

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

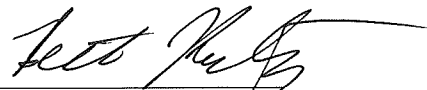
Re: Docket No. 20220004-GU – Natural Gas Conservation Cost Recovery Clause

Dear Mr. Teitzman:

Attached for 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: Natural Gas Conservation Cost
Recovery

Docket No. 20220004-GU
Filed: August 26, 2022

FLORIDA CITY GAS
PRELIMINARY LIST OF ISSUES AND POSITIONS

ISSUE 1: What are the final conservation cost recovery adjustment true-up amounts for the January 2021 through December 2021?

Florida City Gas: The final net true-up amount (including interest, adjustments, and the estimated under-recovery) for the period January 2021 through December 2021 is an under-recovery of \$469,106. See FCG Exhibit MB-1.

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

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 2022 through December 2022 is an over-recovery of \$67,504. See FCG Exhibit MB-2, page 7, Schedule C-3, line 8.

ISSUE 3: What are the appropriate total conservation adjustment true-up amounts to be collected/refunded from 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 \$404,512. See FCG Exhibit MB-2, page 7, Schedule C-3, 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 2023 through December 2023?

Florida City Gas: Applying the total net true-up results in a total of \$7,012,004 of energy conservation program costs to be collected during the period January 2023 through December 2023. See FCG Exhibit MB-2, page 1, Schedule C-1.

ISSUE 5: What are the conservation cost recovery factors for the period January 2023 through December 2023?

Florida City Gas: The appropriate factors are:

<u>Rate Class</u>	<u>CCR Factor (\$/per therm)</u>
RS-1	\$0.25615
RS-100	\$0.16795
RS-600	\$0.09486
GS-1	\$0.05986
GS-6K	\$0.04463
GS-25K	\$0.04452
Gas Lights	\$0.07066
GS-120K	\$0.02987
GS-1250K	\$0.01939
GS-11M – GS-25M	\$0.00000

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.

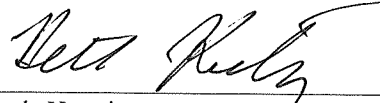
ISSUE 7: What should be the effective date of the new conservation cost recovery factors for billing purposes?

Florida City Gas: The new conservation cost recovery factors should be effective beginning the first billing cycle in January 2023 through the last billing cycle in December 2023 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 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:

Theresa L. Tan Matthew Jones 2540 Shumard Oak Boulevard Tallahassee, FL 32399 ltan@psc.state.fl.us mjones@psc.state.fl.us <i>For Commission Staff</i>	Office of Public Counsel Richard Gentry/Charles J. Rehwinkel c/o The Florida Legislature 111 West Madison Street, Room 812 Tallahassee, FL 32399-1400 gentry.richard@leg.state.fl.us Rehwinkel.charles@leg.state.fl.us <i>For Office of Public Counsel</i>
Mike Cassel Florida Public Utilities Company 208 Wildlight Ave Yulee, Florida 32097 mcassel@fpuc.com <i>For Florida Public Utilities Company</i>	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>
J. Wahlen/M. Means/V. Ponder P.O. Box 391 Tallahassee FL 32302 jwahlen@ausley.com mmeans@ausley.com vponder@ausley.com <i>For Peoples Gas System</i>	Paula Brown P.O. Box 111 Tampa, FL 33601-0111 regdept@tecoenergy.com Kandi Floyd/Karen Bramley Regulatory Affairs P.O. Box 2562 Tampa FL 33601-2562 KLBramley@tecoenergy.com regdept@tecoenergy.com <i>For Peoples Gas System</i>
Jerry H. Melendy, Jr. 3515 U.S. Highway 27 South Sebring, FL 33870 jmelendy@floridasbestgas.com <i>For Sebring Gas System, Inc.</i>	



Beth Keating
Gunster, Yoakley & Stewart, P.A.
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(850) 521-1706

Attorney for Florida City Gas