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Southern Division
Gas Company of Florida
Eaton Gas Service
North Carolina Gas Service
Wiley Cities Gas Service
Waverly Gas Service

955 East 25th Street
Hialeah
Florida 33013-3498
Tel. (305) 691-8710
Fax (305) 691-7112

December 11, 1996

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

Re: **Docket No. 960002-EG**
Conservation Cost Recovery

Enclosed for filing in the above docket are an original and 15 copies of
City Gas Company of Florida's Answers to Staff's First Set of Interrogatories.

Sincerely,



Michael A. Palecki
Vice President of Regulatory Affairs

- ACK _____
- AFA _____ MAP/rt
- APP _____
- CAF _____ Encl.
- CMU _____
- CTR _____
- EAG _____
- LEG _____
- LOA _____
- OTR _____
- PLN _____
- REG _____
- WCS _____
- OTH _____

DOCUMENT NUMBER-DATE
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FPSC-RECORDS/REPORTING

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In Re: Conservation Cost Recovery)
Clause)
_____)

Docket No: 960002-EG
Filed: November 12, 1996
December

**CITY GAS COMPANY OF FLORIDA'S
NOTICE OF SERVICE OF ANSWERS TO STAFF'S
FIRST SET OF INTERROGATORIES (NOS. 1 - 4)**

CITY GAS COMPANY OF FLORIDA furnished by hand delivery on December 12, 1996, to Florida Public Service Commission, 2540 Shumard Oak Boulevard, Tallahassee, Florida 32399, its answers to Staff's First Set of Interrogatories, Nos. 1-4, propounded and served by U.S. Mail on November 19, 1996.

Dated this 12th day of December 1996.

Michael A. Palecki

Michael A. Palecki - NUI Southern Division
Vice President of Regulatory Affairs
955 East 25 Street
Hialeah, FL 33013-3498
(305)691-8710

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In Re: Conservation Cost Recovery)
Clause)
_____)

Docket No: 960002-EG

**CITY GAS COMPANY OF FLORIDA'S
ANSWERS TO STAFF'S FIRST SET OF INTERROGATORIES (NOS. 1 - 4)**

STAFF'S FIRST SET OF INTERROGATORIES TO CITY GAS COMPANY
OF FLORIDA (NOS. 1 - 4)
DOCKET NO. 960002-EG

INTERROGATORY #1

Q. Please identify each Commission-approved conservation program where a customer-specific study or analysis comparing natural gas applications to electric applications is a requirement for program participation.

A. None.

STAFF'S FIRST SET OF INTERROGATORIES TO CITY GAS COMPANY
OF FLORIDA (NOS. 1 - 4)
DOCKET NO. 960002-EG

INTERROGATORY #2

- Q. (a) Where a condition of program participation for a Commission-approved program is a study or analysis comparing natural gas applications to electric applications, please identify how the cost of such studies or analyses were reflected in the cost-effectiveness analysis of the program when originally filed with the Commission.
- (b) Please identify how the cost of such studies or analyses were reflected in subsequent cost-effectiveness analyses performed since the Commission-approved program became effective.
- A. (a) No study or analysis was required.
- (b) None required or performed.

STAFF'S FIRST SET OF INTERROGATORIES TO CITY GAS COMPANY
OF FLORIDA (NOS. 1 - 4)
DOCKET NO. 960002-EG

INTERROGATORY #3

- Q. For the period October 1994 through September 1996, for each instance where a study or analysis comparing natural gas applications to electric applications was performed for a customer in relation to participation or potential participation of that customer in a Commission-approved conservation program, please provide:
- (a) the total cost of the study or analysis; and
 - (b) the total amount of the study or analysis charged to the ECCR clause.
- A. (a) None required or performed.
- (b) None.

STAFF'S FIRST SET OF INTERROGATORIES TO CITY GAS COMPANY
OF FLORIDA (NOS. 1 - 4)
DOCKET NO. 960002-EG

INTERROGATORY #4

Q. For each Commission-approved conservation program which does not dictate the performance of a study or analysis comparing natural gas applications to electric applications as a program participation requirement, but where nevertheless such studies or analyses were performed, please provide the cost-effectiveness analysis of the program under the participant and RIM tests including the costs of such studies or analyses.

A. None performed.

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In Re: Conservation Cost Recovery)
Clause)
_____)

Docket No. 960002-EG

AFFIDAVIT

STATE OF FLORIDA

COUNTY OF DADE

I, Rand W. Smith, hereby certify that the answers to City Gas Company's First Set of Interrogatories, Interrogatory Nos 1, 2, 3 and 4 are true and correct to the best of my knowledge and belief.



AFFIANT

Sworn to and subscribed before me, this 6th day of December 1996,
who is personally known to me, ~~or who has produced~~ _____ as
~~identification.~~



Notary Public

Rachel E. Turner
Type or Print Name



Rachel E. Turner
MY COMMISSION # CC540685 EXPIRES
April 28, 2000
BONDED THRU TROY FAIR INSURANCE, INC.

My Commission Expires:

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the City Gas Company of Florida's Response to Staff's First Set of Interrogatories has been furnished by U.S. Mail to the following parties of record, this 12th day of December, 1996:

Sheila Erstling, Esquire
Division of Legal Services
Florida Public Service Commission
2540 Shumard Oak Blvd.
Tallahassee, FL 32399

John Roger Howe, Esquire
Office of the Public Counsel
c/o The Florida Legislature
111 West Madison Street
Suite #812
Tallahassee, FL 32399

Ausley & McMullen
James Beasley
Post Office Box 391
Tallahassee, FL 32302

South Florida Natural Gas Co.
Peter Martin
101 N. W. 202 Terrace
P. O. Box 69000-J
Miami, FL 33269

Wayne Schiefelbein, Esquire
Gatlin, Woods, Carlson and
Cowdery
1709-D Mahan Drive
Tallahassee, FL 32308

Florida Public Utilities Co.
Mr. Frank C. Cressman
P. O. Box 3395
West Palm Beach, FL 33402-3395

Indiantown Gas Company
Ms. Colette M. Powers
P. O. Box 8
Indiantown, FL 34956-0008

Sebring Gas Company
3515 Highway 27 South
Sebring, FL 33870-5452

Florida Division of Chesapeake
Utilities Corporation
P. O. Box 960
Winter Haven, FL 33882-0960

Florida Power & Light
Bill Walker
215 South Monroe Street
Suite 810
Tallahassee, FL 32301

Beggs & Lane
Jeffery Stone
Post Office Box 12950
Pensacola, FL 32576

Florida Industrial Power Users Group
McWhirter, Reeves McGlothlin
Vicki Kaufman
117 S. Gadsden Street
Tallahassee, FL 32301

Gulf Power Company
Susan Cranmer
P. O. Box 13470
Pensacola, FL 32591

Messer Law Firm
Norman Horton, Jr.
P. O. Box 1876
Tallahassee, FL 32302

St. Joe Natural Gas Co., Inc.
Mr. Stuart L. Shoaf
P. O. Box 549
Port St. Joe, FL 32456-0549

Steel Hector & Davis
Charles Guyton
215 South Monroe Street
Suite 601
Tallahassee, FL 32301

Florida Power Corporation
James McGee
P. O. Box 14042
St. Petersburg, FL 33733


Landers & Parsons
Scheffel Wright
P. O. Box 271
Tallahassee, FL 32302

Peoples Gas System, Inc.
Jack Uhl
P. O. Box 2562
Tampa, FL 33601

West Florida Natural Gas Co.
Mr. J. E. McIntyre
P. O. Box 1460
Panama City, FL 32402-1460

Tampa Electric Company
Angela Llewellyn
Regulatory & Business Strategy
P. O. Box 111
Tampa, FL 33601

Kenneth Hoffman
Rutledge Ecenia Underwood
P. O. Box 551
Tallahassee, FL 32302



Michael A. Palecki
NUI CORPORATION - SOUTHERN DIVISION
Vice President of Regulatory Affairs
955 East 25 Street
Hialeah, FL 33013-3498
(305) 691-8710