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August 22, 2024

VIA E-PORTAL

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

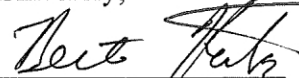
Re: Docket No. 20240004-GU – Natural Gas Conservation Cost Recovery

Dear Mr. Teitzman:

Attached for filing in the above-referenced docket, please find the Joint Preliminary Statement of Issues and Positions of Florida Public Utilities Company and Florida City Gas.

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

Sincerely,



Beth Keating
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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. 20240004-GU
Filed: August 22, 2024

**CONSOLIDATED PRELIMINARY STATEMENT OF ISSUES AND POSITIONS FOR
FLORIDA PUBLIC UTILITIES COMPANY AND FLORIDA CITY GAS**

Pursuant to Order No. PSC-2024-0030-PCO-GU, issued February 6, 2024, establishing the hearing procedures and controlling dates in this docket, Florida Public Utilities Company (“FPUC”) and Florida City Gas (“FCG”) (jointly, “Companies”) hereby submit their Joint Preliminary Statement of Issues:

ISSUE 1. What are the final conservation cost recovery adjustment true-up amounts for the period January 2023 through December 2023?

FPUC: The actual adjusted end of period total true up amount was an under-recovery of \$239,390.

FCG: The actual adjusted end of period total true up amount was an under-recovery of \$161,423.

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

COMPANIES: The projected true-up for the period January 2024 through December 2024 is an over-recovery of \$512,828.

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

COMPANIES: The projected net true-up is an over-recovery of \$112,015 to be refunded.

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

COMPANIES:: A total of \$11,435,110 remains to be recovered during the period January 1, 2025 through December 31, 2025.

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

FPUC:

<u>Rate Class</u>	<u>Adjustment Factor (dollars per them)</u>
Residential - 1; Residential Transportation -	0.23352 (<= 100 Therms)
Residential - 2; Residential Transportation -	0.12933 (> 100<=250 Therms)
Residential - 3; Residential Transportation -	0.07241 (>250 Therms)
Residential Standby Generator	0.26598
General Service - 1; GS Transportation -	0.11003 (<=1,000 Therms)
General Service - 2; GS Transportation -	0.05653 (> 1,000<=5,000 Therms)
General Service - 3; GS Transportation -	0.04941 (> 5,000 <= 10,000 Therms)
General Service - 4; GS Transportation -	0.04376 (> 10,000 < 50,000 Therm)
General Service - 5; GS Transportation -	0.03305 (> 50,000 <= 250,000 Therms)
General Service - 6; GS Transportation -	0.03080 (> 250,000 <= 500,000Therm)
General Service - 7; GS Transportation -	0.02520 (> 500,000 <= 1,000,000 Therm)
General Service - 8 - A; GS Transportation -	0.02415 (> 1,000,000 <= 1,500,000 Therm)
General Service - 8 - B; GS Transportation -	0.02218 (> 1,500,000 <= 2,000,000
General Service - 8 - C; GS Transportation -	0.01262 (> 2,000,000 <= 4,000,000 Therm)
General Service - 8 - D; GS Transportation -	0.01035 (> 4,000,000 Therms)
Commercial - NGV; Comm - NGV Transportation -	0.02907

Commercial Standby Generator - 0.31940

FCG:

<u>Rate Class</u>	<u>Adjustment Factor (dollars per therm)</u>
RS-1	\$0.25141
RS-100	\$0.11554
RS-600	\$0.06816
GS-1	\$0.04592
GS-6K	\$0.03291
GS-25K	\$0.03059
Gas Lights	\$0.03615
GS-120K	\$0.02165
GS-1250K	\$0.01252
GS-11M – GS-25M	\$0.00000

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?

COMPANIES 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?

COMPANIES: 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 twelve months regardless of when the adjustment factor became effective.

ISSUE 8: Should this docket be closed?

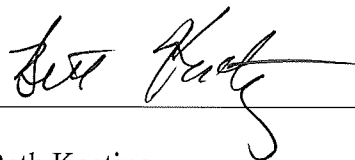
COMPANIES: Recognizing that this is an ongoing cost recovery docket, this docket should remain open with a new docket number assigned for the following year.

Company-specific Issue (FCG and FPUC)

ISSUE 9: Should FPUC and FCG be authorized to consolidate their natural gas conservation costs and recovery amounts?

COMPANIES: Yes. The Companies should be allowed to consolidate their gas conservation functions, as well as the costs incurred by each entity, to then be allocated across each company's separate rate schedules based on the share of base revenues each rate provides to the Companies.

RESPECTFULLY SUBMITTED this 22nd day of August, 2024.



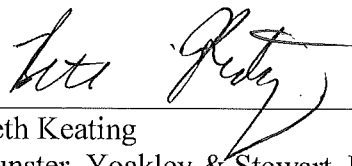
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*Attorneys for Florida Public Utilities
Company and Florida City Gas*

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 22nd day of August, 2024:

Michelle D. Napier Director, Regulatory Affairs Distribution Florida Public Utilities Company 1635 Meathe Drive West Palm Beach, Florida 33411 W: (561) 838-1712 mnapier@fpuc.com Derrick Craig, Manager/Energy Conservation 208 Wildlight Ave Yulee, Florida 32097 dcraig@chpk.com	J. Jeffrey 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 discovery-gcl@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/ P.O. Box 111 Tampa, FL 33601-0111 regdept@tecoenergy.com klbramley@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
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