

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

ORIGINAL FILE COPY

February 5, 1996

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

Re: Docket No. 960003-GU

Dear Ms. Bayo:

Enclosed please find the original and fifteen (15) copies of the Prehearing Statement of the Office of Public Counsel for filing in the above-referenced docket. A diskette in IBM-compatible WordPerfect 5.1 is also submitted.

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

ACK AFA) APP _____ CAF _____ CMU____ CTR making 3 EAGJRH/bgm LEG / LIN 3 OPC RCH SEC / WAS -----OTH ____ RECEIVED & FILED FPSC-BUREAU OF RECORDS

Sincerely,

John Roger Howe Deputy Public Counsel

> DOCUMENT NUMBER-DATE 01263 FEB-5 # FPSC-RECORDS/REPORTING

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In Re: Purchased Gas Adjustment True-up DOCKET NO. 960003-GU FILED: February 5, 1996

ARIGINAL

FILE CUDY

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-96-0015-PCO-GU, issued January 5, 1996, 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

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<u>ISSUE 1</u>: What are the appropriate final purchased gas trueup amounts for the period April 1994 through March 1995?

OPC:

CHESAPEAKE:

No position at this time.

DOCUMENT NUMBER-DATE 01263 FEB-5# FPSC-RECORDS/REPORTING

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:

ISSUE 2: What are the estimated purchased gas adjustment true-up amounts for the period April 1995 through March 1996?

OPC:

No position at this time.
No position at this time.

ISSUE 3: What are the total purchased gas true-up amounts to be collected during the period April 1996 through March 1997?

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:		position			
SEBRING:		position			
SOUTH FLORIDA:		position			
ST. JOE:		position			
WEST FLORIDA:		position			

<u>ISSUE 4</u>: What are the appropriate levelized purchased gas cost recovery (cap) factors for the period April 1996 through March 1997?

OPC:

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

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WEST FLORIDA: No position at this time.

- <u>ISSUE 5</u>: 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, 1996, beginning with the first or applicable billing cycle for the period April, 1996 through March, 1997.

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.

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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

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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. 960003-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 5th day of February, 1996:

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

NORMAN H. HORTON, ESQUIRE Messer, Caparello, Madsen, 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 P.O. Box 411 Tampa, FL 33601 *SHEILA L. ERSTLING, ESQUIRE Florida Public Service Commission 2540 Shumard Oak Blvd. Tallahassee, FL 32399-0850

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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

MICHAEL A. PALECKI NUI Corporation-Southern Division 955 East 25th Street Hialeah, FL 33013-3498

John Roger Howe Deputy Public Counsel

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