ORIGINAL

LANDERS & PARSONS, P.A.

TALLAHASSEE, FL 32301

ATTORNEYS AT LAW

DAVID S. DEE RONALD A. LABASKY JOSEPH W. LANDERS, JR. JOHN T. LAVIA, III FRED A. McCORMACK PHILIP S. PARSONS ROBERT SCHEFFEL WRIGHT

T 1 0 0000

MAILING ADDRESS: POST OFFICE BOX 271 TALLAHASSEE, FL 32302-0271

TELEPHONE (850) 681-0311 TELECOPY (850) 224-5595 www.landersandparsons.com

Blanca Bayo, Director Division of the Commission Clerk and Administrative Services Florida Public Service Commission 2540 Shumard Oak Boulevard Tallahassee, Florida 32399-0850

> Re: Docket No. 030462-GU, Indiantown Gas Company's Responses to Staff's First Data Request

Dear Ms. Bayo:

Yesterday afternoon, a runner from my office delivered to your office an original and five copies of Indiantown Gas Company's responses to Staff's First Data Request in the above-styled docket. Unfortunately, in making the filing, we missed the fact that there were printer errors (over-written text) on pages 4 and 6 of the responses themselves. Accordingly, we are herewith enclosing six copies of the corrected pages 4 and 6 of the Company's responses, and we will sincerely appreciate your forwarding them to the recipients of the responses that were submitted yesterday.

As always, my thanks to you and to your professional Staff for `their kind and courteous assistance. Please accept my sincere apology for the inconvenience caused by this printing glitch. If you have any questions, please give me a call at (850)681-0311.

Cordially yours,

Robert Scheffel Wright

Enclosures

AUS CAF COM CTR ECR GCL OPC MMS SEC OTH

DOCUMENT NUMBER-DATE

July 8, 2003 BY HAND DELIVERY

IGC Response: IGC is not able to provide a definitive answer to this question, because most, if not all, of the costs associated with implementing the Company's transportation service tariff and program are not directly assignable, as suggested by the Data Request. While the specific tasks and costs of initially transferring the citrus plant to transportation were the regulatory and legal fees, plus IGC personnel time, and the like, associated with releasing capacity and with transferring the citrus plant to the Company's then-available tariff, the Company's overall aggregated transportation service tariff and program serves the citrus plant as well as all other IGC customers. Accordingly, IGC has chosen what it believes is the most fair way to allocate these costs.

Request #8. Please explain, in detail, what actions were required to transition the citrus plant to transportation in August, 2001?

IGC Response: IGC was notified verbally of the sale of the citrus plant to its new owners in April 2001. By July, the company was informed that the citrus plant desired to transport, as the new owners' existing facility in Winter Garden was already transporting. In order to accommodate the customer, IGC arranged to transport gas under a new tariff just approved by the PSC in Order No. PSC-01-0070-TRF-GU for commercial customers. There was no time to approve a special tariff rate for the citrus plant to transport. While it served the need for transportation at the time, the tariff was inadequate to address the long term needs of the citrus plant. IGC addressed the specific needs of the citrus plant

DOCUMENT NUMPER DATE U6021 JUL-85 FPSC-COMMISSION CLERK

4

transportation business. To the extent that transportation was ordered by the commission (down to the commercial level) and desired by our customers IGC decided to open its entire system for transportation. Further, the commission has set a precedent by approving transition costs across all customer classes, including those whose members were already transporting at the time that broader transportation service became available, for almost every other gas company under commission jurisdiction in previous cases.

Request #11. Please state the actual costs incurred for the transition of the residential and small commercial customer to transportation.

IGC Response: As indicated in responses to Data Requests No. #3 and No. 12, the costs of IGC's entire transportation program are effectively common to all classes, and accordingly, IGC cannot break out actual costs by customer class segment. IGC can only allocate the costs of the total program in the fairest manner possible.

Request #12. Please explain, in detail, the actions that were required to transition residential and small commercial customers to transportation.

IGC Response: To understand these actions in their real-world context, consider the following brief history of the Company's transportation service program. When required to unbundle by the Commission and requested by the citrus plant to move to transportation service, the company knew that it would need to begin to move its remaining customers toward transportation also.

6