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July 23, 1996

HAND-DELIVERED

Blanca S. Bayo, Director  
Division of Records and Reporting  
Gunter Building  
2540 Shumard Oak Boulevard  
Tallahassee, FL 32399-0870

Re: Unbundling of Natural Gas Services  
Docket No.: 960725-GU

Dear Ms. Bayo:

Enclosed for filing and distribution are the original and fifteen copies of City Gas Company of Florida's Suggested Additional Issues in the above docket.

Please acknowledge receipt of the above on the extra copy enclosed herein and return it to me. Thank you for your assistance.

Yours truly,

*Vicki Gordon Kaufman*  
Vicki Gordon Kaufman

VGK/pw

Encls.

- CK \_\_\_\_\_
- FA \_\_\_\_\_
- GP \_\_\_\_\_
- AF \_\_\_\_\_
- MU \_\_\_\_\_
- TR \_\_\_\_\_
- AG
- EQ Culpepper
- IN \_\_\_\_\_
- EG \_\_\_\_\_
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- TH \_\_\_\_\_



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FPSC-RECORDS/REPORTING

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In Re: Unbundling of Natural  
Gas Services

) Docket No.: 960725-GU  
) Filed: July 23, 1996  
)

**CITY GAS COMPANY OF FLORIDA'S  
SUGGESTED ADDITIONAL ISSUES**

Pursuant to Order No. PSC-96-0844-PCO-GU, Order Establishing Procedure, City Gas Company of Florida (City Gas) files its additional suggested issues.

City Gas, an operating division of NUI Corporation, appreciates the opportunity to provide revisions and additions to Staff's issues in this docket. We believe that in any final determination of unbundling standards that flexibility be the guiding factor and that the issues be framed to reflect the need for flexibility.

I. City Gas' first requested revision to Staff's issues is that they be reworded in a neutral fashion so as to favor neither the LDC, supplier, marketer or customer. City Gas supports the suggested neutral rewording of the issues submitted by the Associated Gas Distributors of Florida in this docket.

II. City Gas suggests the following additional issues for inclusion in the issues to be considered in this docket:

1. Should the LDC be able to establish creditworthiness standards to ensure the financial capability of suppliers, marketers and brokers?

2. Should there be threshold volumetric requirements for transportation or for aggregation of customer loads for transportation? If so, should the LDC have the discretion to set these thresholds?

3. Should each LDC have the discretion to establish nomination and balancing

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FPSC-RECORDS/REPORTING

procedures? If so, should third party suppliers be required to abide by these procedures?

4. Should LDCs be permitted to stream gas on a competitive basis using a negotiated rate?

5. Should LDCs be required (or should LDCs be permitted) to establish non-performance penalties to be levied on suppliers, marketers or brokers who create imbalance situations for the LDC?

6. What issues are involved with total deregulation: cost allocation, tax collection and remittance, conflict resolution, etc.?

7. Which dollars would flow to PGA customers?

8. Which services would remain subject to the PGA?

9. Should large customers simply be deregulated?

10. Who is responsible for tax collection and remittance, who is responsible for bad debts and collection costs, etc.?

11. Should the PSC permit greater discretion to LDCs in setting rates for commercial and industrial customers?

12. Should the Legislature give the PSC authority to pre-qualify suppliers, marketers and brokers?

13. Should the PSC allow greater flexibility to set unbundled transportation rates?

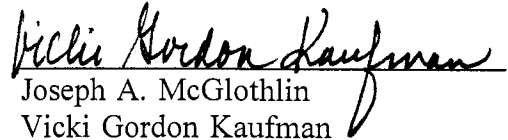
14. Should the LDC's have the discretion to bill the customer in one of two ways?

a. Company bills distribution and commodity components;

b. Company bills distribution component, supplier bills commodity

component.

15. Should aggregators become the customer of the LDC, rather than the individual customers whose loads are being aggregated?



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**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that a true and correct copy of City Gas Company of Florida's Suggested Additional Issues has been furnished by U.S. Mail or by hand delivery(\*) to the following parties this 23rd day of July, 1996:

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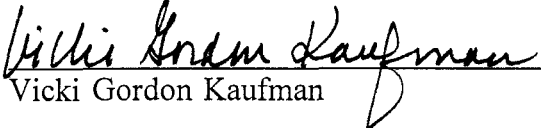
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