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October 6, 2023

**BY E-PORTAL**

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

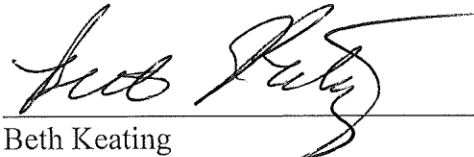
*Re: Docket No. 20230003-GU –Purchased Gas Adjustment (PGA) True-Up.*

Dear Mr. Teitzman:

Attached for electronic filing, please find 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

**BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION**

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

Docket No. 20230003-GU

Filed: October 6, 2023

**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-2023-0089-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:

<b>Witness</b>	<b>Subject Matter</b>	<b>Issue No.</b>
<b>Direct</b>		
Miguel Bustos	Supports FCG’s final Purchased Gas Adjustment (“PGA”) true-up amount related to the twelve-month period ended December 31, 2022.	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 2023 through December 2023; supports FCG’s request for Commission approval of a 2024 PGA Factor for the period of January 1, 2024 through December 31, 2024; and presents the development of the proposed maximum 2024 PGA Factor.	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:

<b>Witness</b>	<b>Proffered By</b>	<b>Exhibit No.</b>	<b>Description</b>	<b>Issue #</b>
Miguel Bustos	FCG	MB-1	Calculation of FCG's final PGA true-up amount related to the twelve-month period ended December 31, 2022	1
Miguel Bustos	FCG	MB-2	Commission prescribed forms supporting calculation of FCG's Actual/Estimated True-Up amount for the current period January 2023 through December 2023 and FCG's proposed 2024 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 2024 PGA Factor based on the Company's expected winter cost of gas is \$0.84816 per therm after the regulatory assessment fees. FCG submits that this is the appropriate maximum levelized 2024 PGA Factor for application to Sales Customers' bills beginning the first billing cycle in January 2024 through the last billing cycle in December 2024 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 1:** What are the final purchased gas adjustment true-up amounts for the period January 2022 through December 2022?

**Florida City Gas:** The final net true-up amount (including interest, adjustments, and the estimated under-recovery included in the 2023 PGA Factor) for the period January 2022 through December 2022 is an over-recovery of \$8,998,019. *See* FCG Exhibit MB-1, Line 7. (*FCG witness Bustos*)

**ISSUE 2:** What are the actual/estimated purchased gas adjustment true-up amounts for the period January 2023 through December 2023?

**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 2023 through December 2023 is an is an under-recovery of \$10,477,497. *See* FCG Exhibit MB-2, Schedule E-4. (*FCG witness Bustos*)

**ISSUE 3:** What are the total purchased gas adjustment true-up amounts to be collected during the period January 2024 through December 2024?

**Florida City Gas:** The total net true-up (inclusive of the final true-up for 2022, the Actual/Estimated True-Up for 2023, and interest) to be collected from January 2024 through December 2024 is an under-recovery of \$1,479,478. *See* FCG Exhibit MB-2, Schedule E-4. (*FCG witness Bustos*)

ISSUE 4: What are the levelized purchased gas cost recovery (cap) factors for the period January 2024 through December 2024?

**Florida City Gas:** The maximum levelized 2024 purchased gas cost recovery (cap) factors based on the Company's expected winter cost of gas is \$0.84391 per therm before the regulatory assessment fees, and \$0.84816 per therm after the regulatory assessment fees. See FCG Exhibit MB-2, Schedule E-1 Winter, lines 42-45. (*FCG witness Bustos*)

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 2024 through the last billing cycle in December 2024 and continuing until modified by subsequent order of the Commission. (*FCG witness Bustos*)

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. (*FCG witness Bustos*)

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. (*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 6th day of October 2023:



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Tallahassee, Florida 32301

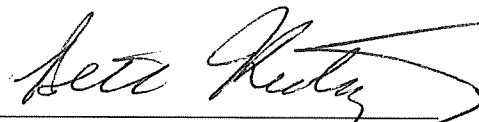
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Fla. Auth. House Counsel No. 1007055  
Florida Power & Light Company  
700 Universe Boulevard (JB/LAW)  
Juno Beach, Florida 33408

*Attorneys for Florida City Gas*

**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that a true and correct copy of the foregoing has been furnished by electronic or US Mail to the following parties of record this 6th day of October 2023:

<p>Florida Public Utilities Company Mike Cassel 208 Wildlight Ave. Yulee FL 32097 <a href="mailto:mcassel@fpuc.com">mcassel@fpuc.com</a></p> <p>Michelle D. Napier 1635 Meathe Drive West Palm Beach FL 33411 <a href="mailto:mnapier@fpuc.com">mnapier@fpuc.com</a></p>	<p>Office of Public Counsel c/o The Florida Legislature 111 West Madison Street, Room 812 Tallahassee, FL 32399-1400 <a href="mailto:christensen.patty@leg.state.fl.us">christensen.patty@leg.state.fl.us</a> <a href="mailto:rehwinkel.charles@leg.state.fl.us">rehwinkel.charles@leg.state.fl.us</a> <a href="mailto:wessling.mary@leg.state.fl.us">wessling.mary@leg.state.fl.us</a></p>
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*Attorney for Florida City Gas*