

Writer's E-Mail Address: [bkeating@gunster.com](mailto:bkeating@gunster.com)

October 10, 2025

**VIA E-PORTAL**

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


**Re: Docket No. 20250004-GU – Natural Gas Conservation Cost Recovery**

Dear Mr. Teitzman:

Attached for filing in the above-referenced docket, please find Florida City Gas's and Florida Public Utilities Company's Joint 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

**BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION**

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

Docket No. 20250004-GU  
Filed: October 10, 2025

**JOINT PREHEARING STATEMENT OF FLORIDA PUBLIC UTILITIES COMPANY  
AND FLORIDA CITY GAS**

Pursuant to Order No. PSC-2025-0051-PCO-GU, issued February 10, 2025, 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 Prehearing Statement:

a.     All Known Witnesses

| <u><b>Witness</b></u> | <u><b>Subject Matter</b></u>  | <u><b>Issues</b></u> |
|-----------------------|---|----------------------|
| Brian Goff            | True Up for 2024  | Issue 1              |
| Kira I. Lake          | Actual/Estimated True-Up for 2025; cost recovery factors for 2026; effective date | Issues 2-8           |

b. All Known Exhibits

| <u>Exhibit Number</u> | <u>Witness</u> | <u>Description</u>   | <u>Issues</u> |
|-----------------------|----------------|--|---------------|
| BG-1                  | Brian Goff     | True-Up Variance<br>Analysis [Schedules<br>CT1-CT6]                                    | 1             |
| KIL-1                 | Kira I. Lake   | Projections: Estimated<br>ECCR charges by rate<br>class [Schedules C-1<br>through C-4] | 2-8           |

c. Statement of Basic Position

The Commission should approve FPUC's and FCG's final net true-ups for the period January through December, 2024, the estimated true-up for the period January through December, 2025, and the projected conservation program expenses and recovery factors for each for the period January through December, 2026.

d. Position on the Issues

**ISSUE 1. What are the final conservation cost recovery adjustment true-up amounts for the period January 2024 through December 2024?**

COMPANIES: The actual adjusted end of period total true up amount was an under-recovery of \$528,102.

**ISSUE 2: What are the appropriate conservation adjustment actual/estimated true-up amounts for the period January 2025 through December 2025?**

COMPANIES: The projected true-up for the period January 2025 through December 2025 is an over-recovery of \$191,587.

**ISSUE 3: What are the appropriate total conservation adjustment true-up amounts to be collected/refunded from January 2026 through December 2026?**

COMPANIES: The projected net true-up is an under-recovery of \$336,515.

**ISSUE 4. What are the total conservation cost recovery amounts to be collected during the period January 2026 through December 2026?**

COMPANIES:: The total costs to be recovered during the projection period are \$13,478,965.

**ISSUE 5. What are the conservation cost recovery factors for the period January 2026 through December 2026?**

**FPUC:**

| <b><u>Rate Class</u></b>                      | <b><u>Adjustment Factor (dollars per therm)</u></b> |
|---|---|
| Residential - 1; Residential Transportation - | 0.26994 ( ≤ 100 Therms)                             |
| Residential - 2; Residential Transportation - | 0.16161 (> 100≤250 Therms)                          |
| Residential - 3; Residential Transportation - | 0.08628 (>250 Therms)                               |
| Residential Standby Generator                 | 0.31997   |
| General Service - 1; GS Transportation -      | 0.07538 (≤1,000 Therms)                             |
| General Service - 2; GS Transportation -      | 0.06409 (> 1,000≤5,000 Therms)                      |
| General Service - 3; GS Transportation -      | 0.05734 (> 5,000 ≤ 10,000 Therms)                   |
| General Service - 4; GS Transportation –      | 0.05100 (> 10,000 < 50,000 Therm)                   |
| General Service - 5; GS Transportation -      | 0.03856 (> 50,000 ≤ 250,000 Therms)                 |

|   |  |
|---|--|
| General Service - 6; GS Transportation –      | 0.03671 (> 2 5 0, 000 <= 5 00, 000Therm) |
| General Service - 7; GS Transportation -      | 0.02983 (> 500,000 <= 1,000,000 Therm)   |
| General Service - 8 - A; GS Transportation -  | 0.02943 (> 1,000,000 <= 1,500,000 Therm) |
| General Service - 8 - B; GS Transportation -  | 0.02578 (> 1,500,000 <= 2,000,000        |
| General Service - 8 - C; GS Transportation -  | 0.01695 (> 2,000,000 <= 4,000,000 Therm) |
| General Service - 8 - D; GS Transportation -  | 0.01211 (> 4,000,000 Therms)             |
| Commercial - NGV; Comm - NGV Transportation - | 0.03386                                  |
| Commercial Standby Generator -                | 0.25075                                  |

**FCG:**

| <b><u>Rate Class</u></b> | <b><u>Adjustment Factor (dollars per therm)</u></b> |
|--------------------------|---|
| RS-1                     | \$0.27092   |
| RS-100                   | \$0.13265   |
| RS-600                   | \$0.07705   |
| GS-1                     | \$0.05251   |
| GS-6K                    | \$0.03793   |
| GS-25K                   | \$0.03541   |
| Gas Lights               | \$0.05109   |
| GS-120K                  | \$0.02514   |
| GS-1250K                 | \$0.01478   |
| 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 2026 through December 2026. Billing cycles may start before January 1, 2026 and the last cycle may be read after December 31, 2026, 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.

e. Stipulated Issues

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

f. Pending Motions

None.

g. Pending Confidentiality Claims or Requests

None.

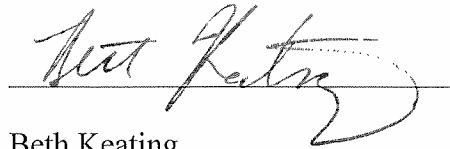
h. Objections to Witness Qualifications as an Expert

None.

i. Compliance with Order No. 2025-0051-PCO-GU

The Companies believe that this Joint Prehearing Statement fully complies with all requirements of the Order Establishing Procedure entered in this docket.

RESPECTFULLY SUBMITTED this 10<sup>th</sup> day of October, 2025.

A handwritten signature in black ink, appearing to read "Beth Keating", is written over a horizontal line.

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 and Florida City Gas*

October 10, 2025

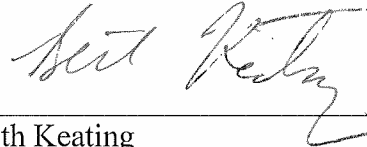
**CERTIFICATE OF SERVICE**

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 10th day of October, 2025:

|  |  |
|--|--|
| Florida Public Utilities Company<br>Michelle Napier<br>Florida Public Utilities Company<br>1635 Meathe Drive<br>West Palm Beach, FL 33411<br><a href="mailto:Michelle_napier@chpk.com">Michelle_napier@chpk.com</a>  | J. Jeffry Wahlen<br>Malcolm Means<br>Virginia Ponder<br>Matt Jones<br>Ausley & McMullen<br>P.O. Box 391<br>Tallahassee, FL 32302<br><a href="mailto:jwahlen@ausley.com">jwahlen@ausley.com</a><br><a href="mailto:mmeans@ausley.com">mmeans@ausley.com</a><br><a href="mailto:vponder@ausley.com">vponder@ausley.com</a><br><a href="mailto:mjones@ausley.com">mjones@ausley.com</a>   |
| Florida Public Service Commission<br>Saad Farooqi<br>Timothy Sparks<br>2540 Shumard Oak Boulevard<br>Tallahassee, FL 32399<br><a href="mailto:sfarooqi@psc.state.fl.us">sfarooqi@psc.state.fl.us</a><br><a href="mailto:tsparks@psc.state.fl.us">tsparks@psc.state.fl.us</a><br><a href="mailto:discovery-gcl@psc.state.fl.us">discovery-gcl@psc.state.fl.us</a> | Office of Public Counsel<br>Walter Trierweiler/Charles<br>Rehwinkel/Patricia Christensen/M.<br>Wessling/Octavio Ponce/Austin Watrous<br>c/o The Florida Legislature<br>111 West Madison Street, Room 812<br>Tallahassee, FL 32399-1400<br><a href="mailto:christensen.patty@leg.state.fl.us">christensen.patty@leg.state.fl.us</a><br><a href="mailto:Rehwinkel.Charles@leg.state.fl.us">Rehwinkel.Charles@leg.state.fl.us</a><br><a href="mailto:Wessling.Mary@leg.state.fl.us">Wessling.Mary@leg.state.fl.us</a> |
| Peoples Gas System<br>Paula Brown/Karen Bramley<br>P.O. Box 111<br>Tampa, FL 33601-0111<br><a href="mailto:regdept@tecoenergy.com">regdept@tecoenergy.com</a><br><a href="mailto:klbramley@tecoenergy.com">klbramley@tecoenergy.com</a>  | St. Joe Natural Gas Company, Inc.<br>Mr. Andy Shoaf/Debbie Stitt<br>P.O. Box 549<br>Port St. Joe, FL 32457-0549<br><a href="mailto:andy@stjoegas.com">andy@stjoegas.com</a><br><a href="mailto:dstitt@stjoegas.com">dstitt@stjoegas.com</a>  |



|  |  |
|--|--|
| Brian Goff, Manager/Sustainability and<br>Environmental Affairs<br>Chesapeake Utilities Corporation<br>208 Wildlight Ave.<br>Yulee, FL 32097<br><a href="mailto:bgoff@chpk.com">bgoff@chpk.com</a> | Sebring Gas System, Inc.<br>Jerry H. Melendy, Jr.<br>3515 U.S. Highway 27 South<br>Sebring, FL 33870<br><a href="mailto:jmelendy@floridasbestgas.com">jmelendy@floridasbestgas.com</a> |
|--|--|



---

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