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JACK SHREVE  
PUBLIC COUNSEL

STATE OF FLORIDA  
OFFICE OF THE PUBLIC COUNSEL

c/o The Florida Legislature  
111 West Madison Street  
Room 812  
Tallahassee, Florida 32399-1400  
904-488-9330

February 13, 1995

Ms. Blanca S. Bayo, Director  
Division of Records and Reporting  
Florida Public Service Commission  
101 E. Gaines Street  
Tallahassee, FL 32399-0863

RE: Docket No. 950003-GU

Dear Ms. Bayo:

Enclosed please find the original and fifteen (15) copies of the Public Counsel's Prehearing Statement for filing in the above-referenced docket.

Please indicate receipt of filing by date-stamping the attached copy of this letter and returning it to this office. Thank you for your assistance in this matter.

- ACK
- AFA
- APP
- CAF
- CMU
- CTR
- EAG *Prakin 3*
- LEG *1*
- LIN *4*
- OPC *JRH/bgm*
- RCH *Enclosures*
- SEC *1*
- WAS
- OTH

Sincerely,

*[Signature]*  
John Roger Howe  
Deputy Public Counsel

RECEIVED & FILED  
*[Signature]*  
FPSC-BUREAU OF RECORDS

DOCUMENT NUMBER-DATE  
01704 FEB 13 1995  
FPSC-RECORDS/REPORTING

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

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In Re: Purchased Gas Adjustment )  
True-up )  
\_\_\_\_\_ )

DOCKET NO. 950003-GU  
FILED: February 13, 1995

PREHEARING STATEMENT OF THE OFFICE OF PUBLIC COUNSEL

The Citizens of the State of Florida, through the Office of Public Counsel, pursuant to the Order Establishing Procedure in this docket, Order No. PSC-95-0067-PCO-GU, issued January 12, 1995, submit this Prehearing Statement.

APPEARANCES:

JOHN ROGER HOWE, Esquire, Deputy Public Counsel, Office of Public Counsel, c/o The Florida Legislature, 111 West Madison Street, Room 812, Tallahassee, Florida 32399-1400  
On behalf of the Citizens of the State of Florida

A. WITNESSES:

None.

B. EXHIBITS:

None.

C. STATEMENT OF BASIC POSITION

None necessary.

D. STATEMENT OF FACTUAL ISSUES AND POSITIONS

Generic Purchased Gas Adjustment Issues

ISSUE 1: What are the appropriate final purchased gas true-up amounts for the period October 1993 through March 1994?

OPC:

CHESAPEAKE:

No position at this time.

CITY GAS:	No position at this time.
FPUC:	No position at this time.
INDIANTOWN:	No position at this time.
PEOPLES GAS:	No position at this time.
SEBRING:	No position at this time.
SOUTH FLORIDA:	No position at this time.
ST. JOE:	No position at this time.
WEST FLORIDA:	No position at this time.

ISSUE 2: What are the estimated purchased gas adjustment true-up amounts for the period April 1994 through March 1995?

OPC:

CHESAPEAKE:	No position at this time.
CITY GAS:	No position at this time.
FPUC:	No position at this time.
INDIANTOWN:	No position at this time.
PEOPLES GAS:	No position at this time.
SEBRING:	No position at this time.
SOUTH FLORIDA:	No position at this time.
ST. JOE:	No position at this time.
WEST FLORIDA:	See position on Issue 6.

ISSUE 3: What are the total purchased gas true-up amounts to be collected during the period April 1995 through March 1996?

OPC:

CHESAPEAKE:	No position at this time.
CITY GAS:	No position at this time.
FPUC:	No position at this time.
INDIANTOWN:	No position at this time.
PEOPLES GAS:	No position at this time.
SEBRING:	No position at this time.
SOUTH FLORIDA:	No position at this time.
ST. JOE:	No position at this time.
WEST FLORIDA:	See position on Issue 6.

ISSUE 4: What are the appropriate levelized purchased gas cost recovery (cap) factors for the period April 1995 through March 1996?

OPC:

CHESAPEAKE:	No position at this time.
CITY GAS:	No position at this time.
FPUC:	No position at this time.
INDIANTOWN:	No position at this time.
PEOPLES GAS:	No position at this time.

SEBRING: No position at this time.  
SOUTH FLORIDA: No position at this time.  
ST. JOE: No position at this time.  
WEST FLORIDA: See position on Issue 6.

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

OPC: The factor should be effective for all meter readings on or after April 1, 1995, beginning with the first or applicable billing cycle for the period April, 1995 through March, 1996.

COMPANY SPECIFIC ISSUES

OPC knows of no Company Specific Issues at this time.

E. STATEMENT OF LEGAL ISSUES AND POSITIONS: None at this time.

F. STATEMENT OF POLICY ISSUES AND POSITIONS: None at this time.

G. STIPULATED ISSUES: None.

H. PENDING MOTIONS: None.

I. STATEMENT OF COMPLIANCE WITH ORDER ESTABLISHING PROCEDURE:

There are no requirements of the Order Establishing Procedure with which the Office of Public Counsel cannot comply.

Respectfully submitted,

JACK SHREVE  
Public Counsel

  
John Roger Howe  
Deputy Public Counsel

Office of Public Counsel  
c/o The Florida Legislature  
111 West Madison Street  
Room 812  
Tallahassee, FL 32399-1400

(904) 488-9330

Attorneys for the Citizens  
of the State of Florida

**CERTIFICATE OF SERVICE**  
**DOCKET NO. 950003-GU**

I HEREBY CERTIFY that a true and correct copy of the foregoing PREHEARING STATEMENT OF THE OFFICE OF PUBLIC COUNSEL has been furnished by U.S. Mail or by \*hand-delivery to the following persons on this 13th day of February, 1995:

STUART SHOAF, PRESIDENT  
St. Joe Natural Gas Company  
P.O. Box 549  
Port St. Joe, FL 32456-0549

FLOYD R. SELF, ESQUIRE  
Messer, Vickers, Caparello,  
Madsen, Lewis, Goldman & Metz  
P.O. Box 1876  
Tallahassee, FL 32302-1876

ANSLEY WATSON, JR., ESQUIRE  
Macfarlane, Ausley, Ferguson  
& McMullen  
P.O. Box 1531  
Tampa, FL 33601-1531

RICHARD A. ZAMBO, ESQUIRE  
Richard A. Zambo, P.A.  
598 S. W. Hidden River Avenue  
Palm City, FL 34990

BRIAN J. POWERS,  
General Manager  
Indiantown Gas Co.  
P.O. Box 8  
Indiantown, FL 34956

MR. RUSSELL D. CHAPMAN  
Administrator, Support Services  
Tampa Electric Company  
F.O. Box 411  
Tampa, FL 33601

\*ROBERT V. ELIAS, ESQUIRE  
Florida Public Service  
Commission  
101 E. Gaines Street  
Tallahassee, FL 32399-0863

WAYNE L. SCHIEFELBEIN, ESQUIRE  
Gatlin, Woods, Carlson  
& Cowdery  
1709-D Mahan Drive  
Tallahassee, FL 32308

JOSEPH A. MCGLOTHLIN, ESQUIRE  
VICKI GORDON KAUFMAN, ESQUIRE  
McWhirter, Reeves, McGlothlin,  
Davidson & Bakas  
315 South Calhoun Street  
Suite 716  
Tallahassee, FL 32301

JERRY H. MELENDY, JR.,  
Vice President  
Sebring Gas System, Inc.  
3515 U.S. Highway 27 South  
Sebring, FL 33870-5452

MR. LEE L. WILLIS  
MR. JAMES D. BEASLEY  
Macfarlane, Ausley, Ferguson  
& McMullen  
P.O. Box 391  
Tallahassee, FL 32302

  
John Roger Howe  
Deputy Public Counsel