



GUNSTER

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October 1, 2021

**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 Prehearing Statement in 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 or concerns.

Sincerely,

*s/Beth Keating*

Beth Keating  
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**BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION**

In re: Natural Gas Conservation Cost Recovery

Docket No. 20210004-GU

Filed: October 1, 2021

**FLORIDA CITY GAS  
PREHEARING STATEMENT**

Florida City Gas (“FCG” or “the Company”) hereby submits this Prehearing Statement pursuant to Order Establishing Procedure, Order Nos. PSC-2021-0076-PCO-GU and PSC-2021-0209-PCO-GU, and states as follows:

**1. KNOWN WITNESSES**

FCG intends to offer the following testimonies sponsored by FCG witness Miguel Bustos into the evidentiary record in this proceeding:

<b>Witness</b>	<b>Subject Matter</b>	<b>Issue No.</b>
Direct Testimony of Miguel Bustos, submitted on May 3, 2021	Supports FCG’s final Natural Gas Conservation Cost Recovery (“NGCCR”) true-up amount related to the twelve-month period ended December 31, 2020	1
Direct Testimony of Miguel Bustos, submitted August 6, 2021	Presents the Actual/Estimated True-Up amount (based on actual data for six months and projected data for six months) for the current period January 2021 through December 2021; presents FCG’s projection of total NGCCR costs for the period January 2022 through December 2022; and presents the development of NGCCR Factors to be charged during 2022	2-8

**2. KNOWN EXHIBITS**

FCG intends to offer the following exhibits sponsored by FCG witness Miguel Bustos into the evidentiary record in this proceeding:

<b>Witness</b>	<b>Proffered By</b>	<b>Exhibit No.</b>	<b>Description</b>
Miguel Bustos	FCG	MB-1	Calculation of FCG's final NGCCR true-up amount related to the twelve-month period ended December 31, 2020
Miguel Bustos	FCG	MB-2	Commission prescribed forms supporting calculation of FCG's Actual/Estimated True-Up amount for the current period January 2021 through December 2021 and FCG's proposed 2022 NGCCR Factors

In addition to the above pre-filed exhibits, FCG reserves the right to utilize any exhibit introduced by any other party. FCG additionally reserves the right to introduce any additional exhibit necessary for cross-examination or impeachment at the final hearing.

### **3. BASIC POSITION**

FCG has appropriately calculated its true-up amounts and NGCCR Factors as shown in the Company's positions on Issue Nos. 1 through 7 below. The Company's final true-up amount for 2020, Actual/Estimated True-Up amount for 2021, and proposed 2022 NGCCR Factors are consistent with the Commission's methodology for calculating the net true-up and recovery factors for the natural gas conservation programs and, therefore, should be approved. FCG submits that the proposed 2022 NGCCR Factors are appropriate for application to customers' bills beginning the first billing cycle in January 2022 through the last billing cycle in December 2022 and continuing until modified by subsequent order of the Commission.

### **4. STATEMENT OF ISSUES AND POSITIONS**

FCG's statement of issues and positions in this proceeding are as follows:

Issue No. 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. (FCG witness Bustos)*

Issue No. 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. (FCG witness Bustos)*

Issue No. 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. (FCG witness Bustos)*

Issue No. 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. (*FCG witness Bustos*)

Issue No. 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

*See* FCG Exhibit MB-2, Schedule C-1. (*FCG witness Bustos*)

Issue No. 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. (*FCG witness Bustos*)

Issue No. 7: What should be the effective date of the new conservation cost recovery factors for billing purposes?

**Florida City Gas:** 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. (*FCG witness Bustos*)

Issue No. 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. (*FCG witness Bustos*)

**5. STIPULATED ISSUES**

FCG is not a party to and is not aware of any stipulations at this time. However, FCG remains willing to work with all parties to resolve any outstanding issues, and believes it should be possible to reach a stipulation on each of the above-listed issues as they relate to FCG.

**6. PENDING MOTIONS**

FCG is not aware of any motions currently pending before the Commission for disposition.

7. **REQUESTS/CLAIMS FOR CONFIDENTIALITY**

FCG has no pending requests or claims for confidentiality.

8. **OBJECTIONS TO WITNESS QUALIFICATIONS**

FCG has no objections to the qualifications of any witness, and further states that it is not aware of any objections or challenges to the qualifications of any FCG witness.

9. **REQUEST FOR SEQUESTRATION OF WITNESSES**

FCG has no pending requests for sequestration of any witness, and further states that it is not aware of any such request related to any FCG witness.

10. **COMPLIANCE WITH ORDER ESTABLISHING PROCEDURE**

FCG states that it believes it is in full compliance with the Commission's Order Establishing Procedure.

Respectfully submitted this 1st day of October 2021.

*s/Beth Keating*

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**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that a true and correct copy of the foregoing has been furnished by electronic or US Mail to the following parties of record this 1st day of October 2021

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