

**BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION**

In re: Natural Gas Conservation )  
Cost Recovery Clause. )  
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DOCKET NO. 20240004-GU  
FILED: October 9, 2024

**PREHEARING STATEMENT  
OF PEOPLES GAS SYSTEM, INC.**

**A. APPEARANCES:**

J. Jeffry Wahlen  
Malcolm N. Means  
Virginia Ponder  
Ausley McMullen  
123 S. Calhoun St.  
Tallahassee, Florida 32301-1517  
On behalf of Peoples Gas System, Inc. (“Peoples,” “PGS,” or the “company”)

**B. WITNESSES:**

<b>Witness</b>	<b>Subject Matter</b>	<b>Issue #</b>
<b>Direct</b>		
Charles T. Morgan II	Conservation Cost Recovery True-up and Projection	1-7

**C. EXHIBITS:**

<b>Witness</b>	<b>Proffered By</b>	<b>Exhibit #</b>	<b>Description</b>	<b>Issue #</b>
<b>Direct</b>				
Charles T. Morgan II	PGS	CTM-1, filed May 1, 2024	Schedules supporting cost recovery factor, actual January 2023 – December 2023	1
Charles T, Morgan II	PGS	CTM-2, filed August 1, 2024	Schedules supporting conservation costs projected for the period July 2024 – December 2025	2-7

**D. STATEMENT OF BASIC POSITION**

**PGS' Statement of Basic Position:**

The Commission should determine that the company has properly calculated its conservation cost recovery true-up and projections and the natural gas conservation cost recovery factors set forth in the testimony and exhibits of Witness Charles T. Morgan II for the period January 2025 through December 2025.

**E. STATEMENT OF 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:** An adjusted net true-up over-recovery of \$840,690, including interest. (Morgan)

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

**PGS:** An under-recovery of \$2,324,526, including interest. (Morgan)

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

**PGS:** A collection of \$1,483,836, including interest. (Morgan)

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

**PGS:** \$37,821,603, including current period estimated true-up. (Morgan)

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

PGS: For the period January 2025 through December 2025, the cost recovery factors are as follows:

<u>Rate Schedule</u>	<u>Cost Recovery Factors</u> <u>(Dollars per Therm)</u>
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

(Morgan)

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

PGS: Yes. The Commission should approve revised tariffs reflecting the natural gas conservation cost recovery amounts determined to be appropriate in this proceeding. (Morgan)

**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 long as each customer is billed for 12 months regardless of when the factors became effective. (Morgan)

**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.  
(Morgan)

COMPANY-SPECIFIC CONSERVATION COST RECOVERY ISSUES

Peoples has no company-specific conservation cost recovery issues as of this date.

**F. STIPULATED ISSUES**

The company is not aware of any stipulated issues as of this date.

**G. PENDING MOTIONS**

The company is not aware of any pending motions as of this date.

**H. PENDING CONFIDENTIALITY CLAIMS OR REQUESTS**

The company has no pending confidentiality claims or requests as of this date.

**I. OBJECTIONS TO WITNESS QUALIFICATIONS AS AN EXPERT**

The company has no objections to any witness's qualifications as an expert in this proceeding.

**J. COMPLIANCE WITH ORDER ESTABLISHING PROCEDURE**

The company has complied with all requirements of the Order Establishing Procedure entered in this docket.

DATED this 9<sup>th</sup> day of October, 2024.

Respectfully submitted,



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J. Jeffrey Wahlen

[jwahlen@ausley.com](mailto:jwahlen@ausley.com)

Malcolm N. Means

[mmeans@ausley.com](mailto:mmeans@ausley.com)

Virginia Ponder

[vponder@ausley.com](mailto:vponder@ausley.com)

Ausley McMullen

P.O. Box 391

Tallahassee, Florida 32302

(850) 224-9115

ATTORNEYS FOR PEOPLES GAS SYSTEM, INC.

## CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing Prehearing Statement filed on behalf of Peoples Gas System, has been furnished by electronic mail this 9<sup>th</sup> day of October 2024, to the following:

Timothy Sparks  
Saad Farooqi  
Office of General Counsel  
Florida Public Service Commission  
Room 390L – Gerald L. Gunter Building  
2540 Shumard Oak Boulevard  
Tallahassee, FL 32399-0850  
[tsparks@psc.state.fl.us](mailto:tsparks@psc.state.fl.us)  
[sfarooqi@psc.state.fl.us](mailto:sfarooqi@psc.state.fl.us)  
[discovery-gcl@psc.state.fl.us](mailto:discovery-gcl@psc.state.fl.us)

Walt L. Trierweiler  
Charles J. Rehwinkel  
Patricia A. Christensen  
Mary A. Wessling  
Octavio Ponce  
Austin Watrous  
Office of Public Counsel  
111 West Madison Street – Room 812  
Tallahassee, FL 32399-1400  
[trierweiler.walt@leg.state.fl.us](mailto:trierweiler.walt@leg.state.fl.us)  
[rehwinkel.charles@leg.state.fl.us](mailto:rehwinkel.charles@leg.state.fl.us)  
[christensen.patty@leg.state.fl.us](mailto:christensen.patty@leg.state.fl.us)  
[wessling.mary@leg.state.fl.us](mailto:wessling.mary@leg.state.fl.us)  
[ponce.octavio@leg.state.fl.us](mailto:ponce.octavio@leg.state.fl.us)  
[watrous.austin@leg.state.fl.us](mailto:watrous.austin@leg.state.fl.us)

Charles A. Shoaf/ Debbie Stitt  
St. Joe Natural Gas Company  
P.O. Box 549  
Port St. Joe, FL 32457-0549  
[andy@stjoegas.com](mailto:andy@stjoegas.com)  
[dstitt@stjoegas.com](mailto:dstitt@stjoegas.com)

Beth Keating  
Gunster Law Firm  
215 South Monroe Street, Suite 601  
Tallahassee, FL 32301-1839  
[bkeating@gunster.com](mailto:bkeating@gunster.com)

Jerry H. Melendy, Jr.  
Sebring Gas System  
3515 Highway 27 South  
Sebring, FL 33870-5452  
[jmelendy@floridasbestgas.com](mailto:jmelendy@floridasbestgas.com)

Derrick Craig  
Florida Public Utilities Company  
Florida Division of Chesapeake Utilities  
208 Wildlight Ave  
Yulee, FL 32097  
[dcraig@chpk.com](mailto:dcraig@chpk.com)

Michelle D. Napier  
Florida Public Utilities Company  
1635 Meathe Drive  
West Palm Beach, Florida 33411  
[mnapier@fpuc.com](mailto:mnapier@fpuc.com)



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ATTORNEY