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October 8, 2019

### **ELECTRONIC PORTAL**

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

## Re: Docket No. 20190003-GU – Purchased Gas Adjustment (PGA) True-up.

Dear Mr. Teitzman:

Attached for electronic filing, please find the **FLORIDA PUBLIC UTILITIES COMPANY-FORT MEADE'S PREHEARING STATEMENT**, 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

Greg Munson 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**

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In re: Purchased Gas Adjustment (PGA) True-up

Docket No. 20190003-GU

Filed: October 8, 2019

## FLORIDA PUBLIC UTILITIES COMPANY AND FLORIDA PUBLIC UTILITIES COMPANY-FORT MEADE'S PREHEARING STATEMENT

Pursuant to the requirements of the Order on Procedure, Order No. PSC-2019-0081-PCO-GU, issued February 26, 2019, Florida Public Utilities Company and Florida Public Utilities Company-Fort Meade (jointly, "FPUC") hereby submits its Prehearing Statement.

A. <u>Appearances</u>

Beth Keating Gunster, Yoakley & Stewart, P.A. 215 South Monroe St., Suite 601 Tallahassee, FL 32301 (850) 521-1706 On behalf of Florida Public Utilities Company

#### B. Known Witnesses

FPUC intends to offer the direct testimony of Derrick M. Craig, as filed on May 1, 2019, and Michelle Napier's and Jacob Case's direct testimonies, filed on August 9, 2019.

Derrick M. Craig	Issue 1
Michelle D. Napier	Issues 3 – 6
Jacob E. Case	Issues 3 and 4

### C. Known Exhibits

FPUC intends to sponsor the following exhibits:

Craig	DMC-1	Final Fuel Over/Under Recovery (Schedule A-	
		7)	
Napier	MDN-1	Schedules E-1, E-1/R, E-2, E-3, E-4, E-5	

## D. <u>Basic Position</u>

FPUC has appropriately calculated its true-up amounts and purchased gas adjustment factor as shown in the Company's positions on Issues 1-6 and asks that the Commission approve the Company's proposed PGA Factor for 2020.

### E. –G <u>Issues</u>

FPUC's positions on the issues identified for hearing are as follows:

Issue 1:	What are the final purchased gas adjustment true-up amounts for the period January 2018 through December 2018?	
FPUC:	An under-recovery of \$2,621,657, inclusive of interest.	
Issue 2:	What are the actual/estimated purchased gas adjustment true-up amounts for the period January 2019 through December 2019?	
FPUC:	An over-recovery of \$3,375,203, inclusive of interest.	
Issue 3:	What are the total purchased gas adjustment true-up amounts to be collected (refunded) during the period January 2020 through December 2020?	
FPUC:	An over-recovery of \$753,546 to be refunded.	
Issue 4:	What are the levelized purchased gas cost recovery (cap) factors for the period January 2020 through December 2020?	
FPUC:	The appropriate PGA factor is 100.946¢ cents per therm.	
Issue 5:	What should be the effective date of the new purchased gas adjustment charge for billing purposes?	
FPUC:	The factors should be effective for all meter readings on or after January 1, 2020 and should apply for bills rendered for meter readings taken between January 1, 2020 and December 31, 2020.	
<u>Issue 6:</u>	Should the Commission approve revised tariffs reflecting the new purchased gas adjustment charges determined to be appropriate in this proceeding?	
FPUC:	Yes. The Commission should approve revised tariffs reflecting the new purchased gas adjustment 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.

G. <u>Stipulated Issues</u>

While not a party to stipulations at this time, FPUC believes that it should be possible to reach a stipulation on each of the issues as they pertain to FPUC.

H. <u>Pending Motions</u>

None at this time.

- I. <u>Pending Confidentiality Requests</u> None.
- J. <u>Compliance With Order on Procedure</u>

Florida Public Utilities Company has fully complied with the requirements of the Order on Procedure, Order No. PSC-2019-0081-PCO-GU.

K. Objections to Witness Qualifications

Florida Public Utilities Company has no objection to the qualifications of any expert witness.

RESPECTFULLY SUBMITTED this 8th day of October, 2019.

the

Beth Keating Gunster, Yoakley & Stewart, P.A. 215 South Monroe St., Suite 601 Tallahassee, FL 32301 (850) 521-1706 Attorneys for Florida Public Utilities Company

# **CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that a true and correct copy of the foregoing has been furnished by Electronic Mail to the following parties of record this 8th day of October, 2019:

Mike CasselAnsley Watson, Jr./Andrew Brown1750 S 14th Street, Suite 200P.O. Box 1531Fernandina Beach, FL 32034Tampa, FL 33601-1531mcassel@fpuc.comAB@macfar.comKurt Schrader, EsquireOffice of Public CounselFlorida Public Service CommissionCharles Rehwinkel/Patricia Christensen2540 Shumard Oak BoulevardCharles Rehwinkel/Patricia ChristensenTallahassee, FL 32399111 West Madison Street, Room 812Kschrade@psc.state.fl.usTallahassee, FL 32399-1400Rehwinkel.Charles@leg.state.fl.usChristensen.Patty@leg.state.fl.usPeoples Gas SystemSt. Joe Natural Gas Company, Inc.Paula Brown/Kandi FloydP.O. Box 549Po. Box 111Port St. Joe, FL 32457-0549Tampa, FL 33601-0111Port St. Joe, FL 32457-0549Pedept@teccenergy.comAndy@stjoegas.comFlorida City GasChristopher T. WrightCarolyn BermudezSenior AttorneyVo45 NW 97th AvenueFlorida City GasDoral, Florida 33178700 Universe Boulevard (JB/LAW)Quarter, Yoakley & Stewart, P.A.Juno Beach, Florida 33408Christopher.Wright@fpl.comGreg MunsonGunster, Yoakley & Stewart, P.A.And215 South Monroe St., Suite 601Tallahassee, FL 32301	Florida Public Utilities Company	
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