



FILED 8/25/2023  
DOCUMENT NO. 04968-2023  
FPSC - COMMISSION CLERK

Attorneys and Counselors at Law  
123 South Calhoun Street  
P.O. Box 391 32302  
Tallahassee, FL 32301

P: (850) 224-9115  
F: (850) 222-7560

[ausley.com](http://ausley.com)

August 25, 2023

**VIA: ELECTRONIC FILING**

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

Re: Docket No. 20230004-GU  
Peoples Gas System – Natural gas conservation cost recovery

Dear Mr. Teitzman:

Attached for filing in the above docket is Peoples Gas System, Inc.'s Preliminary List of Issues and Positions.

Thank you for your assistance in connection with this matter.

Sincerely,

A handwritten signature in blue ink that reads 'V. Ponder'.

Virginia Ponder

VLP/ne  
Attachment

cc: All parties of record

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Natural Gas Conservation Cost )  
Recovery. )  
\_\_\_\_\_ )

DOCKET NO. 20230004-GU

FILED: August 25, 2023

**PEOPLES GAS SYSTEM, INC.'S  
PRELIMINARY LIST OF ISSUES AND POSITIONS**

Peoples Gas System, Inc. ("PGS") by its undersigned attorneys, submits the following Preliminary List of the Issues and Positions:

**GENERIC CONSERVATION COST RECOVERY ISSUES**

**ISSUE 1:** What are the final conservation cost recovery adjustment true-up amounts for the period January 2022 through December 2022?

PGS: \$1,970,805 under-recovery.

**ISSUE 2:** What are the appropriate total conservation adjustment actual/estimated true-up amounts for the period January 2023 through December 2023?

PGS: \$10,460,672 under-recovery.

**ISSUE 3:** What are the appropriate total conservation adjustment true-up amounts to be collected/refunded from the period January 2024 through December 2024?

PGS: A collection of \$12,431,477.

**ISSUE 4:** What are the total conservation cost recovery amounts to be collected during the period January 2024 through December 2024?

PGS: A collection of \$44,755,074.

**ISSUE 5:** What are the conservation cost recovery factors for the period January 2024 through December 2024?

PGS:

<b><u>Rate Schedule</u></b>	<b><u>Cost Recovery Factors (per therm)</u></b>
RS & RS-SG & RS-GHP	\$0.21579
SGS	\$0.12933
GS-1 & CS-SG & CS-GHP	\$0.06667
GS-2	\$0.05036

GS-3	\$0.04243
GS-4	\$0.03134
GS-5	\$0.02183
CSLS	\$0.04347

**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?**

PGS: Yes, the Commission should approve revised tariffs reflecting the natural gas conservation cost recovery factors determined to be appropriate in this proceeding.

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

PGS: The factors should be effective beginning with the specified conservation cost recovery cycle and thereafter for the period January 2023 through December 2023. Billing cycles may start before January 1, 2023, and the last cycle may be read after December 31, 2023, so that each customer is billed for 12 months regardless of when the factor became effective.

**ISSUE 8: Should this docket be closed?**

PGS: Yes, Docket No. 20230004-GU should be closed once the Commission's decisions on all the issues in the docket have become final and the Commission has concluded that the docket has otherwise met the requirements for closure.

DATED this 25th day of August 2023.

Respectfully submitted,

---

JEFF WAHLEN  
jwahlen@ausley.com  
MALCOLM N. MEANS  
mmeans@ausley.com  
VIRGINIA PONDER  
virginia@ausley.com  
Ausley McMullen  
Post Office Box 391  
Tallahassee, FL 32302  
(850) 224-9115  
ATTORNEYS FOR PEOPLES GAS SYSTEM, INC.

**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that a true and correct copy of the foregoing Preliminary List of Issues and Positions, filed on behalf of Peoples Gas System, Inc. has been furnished by electronic mail this 25<sup>th</sup> day of August 2023, to the following:

Timothy Sparks  
Carlos Marquez  
Office of General Counsel  
Florida Public Service Commission  
Room 390L – Gerald L. Gunter Building  
2540 Shumard Oak Boulevard  
Tallahassee, FL 32399-0850  
[tsparks@psc.state.fl.us](mailto:tsparks@psc.state.fl.us)  
[cmarquez@psc.state.fl.us](mailto:cmarquez@psc.state.fl.us)

Walt L. Trierweiler  
Charles J. Rehwinkel  
Patricia A. Christensen  
Mary A. Wessling  
Office of Public Counsel  
111 West Madison Street – Room 812  
Tallahassee, FL 32399-1400  
[trierweiler.walt@leg.state.fl.us](mailto:trierweiler.walt@leg.state.fl.us)  
[rehwinkel.charles@leg.state.fl.us](mailto:rehwinkel.charles@leg.state.fl.us)  
[christensen.patty@leg.state.fl.us](mailto:christensen.patty@leg.state.fl.us)  
[wessling.mary@leg.state.fl.us](mailto:wessling.mary@leg.state.fl.us)

Jerry H. Melendy, Jr.  
Sebring Gas System  
3515 Highway 27 South  
Sebring, FL 33870-5452  
[jmelendy@floridasbestgas.com](mailto:jmelendy@floridasbestgas.com)

Charles A. Shoaf/ Debbie Stitt  
St. Joe Natural Gas Company  
P.O. Box 549  
Port St. Joe, FL 32457-0549  
[andy@stjoegas.com](mailto:andy@stjoegas.com)  
[dstitt@stjoegas.com](mailto:dstitt@stjoegas.com)

Christopher T. Wright  
Florida Power & Light Company  
700 Universe Boulevard (LAW/JB)  
Juno Beach, FL 33408-0420  
[Christopher.Wright@fpl.com](mailto:Christopher.Wright@fpl.com)

Beth Keating  
Gunster Law Firm  
215 South Monroe Street, Suite 601  
Tallahassee, FL 32301-1839  
[bkeating@gunster.com](mailto:bkeating@gunster.com)

Mike Cassel/ Derrick Craig  
Florida Public Utilities Company  
Florida Division of Chesapeake Utilities  
208 Wildlight Ave  
Yulee, FL 32097  
[mcassel@fpuc.com](mailto:mcassel@fpuc.com)  
[dcraig@chpk.com](mailto:dcraig@chpk.com)

Michelle D. Napier  
Florida Public Utilities Company  
1635 Meathe Drive  
West Palm Beach, Florida 33411  
[mnapier@fpuc.com](mailto:mnapier@fpuc.com)



\_\_\_\_\_  
ATTORNEY