

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

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

DOCKET NO. 20220004-GU
FILED: October 7, 2022

**PREHEARING STATEMENT
OF PEOPLES GAS SYSTEM**

A. APPEARANCES:

J. Jeffrey Wahlen
Malcolm N. Means
Virginia Ponder
Ausley McMullen
123 S. Calhoun St.
Tallahassee, Florida 32301-1517
On behalf of Peoples Gas System

B. WITNESSES:

Witness	Subject Matter	Issue #
Direct		
Karen L. Bramley	Conservation Cost Recovery True-Up and Projection	1-7

C. EXHIBITS:

Witness	Proffered By	Exhibit #	Description	Issue #
Direct				
Karen L. Bramley	Peoples Gas System	KLB-1, filed May 2, 2022	Schedules Supporting Cost Recovery Factor, Actual January 2021 – December 2021	1
Karen L. Bramley	Peoples Gas System	KLB-2, filed August 5, 2022	Schedules supporting conservation costs projected for the period January 2023 – December 2023	2-7

D. STATEMENT OF BASIC POSITION

PGS's Statement of Basic Position:

The Commission should determine that Peoples Gas System has properly calculated its conservation cost recovery true-up and projections and the natural gas conservation cost recovery factors set forth in the testimony and exhibits of Witness Karen L. Bramley for the period January 2023 through December 2023.

E. STATEMENT OF ISSUES AND POSITIONS

GENERIC CONSERVATION COST RECOVERY ISSUES

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

PGS: An adjusted net true-up over-recovery of \$2,209,020, including interest. (Bramley)

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

PGS: An over-recovery of \$1,333,568, including interest. (Bramley)

ISSUE 3: What are the appropriate total conservation adjustment true-up amounts to be collected/refunded for the period January 2023 through December 2023?

PGS: A refund of \$3,542,588, including interest. (Bramley)

ISSUE 4: What are the total conservation cost recovery amounts to be collected during the period January 2023 through December 2023?

PGS: \$18,338,325 (including current period estimated true-up). (Bramley)

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

PGS: For the period January 2023 through December 2023, the cost recovery factors are as follows:

<u>Rate Schedule</u>	<u>Cost Recovery Factors</u> <u>(Dollars per Therm)</u>
RS & RS-SG & RS-GHP	0.09056
SGS	0.05718
GS-1 & CS-SG & CS-GHP	0.02909
GS-2	0.02167
GS-3	0.01843
GS-4	0.01336
GS-5	0.00928
CSLS	0.01851
(Bramley)	

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?

PGS: Yes, the Commission should approve revised tariffs reflecting the energy conservation cost recovery amounts and establishing energy conservation cost recovery factors determined to be appropriate in this proceeding. (Bramley)

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

PGS: The factors should be effective beginning with the specified conservation cost recovery cycle and thereafter for the period January 2023 through December 2023. Billing cycles may start before January 1, 2023, and the last cycle may be read after December 31, 2023, so long as each customer is billed for 12 months regardless of when the factors became effective. (Bramley)

ISSUE 8: Should this docket be closed?

PGS: Yes, Docket No. 20220004-GU should be closed once the Commission's decisions on all of the issues in the docket have become final and the Commission has concluded that the docket has otherwise met the requirements for closure.

COMPANY-SPECIFIC CONSERVATION COST RECOVERY ISSUES

PGS has no company-specific conservation cost recovery issues as of this date.

F. STIPULATED ISSUES

PGS is not aware of any stipulated issues as of this date.

G. PENDING MOTIONS

PGS is not aware of any pending motions as of this date.

H. PENDING CONFIDENTIALITY CLAIMS OR REQUESTS

PGS has no pending confidentiality claims or requests as of this date.

I. OBJECTIONS TO WITNESS QUALIFICATIONS AS AN EXPERT

PGS has no objections to any witness' qualifications as an expert in this proceeding.

J. COMPLIANCE WITH ORDER ESTABLISHING PROCEDURE

PGS has complied with all requirements of the Order Establishing Procedure entered in this docket.

DATED this 7th day of October, 2022.

Respectfully submitted,

A handwritten signature in blue ink, appearing to read "V. Ponder", is written over a horizontal line.

J. JEFFRY WAHLEN

jwahlen@ausley.com

MALCOLM N. MEANS

mmeans@ausley.com

VIRGINIA PONDER

vponder@ausley.com

Ausley McMullen

P.O. Box 391

Tallahassee, Florida 32302

(850) 224-9115

ATTORNEYS FOR PEOPLES GAS SYSTEM

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing Prehearing Statement, filed on behalf of People Gas System, has been furnished by electronic mail on this 7th day of October 2022 to the following:

Matthew Jones
Adria Harper
Office of General Counsel
Florida Public Service Commission
Room 390L – Gerald L. Gunter Building
2540 Shumard Oak Boulevard
Tallahassee, FL 32399-0850
majones@psc.state.fl.us
aharper@psc.state.fl.us

Richard Gentry
Charles J. Rehwinkel
Office of Public Counsel
111 West Madison Street – Room 812
Tallahassee, FL 32399-1400
gentry.richard@leg.state.fl.us
rehwinkel.charles@leg.state.fl.us

Jerry H. Melendy
Sebring Gas System
3515 Highway 27 South
Sebring, FL 33870-5452
jmelendy@floridasbestgas.com

Charles A. Shoaf
Debbie Stitt
St. Joe Natural Gas Company
P.O. Box 549
Port St. Joe, FL 32457-0549
andy@stjoegas.com
dstitt@stjoegas.com

Nora Bordine/Karen Bramley
Regulatory Affairs
Peoples Gas System
P.O. Box 2562
Tampa, FL 33601-2562
nmbordine@tecoenergy.com
klbramley@tecoenergy.com

Christopher T. Wright
Florida Power & Light Company
700 Universe Boulevard (LAW/JB)
Juno Beach, FL 33408-0420
Christopher.Wright@fpl.com

Beth Keating
Gunster Law Firm
215 South Monroe Street, Suite 601
Tallahassee, FL 32301-1839
bkeating@gunster.com

Mike Cassel
Regulatory and Governmental Affairs
Florida Public Utilities Company
Florida Division of Chesapeake Utilities Corp.
208 Wildlight Ave
Yulee, FL 32097
mcassel@fpuc.com

Paula Brown
Regulatory Affairs
Peoples Gas System
P.O. Box 111
Tampa, FL 33601-01111
regdept@tecoenergy.com



ATTORNEY