



**GUNSTER**  
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October 1, 2021

**E-Portal**

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

**Re: Docket No. 20210003-GU - Purchased gas adjustment (PGA) true-up.**

Dear Mr. Teitzman:

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

*s/Beth Keating*  
Beth Keating  
Gunster, Yoakley & Stewart, P.A.  
215 South Monroe St., Suite 601  
Tallahassee, FL 32301  
(850) 521-1706

MEK

cc: Parties of Record  
PSC Staff (Word-Version)

**BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION**

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

Docket No. 20210003-GU

Filed: October 1, 2021

**FLORIDA PUBLIC UTILITIES COMPANY AND FLORIDA PUBLIC UTILITIES  
COMPANY-FORT MEADE’S PREHEARING STATEMENT**

Pursuant to the requirements of the Order Establishing Procedure, Order Nos. PSC-2021-0084-PCO-GU, issued on February 19, 2021 and PSC-2021-0084A-PCO-GU, Amendatory Order, issued on March 22, 2021, as further amended by PSC-2021-0207-PCO-GU, issued June 7, 2021, Florida Public Utilities Company and Florida Public Utilities Company-Fort Meade (jointly, “FPUC”) hereby submit their Prehearing Statement.

A. Appearances

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 3, 2021, and Witness Craig’s and Jeffrey B. Bates’s direct testimonies, filed on August 6, 2021.

Derrick M. Craig	Issue 1
Derrick M. Craig	Issues 3 – 6, 7
Jeffrey B. Bates	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)	Issue 1
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Craig                      DMC-2                      Schedules E-1, E-1/R, E-2, E-3, E-4, E-5                      Issues 3-6

D. 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 and asks that the Commission approve the Company's proposed PGA Factor for 2022.

E. –G Issues

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 2020 through December 2020?

FPUC:                      An under-recovery of \$3,199,135, inclusive of interest.

Issue 2:                      What are the actual/estimated purchased gas adjustment true-up amounts for the period January 2021 through December 2021?

FPUC:                      An over-recovery of \$5,120,126, inclusive of interest.

Issue 3:                      What are the total purchased gas adjustment true-up amounts to be collected (refunded) during the period January 2022 through December 2022?

FPUC:                      An over-recovery of \$1,920,991 remains to be refunded.

Issue 4:                      What are the levelized purchased gas cost recovery (cap) factors for the period January 2022 through December 2022?

FPUC:                      The appropriate PGA factor is 105.04¢ 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, 2022 and should apply for bills rendered for meter readings taken between January 1, 2022 and December 31, 2022.

Issue 6: 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

Issue 7: Should this docket be closed?

FPUC: This is an ongoing proceeding; however, upon the conclusion of this year's proceeding, this docket should be closed, and a new docket should be opened to address cost recovery for 2022.

G. Stipulated Issues

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. Pending Motions

None at this time.

I. Pending Confidentiality Requests

None.

J. Compliance With Order on Procedure

Florida Public Utilities Company has fully complied with the requirements of Order Nos. PSC-2021-0084-PCO-GU, issued on February 19, 2021 and PSC-2021-0084A-PCO-GU, Amendatory Order, issued on March 22, 2021, as further amended by PSC-2021-0207-PCO-GU.

K. Objections to Witness Qualifications

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

RESPECTFULLY SUBMITTED this 1<sup>st</sup> day of October, 2021.

*s/Beth Keating*

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 1st day of October, 2021:

<p>Florida Public Utilities Company Mike Cassel 208 Wildlight Ave. Yulee FL 32097 <a href="mailto:mcassel@fpuc.com">mcassel@fpuc.com</a></p>	<p>MacFarlane Ferguson Law Firm Andrew Brown/Thomas R. Farrior P.O. Box 1531 Tampa, FL 33601-1531 <a href="mailto:AB@macfar.com">AB@macfar.com</a> <a href="mailto:trf@macfar.com">trf@macfar.com</a></p>
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<p>Peoples Gas System Paula Brown/Kandi Floyd/Karen Bramley P.O. Box 111 Tampa, FL 33601-0111 <a href="mailto:regdept@tecoenergy.com">regdept@tecoenergy.com</a> <a href="mailto:kfloyd@tecoenergy.com">kfloyd@tecoenergy.com</a> <a href="mailto:KLBramley@tecoenergy.com">KLBramley@tecoenergy.com</a></p>	<p>St. Joe Natural Gas Company, Inc. Andy Shoaf Debbie Stitt P.O. Box 549 Port St. Joe, FL 32457-0549 <a href="mailto:Andy@stjoegas.com">Andy@stjoegas.com</a> <a href="mailto:dstitt@stjoegas.com">dstitt@stjoegas.com</a></p>
<p>Christopher T. Wright Fla. Auth. House Counsel No. 1007055 Florida Power &amp; Light Company 700 Universe Boulevard (JB/LAW) Juno Beach, Florida 33408 <a href="mailto:Christopher.Wright@fpl.com">Christopher.Wright@fpl.com</a></p>	

*s/Beth Keating* \_\_\_\_\_

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