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August 29, 2019

VIA E-PORTAL FILING

Mr. Adam J. Teitzman
Commission Clerk
Florida Public Service Commission
2540 Shumard Oak Boulevard
Tallahassee, Florida 32399-0850

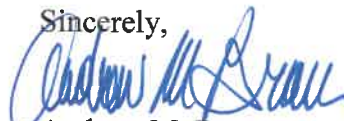
Re: Docket No. 20190004-GU - Natural gas conservation recovery

Dear Mr. Teitzman:

Attached for electronic filing in the above docket on behalf of Peoples Gas System, please find their Preliminary List of Issues and Positions.

Thank you for your assistance.

Sincerely,


Andrew M. Brown

AB/plb
Attachment

cc: Parties of Record
Mr. Mark R. Roche
Ansley Watson, Jr., Esq.

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Natural Gas Conservation Cost)
Recovery.)
_____)

DOCKET NO. 20190004-GU

FILED: August 29, 2019

**PEOPLES GAS SYSTEM'S
PRELIMINARY LIST OF ISSUES AND POSITIONS**

Peoples Gas System ("PGS" or "the company"), hereby submits its Preliminary List of the Issues and Positions to be taken up at the hearing scheduled to commence on November 5, 2019 in the above docket.

GENERIC CONSERVATION COST RECOVERY ISSUES

ISSUE 1: What are the final conservation cost recovery adjustment true-up amounts for the period January 2018 through December 2018?

Peoples Gas System's Position: An under-recovery of \$4,237,501, including interest.
(Witness: Roche)

ISSUE 2: What are the appropriate total conservation adjustment actual/estimated true-up amounts for the period January 2019 through December 2019?

Peoples Gas System's Position: An over-recovery of \$1,478,754, including interest.
(Witness: Roche)

ISSUE 3: What are the appropriate total conservation adjustment true-up amounts to be collected/refunded from the period January 2020 through December 2020?

Peoples Gas System's Position: A collection of \$2,758,747, including interest. (Witness: Roche)

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

Peoples Gas System's Position: \$19,577,952. (Witness: Roche)

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

Peoples Gas System's Position: For the period January 2019 through December 2019 the cost recovery factors are as follows:

<u>Rate Schedule</u>	<u>Cost Recovery Factors</u> <u>(Dollars per Therm)</u>
RS & RS-SG & RS-GHP	0.10948
SGS	0.06692
GS-1 & CS-SG & CS-GHP	0.03278
GS-2	0.02387
GS-3	0.01977
GS-4	0.01459
GS-5	0.01073
NGVS	0.02149
CSLS	0.01727

(Witness: Roche)

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?

Peoples Gas System's Position: Yes, the Commission should approve revised tariffs reflecting the natural gas conservation cost recovery factors determined to be appropriate in this proceeding. (Witness: Roche)

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

Peoples Gas System's Position: The factors should be effective beginning with the specified conservation cost recovery cycle and thereafter for the period January 2020 through December 2020. Billing cycles may start before January 1, 2020, and the last cycle may be read after December 31, 2020, so that each customer is billed for 12 months regardless of when the factor became effective. (Witness: Roche)

ISSUE 8: Should this docket be closed.

Peoples Gas System's Position: Yes, Docket No. 20190004-GU should be closed once the Commission's decisions on all of the issues in the docket have become final and the Commission has concluded that the docket has otherwise met the requirements for closure.

DATED this 29th day of August 2019.

Respectfully submitted,



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ATTORNEYS FOR PEOPLES GAS SYSTEM

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing Petition, filed on behalf of Peoples Gas System, has been furnished by electronic mail on this 29th day of August, 2019, to the following:

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