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# FCG's Response to Staff's First Set of Interrogatories, No. 1

Florida City Gas Docket No: 20210003 Staff's First Set of Interrogatories Interrogatory No: 1

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#### QUESTION:

Paragraph 6 of the petition filed on May 3, 2021 and Exhibit MB-1 states that the company had an over recovery of \$500,185 for the period January through December 2020. Referring to witness Bustos' direct testimony on page 3, lines 22-23 refers to an under-recovery of \$1,067,888 for the period January through December 2020 and on page 4, lines 5-6 refers to an estimated under-recovery of \$1,568,073 for the period January through December 2020. Please confirm if the above statements are correct.

#### RESPONSE:

The over recovery of \$500,185 stated in paragraph 6 of FCG's petition filed on May 3, 2021 is correct. The actual under recovery for the period January 2020 to December 2020, which is based on 12 months of actual data, is \$1,067,888. The current 2021 PGA Factors include an estimated 2020 under recovery of \$1,568,073, which was based on 6 months actual data and 6 months estimated data. See In re: Purchased gas adjustment (PGA) true-up, Order No. PSC-2020-0471-FOF-GU, Docket No. Docket No. 20200003-GU (FPSC Nov. 23, 2020). The difference between the estimated 2020 under recovery of \$1,568,073 currently being recovered in the 2021 PGA Factors and the actual 2020 under recovery of \$1,067,888 is an over recovery of \$500,185. This over-recovery will be refunded to customers in the 2022 PGA Factors.

### **DECLARATION**

I sponsored the answers to Interrogatory No. 1 from STAFF'S FIRST SET OF INTERROGATORIES (NO. 1) to Florida City Gas in Docket No. 20210003-GU. The responses are true and correct based on my personal knowledge. Under penalties of perjury, I declare that I have read the foregoing declaration and the interrogatory answers identified above, and that the facts stated therein are true.

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Miguel Bustos		

Date: 08/23/2021