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September 30, 2008

VIA ELECTRONIC FILING

Ms. Ann Cole
Commission Clerk
Florida Public Service Commission
2540 Shumard Oak Boulevard
Tallahassee, FL 32399-0850

Re: Docket No. 080003-GU – Purchased Gas Adjustment (PGA) True-Up

Dear Ms. Cole:

Enclosed for electronic filing in the above referenced Docket, please find Florida City Gas's Preliminary Statement of Issues and Positions.

Your assistance in this matter is greatly appreciated.

Sincerely,

Beth Keating
AKERMAN SENTERFITT
106 East College Avenue, Suite 1200
Tallahassee, FL 32302-1877
Phone: (850) 224-9634
Fax: (850) 222-0103

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In Re: Purchased Gas Adjustment)
(PGA) True-up)
_____)

Docket No. 080003-GU

Filed: September 30, 2008

**FLORIDA CITY GAS
PRELIMINARY STATEMENT OF ISSUES AND POSITIONS**

Florida City Gas submits this preliminary statement of issues and positions:

Issue 1: What are the appropriate final purchased gas adjustment true-up amounts for the period January 2007 through December 2007?

Florida City Gas: \$719,773 over-recovery

Issue 2: What are the estimated purchased gas adjustment true-up amounts for the period January 2008 through December 2008?

Florida City Gas: \$349,603 over-recovery

Issue 3: What are the total purchased gas adjustment true-up amounts to be collected during the period January 2008 through December 2008?

Florida City Gas: \$1,069,376 over-recovery

Issue 4: What are the appropriate levelized purchased gas cost recovery (cap) factors for the period January 2009 through December 2009?

Florida City Gas: 139.771 cents/therm (before regulatory assessment fees) or 140.474 cents/therm (after regulatory assessment fees)

Docket No. 080003-GU
September 30, 2008

Issue 5: What should be the effective date of the new purchased gas adjustment charge for billing purposes?

Florida City Gas: The factors should be effective for all meter readings on or after January 1, 2009 and should apply for bills rendered for meter readings taken between January 1, 2009 and December 31, 2009.

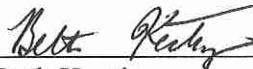
RESPECTFULLY SUBMITTED this 30th day of September, 2008.


Beth Keating
Akerman Senterfitt Attorneys at Law
106 East College Avenue, Suite 1200
Tallahassee, FL 32301
(850) 224-9634

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing has been furnished by U.S. Mail to the following parties of record this 30th day of September, 2008:

Florida Public Utilities Company Mehrdad Khojasteh P.O. Box 3395 West Palm Beach, FL 33402-3395	MacFarlane Ferguson Law Firm Ansley Watson, Jr. P.O. Box 1531 Tampa, FL 33601-1531
Messer Law Firm Norman H. Horton, Jr. P.O. Box 15579 Tallahassee, FL 32317	Office of Public Counsel J.R. Kelly/Patricia Christensen/S.Burgess c/o The Florida Legislature 111 West Madison Street Room 812 Tallahassee, FL 32399-1400
Peoples Gas System Paula Brown P.O. Box 111 Tampa, FL 33601-0111	St. Joe Natural Gas Company, Inc. Mr. Stuart L. Shoaf P.O. Box 549 Port St. Joe, FL 32457-0549
TECO Energy, Inc. Matthew Costa P.O. Box 111 Tampa, FL 33601-0111	AGL Resources Inc. Elizabeth Wade Ten Peachtree Place Location 1470 Atlanta, GA 30309
Florida City Gas Melvin Williams 955 East 25 th Street Hialeah, FL 33013-3498	Katherine Fleming Florida Public Service Commission 2540 Shumard Oak Boulevard Tallahassee, FL 32399
Florida City Gas Jay Sutton 4180 South US Hwy. 1 Rockledge, FL 32955-5309	Charles A. Costin Costin and Costin Law Firm P.O. Box 98 Port Saint Joe, FL 32457-1159



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