FILED 8/31/2018 DOCUMENT NO. 05766-2018 FPSC - COMMISSION CLERK



Attorneys At Law Strategically Positioned in Florida's Capital

August 31, 2018

Via E-PORTAL

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

Re: Docket 20180004

Dear Ms. Stauffer:

Enclosed for filing is the Preliminary List of Issues and Positions Filed on Behalf of Sebring Gas System, Inc.

Should you have any questions, please may contact us.

Sincerely, L. Sumner

Legal Assistant to Paula M. Sparkman

/lls

Enclosure X:\psparkman\Sebring Gas Systems Inc\20180004-GU\Cover letters-correspondence\Ltr011018.clk 6.wpd

> Regional Center Office Park / 2618 Centennial Place / Tallahassee, Florida 32308 Mailing Address: P.O. Box 15579 / Tallahassee, Florida 32317 Main Telephone: (850) 222-0720 / Fax: (850) 224-4359

#### **BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION**

In re: Natural Gas Conservation Cost Recovery. Docket No. 180004-GU Filed: August 31, 2018

### 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:

)

)

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

Sebring's Position: \$3,246 (under-recovery).

**Issue 2:** What are the appropriate conservation adjustment actual/estimated true-up amounts for the period January 2018 through December 2018?

Sebring's Position: \$13,882 (under-recovery).

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

Sebring's Position: \$46,648

**Issue 4:** What are the total conservation cost recovery amounts to be collected during the period January 2019 through December 2019?

Sebring's Position: \$60,530

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

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

RATE CLASS:	RATE/\$PER THERM
TS-1	\$0.22380/therm
TS-2	\$0.08822/therm
TS-3	\$0.05791/therm
TS-4	\$0.04966/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 2019 through December 2019 and to billings thereafter until other conservation cost recovery factors are approved by the Commission. 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.

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.

Docket No. 20180004-GU

### **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 have been served by Electronic 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 1750 SW 14 <sup>th</sup> Street, Suite 200 Fernandina Beach, FL 32034 <u>mcassel@fpuc.com</u>	MacFarlane Law Firm Ansley Watson, Jr./Andrew Brown P.O. Box 1531 Tampa, FL 33601-1531 <u>aw@macfar.com</u> , <u>ab@macfar.com</u>
Gunster Law Firm Mr. Gregory M. Munson Ms. Beth Keating 215 South Monroe Street, Suite 601 Tallahassee, FL 32301 gmunson@gunster.com, bkeating@gunster.com	Office of Public Counsel J. R. Kelly/Charles Rehwinkel/Patricia Christensen c/o The Florida Legislature 111 West Madison Street, Rm 812 Tallahassee, FL 32399-1400 kelly.jr@leg.state.fl.us Rehwinkel.charles@leg.state.fl.us Christensen.Patty@leg.state.fl.us
Peoples Gas System Paula Brown/Kandi M. Floyd Regulatory Affairs P. O. Box 111 Tampa FL 33601 (813) 228-1444 +1-813-2281770 regdept@tecoenergy.com kfloyd@tecoenergy.com	Rachael Dziechciarz Florida Public Service Commission 2540 Shumard Oak Boulevard Tallahassee, FL 32399 rdziechc@psc.state.fl.us
St. Joe Natural Gas Company, Inc. Mr. Andy Shoaf P. O. Box 549 Port St. Joe FL 32457 <u>andy@stjoegas.com</u>	Florida City Gas Carolyn Bermudez/Miguel Bustos 4045 NW 97 <sup>th</sup> Avenue Doral, Florida 33178 <u>Carolyn.Bermudez@nexteraenergy.com</u> <u>Miguel.bustos@nexteraenergy.com</u>
Jerry H. Melendy, Jr. Sebring Gas System, Inc. 3515 U.S. Highway 27 South Sebring, FL 33870-5452 jmelendy@floridasbestgas.com	Florida Division of Chesapeake Utilities Corporation Mr. Mike Cassel 1750 S.W. 14th Street, Suite 200 Fernandina Beach FL 32034 (904) 491-4361 <u>mcassel@fpuc.com</u>

Christopher T. Wright Florida Power and Light 700 Universe Boulevard (LAW/JB) Juno, Beach, Florida 33408 <u>Christopher.Wright@fpl.com</u>

Paula M. Sparkman Messer Caparello, P.A. 2618 Centennial Place Tallahassee, FL 32308 850-222-0720 Psparkman@lawfla.com