Diamond Williams

From:

Keating, Beth [BKeating@gunster.com]

Sent:

Wednesday, October 12, 2011 1:28 PM

To:

Filings@psc.state.fl.us

Cc:

Jennifer Crawford

Subject:

Docket No. 110003

Attachments: 20111012131345003.pdf; Prehearing Statement PGA 2011.DOC

Attached for electronic filing, please find the Florida Public Utilities Company's Prehearing Statement.

Please don't hesitate to contact me if you have any questions.

Beth Keating

Gunster, Yoakley & Stewart, P.A.

215 S. Monroe St., Suite 618 Tallahassee, FL 32301 bkeating@gunster.com Direct Line: (850) 521-1706

a. Person responsible for this electronic filing:

Beth Keating

Gunster, Yoakley & Stewart, P.A.

215 S. Monroe St., Suite 618 Tallahassee, FL 32301 bkeating@gunster.com Direct Line: (850) 521-1706

- b. Docket No. 110003-GU In re: Purchased Gas Adjustment (PGA) True-Up.
- c. On behalf of: Florida Public Utilities Company
- d. There are a total of pdf file: 5 pages.

Word file: 4 pages.

e. Description: Prehearing Statement



Beth Keating | Attorney Governmental Affairs 215 S. Monroe Street, Suite 601 Tallahassee, FL 32301 P 850-521-1706 C 850-591-9228 gunster.com | View my bio

Tax Advice Disclosure: To ensure compliance with requirements imposed by the IRS under Circular 230, we inform you that any U.S. federal tax advice contained in this

communication (including any attachments), unless otherwise specifically stated, was not intended or written to be used, and cannot be used, for the purpose of (1) avoiding penalties under the Internal Revenue Code or (2) promoting, marketing or recommending to another party any matters addressed herein. Click the following hyperlink to view the complete Gunster IRS Disclosure & Confidentiality note.

http://www.gunster.com/terms-of-use/



Writer's Direct Dial Number: (850) 521-1706 Writer's E-Mail Address: bkeating@gunster.com

October 12, 2011

VIA ELECTRONIC FILING - FILINGS@PSC.STATE.FL.US

Ms. Ann Cole Commission Clerk Florida Public Service Commision 2540 Shumard Oak Boulevard Tallahassee, FL 32399-0850

Re: Docket No. 110003-GU - Purchased Gas Adjustment (PGA) True Up.

Dear Ms. Cole:

Attached for electronic filing, please find Florida Public Utilities Company's Prehearing Statement in the referenced docket. Also attached is a copy of the Prehearing Statement in Word format.

As always, thank you for your assistance with this filing, and please don't hesitate to let me know if you have any questions at all.

Sincerely,

Beth Keating

Gunster, Yoakley & Stewart, P.A. 215 South Monroe St., Suite 601

Tallahassee, FL 32301

(850) 521-1706

MEK

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Purchased Gas Adjustment)	Docket No. 110003-GU
(PGA) True-up	.)	
)	Filed: October 12, 2011

FLORIDA PUBLIC UTILITIES COMPANY'S PREHEARING STATEMENT

Pursuant to the requirements of the Order on Procedure, Order No. PSC-11-0120-PCO-GU, Florida Public Utilities Company ("FPUC") hereby submits its Prehearing Statement.

A. Known Witnesses

Florida Public Utilities intends to offer the direct testimony of Curtis D. Young dated May 3, 2011, as well as the testimony of Cheryl M. Martin, dated September 14, 2011.

Curtis D. Young

Issue 1

Cheryl M. Martin

Issues 2 - 6

B. Known Exhibits

Florida Public Utilities Company intends to sponsor the following exhibits:

Young

CDY-11

Final Fuel Over/Under Recovery (Schedule A-

7)

Martin

CMM-1

Schedules E-1 Winter, E-1, E-1/R, E-2,

E-3, E-4, E-5

C. Basic Position

FPUC has appropriately calculated its true-up amounts and purchased gas adjustment factor as shown in the Company's positions on Issues 1-6.

D. - F. Issues

FPUC's positions on the issues identified by Staff are as follows:

,

{TL260149;1} WPB_ACTIVE 4926107.1 DOCUMENT NUMBER - DATE

07479 OCT 12 =

¹ Amended August 1, 2011.

Docket No. 110003-GU

Page 2

<u>Issue 1:</u> What are the final purchased gas adjustment true-up amounts for the period

January 2010 through December 2010?

FPUC: An under-recovery of \$2,562,014.

Issue 2: What are the actual/estimated purchased gas adjustment true-up amounts for

the period January 2011 through December 2011?

FPUC: An over-recovery of \$2,151,001.

Issue 3: What are the total purchased gas adjustment true-up amounts to be collected

during the period January 2012 through December 2012?

FPUC: An under-recovery of \$411,013.

Issue 4: What are the appropriate levelized purchased gas cost recovery (cap) factors

for the period January 2012 through December 2012?

FPUC: The appropriate PGA factor is 79.064 cents per therm, which includes

additional capacity costs included in the Company's 2012 projections and reflecting anticipated additional upstream supply and capacity to serve new

customers in 2012 in Nassau County.

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,

2012 and should apply for bills rendered for meter readings taken between

January 1, 2012 and December 31, 2012.

Issue 6: What changes, if any, should be made to improve the reporting mechanism

related to monthly PGA reporting as established in Order No. 24463?

FPUC: FPUC agrees with Commission Staff's preliminary position that invoices

need not be submitted, but merely retained for audit purposes. FPUC also agrees that elimination of the monthly flex down notice would be

appropriate.

Docket No. 110003-GU Page 3

G. Stipulated Issues

None at this time.

H. Pending Motions

None at this time.

I. Pending Confidentiality Requests

Notice of Intent submitted October 10, 2011, with Request pending filing on or before October 30, 2011.

J. Compliance With Order on Procedure

Florida Public Utilities Company has fully complied with the requirements of the Order on Procedure, Order No. PSC-11-0120-PCO-GU.

K. Objections to Witness Qualifications

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

RESPECTFULLY SUBMITTED this 12th day of October, 2011.

Beth Keating

Gunster, Yoakley & Stewart, P.A. 215 South Monroe St., Suite 601

Tallahassee, FL 32301

(850) 521-1706

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing has been furnished by electronic mail or U.S. Mail* to the following parties of record this 12th day of October, 2011:

Florida Public Utilities Company	MacFarlane Ferguson Law Firm	
Thomas A. Geoffroy	Ansley Watson, Jr.	
P.O. Box 3395	P.O. Box 1531	
West Palm Beach, FL 33402-3395	Tampa, FL 33601-1531	
Charles A. Costin *	Office of Public Counsel	
Costin and Costin Law Firm	J.R. Kelly/Patricia Christensen	
P.O. Box 98	c/o The Florida Legislature	
Port Saint Joe, FL 32457-1159	111 West Madison Street	
	Room 812	
	Tallahassee, FL 32399-1400	
People Gas System	St. Joe Natural Gas Company, Inc.	
Paula Brown	Mr. Stuart L. Shoaf	
P.O. Box 111	P.O. Box 549	
Tampa, FL 33601-0111	Port St. Joe, FL 32457-0549	
TECO Energy, Inc.	AGL Resources Inc.	
Javier Cuebas	Elizabeth Wade/David Weaver	
P.O. Box 111	Ten Peachtree Place	
Tampa, FL 33601-0111	Location 1470	
•	Atlanta, GA 30309	
Florida City Gas	Jennifer Crawford	
Melvin Williams	Florida Public Service Commission	
933 East 25 th Street	2540 Shumard Oak Boulevard	
Hialeah, FL 33013-3498	Tallahassee, FL 32399	

Beth Keating

Gunster, Yoakley & Stewart, P.A. 215 South Monroe St., Suite 601

Tallahassee, FL 32301

(850) 521-1706