

  
**MESSER CAPARELLO**  
Attorneys At Law  
*Strategically Positioned in Florida's Capital*

October 9, 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 Prehearing Statement filed on behalf of Sebring Gas System, Inc.

Should you have any questions, please may contact us.

Sincerely,

  
Lori L. Sumner

Legal Assistant to Paula M. Sparkman

/lls

Enclosure

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BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

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

Docket No. 180004-GU  
Filed: October 9, 2018

**SEBRING GAS SYSTEM INC.'S  
PREHEARING STATEMENT**

Sebring Gas System, Inc. ("Sebring"), by and through its undersigned counsel, submits its Prehearing Statement pursuant to Order No. PSC 2018-0115-PCO-GU in the above-styled docket.

**1. KNOWN WITNESSES**

<u>Witness</u>	<u>Subject Matter</u>	<u>Issues</u>
Jerry H. Melendy, Jr.	Conservation cost recovery factor	1 - 7

**2. EXHIBITS**

<u>Witness</u>	<u>Description</u>
Jerry H. Melendy	

① GO ahead & file & serve on all parties

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② The interrogatory responses will file as soon as we get back from Jerry.

**3. BASIC POSITIONS**

Sebring's position is that the conservation adjustment true-up amounts for the period January 2017 through December 2017 are \$3,246 (under-recovery) and the conservation adjustment true-up amounts for the period January 2018 through December 2018 are \$3,246 (under-recovery).

**4. STATEMENT OF ISSUES AND POSITIONS**

**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?

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?**

Sebring's Position: The appropriate factors are:

<u>RATE CLASS:</u>	<u>RATE/\$PER THERM</u>
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?**

Sebring's Position: 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.

**5. STIPULATED ISSUES**

None.

**6. PENDING MOTIONS**

None.

**7. PENDING CLAIMS OF CONFIDENTIALITY**

None.

**8. OBJECTIONS TO EXPERT WITNESS QUALIFICATIONS**

None

**9. REQUEST FOR SEQUESTRATION OF WITNESS**

No.

**10. ANY REQUIREMENT THAT CANNOT BE COMPLIED WITH**

None.

Respectfully submitted this 9th day of October, 2018.



PAULA M. SPARKMAN, ESQ.

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Attorney for Sebring Gas System, Inc.

Docket No. 180004-GU

**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that a true and correct copy of the foregoing Sebring Gas System's PREHEARING STATEMENT has been served by Electronic Mail to the following parties of record this 9th day of October, 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 <a href="mailto:mcassel@fpuc.com">mcassel@fpuc.com</a>	MacFarlane 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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