FILED 9/14/2017 DOCUMENT NO. 07660-2017 FPSC - COMMISSION CLERK



Attorneys At Law Strategically Positioned in Florida's Capital

September 14, 2017

Via E-PORTAL

Ms. Carlotta S. Stauffer Commission Clerk Florida Public Service Commission 2540 Shumard Oak Boulevard Tallahassee, FL 32399-0850

Re: Docket 170004-GU

Dear Ms. Stauffer:

Enclosed for filing on behalf of Sebring Gas System Inc., is its Preliminary List of Issues and Positions.

Should you have any questions, please may contact me.

Sincerely, Paula M. Spa an

PMS/kc

cc: Jerry Melendy, Jr.

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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing Sebring Gas System's Preliminary List of Issues and Positions, has been served by Electronic Mail or Hand Delivery to the following parties of record this 14th day of September, 2017

Florida Public Utilities Company/Florida	MacFarlane Law Firm
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Peoples Gas System	St. Joe Natural Gas Company, Inc.
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Florida Public Service Commission	Sebring Gas System, Inc.
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Paula M. Sparkman

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BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Natural Gas Conservation Cost Recovery.

Docket No. 170004-GU Filed: September 14, 2017

PRELIMINARY LIST OF ISSUES AND POSITIONS FILED ON BEHALF OF SEBRING GAS SYSTEM INC.

Sebring Gas System, Inc. ("Sebring"), by and through its undersigned counsel, hereby

submits its List of Issues and Positions for its consolidated natural gas division as follows:

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Issue 1: What are the final conservation cost recovery adjustment true-up amounts for the January 2016 through December 2016?

Sebring's Position: \$8,491 (under-recovery).

Issue 2: What are the appropriate conservation adjustment actual/estimated true-up amounts for the period January 2017 through December 2017?

Sebring's Position: \$11,073 (under-recovery).

Issue 3: What are the appropriate total conservation adjustment true-up amounts to be collected/refunded from January 2018 through December 2018?

Sebring's Position: \$44,676

Issue 4: What is the total conservation cost recovery amounts to be collected during the period January 2018 through December 2018?

Sebring's Position: \$55,749

Issue 5: What are the conservation cost recovery factors for the period January 2018 through December 2018?

<u>Sebring's Position</u>: The appropriate factors are:

RATE CLASS:	<u>RATE/\$PER THERM</u>
TS-1	\$0.18218/therm
TS-2	\$0.08440/therm
TS-3	\$0.04943/therm
TS-4	\$0.04157/therm

- **Issue 6:** Should the Commission approve revised tariffs reflecting the natural gas conservation cost recovery amounts and establishing natural gas conservation cost recovery factors determined to be appropriate in this proceeding?
- <u>Sebring's Position</u>: Yes. The Commission should approve revised tariffs reflecting the natural gas cost recovery amounts and establishing natural gas conservation cost recovery factors as determined to be appropriate by the Commission.

Issue 7: What should be the effective date of the new conservation cost recovery factors for billing purposes?

Sebring's Position: The conservation cost recovery factors should be effective beginning with the specified conservation cost recovery period and thereafter for the period January 2018 through December 2018 and to billings thereafter until other conservation cost recovery factors are approved by the Commission. Billing cycles may start before January 1, 2018, and the last cycle may be read after December 31, 2018, so that each customer is billed for twelve months regardless of when the adjustment factor became effective.

Respectfully submitted this 14th day of September, 2017.

PAULA M. SPARKMAN, ESQ. MESSER CAPARELLO, P.A. Post Office Box 15579 Tallahassee, Florida 32317 <u>psparkman@lawfla.com</u> Phone: 850-222-0720

Attorney for Sebring Gas System, Inc.