



**GUNSTER**  
ATTORNEYS AT LAW

Writer's Direct Dial Number: (850) 521-1706  
Writer's E-Mail Address: bkeating@gunster.com

August 27, 2021

**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 the Preliminary Statement of Issues and Positions of Florida Public Utilities Company, Florida Public Utilities Company – Indiantown Division, Florida Public Utilities Company – Fort Meade, and the Florida Division of Chesapeake Utilities Corporation for the above-referenced docket.

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

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 )  
Clause )  
\_\_\_\_\_ )

Docket No. 20210004-GU  
Filed: August 27, 2021

**CONSOLIDATED PRELIMINARY STATEMENT OF ISSUES AND POSITIONS FOR  
FLORIDA PUBLIC UTILITIES COMPANY, FLORIDA DIVISION OF CHESAPEAKE  
UTILITIES CORPORATION AND FLORIDA PUBLIC UTILITIES-INDIANTOWN  
DIVISION**

Pursuant to Order No. PSC-2021-0076-PCO-GU, issued February 10, 2021, establishing the hearing procedures and controlling dates in this docket, and Order No. PSC-2021-0209-PCOGU, issued June 7, 2021, Florida Public Utilities Company (“FPUC”), the Florida Division of Chesapeake Utilities Corporation (“CUC”), Florida Public Utilities Company-Indiantown Division (“Indiantown”), and Florida Public Utilities – Fort Meade (“Fort Meade”), referred to jointly herein as “Consolidated Companies,” hereby submit their Consolidated Preliminary Statement of Issues:

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

Consolidated Companies: The Consolidated Companies over-recovered \$364,692, as compared to the estimated over-recovery of \$808,126, resulting in an adjusted end of period total true up amount of an under-recovery of \$443,434.

**ISSUE 2: What are the appropriate conservation adjustment actual/estimated true-up amounts for the period January 2021 through December 2021? [Current year true-up amount]**

Consolidated Companies: The projected true-up for the period January 2021 through December 2021 is an over-recovery of \$769,847.

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

Consolidated Companies: The projected net true-up is an over-recovery of \$326,413.

**ISSUE 4. What are the total conservation cost recovery amounts to be collected during the period January 2022 through December 2022?**

Consolidated Companies: A total of \$4,692,087 remains to be recovered during the period January 1, 2022 through December 31, 2022.

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

CUC: The appropriate factors are:

<u>Rate Class</u>	<u>Adjustment Factor (dollars per therm)</u>	
FTS-A	\$	0.21173
FTS-B	\$	0.16429
FTS-1	\$	0.14627
FTS-2	\$	0.08113
FTS-2.1	\$	0.05816
FTS-3	\$	0.05020
FTS-3.1	\$	0.03672
FTS-4	\$	0.03070
FTS-5	\$	0.02681

<u>Rate Class</u>	<u>Adjustment Factor (dollars per therm)</u>	
FTS-6	\$	0.02165

FTS-7	\$	0.01486
FTS-8	\$	0.01337
FTS-9	\$	0.01122
FTS-10	\$	0.01032
FTS-11	\$	0.00744
FTS-12	\$	0.00766
FTS-NGV	\$	0.01443

The Consolidated Companies also seek approval of the following experimental per bill Conservation Cost Recovery Adjustment (Experimental) factors for Chesapeake:

<b>Rate Class</b>	<b>ECCR Factor (\$ per bill)</b>
FTS-A	\$1.34
FTS-B	\$1.74
FTS-1	\$2.17
FTS-2	\$4.27
FTS-2.1	\$6.05
FTS-3	\$15.20
FTS-3.1	\$21.08

FPUC and FPU-Fort Meade:

The appropriate factors are:

<b><u>Rate Class</u></b>	<b><u>Adjustment Factor (dollars per therm)</u></b>
RESIDENTIAL (FPU, Fort Meade)	\$ 0.08627
COMMERCIAL SMALL (FPU, Fort Meade)( Gen Srv GSI & GS	\$ 0.05498

<u>Rate Class</u>	<u>Adjustment Factor (dollars per therm)</u>
Transportation <600)	
COMMERCIAL SMALL (FPU, Fort Meade) (Gen Srv GS2 & GS Transportation >600)	\$ 0.04090
COMM. LRG VOLUME (FPU, Fort Meade) (Large Vol & LV Transportation <,> 50,000 units)	\$ 0.03407
Natural Gas Vehicles	\$ 0.01461

Indiantown: The appropriate factors are:

<u>Rate Class</u>	<u>Adjustment Factor (dollars per therm)</u>
TS1 (INDIANTOWN DIVISION)	\$ 0.08395
TS2 (INDIANTOWN DIVISION)	\$ 0.01167
TS3 (INDIANTOWN DIVISION)	\$ 0.01658
TS4 (INDIANTOWN DIVISION) <sup>1</sup>	\$ 0.0000

**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?**

Consolidated Companies: Yes. The Commission should approve revised tariffs reflecting the natural gas conservation cost recovery amounts and establishing gas conservation cost recovery

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<sup>1</sup> The Consolidated Companies note that the customers in this class are no longer on the system; therefore, the rate is appropriately reflected as \$0.

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

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

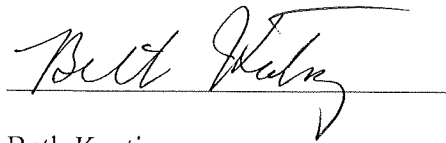
Consolidated Companies: The factors should be effective beginning with the specified conservation cost recovery cycle and thereafter for the period January 2022 through December 2022. Billing cycles may start before January 1, 2022 and the last cycle may be read after December 31, 2022, so that each customer is billed for twelve months regardless of when the adjustment factor became effective.

**ISSUE 8: Should this docket be closed?**

Consolidated Companies: This is an ongoing proceeding; however, upon the conclusion of this year's proceeding, this docket should be closed and a new docket should be opened to address cost recovery for 2022.

Docket No. 20210004-GU  
August 27, 2021

RESPECTFULLY SUBMITTED this 27th day of August, 2021.

A handwritten signature in cursive script, reading "Beth Keating", is written over a horizontal line.

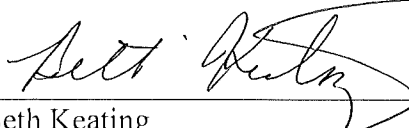
Beth Keating  
Gunster, Yoakley & Stewart, P.A.  
215 South Monroe St., Suite 601  
Tallahassee, FL 32301  
(850) 521-1706

*Attorneys for Florida Public Utilities  
Company, Florida Public Utilities Company-  
Indiantown Division, Florida Public Utilities  
Company – Fort Meade, and the Florida  
Division of Chesapeake Utilities Corporation*

**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 27th day of August, 2021:

Florida Public Utilities Company Mike Cassel 208 Wildlight Ave. Yulee, FL 32097 <a href="mailto:mcassel@fpuc.com">mcassel@fpuc.com</a>	MacFarlane Ferguson Law Firm Andrew Brown/Thomas R. Farrior P.O. Box 1531 Tampa, FL 33601-1531 <a href="mailto:AB@macfar.com">AB@macfar.com</a> <a href="mailto:trf@macfar.com">trf@macfar.com</a>
Charles Murphy, Esquire Florida Public Service Commission 2540 Shumard Oak Boulevard Tallahassee, FL 32399 <a href="mailto:cmurphy@psc.state.fl.us">cmurphy@psc.state.fl.us</a>	Office of Public Counsel Richard Gentry/Charles J. Rehwinkel c/o The Florida Legislature 111 W. Madison St., Rm 812 Tallahassee FL 32399 <a href="mailto:rehwinkel.charles@leg.state.fl.us">rehwinkel.charles@leg.state.fl.us</a> <a href="mailto:gentry.richard@leg.state.fl.us">gentry.richard@leg.state.fl.us</a>
Peoples Gas System Paula Brown/Kandi Floyd P.O. Box 111 Tampa, FL 33601-0111 <a href="mailto:regdept@tecoenergy.com">regdept@tecoenergy.com</a> <a href="mailto:kfloyd@tecoenergy.com">kfloyd@tecoenergy.com</a>	St. Joe Natural Gas Company, Inc. Andy Shoaf Debbie Stitt P.O. Box 549 Port St. Joe, FL 32457-0549 <a href="mailto:Andy@stjoegas.com">Andy@stjoegas.com</a> <a href="mailto:Dstitt@stjoegas.com">Dstitt@stjoegas.com</a>
Sebring Gas System, Inc. Jerry H. Melendy 3515 Highway 27 South Sebring FL 33870-5452 <a href="mailto:jmelendy@floridasbestgas.com">jmelendy@floridasbestgas.com</a>	Florida City Gas Kurt Howard 700 Universe Boulevard Juno Beach FL 33408 (561) 304-5458 <a href="mailto:kurt.howard@nexteraenergy.com">kurt.howard@nexteraenergy.com</a>
Christopher T. Wright Florida Power & Light Company 700 Universe Boulevard (JB/LAW) Juno Beach, Florida 33408 <a href="mailto:Christopher.wright@fpl.com">Christopher.wright@fpl.com</a>	

  
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Tallahassee, FL 32301