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August 22, 2024

**VIA: ELECTRONIC FILING**

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

Re: Docket No. 20240004-GU  
Peoples Gas System, Inc.– Natural gas conservation cost recovery

Dear Mr. Teitzman:

Attached for filing in the above docket is Peoples Gas System, Inc.'s Preliminary List of Issues and Positions.

Thank you for your assistance in connection with this matter.

Sincerely,

A handwritten signature in blue ink that reads 'V. Ponder'.

Virginia Ponder

VLP/ne  
Attachment

cc: All parties of record

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Natural Gas Conservation Cost )  
Recovery. )  
\_\_\_\_\_ )

DOCKET NO. 20240004-GU

FILED: August 22, 2024

**PEOPLES GAS SYSTEM'S  
PRELIMINARY LIST OF ISSUES AND POSITIONS**

Peoples Gas System, Inc. ("PGS") by its undersigned attorneys, submits the following Preliminary List of the 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 2023 through December 2023?

PGS: \$840,690 over-recovery.

**ISSUE 2:** What are the appropriate total conservation adjustment actual/estimated true-up amounts for the period January 2024 through December 2024?

PGS: \$2,324,526 under-recovery.

**ISSUE 3:** What are the appropriate total conservation adjustment true-up amounts to be collected/refunded from the period January 2025 through December 2025?

PGS: A collection of \$1,483,836.

**ISSUE 4:** What are the total conservation cost recovery amounts to be collected during the period January 2025 through December 2025?

PGS: A collection of \$37,821,603.

**ISSUE 5:** What are the conservation cost recovery factors for the period January 2025 through December 2025?

PGS:

**Rate Schedule**

**Cost Recovery Factors (per therm)**

RS & RS-SG & RS-GHP	\$0.17732
SGS	\$0.11074
GS-1 & CS-SG & CS-GHP	\$0.05851
GS-2	\$0.04497
GS-3	\$0.03793
GS-4	\$0.02739

GS-5 \$0.01918  
CSLS \$0.03822

**ISSUE 6:** Should the Commission approve revised tariffs reflecting the natural gas conservation cost recovery factors determined to be appropriate in this proceeding?

PGS: Yes, the Commission should approve revised tariffs reflecting the natural gas 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?

PGS: The factors should be effective beginning with the specified conservation cost recovery cycle and thereafter for the period January 2025 through December 2025. Billing cycles may start before January 1, 2025, and the last cycle may be read after December 31, 2025, so that each customer is billed for 12 months regardless of when the factor became effective.

**ISSUE 8:** Should this docket be closed?

PGS: Yes, Docket No. 20240004-GU should be closed once the Commission's decisions on all the issues in the docket have become final and the Commission has concluded that the docket has otherwise met the requirements for closure.

DATED this 22nd day of August 2024.

Respectfully submitted,



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ATTORNEYS FOR PEOPLES GAS SYSTEM, INC.

**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that a true and correct copy of the foregoing has been furnished by electronic mail this 22nd day of August 2024, to the following:

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