



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

Dear Mr. Teitzman:

Attached for filing in the above-referenced docket, please find Florida Division of Chesapeake Utilities Corporation, Florida Public Utilities Company, Florida Public Utilities Company-Fort Meade, and Florida Public Utilities Company-Indiantown Division's ("FPUC") Consolidated Prehearing Statement.

Should you have any questions whatsoever, please do not hesitate to contact me. Thank you for your assistance in this matter.

Sincerely,

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

MEK

Cc: (Parties of Record)
PSC Staff (Word)

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Natural Gas)
Conservation Cost Recovery)
Clause)
_____)

Docket No. 20210004-GU
Filed: October 1, 2021

CONSOLIDATED PREHEARING STATEMENT FOR FLORIDA PUBLIC UTILITIES COMPANY, FLORIDA DIVISION OF CHESAPEAKE UTILITIES CORPORATION AND FLORIDA PUBLIC UTILITIES-INDIANTOWN DIVISION

In accordance with Order No. PSC-2021-0074-PCO-GU, issued February 10, 2021, as amended by Order No. PSC-2020-0209-PCO-GU, 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 Prehearing Statement:

a. All Known Witnesses

<u>Witness</u>	<u>Subject Matter</u>	<u>Issues</u>
Curtis Young	True Up for 2020	Issue 1
Kira I. Lake	Actual/Estimated True-up Amount for 2021; cost recovery factors for 2022; effective date	Issues 2 – 8

b. All Known Exhibits

<u>Exhibit Number</u>	<u>Witness</u>	<u>Description</u>	<u>Issues</u>
CDY-1	Curtis Young	True-Up Variance Analysis [Schedules CT1-CT6]	1
KIL-1	Kira I. Lake	Projections: Estimated ECCR charges by rate class [Schedules C-1 through C-4]	2-7

c. Statement of Basic Position

The Commission should approve the Consolidated Companies' respective final net true-ups for the period January through December 2020, the estimated true-up for the period January through December, 2021, and the projected conservation program expenses and recovery factors for the period January through December, 2022.

d. Position on the 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</u> <u>(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:

Rate Class	ECCR Factor (\$ per bill)
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:

<u>Rate Class</u>		<u>Adjustment Factor (dollars per therm)</u>
RESIDENTIAL (FPU,Fort Meade)	\$	0.08627
COMMERCIAL SMALL (FPU.Fort Meade)(Gen Srv GS1 & GS Transportation <600)	\$	0.05498
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) ¹	\$	0.0000

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

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 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.

e. Stipulated Issues

While not a party to stipulations at this time, the Consolidated Companies believe that it should be possible to reach a stipulation on each of the issues as they pertain to the Consolidated Companies.

f. Pending Motions

None.

October 1, 2021

g. Pending Confidentiality Claims or Requests

None.

h. Objections to Witness Qualifications as an Expert

None.

i. Compliance with Order No. 2021-0074-PCO-GU

CUC, FPUC, FPUC-Fort Meade, and Indiantown believe that this Prehearing Statement fully complies with all requirements of the Order Establishing Procedure entered in this docket.

RESPECTFULLY SUBMITTED this 1st day of October, 2021.

s/Beth Keating

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*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 1st day of October, 2021:

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