

Writer's E-Mail Address: bkeating@gunster.com

October 6, 2023

VIA E-PORTAL

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

Re: Docket No. 20230004-GU – Natural Gas Conservation Cost Recovery

Dear Mr. Teitzman:

Attached for filing in the above-referenced docket, please find Florida Public Utilities Company's Prehearing Statement.

Should you have any questions whatsoever, please do not hesitate to contact me. Thank you for your assistance in this matter.

Sincerely,



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

MEK

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

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

Docket No. 20230004-GU
 Filed: October 6, 2023

PREHEARING STATEMENT OF FLORIDA PUBLIC UTILITIES COMPANY

In accordance with Order No. PSC-2023-0087-PCO-GU, issued February 15, 2023, Florida Public Utilities Company (“FPUC”) hereby submits its Prehearing Statement:

a. All Known Witnesses

<u>Witness</u>	<u>Subject Matter</u>	<u>Issues</u>
Derrick M. Craig	True Up for 2022 and Actual/Estimated True-up for 2023; cost recovery factors for 2024; effective date ¹	Issues 1-8

b. All Known Exhibits

<u>Exhibit Number</u>	<u>Witness</u>	<u>Description</u>	<u>Issues</u>
DMC-1	Derrick M. Craig	True-Up Variance Analysis [Schedules CT1-CT6]	1
DMC-2	Derrick M. Craig	Projections: Estimated ECCR charges by rate class [Schedules C-1 through C-4]	2-7

¹ Errata submitted August 25, 2023.

c. Statement of Basic Position

The Commission should approve FPUC's final net true-up for the period January through December, 2022, the estimated true-up for the period January through December, 2023, and the projected conservation program expenses and recovery factors for the period January through December, 2024.

d. Position on the Issues

ISSUE 1. What are the final conservation cost recovery adjustment true-up amounts for the period January 2022 through December 2022?

FPUC: The actual adjusted end of period total true up amount was an over-recovery of \$956,051.

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

FPUC: The projected true-up for the period January 2023 through December 2023 is an over-recovery of \$555,104.

ISSUE 3: What are the appropriate total conservation adjustment true-up amounts to be collected/refunded from January 2024 through December 2024?

FPUC: The projected net true-up is an over-recovery of \$1,511,155 to be refunded.

ISSUE 4. What are the total conservation cost recovery amounts to be collected during the period January 2024 through December 2024?

FPUC: A total of \$3,304,245 remains to be recovered during the period January 1, 2024 through December 31, 2024.

ISSUE 5. What are the conservation cost recovery factors for the period January 2024 through December 2024?

<u>Rate Class</u>	<u>Adjustment Factor (dollars per therm)</u>
Residential - 1; Residential Transportation - 1 (≤ 100 Therms)	0.13035
Residential - 2; Residential Transportation - 2 ($100 < \leq 250$ Therms)	0.06657
Residential - 3; Residential Transportation - 3 (> 250 Therms)	0.03655
Residential Standby Generator	0.14743
General Service - 1; GS Transportation - 1 ($\leq 1,000$ Therms)	0.06735
General Service - 2; GS Transportation - 2 ($1,000 < \leq 5,000$ Therms)	0.03100
General Service - 3; GS Transportation - 3 ($5,000 < \leq 10,000$ Therms)	0.02701
General Service - 4; GS Transportation - 4 ($10,000 < \leq 50,000$ Therms)	0.02392
General Service - 5; GS Transportation - 5 ($50,000 < \leq 250,000$ Therms)	0.01808
General Service - 6; GS Transportation - 6 ($250,000 < \leq 500,000$ Therms)	0.01680
General Service - 7; GS Transportation - 7 ($500,000 < \leq 1,000,000$ Therms)	0.01377
General Service - 8 - A; GS Transportation - 8 - A ($1,000,000 < \leq 1,500,000$ Therms)	0.01304
General Service - 8 - B; GS Transportation - 8 - B ($1,500,000 < \leq 2,000,000$ Therms)	0.01215

General Service - 8 - C; GS Transportation - 8 - C (<i>> 2,000,000 < = 4,000,000 Therms</i>)	0.00690
General Service - 8 - D; GS Transportation - 8 - D (<i>> 4,000,000 Therms</i>)	0.00568
Commercial - NGV; Comm - NGV Transportation	0.01590
Commercial Standby Generator	0.16326

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?

FPUC: Yes. The Commission should approve revised tariffs reflecting the natural gas conservation cost recovery amounts and establishing gas 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

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

FPUC: The factors should be effective beginning with the specified conservation cost recovery cycle and thereafter for the period January 2024 through December 2024. Billing cycles may start before January 1, 2024 and the last cycle may be read after December 31, 2024, so that each customer is billed for twelve months regardless of when the adjustment factor became effective.

ISSUE 8: Should this docket be closed?

FPUC: Recognizing that this is an ongoing cost recovery docket, this docket should remain open with a new docket number assigned for the following year.

e. Stipulated Issues

While not a party to stipulations at this time, the Consolidated Companies believe that it should be possible to reach a stipulation on each of the issues as they pertain to the Consolidated Companies.

f. Pending Motions

None.

g. Pending Confidentiality Claims or Requests

None.

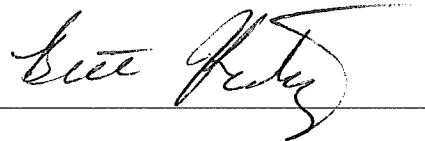
h. Objections to Witness Qualifications as an Expert

None.

i. Compliance with Order No. 2023-0087-PCO-GU

FPUC believes that this Prehearing Statement fully complies with all requirements of the Order Establishing Procedure entered in this docket.

RESPECTFULLY SUBMITTED this 6th day of October, 2023.



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

*Attorneys for Florida Public Utilities
Company*

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 6th day of October, 2023:

Florida Public Utilities Company Mike Cassel/Michelle Napier Florida Public Utilities Company 1635 Meathe Drive West Palm Beach, Florida 33411 mcassel@fpuc.com michelle.napier@fpuc.com	J. Jeffry Wahlen Malcolm Means Virginia Ponder Ausley & McMullen P.O. Box 391 Tallahassee, FL 32302 jwahlen@ausley.com mmeans@ausley.com vponder@ausley.com
Florida Public Service Commission Timothy Sparks 2540 Shumard Oak Boulevard Tallahassee, FL 32399 tsparks@psc.state.fl.us	Office of Public Counsel Walter Trierweiler/Charles Rehwinkel/Patricia Christensen//M. Wessling c/o The Florida Legislature 111 West Madison Street, Room 812 Tallahassee, FL 32399-1400 christensen.patty@leg.state.fl.us Rehwinkel.Charles@leg.state.fl.us Wessling.Mary@leg.state.fl.us
Peoples Gas System Paula Brown/Karen Bramley/Nora Bordine P.O. Box 111 Tampa, FL 33601-0111 regdept@tecoenergy.com klbramley@tecoenergy.com nmbordine@tecoenergy.com	St. Joe Natural Gas Company, Inc. Mr. Andy Shoaf/Debbie Stitt P.O. Box 549 Port St. Joe, FL 32457-0549 andy@stjoegas.com dstitt@stjoegas.com
Florida Power & Light Company Christopher T. Wright 700 Universe Boulevard Juno Beach, FL 33408 Christopher.Wright@fpl.com	Sebring Gas System, Inc. Jerry H. Melendy, Jr. 3515 U.S. Highway 27 South Sebring, FL 33870 jmelendy@floridasbestgas.com



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