



GUNSTER
ATTORNEYS AT LAW

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October 1, 2021

VIA E-PORTAL

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

Re: Docket No. 20210004-GU – Natural Gas Conservation Cost Recovery

Dear Mr. Teitzman:

Attached for electronic filing in the above-referenced docket, please find Sebring Gas System, Inc.'s Prehearing Statement.

Thank you for your assistance with this filing. As always, please don't hesitate to let me know if you have any questions or concerns.

Sincerely,

s/Beth Keating
Beth Keating
Gunster, Yoakley & Stewart, P.A.
215 South Monroe St., Suite 601
Tallahassee, FL 32301
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MEK

Cc: (Parties of Record)
PSC Staff (Word)

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Natural Gas Conservation Cost Recovery

Docket No. 20210004-GU
Filed: October 1, 2021

**SEBRING GAS SYSTEM, INC.’S
PREHEARING STATEMENT**

Sebring Gas System, Inc. (“Sebring”) hereby submits this Prehearing Statement pursuant to Order Establishing Procedure, Order No. PSC-2021-0076-PCO-GU, issued February 10, 2021, as amended by Order No. PSC-2021-0209-PCO-GU and Order No. PSC-2021-0339-PCO-GU, and states as follows:

a. All Known Witnesses

<u>Witness</u>	<u>Subject Matter</u>	<u>Issues</u>
Jerry H. Melendy	True Up for 2020	Issue 1

Jerry H. Melendy	Actual/Estimated True-up Amount for 2021; cost recovery factors for 2022; effective date	Issues 2 – 7
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b. All Known Exhibits

<u>Exhibit Number</u>	<u>Witness</u>	<u>Description</u>	<u>Issue</u>
JHM-1	Jerry Melendy	True-Up Variance Analysis [Schedules CT1-CT6]	1
JHM-2	Jerry Melendy	Projections: Estimated ECCR charges by rate class [Schedules C-1 through C-4]	2-7

c. Statement of Basic Position

The Commission should approve Sebring’s respective final net true-ups for the period January through December 2020, the estimated true-up for the period January through December, 2021, and the projected conservation program expenses and recovery factors for the period January through December, 2022.

d. Position on the Issues

ISSUE 1: What are the final conservation cost recovery adjustment true-up amounts for the period January 2020 through December 2020?

Sebring: Final adjusted true up amount for the period is an under-recovery of \$12,927.

ISSUE 2: What are the appropriate conservation adjustment actual/estimated true-up amounts for the period January 2021 through December 2021?

Sebring: The appropriate actual/estimated true up for the period, net of the prior period adjustment, is an under-recovery of \$19,460.

ISSUE 3: What are the appropriate total conservation adjustment true-up amounts to be collected/refunded from January 2022 through December 2022?

Sebring: The appropriate amount is an under-recovery of \$32,387.

ISSUE 4: What are the total conservation cost recovery amounts, net of the true-up amount, to be collected during the period January 2022 through December 2022?

Sebring: The projected conservation costs for January 2021 through December 2021 are projected to be \$27,433, which results in a total amount of \$59,820 to be recovered during the period January 2022 through December 2022.

ISSUE 5: What are the conservation cost recovery factors for the period January 2022 through December 2022?

Sebring: Sebring’s proposed conservation cost recovery factors for 2022 are:

TS-1	\$.20867
TS-2	\$.09056

TS-3	\$.05580
TS-4	\$.04914

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, 2022 and should apply to bills rendered for meter readings taken between January 1, 2022 and December 31, 2022.

ISSUE 8: Should this docket be closed?

Sebring: Recognizing that this is an ongoing cost recovery docket, this docket should be closed after the time for filing an appeal has run, and a new docket should be opened for gas conservation cost recovery in 2022.

e. Stipulated Issues

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

f. Pending Motions

None.

g. Pending Confidentiality Claims or Requests

None.

h. Objections to Witness Qualifications as an Expert

None.

i. Compliance with Order No. 2021-0076-PCO-GU

Docket No. 20210004-GU

Sebring believes that this Prehearing Statement fully complies with all requirements of the Order Establishing Procedure entered in this docket.

Respectfully submitted this 1st day of October, 2021.

s/Beth Keating
Beth Keating
Gunster, Yoakley & Stewart, P.A.
215 South Monroe St., Suite 601
Tallahassee, FL 32301

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 1st day of October, 2021:

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s/Beth Keating

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