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August 31, 2018

**BY E-PORTAL**

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

***Re: Docket No. 20180004-GU – Natural Gas Conservation Cost Recovery Clause***

Dear Ms. Stauffer:

Attached for filing, please find Florida City Gas' Preliminary Statement of Issues and Positions in the above-referenced docket.

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

MEK  
cc: Parties of Record

**BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION**

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

Docket No. 20180004-GU  
Filed: August 31, 2018

**FLORIDA CITY GAS'**  
**PRELIMINARY STATEMENT OF ISSUES AND POSITIONS**

The following is the preliminary statement of issues and positions filed on behalf of Florida City Gas:

ISSUE 1: What are the final conservation cost recovery adjustment true-up amounts for the period January 2017 through December 2017?

Florida City Gas: An over-recovery of \$166,106, calculated based upon an end-of-period net true up over-recovery of \$759,107.

ISSUE 2: What are the appropriate conservation adjustment actual/estimated true-up amounts for the period January 2018 through December 2018? [Current year true-up amount]

Florida City Gas: An over-recovery of \$430,115.

ISSUE 3: What are the appropriate total conservation adjustment true-up amounts to be collected/refunded from January 2019 through December 2019?

Florida City Gas: An over-recovery of \$596,281.

ISSUE 4: What are the total conservation cost recovery amounts, net of the true-up amount, to be collected during the period January 2019 through December 2019?

Florida City Gas: A total net amount of \$4,819,099.

ISSUE 5: What are the conservation cost recovery factors for the period January 2019 through December 2019?

Florida City Gas: The appropriate factors are:

<u>Rate Class</u>	<u>CCR Factor (\$/per therm)</u>
RS-1	\$0.19898
RS-100	\$0.11940
RS-600	\$0.07450
GS-1	\$0.04288
GS-6K	\$0.03263
GS-25K	\$0.03163
Gas Lights	\$0.05150
GS-120K	\$0.02108


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?

Florida City Gas: Yes. The Commission should approve revised tariffs reflecting the new energy conservation cost 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: What should be the effective date of the new 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 2019 through December 2019. Billing cycles may start before January 1, 2019 and the last cycle may be read after December 31, 2019, so that each customer is billed for twelve months regardless of when the adjustment factor became effective.

RESPECTFULLY SUBMITTED this 31st day of August, 2018.

  
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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing has been furnished by electronic or US Mail to the following parties of record this 31st day of August, 2018:

Florida Public Utilities Company/Florida Division of Chesapeake Utilities/Indiantown Mike Cassel Florida Public Utilities Company 1750 S 14th Street, Suite 200 Fernandina Beach FL 32034 <a href="mailto:mcassel@fpuc.com">mcassel@fpuc.com</a>	MacFarlane Ferguson Law Firm Ansley Watson, Jr. /Andrew Brown P.O. Box 1531 Tampa, FL 33601-1531 <a href="mailto:aw@macfar.com">aw@macfar.com</a> <a href="mailto:AB@macfar.com">AB@macfar.com</a>
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