

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

August 26, 2022

BY E-PORTAL

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

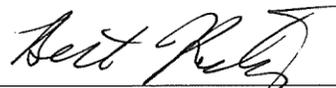
Re: Docket No. 20220003-GU –Purchased Gas Adjustment (PGA) True-Up.

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 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: Purchased Gas Adjustment (PGA)
True-Up

Docket No. 20220003-GU
Filed: August 26, 2022

FLORIDA CITY GAS
PRELIMINARY STATEMENT OF ISSUES AND BASIC POSITIONS

ISSUE 1: What are the final purchased gas adjustment true-up amounts for the period January 2021 through December 2021?

Florida City Gas: The final net true-up amount (including interest, adjustments, and the estimated under-recovery included in the 2022 PGA Factor) for the period January 2021 through December 2021 is an under-recovery of \$2,055,353. *See* FCG Exhibit MB-2, Schedule E-4.

ISSUE 2: What are the actual/estimated purchased gas adjustment true-up amounts for the period January 2022 through December 2022?

Florida City Gas: The Actual/Estimated True-Up amount (based on actual data for six months and projected data for six months) for the current period January 2022 through December 2022 is an under-recovery of \$13,464,473. *See* FCG Exhibit MB-2, Schedule E-4.

ISSUE 3: What are the total purchased gas adjustment true-up amounts to be collected during the period January 2023 through December 2023?

Florida City Gas: The total net true-up (inclusive of the final true-up for 2021, the Actual/Estimated True-Up for 2022, and interest) to be collected from January 2023 through December 2023 is an under-recovery of \$15,519,826. *See* FCG Exhibit MB-2, Schedule E-4.

ISSUE 4: What are the levelized purchased gas cost recovery (cap) factors for the period January 2023 through December 2023?

Florida City Gas: The maximum levelized purchased gas cost recovery (cap) factors based on the Company's expected winter cost of gas is \$1.7040 per therm before the regulatory assessment fees, and \$1.7126 per therm after the regulatory assessment fees.

ISSUE 5: What should be the effective date of the new purchased gas adjustment charge for billing purposes?

Florida City Gas: The new purchased gas adjustment charge should be effective for application to Sales Customers' bills beginning the first billing cycle in January 2023 through the last billing cycle in December 2023 and continuing until modified by subsequent order of the Commission.

ISSUE 6: Should the Commission approve revised tariffs reflecting the new purchased gas adjustment charges determined to be appropriate in this proceeding?

Florida City Gas: Yes. The Commission should approve revised tariffs reflecting the new purchased gas adjustment charges 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 levelized purchased gas cost recovery factors determined to be appropriate in this proceeding.

ISSUE 7: 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 26th day of August 2022.



Beth Keating
Gunster, Yoakley & Stewart, P.A.
215 South Monroe St., Suite 601
Tallahassee, FL 32301

Christopher T. Wright, Senior Attorney
Fla. Auth. House Counsel No. 1007055
Florida Power & Light Company
700 Universe Boulevard
Juno Beach, Florida 33408

Attorneys for Florida City Gas

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 26th day of August 2022:

| | |
|---|--|
| <p>Ryan Sandy, Esquire Florida Public Service Commission 2540 Shumard Oak Boulevard Tallahassee, FL 32399 rsandy@psc.state.fl.us <i>For Commission Staff</i></p> | <p>Office of Public Counsel Richard Gentry/Patricia A. Christensen c/o The Florida Legislature 111 West Madison Street, Room 812 Tallahassee, FL 32399-1400 gentry.richard@leg.state.fl.us christensen.patty@leg.state.fl.us <i>For Office of Public Counsel</i></p> |
| <p>Ausley Law Firm (22b) J. Wahlen/M. Means/V. Ponder P.O. Box 391 Tallahassee FL 32302 (850) 224-9115 (850) 222-7952 jwahlen@ausley.com mmeans@ausley.com vponder@ausley.com <i>For Peoples Gas System</i></p> | <p>Mr. Andy Shoaf/Debbie Stitt P.O. Box 549 Port St. Joe, FL 32457-0549 andy@stjoegas.com dstitt@stjoegas.com <i>For St. Joe Natural Gas Company, Inc.</i></p> |
| <p>Mike Cassel Florida Public Utilities Company 208 Wildlight Ave Yulee, Florida 32097 mcassel@fpuc.com</p> <p>Michelle D. Napier 1635 Meathe Drive West Palm Beach FL 33411 (561) 838-1712 mnapier@fpuc.com <i>For Florida Public Utilities Company</i></p> | <p>Paula Brown P.O. Box 111 Tampa, FL 33601-0111 regdept@tecoenergy.com</p> <p>Kandi Floyd/Karen Bramley Regulatory Affairs P.O. Box 2562 Tampa FL 33601-2562 (813) 228-1444 (813) 228-1770 KLBramley@tecoenergy.com regdept@tecoenergy.com <i>For Peoples Gas System</i></p> |


Beth Keating
Gunster, Yoakley & Stewart, P.A.
215 South Monroe St., Suite 601
Tallahassee, FL 32301

Attorney for Florida City Gas