filed: August 25, 2021

FLORIDA CITY GAS
PRELIMINARY STATEMENT OF ISSUES AND BASIC POSITIONS

ISSUE 1: What are the final conservation cost recovery adjustment true-up amounts for the January 2020 through December 2020?

Florida City Gas: The final net true-up amount (including interest, adjustments, and the estimated under-recovery) for the period January 2020 through December 2020 is an under-recovery of \$533,692. *See* FCG Exhibit MB-1.

ISSUE 2: What are the appropriate conservation adjustment actual/estimated true-up amounts for the period January 2021 through December 2021?

Florida City Gas: The Actual/Estimated True-Up (based on actual data for six months and projected data for six months) for the current period January 2021 through December 2021 is an under-recovery of \$288,441. *See* FCG Exhibit MB-2, Schedule C-3, page 4, line 8.

ISSUE 3: What are the appropriate total conservation adjustment true-up amounts to be collected/refunded from January 2022 through December 2022?

Florida City Gas: The total net true-up (inclusive of the final true-up for 2019, the Actual/Estimated True-Up for 2020, and interest) to be collected from January 2021 through December 2021 is an under-recovery of \$822,560. *See* FCG Exhibit MB-2, Schedule C-3, page 4, line 12.

ISSUE 4: What are the total conservation cost recovery amounts, net of the true-up amount, to be collected during the period January 2022 through December 2022?

Florida City Gas: Applying the total net true-up results in a total of \$7,482,015 of energy conservation program costs to be collected during the period January 2022 through December 2022. *See* FCG Exhibit MB-2, Schedule C-1.

ISSUE 5: What are the conservation cost recovery factors for the period January 2022 through December 2022?

Florida City Gas: The appropriate factors are:

<u>Rate Class</u>	<u>CCR Factor (\$/per therm)</u>
RS-1	\$0.27057
RS-100	\$0.17325
RS-600	\$0.09718
GS-1	\$0.06055
GS-6K	\$0.04700
GS-25K	\$0.04551
Gas Lights	\$0.07296
GS-120K	\$0.03040
GS1250K	\$0.01797
GS-11M – GS-25M	\$0.0

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?

Florida City Gas: Yes. The Commission should approve revised tariffs reflecting the new conservation cost recovery factors 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. The Commission should grant Staff authority to administratively approve revised tariffs reflecting the new conservation cost recovery factors determined to be appropriate in this proceeding.

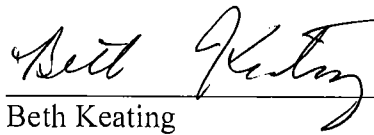
ISSUE 7: What should be the effective date of the new conservation cost recovery factors for billing purposes?

Florida City Gas: No. The new conservation cost recovery factors should be effective beginning the first billing cycle in January 2022 through the last billing cycle in December 2022 and continuing until modified by subsequent order of this Commission.

ISSUE 8: Should this docket be closed?

Florida City Gas: No. While a separate docket is assigned each year for administrative convenience, this is a continuing docket and should remain open.

Respectfully submitted this 25th day of August 2021.



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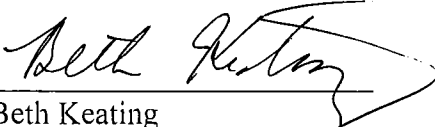
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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing has been furnished by Electronic Mail to the following parties of record this 25th day of August 2021:

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