



GUNSTER

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

October 7, 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 the Florida City Gas's Prehearing Statement.

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
PSC Staff

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Purchased Gas Adjustment (PGA) True-Up

Docket No. 20220003-GU

Filed: October 7, 2022

**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-2022-0063-PCO-GU and Amendatory Order PSC-2022-0063A-PCO-GU and states as follows:

1. FCG WITNESSES

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

Witness	Subject Matter	Issue No.
Direct		
Miguel Bustos	Supports FCG’s final Purchased Gas Adjustment (“PGA”) true-up amount related to the twelve-month period ended December 31, 2021.	1
Miguel Bustos	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 2022 through December 2022; supports FCG’s request for Commission approval of a PGA Factor to be applied for service to be rendered during the period of January 1, 2023 through December 31, 2023; and presents the development of the proposed maximum PGA Factor that may be charged to Sales Customers during 2023.	2-6

2. KNOWN EXHIBITS

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

Witness	Proffered By	Exhibit No.	Description	Issue #
Direct				
Miguel Bustos	FCG	MB-1	Calculation of FCG's final PGA true-up amount related to the twelve-month period ended December 31, 2021	1
Miguel Bustos	FCG	MB-2	Commission prescribed forms supporting calculation of FCG's Actual/Estimated True-Up amount for the current period January 2022 through December 2022 and FCG's proposed 2023 maximum levelized PGA Factor	2-6

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. STATEMENT OF BASIC POSITION

FCG has appropriately calculated its true-up amounts and PGA Factor as shown in the Company's positions on Issue Nos. 1 through 6 below. The maximum levelized PGA Factor based on the Company's expected winter cost of gas is 1.71261 dollars per therm after the regulatory assessment fees. FCG submits that this is the appropriate maximum levelized PGA Factor 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.

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 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. (*FCG witness Bustos*)

Issue No. 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 is an under-recovery of \$13,464,473. *See* FCG Exhibit MB-2, Schedule E-4. (*FCG witness Bustos*)

Issue No. 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. (*FCG witness Bustos*)

Issue No. 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 \$1.70404 per therm before the regulatory assessment fees, and \$1.71261 per therm after the regulatory assessment fees. *(FCG witness Bustos)*

Issue No. 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. *(FCG witness Bustos)*

Issue No. 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. *(FCG witness Bustos)*

Issue No. 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. (*FCG witness Bustos*)

5. **STIPULATED ISSUES**

FCG is not a party to or 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 7th day of October 2022.



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

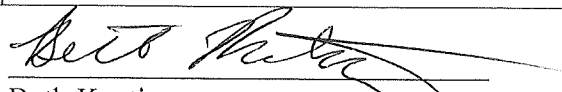
Christopher T. Wright
Fla. Auth. House Counsel No. 1007055
Florida Power & Light Company
700 Universe Boulevard (JB/LAW)
Juno Beach, Florida 33408

Attorneys for Florida City Gas

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of Florida City Gas's Prehearing Statement has been furnished by Electronic Mail to the following parties of record this 7th day of October 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 (22e) Richard Gentry/Patricia A. Christensen c/o The Florida Legislature 111 W. Madison Street, Room 812 Tallahassee FL 32399-1400 (850) 488-9330 christensen.patty@leg.state.fl.us gentry.richard@leg.state.fl.us <i>For Office of Public Counsel</i></p>
<p>Ausley Law Firm (22a) J. Wahlen/M. Means/V. Ponder P.O. Box 391 Tallahassee FL 32302 (850) 224-9115 (850) 222-7560 jwahlen@ausley.com mmeans@ausley.com vponder@ausley.com <i>For Peoples Gas System</i></p>	<p>Andy Shoaf/Debbie Stitt P. O. Box 549 Port St. Joe FL 32457-0549 (850) 229-8216 (850) 229-8392 andy@stjoegas.com dstitt@stjoegas.com <i>For St. Joe Natural Gas Company, Inc.</i></p>
<p>Paula Brown Regulatory Affairs P.O. Box 111 Tampa FL 33601-0111 (813) 228-1444 (813) 228-1770 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>	<p>Mr. Mike Cassel 208 Wildlight Ave. Yulee FL 32097 (904) 491-4361 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>


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