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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. 20240003-GU - Purchased Gas Adjustment (PGA) True Up.

Dear Mr. Teitzman:

Attached for filing, please find the Florida Public Utilities Company's and Florida City Gas's Joint Preliminary Statement of Issues and Positions.

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

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BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In Re: Purchased Gas Adjustment (PGA) True-up)))	Docket No. 2024 Filed: August 22	
			S AND FLORIDA CIT FISSUES AND POSIT	
	-	• ,	") and Florida City Ga	
jointly, "Companie	es") hereby submit th	is preliminar	y statement of issues and	positions:
<u>Issue 1:</u>	What are the final purchased gas adjustment true-up amounts for the period January 2023 through December 2023?			
Companies:	The final true-up amount for the period January 2023 through December 2023, including interest, is an over-recovery \$7,467,718. (FCG \$2,096,549 + FPUC \$5,571,169)			
<u>Issue 2:</u>	What are the actual/estimated purchased gas adjustment true-up amounts for the period January 2024 through December 2024?			
Companies:	The actual/estimated true up amount for 2024 is an expected under-recovery of \$4,156,132 inclusive of interest.			
Issue 3:	What are the total purchased gas adjustment true-up amounts to be collected (refunded) during the period January 2025 through December 2025?			
Companies:	In total, the Companies have calculated an over-recovery of \$3,311,586, to			

be refunded over the January – December 2025 period.

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<u>Issue 4:</u> What are the levelized purchased gas cost recovery (cap) factors for the

period January 2025 through December 2025?

Companies: The appropriate PGA factor is 100.15¢ per therm.

Issue 5: What should be the effective date of the new purchased gas adjustment

charge for billing purposes?

FPUC: The factors should be effective for all meter readings on or after January 1,

2025 and should apply for bills rendered for meter readings taken between

January 1, 2025 and December 31, 2025.

Issue 6: Should the Commission approve revised tariffs reflecting the new

purchased gas adjustment charges determined to be appropriate in this

proceeding?

FPUC: 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.

Issue 7: Should this docket be closed?

FPUC: This is a continuing cost recovery docket and should remain an active and

ongoing proceeding. As such, a new docket number should be established

annually to reflect the new calendar year.

Company-specific Issue (FCG and FPUC)

ISSUE 8: Should FPUC and FCG be authorized to consolidate their purchased gas costs and

recovery amounts?

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<u>COMPANIES</u>: Yes. The Companies should be allowed to consolidate their gas purchasing 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.

By:

Beth Keating

Gunster, Yoakley & Stewart, P.A. 215 South Monroe St., Suite 601

Tallahassee, FL 32301

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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:

Pl	T T. CC TV 11		
Florida Public Utilities Company	J. Jeffry Wahlen		
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