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March 22, 1996

Ms. Blanca S. Bayo, Director
Division of Records and Reporting
Florida Public Service Commission
2540 Shumard Oak Boulevard, Rm. 110
Tallahassee, FL 32399-0850

Re: Amendment to Docket No. ~~950003-GU~~, Purchased Gas Adjustment Cost
Recovery for December 1995 and Docket No. ~~96003-GU~~, for January 1996

Dear Ms. Bayo:

Enclosed please find original and sixteen (16) copies of amendments to City Gas Company of Florida's December 1995 and January 1996 Purchase Gas Adjustment filing. The Company revised Schedules A-1R to incorporate the appropriate year to date figures for each month.

The Company requests specified confidential treatment of portions of Schedule A-1R as described in Exhibit A. The confidential document is filed under separate cover (copy enclosed).

Please acknowledge receipt and filing of the above by stamping the duplicate copy of this letter and returning same to me.

Thank you for your assistance in connection with this matter.

Sincerely,

*Zulka Scala for
Michael A. Palecki*

Michael A. Palecki
Vice President of Regulatory Affairs

Enclosures

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EPSC BUREAU OF RECORDS

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03574 MAR 26 96
FPSC-RECORDS/REPORTING

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Purchased Gas)
Adjustment Cost Recovery)
_____)

Docket No. 950003-GU
Filed: March 22, 1996

CITY GAS COMPANY OF FLORIDA REQUEST
FOR SPECIFIED CONFIDENTIAL TREATMENT

City Gas Company of Florida ("City Gas" or "the Company"), pursuant to section 366.093, Florida Statutes, submits the following Request for Specified Confidential Treatment of portions of its Amended Purchased Gas Adjustment (PGA) filing for the months of December 1995 and January 1996. In support thereof, City Gas states:

1. City Gas' amended PGA filing for the months of December 1995 and January 1996 consists of Schedule A-1R. The confidential version of City Gas' filing for these months is submitted in a sealed envelope concurrently with this request.
2. Attached hereto as Exhibit "A" is a detailed justification for the requested confidential treatment of the highlighted portions of City Gas' filing referenced above.
3. The material for which confidential classification is sought is intended to be and is treated by City Gas as proprietary and has not been publicly disclosed.
4. City Gas requests that the information for which it seeks confidential classification not be declassified for a period of eighteen months as provided in section 366.093 (4), Florida Statutes. The time period requested is necessary to allow City

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FPSC-RECORDS/REPORTING

Gas to negotiate future gas purchase contracts with suppliers/competitors (and other customers having access to information which would adversely affect the ability of the Company to negotiate such future contracts) on favorable terms.

Wherefore, City Gas Company of Florida respectfully requests the Commission grant its petition for Specified Confidential Treatment of the information identified in Exhibit "A."

Dated this March 22, 1996

City Gas Company of Florida
A Division of NUI Corporation
955 East 25th Street
Hialeah, FL 33013

*Zulka Seala for
Michael A. Palecki*

Michael A. Palecki
Vice President of Regulatory Affairs

EXHIBIT "A"
CITY GAS COMPANY OF FLORIDA

Data Elements for the December 1995 and January 1996 PGA for which Confidential Treatment is Requested

Schedule Number, or Other Identifier	Page	Lines	Columns	Justification (See "Notes" Below)
A-1R	2	1-6	A, B, C, E, F, G	(2, 3)
		7-8	A, B, C, E, F, G	(3)
		15-20	A, B, C, E, F, G	(2,3)
		21-22	A, B, C, E, F, G	(3)
		28	A, B, C, E, F, G	(1)
		31	A, B, C, E, F, G	(1)

Notes To Exhibit "A" Regarding Justification:

(1) Line 28 and 31 of Schedule A-1 and A-1R contain City Gas' Weighted Average Cost of Gas (WACOG) for the current month. Dissemination of this information could adversely influence the Company's ability to effectively negotiate for low-cost gas supplies. If gas suppliers know the Company's WACOG, they may tend to quote future gas prices at or above the weighted level. Likewise, vendors who previously supplied gas to the Company at prices below the average cost could tend to resist making future price concessions. As a consequence, ratepayers may pay higher gas costs. Public knowledge of City Gas' WACOG "would impair the efforts of the Company to contract for goods or services on favorable terms," Section 366.093(3)(d), Florida Statutes.

(2) Disclosure of lines 4 and 18, Schedules A-1 and A-1R, will allow suppliers to derive the price that the Company pays third-party suppliers. Dividing line 4, Cost of Gas Purchased, by line 18, Therms Purchased, yields the WACOG that appears on line 31. As explained above, publication of the information on line 31 could diminish the Company's ability to constructively negotiate for gas supplies. Therefore, any information that could provide competitors with the contents of line 31 should be also granted confidentiality. Public knowledge of this information "would impair the efforts of City Gas to contract for goods or services on favorable terms," Section 366.093(3)(d), Florida Statutes.

(3) Lines 1-6, 7-8, 15-22, Schedules A-1 and A-1R, contain components of arithmetical calculations used to derive the per therm price of gas. Disclosure of these numbers is "reasonably likely" to impair the Company's efforts to contract for goods and services on favorable terms. Similarly, the Company further requests confidentiality for Schedule A-1, Supporting Details, with respect to the columns named Therms, Invoice Amount and Cost per Therm. This schedule shows the derivation and arithmetic manipulation of information on Schedule A-1 and A-1R. Publication of the supporting details for these Schedules "would also impair the efforts of City Gas to contract for goods or services on favorable terms," Section 366.093(3)(d), Florida Statutes.

COMPANY:
CITY GAS COMPANY OF FLORIDA

COMPARISON OF ACTUAL VERSUS FLEX-DOWN ESTIMATE
OF THE PURCHASED GAS ADJUSTMENT COST RECOVERY FACTOR
ESTIMATED FOR THE PERIOD OF:

SCHEDULE A-1/R
(REVISED 6/08/94)
(Flex Down) PAGE 2 OF 11

		APRIL 95		Through		MARCH 95			
		CURRENT MONTH: 12/95		DIFFERENCE		PERIOD TO DATE		DIFFERENCE	
		(A)	(B)	(C)	(D)	(E)	(F)	(G)	(H)
		ACTUAL	ORG. EST.	AMOUNT	%	ACTUAL	ORG. EST.	AMOUNT	%
COST OF GAS PURCHASED									
1	COMMODITY (Pipeline) Includes No Notice Commodity Adjustment				-60.16				-12.45
2	NO NOTICE SERVICE RESERVATION (Line 29 A-1 support detail)				0.00				
3	SWING SERVICE								
4	COMMODITY (Other)				-26.64				-6.61
5	DEMAND (Line 32-29 A-1 support detail)				7.47				1.50
6	OTHER				-21.88				-2.86
LESS END-USE CONTRACT									
7	COMMODITY (Pipeline)				#DIV/0!				0.00
8	DEMAND				#DIV/0!				0.00
9		0	0	0		0	0	0	
10	Second Prior Month Purchase Adj. (OPTIONAL)	0	0	0		0	0	0	
11	TOTAL COST (1+2+3+4+5+6+10)-(7+8+9)	3,256,105	3,883,875	(627,770)	-16.16	16,222,315	16,850,088	(627,771)	-3.73
12	NET UNBILLED	0	0	0		0	0	0	
13	COMPANY USE	0	0	0	#DIV/0!	(19,079)	(19,079)	0	0.00
14	TOTAL THERM SALES	2,507,437	3,880,191	(1,372,754)	-35.36	15,885,485	17,258,239	(1,372,754)	-7.95
THERMS PURCHASED									
15	COMMODITY (Pipeline) Billing Determinants Only				-29.94				-5.71
16	NO NOTICE SERVICE RESERVATION Bill. Determinants Only (Line 29 A-1 support detail)				0.00				0.00
17	SWING SERVICE Commodity								
18	COMMODITY (Other) Commodity				-29.94				-5.71
19	DEMAND Billing Determinants Only (Line 32-29 A-1 support detail)				-3.70				-0.77
20	OTHER Commodity				-21.89				-3.28
LESS END-USE CONTRACT									
21	COMMODITY (Pipeline)				#DIV/0!				0.00
22	DEMAND				#DIV/0!				0.00
23		0	0	0		0	0	0	
24	TOTAL PURCHASES (17+18+20)-(21+23)	7,784,269	10,952,329	(3,168,060)	-28.93	64,611,789	67,779,849	(3,168,060)	-4.67
25	NET UNBILLED	0	0	0		0	0	0	
26	COMPANY USE	0	0	0	#DIV/0!	(136,560)	(136,560)	0	0.00
27	TOTAL THERM SALES (24-26 Estimated only)	7,784,269	10,952,329	(3,168,060)	-28.93	60,189,582	63,357,642	(3,168,060)	-5.00
CENTS PER THERM									
28	COMMODITY (Pipeline) (1/15)				-43.07				-7.13
29	NO NOTICE SERVICE (2/16)	0.00694	0.00000	0.00694		0.00694	0.00000	0.00694	
30	SWING SERVICE (3/17)	0.00000		0.00000		0.00000	0.00000	0.00000	
31	COMMODITY (Other) (4/18)				4.70				-0.96
32	DEMAND (5/19)	0.07734	0.06931	0.00803	11.59	0.07367	0.07202	0.00165	2.29
33	OTHER (6/20)	0.39375	0.39373	0.00002	0.01	0.46784	0.46533	0.00251	0.54
LESS END-USE CONTRACT									
34	COMMODITY Pipeline (7/21)	0.00000	0.00000	0.00000	#DIV/0!	0.00717	0.00717	0.00000	0.00
35	DEMAND (8/22)	0.00000	0.00000	0.00000	#DIV/0!	0.04303	0.04303	0.00000	0.00
36									
37	TOTAL COST (11/24)	0.41829	0.35462	0.06367	17.95	0.25107	0.24860	0.00247	0.99
38	NET UNBILLED (12/25)			0.00000				0.00000	
39	COMPANY USE (13/26)	#VALUE!	0.00000	#VALUE!	0.00	0.13971	0.13971	0.00000	0.00
40	TOTAL THERM SALES (11/27)	0.41829	0.35462	0.06367	17.95	0.25107	0.24860	0.00247	0.99
41	TRUE-UP (E-2)	(0.00034)	(0.00034)	0.00000	0.00	(0.00187)	(0.00187)	0.00000	0.00
42	TOTAL COST OF GAS (40+41)	0.41795	0.35428	0.06367	17.97	0.24920	0.24673	0.00247	1.00
43	REVENUE TAX FACTOR	1.00376	1.00376	0.00000	0.00	1.00376	1.00376	0.00000	0.00
44	PGA FACTOR ADJUSTED FOR TAXES (42x43)	0.41952	0.35561	0.06391	17.97	0.25014	0.24766	0.00248	1.00
45	PGA FACTOR ROUNDED TO NEAREST .001	0.42000	0.35600	0.06400	17.98	0.25000	0.24800	0.00200	0.81

COMPANY:
CITY GAS COMPANY OF FLORIDA

COMPARISON OF ACTUAL VERSUS FLEX-DOWN ESTIMATE
OF THE PURCHASED GAS ADJUSTMENT COST RECOVERY FACTOR
ESTIMATED FOR THE PERIOD OF:

SCHEDULE A-1/R
(REVISED 8/08/94)
(Flex Down) PAGE 2 OF 15

		APRIL 95		Through		MARCH 96			
		CURRENT MONTH:		DIFFERENCE		PERIOD TO DATE		DIFFERENCE	
		(A)	(B)	(C)	(D)	(E)	(F)	(G)	(H)
		ACTUAL	ORG. EST.	AMOUNT	%	ACTUAL	ORG. EST.	AMOUNT	%
COST OF GAS PURCHASED									
1	COMMODITY (Pipeline) Includes No Notice Commodity Adjustment				-24.23				-14.66
2	NO NOTICE SERVICE RESERVATION (Line 29 A-1 support detail)				0.00				
3	SWING SERVICE				---				
4	COMMODITY (Other)				-30.63				-13.06
5	DEMAND (Line 32 - 29 A-1 support detail)				-2.83				0.84
6	OTHER				129.27				11.79
LESS END-USE CONTRACT						0	0		
7	COMMODITY (Pipeline)				0.00				0.00
8	DEMAND				0.00				0.00
9		0	0	0	---	0	0	0	---
10	Second Prior Month Purchase Adj. (OPTIONAL)	0	0	0	---	0	0	0	---
11	TOTAL COST (1+2+3+4+5+6+10)-(7+8+9)	3,774,756	4,967,951	(1,193,195)	-24.02	19,997,071	21,818,037	(1,820,966)	-8.35
12	NET UNBILLED	0	0	0	---	0	0	0	---
13	COMPANY USE	0	0	0	0.00	(19,079)	(19,079)	0	0.00
14	TOTAL THERM SALES	3,226,349	4,963,589	(1,737,240)	-35.00	19,111,834	22,221,828	(3,109,994)	-14.00
THERMS PURCHASED									
15	COMMODITY (Pipeline) Billing Determinants Only				-32.86				-10.61
16	NO NOTICE SERVICE RESERVATION Bil. Determinants Only (Line 29 A-1 support detail)				0.00				0.00
17	SWING SERVICE Commodity				---				---
18	COMMODITY (Other) Commodity				-32.86				-10.61
19	DEMAND Billing Determinants Only (Line 32-29 A-1 support detail)				1.04				-0.42
20	OTHER Commodity				83.52				7.78
LESS END-USE CONTRACT						0	0		
21	COMMODITY (Pipeline)				0.00				0.00
22	DEMAND				0.00				0.00
23		0	0	0	---	0	0	0	---
24	TOTAL PURCHASES (17+18+20)-(21+23)	8,508,368	12,652,212	(4,143,844)	-32.75	73,120,157	80,432,061	(7,311,904)	-9.09
25	NET UNBILLED	0	0	0	---	0	0	0	---
26	COMPANY USE	0	0	0	0.00	(136,560)	(136,560)	0	0.00
27	TOTAL THERM SALES (24-26 Estimated only)	8,493,505	12,652,212	(4,158,707)	-32.87	68,683,087	76,009,854	(7,326,767)	-9.64
CENTS PER THERM									
28	COMMODITY (Pipeline) (1/15)				12.86				-4.55
29	NO NOTICE SERVICE (2/16)	0.00694	0.00000	0.00694	---	0.00694	0.00000	0.00694	---
30	SWING SERVICE (3/17)	---	---	0.00000	---	0.00000	0.00000	0.00000	---
31	COMMODITY (Other) (4/18)				3.33				-2.74
32	DEMAND (5/19)	0.05088	0.05291	-0.00203	-3.84	0.06914	0.06827	0.00087	1.27
33	OTHER (6/20)	0.49186	0.39369	0.09817	24.94	0.47309	0.45613	0.01696	3.72
LESS END-USE CONTRACT									
34	COMMODITY Pipeline (7/21)	0.00000	0.00000	0.00000	0.00	0.00717	0.00717	0.00000	0.00
35	DEMAND (8/22)	0.00000	0.00000	0.00000	0.00	0.04303	0.04303	0.00000	0.00
36		---	---	0.00000	---	---	---	0.00000	---
37	TOTAL COST (11/24)	0.44365	0.39265	0.05100	12.99	0.27348	0.27126	0.00222	0.82
38	NET UNBILLED (12/25)	---	---	0.00000	---	---	---	0.00000	---
39	COMPANY USE (13/26)	0.00000	0.00000	0.00000	0.00	0.13971	0.00000	0.00000	0.00
40	TOTAL THERM SALES (11/27)	0.44443	0.39265	0.05178	13.19	0.44443	0.39265	0.05178	13.19
41	TRUE-UP (E-2)	(0.00034)	(0.00034)	0.00000	0.00	(0.00187)	(0.00187)	0.00000	0.00
42	TOTAL COST OF GAS (40+41)	0.44409	0.39231	0.05178	13.20	0.44256	0.39078	0.05178	13.25
43	REVENUE TAX FACTOR	1.00376	1.00376	0.00000	0.00	1.00376	1.00376	0.00000	0.00
44	PGA FACTOR ADJUSTED FOR TAXES (42x43)	0.44576	0.39379	0.05197	13.20	0.44422	0.39225	0.05197	13.25
45	PGA FACTOR ROUNDED TO NEAREST .001	0.44600	0.39400	0.05200	13.20	0.44400	0.39200	0.05200	13.27