

LANDERS & PARSONS
ATTORNEYS AT LAW

CINDY L. BARTIN
DAVID S. DEE
JOSEPH W. LANDERS, JR.
JOHN T. LAVIA, III
RICHARD A. LOTSPEICH
FRED A. McCORMACK
PHILIP S. PARSONS
ROBERT SCHEFFEL WRIGHT

HOWELL L. FERGUSON
OF COUNSEL

VICTORIA J. TSHINKEL
SENIOR CONSULTANT
NOT A MEMBER OF THE FLORIDA BAR

310 WEST COLLEGE AVENUE
POST OFFICE BOX 271
TALLAHASSEE, FLORIDA 32302
TELEPHONE (904) 681-0311
TELECOPY (904) 224-5595

November 1, 1995

BY HAND DELIVERY

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

Re: FPSC Docket No. 950002-EG, In Re: Conservation Cost Recovery Clause

Dear Ms. Bayo:

Enclosed for filing are the original and fifteen copies of Peoples Gas System's Petition for Approval of True-Up Amount, and the original and fifteen copies of the direct testimony and exhibit of Vernon I. Krutsinger in the above-styled docket. Also enclosed is a 3.5" computer diskette with Peoples' Petition and Mr. Krutsinger's direct testimony in WordPerfect 5.1 format.

Please acknowledge these filings by stamping the additional duplicate copy of each and returning them to me via our firm's runner.

Thank you very much for all your assistance, and for your Division's consistently helpful and professional service. If you have any questions, please give me a call.

Cordially yours,

Robert Scheffel Wright
Robert Scheffel Wright

Enclosures

RECEIVED & FILED

Mrs
FPSC-BUREAU OF RECORDS

- ACK
- AFA 4
- APP _____
- CC _____
- CF _____
- CP _____
- CS _____
- EA 1
- EL _____
- LI 3
- OT _____
- RC _____
- SEC 1
- WAS _____
- OTH _____

Petition
DOCUMENT NUMBER-DATE
10778 NOV-1 95
FPSC-RECORDS/REPORTING

Testimony
DOCUMENT NUMBER-DATE
10779 NOV-1 95
FPSC-RECORDS/REPORTING

10¹³

ORIGINAL
FILE COPY

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In Re: Conservation Cost)
Recovery Clause)
_____)

DOCKET NO. 950002-EG

FILED: NOVEMBER 1, 1995

**PETITION OF PEOPLES GAS SYSTEM, INC.
FOR APPROVAL OF TRUE-UP AMOUNT**

Peoples Gas System, Inc. ("Peoples" or "the Company"), pursuant to the Case Assignment and Scheduling Record for this docket, hereby petitions the Commission to approve its final Conservation Cost Recovery ("CCR") true-up amount for the period October 1, 1994 through September 30, 1995. In support of its Petition, Peoples states as follows.

1. The name and address of the Petitioner are:

Peoples Gas System, Inc.
111 Madison Street
Post Office Box 2562
Tampa, Florida 33601-2562 .

For deliveries by hand or by courier service, the ZIP Code for 111 Madison Street is 33602.

2. The person to whom notices, orders, and pleadings in this docket should be addressed is:

Robert Scheffel Wright, Esquire
Landers & Parsons
310 West College Avenue
Post Office Box 271
Tallahassee, Florida 32302 .

For deliveries by hand or by courier service, the ZIP Code for 310 West College Avenue is 32301.

DOCUMENT NUMBER-DATE

10778 NOV-1 95

FPSC-RECORDS/REPORTING

Peoples also requests that a courtesy copy of all notices, orders, and pleadings be furnished to:

Mr. Vernon I. Krutsinger
Manager, Energy Utilization
Peoples Gas System, Inc.
Post Office Box 2562
Tampa, Florida 33601-2562 .


3. Peoples' calculation of the true-up for which approval is requested is consistent with the Commission's prescribed methodology. This calculation and the supporting documentation are contained in an Exhibit (Exhibit VIK-1) consisting of the Conservation Cost Recovery True-Up Reporting Forms, completed as directed by the Commission Staff. A copy of Exhibit VIK-1 is included with the testimony and exhibits of Mr. Vernon I. Krutsinger in support of Peoples' petition for approval of the true-up, which are being filed simultaneously with this Petition.

4. By its Order No. PSC-95-0398-FOF-EG, the Commission approved, as part of Peoples' CCR factor to be applied to customers' bills during the period April 1994 through March 1995, an estimated true-up of \$3,732,152 underrecovery for the October 1994 through September 1995 period. The actual overrecovery for the October 1994 - September 1995 period, including principal and interest, was \$1,020,434.

5. Adding the projected underrecovery to the actual overrecovery produces a final adjusted net true-up, including both principal and interest, of \$4,752,586 overrecovery.

WHEREFORE, based on the foregoing, Peoples Gas System respectfully requests that the Commission approve the overrecovery of \$4,752,586 as the final true-up amount for the October 1994 through September 1995 period.

Respectfully submitted this 1st day of November, 1995.



Robert Scheffel Wright
Florida Bar No. 966721
LANDERS & PARSONS
310 West College Avenue
Post Office Box 271
Tallahassee, Florida 32302

Counsel for Peoples Gas System, Inc.

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing has been served by hand delivery (*) or by United States Mail, postage prepaid, on the following individuals this 1st day of November, 1995:

Sheila Erstling, Esquire*
Division of Legal Services
Florida Public Service Commission
Gunter Bldg., Room 370
2540 Shumard Oak Bld.
Tallahassee, Florida 32399-0862

Lee L. Willis, Esquire
James D. Beasley, Esquire
Macfarlane, Ausley, Ferguson &
McMullen
227 S. Calhoun Street
Tallahassee, Florida 32301

Jack Shreve, Esquire
John Roger Howe
Deputy Public Counsel
Office of Public Counsel
c/o The Florida Legislature
111 West Madison Street
Room 812
Tallahassee, Florida 32399-1400

Wayne L. Schiefelbein
Gatlin, Woods, Carlson & Cowdery
1709-D Mahan Drive
Tallahassee, Florida 32308

Jeffrey A. Stone, Esquire
G. Edison Holland, Esquire
Beggs & Lane
P.O. Box 12950
Pensacola, FL 32576-2950

Joseph A. McGlothlin, Esquire
Vicki Gordon Kaufman, Esquire
McWhirter, Reeves, et al.
117 S. Gadsden Street
Tallahassee, FL 32301

John W. McWhirter, Jr., Esq.
McWhirter, Reeves, et al.
Post Office Box 3350
Tampa, FL 33601

Floyd R. Self, Esquire
Messer, Vickers, et al.
215 S. Monroe Street
Suite 701
Tallahassee, FL 32301

Debbie Stitt
Energy Conservation Analyst
St. Joe Natural Gas Company
Post Office Drawer 549
Port St. Joe, FL 32456

James A. McGee, Esquire
Florida Power Corporation
Post Office Box 14042
St. Petersburg, FL 33733

Charles Guyton, Esquire*
Steel, Hector & Davis
215 S. Monroe St., Ste. 601
Barnett Bank Bldg.
Tallahassee, FL 32301


ROBERT SCHEFFEL WRIGHT