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Diamond Williams

From:

Keating, Beth [BKeating@gunster.com]

Sent:

Wednesday, October 12, 2011 1:21 PM

To:

Filings@psc.state.fl.us

Cc:

Jennifer Crawford

Subject:

Docket No. 110004-GU

Attachments: 20111012131302892.pdf; Conservation Prehearing Statement (11).DOC

Attached for electronic filing, please find the Florida City Gas's Prehearing Statement in the referenced docket.

Beth Keating

Gunster, Yoakley & Stewart, P.A.

215 S. Monroe St., Suite 618
Tallahassee, FL 32301
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a. Person responsible for this electronic filing:

Beth Keating

Gunster, Yoakley & Stewart, P.A.

215 S. Monroe St., Suite 618 Tallahassee, FL 32301 bkeating@gunster.com
Direct Line: (850) 521-1706

- b. Docket No. 110004-GU In re: Natural Gas Conservation Cost Recovery.
- c. On behalf of: Florida City Gas
- d. There are a total of PDF filed: 6 pages.

Word file: 5 pages

e. Description: Prehearing Statement



Beth Keating | Attorney Governmental Affairs 215 S. Monroe Street, Suite 601 Tallahassee, FL 32301 P 850-521-1706 C 850-591-9228 gunster.com | View my bio

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October 12, 2011

VIA ELECTRONIC FILING - FILINGS@PSC.STATE.FL.US

Ms. Ann Cole Commission Clerk Florida Public Service Commision 2540 Shumard Oak Boulevard Tallahassee, FL 32399-0850

Re: Docket No. 110004-GU - Conservation Cost Recovery Clause

Dear Ms. Cole:

Attached for electronic filing, please find Florida City Gas's Prehearing Statement in the referenced docket. Also attached is a copy of the Prehearing Statement in Word format.

As always, thank you for your assistance with this filing, and please don't hesitate to let me know if you have any questions at all.

Sincerely,

Beth Keating

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

Tallahassee, FL 32301

(850) 521-1706

MEK

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Conservation Cost Recovery) [Docket	No. 1100	004-GI	J
Clause)) l	Filed:	October 1	12, 201	11
	•				

FLORIDA CITY GAS COMPANY'S PREHEARING STATEMENT

Pursuant to the requirements of the Order on Procedure, Order No. PSC-11-0121-PCO-GU, Florida City Gas hereby submits its Prehearing Statement.

A. **Known Witnesses**

Florida City Gas intends to offer the testimony of Carolyn Bermudez filed on May 3, 2011, and September 13, 2011.

Carolyn Bermudez (Direct)

Issues: 1-4

B. Known Exhibits

Florida City Gas intends to sponsor the following exhibits:

Bermudez (Direct)

CB-1

Schedules CT-1, CT-2, CT-3, and

CT-6

Bermudez (Direct) CB-2

Schedules C-1, C-2, C-3, and C-5

C. **Basic Position**

WPB_ACTIVE 4926054.1

The Company's true-up amounts and conservation cost recovery factors as shown in Issues 1 through 4 are appropriate and should be approved.

DOCUMENT NUMBER - DATE

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D. – F. Issues

1. What are the final conservation cost recovery true-up amounts for the period January 2010 through December 2010?

Florida City Gas: An under-recovery of \$1,383,906, including interest.

2. What are the total conservation cost recovery amounts to be collected during the period January 2012 through December 2012?

Florida City Gas: A total of \$5,858,620.

3. What are the conservation cost recovery factors for the period January 2012 through December 2012?

<u>Florida City Gas:</u> The appropriate factors are:

Rate Class	<u>Factor</u>
GS-1, GS-100, GS-220 (Sales & Transportation)	\$0.17120
GS-600 (Sales & Transportation)	\$0.09061
GS-1200 (Sales & Transportation)	\$0.05493
GS-6k (Sales & Transportation)	\$0.04551
GS-25000 (Sales & Transportation)	\$0.04526
GS-60000 (Sales & Transportation)	\$0.04425
Gas Lights	\$0.08821
GS-120000 (Sales & Transportation)	\$0.03161
GS-250000 (Sales & Transportation)	\$0.02966

4. What should be the effective date of the conservation cost recovery factors for billing purposes?

Florida City Gas:

The factors should be effective beginning with the specified conservation cost recovery cycle and thereafter for the period January 2012 through December 2012. Billing cycles may start before January 1, 2012 and the

last cycle may be read after December 31, 2012, so that each customer is billed for twelve months regardless of when the adjustment factor became effective.

G. Stipulated Issues

Florida City Gas is not a party to any stipulations at this time, although it believes that it should be possible to reach a stipulation on each of the above issues as they relate to Florida City Gas.

H. Pending Motions

Florida City Gas has no pending motions or other matters requiring attention at this time.

I. Pending Confidentiality Requests

None.

J. Compliance With Order on Procedure

Florida City Gas believes that this Prehearing Statement fully complies with the requirements of the Order on Procedure.

K. Objections to Witness Qualifications

Florida City Gas has no objection to the qualifications of any expert witness.

RESPECTFULLY SUBMITTED this 12th day of October, 2011.

Beth Keating

Gunster, Yoakley & Stewart, P.A. 215 South Monroe St., Suite 618

Tallahassee, FL 32301

(850) 521-1706

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing has been furnished by electronic mail or U.S. Mail to the following parties of record this 12th day of October, 2011:

Florida Public Utilities Company Cheryl Martin P.O. Box 3395 West Palm Beach, FL 33402-3395	MacFarlane Ferguson Law Firm Ansley Watson, Jr. P.O. Box 1531 Tampa, FL 33601-1531
Messer Law Firm Norman H. Horton, Jr. P.O Box 15579 Tallahassee, FL 32317	Office of Public Counsel J.R. Kelly/Patricia Christensen c/o The Florida Legislature 111 West Madison Street Room 812 Tallahassee, FL 32399-1400
Peoples Gas System Paula Brown P.O. Box 111 Tampa, FL 33601-0111	St. Joe Natural Gas Company, Inc. Mr. Stuart L. Shoaf P.O. Box 549 Port St. Joe, FL 32457-0549
TECO Energy, Inc. Javier Cuebas P.O. Box 111 Tampa, FL 33601-0111	AGL Resources Inc. Elizabeth Wade/David Weaver Ten Peachtree Place Location 1470 Atlanta, GA 30309
Florida City Gas Melvin Williams 933 East 25 th Street Hialeah, FL 33013-3498	Jennifer Crawford Florida Public Service Commission 2540 Shumard Oak Boulevard Tallahassee, FL 32399

DOCKET NO. 110004-GU PREHEARING STATEMENT

Florida Division of Chesapeake Utilities Corporation Thomas A. Geoffroy	
P.O. Box 960 Winter Haven, FL 33882-0960	
Sebring Gas System, Inc.	
Jerry H. Melendy, Jr. 3515 U.S. Highway 27 South	
Sebring, FL 33870	

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