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August 29, 2019

BY E-PORTAL

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

Re: Docket No. 20190004-GU – Natural Gas Conservation Cost Recovery Clause

Dear Mr. Teitzman:

Attached for filing, please find Sebring Gas System's Preliminary Statement of Issues and Positions.

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
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215 South Monroe St., Suite 601
Tallahassee, FL 32301
(850) 521-1706

MEK
cc: Parties of Record

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Natural Gas Conservation Cost
Recovery

Docket No. 20190004-GU
Filed: August 29, 2019

**SEBRING GAS SYSTEM, INC.'S
PRELIMINARY STATEMENT OF ISSUES AND POSITIONS**

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

Sebring: Final adjusted true up amount for the period is an under-recovery of \$346.

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

Sebring: The appropriate actual/estimated true up for the period, net of the prior period adjustment, is an under-recovery of \$1,332.

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

Sebring: The appropriate amount is an under-recovery of \$1,678.

ISSUE 4: What are the total conservation cost recovery amounts, net of the true-up amount, to be collected during the period January 2020 through December 2020?

Sebring: The projected conservation costs for January 2020 through December 2020 are projected to be \$57,293, which results in a total amount of \$58,971 to be recovered during the period January 2020 through December 2020.

ISSUE 5: What are the conservation cost recovery factors for the period January 2020 through December 2020?

Sebring: Sebring's proposed conservation cost recovery factors for 2020 are:

TS-1	\$.19137
TS-2	\$.08583

TS-3	\$0.05070
TS-4	\$0.04358

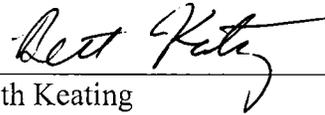
ISSUE 6: Should the Commission approve revised tariffs reflecting the natural gas conservation cost recovery amounts and establishing natural gas conservation cost recovery factors determined to be appropriate in this proceeding?

Sebring: Yes. The Commission should approve revised tariffs reflecting the new energy conservation cost 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.

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

Sebring: The new conservation cost recovery factors should be effective for all meter readings on or after January 1, 2020 and should apply to bills rendered for meter readings taken between January 1, 2020 and December 31, 2020.

Respectfully submitted this 29th day of August, 2019.



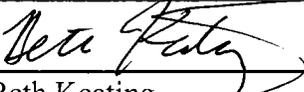
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Attorneys for Sebring Gas System, Inc.

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing has been furnished by electronic or US Mail to the following parties of record this 29th day of August, 2019:

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