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Matthew R. Costa Corporate Counsel 702 North Franklin Street Tampa, Florida 33602 Direct: (813) 228-4938 Fax: (813) 228-1328 E-Mail: mcosta@tecoenergy.com

October 9, 2003

VIA FEDERAL EXPRESS

Blanca S. Bayo, Director Division of Commission Clerk & Administrative Services Florida Public Service Commission Capital Circle Office Center 2540 Shumard Oak Boulevard Tallahassee, Florida 32399-0850

Re: Docket No. 030004-GU -Natural Gas Conservation Cost Recovery Clause

Dear Ms. Bayo:

Enclosed for filing with the Commission in the above-docket on behalf of Peoples Gas System ("Peoples"), please find the original and 15 copies of Peoples Preliminary Statement of Issues and Positions.

Please acknowledge your receipt and the date of filing of the enclosures on the duplicate copy of this letter and return the same to the undersigned in the enclosed pre-addressed envelope.

Thank you for your assistance.

Sincerely,

Matthew R. Costa Corporate Counsel

AUS CAF CMP COM CTR ECR cc: GCL OPC MMS SEC OTH

MRC/sb Enclosures Ms. Kandi M. Floyd All Parties of Record RECEIVED & FILED **FPSC-BUREAU OF RECORDS**



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PEOPLES GAS 702 NORTH FRANKLIN STREET P. O. BOX 2562 TAMPA, FL 33601-2562 AN EQUAL OPPORTUNITY COMPANY

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BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In Re: Natural Gas Conservation : Cost Recovery Clause DOCKET NO. 030004-GU

Submitted for Filing: 10-10-03

PEOPLES GAS SYSTEM'S PRELIMINARY STATEMENT OF ISSUES AND POSITIONS

Peoples Gas System ("PGS") hereby submits its preliminary statement of issues and

positions to be addressed at the hearing now scheduled to commence on November 12, 2003 in this

docket.

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<u>ISSUE</u>: What is the end-of-period final true-up amount for the period January 1, through December 31, 2002?

PGS (except West Florida): \$380,930 underrecovery

PGS (West Florida): \$530,074 underrecovery

:

<u>ISSUE:</u> What are the appropriate conservation cost recovery factors for the period January 1 through December 31, 2004?

<u>PGS (except West Florida)</u>: The appropriate conservation cost recovery factors for the period January 1 through December 31, 2004 are as follows:

	ECCR Factor
Rate Class	(per therm)
Residential	\$0.06961
Small General Service	\$0.06203
General Service 1	\$0.02286
General Service 2	\$0.01859
General Service 3	\$0.01564
General Service 4	\$0.01411
General Service 5	\$0.00799
Natural Gas Vehicle Service	\$0.01185
Commercial Street Lighting	\$0.00998

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<u>PGS – West Florida:</u> The appropriate conservation cost recovery factors for the period January 1 through December 31, 2004 are as follows:

ECCR Factor
(per therm)
\$0.14384
\$0.12685
\$0.05425
\$0.04296
\$0.03596
\$0.03245
\$0.01806
\$0.00000
\$0.02292

<u>ISSUE</u>: What should be the effective date of the new conservation cost recovery factors for billing purposes?

<u>PGS</u>: The factors should be effective beginning with the specified conservation cost recovery cycle and thereafter for the period January 1, 2004 through December 31, 2004. Billing cycles may start before January 1, 2004, and the last cycle may be read after December 31, 2004, so that each customer is billed for 12 months regardless of when such adjustment factor becomes effective.

Dated this 9th day of October, 2003.

Respectfully submitted,

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MATTHEW R. COSTA, ESQUIRE Corporate Counsel TECO Energy, Inc. Post Office Box 111 Tampa, Florida 33601 (813) 228-4938

and

ANSLEY WATSON, JR., ESQUIRE Macfarlane Ferguson & McMullen Post Office Box 1531 Tampa, Florida 33601 (813) 273-4200 Attorneys for Peoples Gas System

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing Preliminary Statement of Issues and Positions has been furnished this 9th day of October, 2003, by regular U.S. Mail, postage prepaid, to all known parties of record.

MATTHEW R. COSTA, ESQUIRE