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August 1, 1996

IN REPLY REFER TO

Ansley Watson, Jr
P. O. Box 1531
Tampa, Florida 33601

VIA FEDERAL EXPRESS

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

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Re: Docket No. 960404-GU -- Application for approval of new depreciation rates by PEOPLES GAS SYSTEM, INC.

Dear Ms. Bayo:

Enclosed for filing in the above docket please find fifteen (15) copies of Peoples Gas System, Inc.'s responses to the Staff Report on the Depreciation Study For Peoples.

Please acknowledge your receipt of the enclosures on the duplicate copy of this letter, and return the same to me in the enclosed preaddressed envelope.

Many thanks for your usual assistance.

Sincerely,

Ansley Watson, Jr.

ANSLEY WATSON, JR.

CS
BUREAU OF RECORDS

AWjr/a
Enclosures

cc: Mr. Francis J. Sivard (w/o enclosures)

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STAFF REPORT
PEOPLES GAS SYSTEM, INC.
1996 DEPRECIATION STUDY

Peoples Gas System, Inc. has submitted this depreciation study in conformance with Rule 25-7.045, Florida Administrative Code, as the last such study was made in 1991. This study represents an overall review of depreciation requirements and the Company's third depreciation represcription since the introduction of "reserve-sensitive" depreciation rates.

COMPANY RESPONSE

As requested, the following pages contain a written response to the Staff Report including answers to the questions, concurrences and/or counter-proposals. Where Staff has found the Company's proposals to be acceptable, we appreciate the concurrence and make no further response.

GENERAL

1. Question No. 2 of staff's initial review requested information on various accounts that had assets placed in service and subsequently retired in the same year. The company responded that there were many reasons why items placed in service might be retired within the same year. The reasons given included governmental action, customer request, lost customer business, theft, damage caused by external forces, and sale of the asset.

   For those retirements made due to governmental action, please provide the amount, if applicable, of any reimbursement made to the company. For those retirements made due to theft or damage caused by external forces, please specify if the asset was insured and if compensation was made by the insurer to cover the theft or damage. In addition, if the asset was damaged, please explain what caused the damage.

A. No reimbursements were received by the Company for any of the main retirements made due to governmental action. The company covers the majority of its assets under a property insurance policy which has a $25,000 deductible. None of the damaged items listed had a value large enough to seek recovery under our insurance coverage. The only item damaged by external forces was the 1995 - Mains, steel - $83.49. A contractor damaged 16 feet of 2 inch steel while working at the site but no claim was filed for this minor amount. The 1991- Communications Equipment - $2,843.10 was a rectifier (a major component of a telephone system) which malfunctioned but was not covered under warranty. The damaged meters were all the result of internal corrosion from water condensation.

2. Please refer to the Schedule of Plant and Reserve Activity for the years 1993-1994. Page 1 of this schedule reflects an adjustment to Account 376- Mains other than plastic, in the amount of $65,277.74. However, the detail of adjustments to plant for the same period reflect a net total of $64,752.74, creating a difference of $525. Please reconcile the two schedules.

A. An adjustment was made to account 37600 for $525.00 during the first month of our fiscal year 1994 on JE 01-162. The adjustment was a charge that posted to the AFE after it had been closed to plant. This item was inadvertently omitted from the detailed adjustment list and would have brought that total to $65,277.74.

The net adjustment to Account 376 of $64,752.74 includes sales tax audit adjustments totalling $102,294.74. Please explain the nature of these adjustments.

A. In our fiscal year 1994, the company incurred a net sales tax liability of $135,952.23 related to an audit of the tax period July, 1988 through April, 1993. Our Tax Department reviewed the purchases that generated this tax liability and determined that 75.24% of the purchases pertained to items normally capitalized by the Company. Therefore, the amount of sales tax which should have been capitalized was $102,294.74. Mains make up the largest segment of plant that these purchases might apply to. Therefore, the $102,294.74 was allocated among our operating divisions based on their investment in mains and capitalized to account 37600 accordingly.

3. The detail of adjustments to plant for the years 1993-1994 reflects adjustments to Account 392.01- Autos and Trucks up to 1 Ton in the amount of $435,892.43. According to the schedule, the adjustment was related to a special recall. Please provide additional information on the circumstances surrounding these adjustments.

A. Please refer to the attached "exhibit A" which is a copy of the recall notice from GMC Trucks. This notice related to 21 natural gas powered trucks owned by the Company. GMC repurchased these vehicles from the Company under the terms of the recall.

DISTRIBUTION PLANT

Structures and Improvements (Account 375)

Staff has no objection to your proposal of maintaining the service life underlying the currently prescribed remaining life and the currently prescribed net salvage component for this account. In addition, the company's proposed curve shape is reasonable. However, we do have some questions pertaining to the 1993 retirement of two structures totaling $394,899.03 which were related to the company's Fulford Operation Center.

In response to the initial review, the company states that the structures had to be demolished because of environmental issues. Please provide an explanation of what these environmental issues were, and why the project was delayed for nearly 10 years. We would like to understand why these buildings were demolished in the same year construction was finally complete.

A. The Company had begun construction of new administrative offices and transportation facility at our North Miami Operations Center (Fulford) in the mid-1980's. After we were well into construction, the Metro-Dade Environmental Resource Management (DERM) forced us to stop construction because of the discovery of coal-tar contamination at the site. This contamination was a result of the manufactured gas process which was conducted at this site until around 1959.

Investigation of the extent of contamination has been on-going since that time. This type of contamination assessment and site investigation is very time consuming in that we were dealing with two regulatory agencies, DERM and the Department of Environmental Protection (DEP).

In 1993 it was determined that, despite significant remedial action on the site, we would not be able to obtain the necessary permits to complete the project and occupy the buildings. It was decided that the property could be used as a parking lot for the employees in the existing Fulford Plant. The building was torn down and design work for the parking lot began. A nearby building was purchased and renovated by the Company for its new offices.

Mains (Accounts 376 and 376.02)

As with the above account, we have no objection to the Company's proposed. service lives or curve shapes for each of the Mains categories. However, we do have concerns with the assets placed in service and retired within the same year during 1991-1995. In the General section of this report, we requested additional information/clarification regarding the company's response to Question No. 2 of the initial review. This should eliminate our concerns regarding the retirement activity in these accounts.

Staff is still reviewing the expected future net salvage for Account 376 - Mains other than plastic. The company refers to certain anomalies occurring which increased removal costs. Please explain what the anomalies were and why the company believes they are not indicative of future activity?

A. Three of our 13 divisions have had an increase in main retirements due to municipal improvements, sewer and road construction in urban areas. The average removal cost percentage for these three divisions for this type of retirement is 87 percent compared to a 32 percent average for the other ten divisions for the same type of retirement. These retirements do not represent the norm for our total investment in this account. Also, we believe that this type of retirement activity will not continue to this degree in the three divisions discussed above. Therefore, it will not have the impact on the overall removal cost percentage as that reflected in our depreciation study.

The company also states that a Florida Department of Transportation (D.O.T.) requirement that mains be physically removed pertains to certain locations. Are there any specific criteria as to what type of locations fall into this category? Please provide an example which shows the actual costs incurred by the company due to the D.O.T. requirement. Is there an estimate of the October 1, 1995 investment that is associated with mains that will be required to be physically removed upon retirement due to the D.O.T. requirement?

A. In general, mains on Florida D.O.T. projects (road construction, etc.) which are in conflict with proposed D.O.T. roadway and drainage designs must be removed and/or relocated. Those that are not in direct conflict with their design can remain in place and are considered "placed out of service." These must be shown on all drawings and records provided to the D.O.T.

It would not be meaningful to provide "an example which shows the actual costs incurred by the company due to the D.O.T. requirements" because the scope of relocations required vary between D.O.T. projects and even within the same project.

We do not have an estimate of how much of the investment associated with mains will be physically removed upon retirement due to the D.O.T. requirement. While the D.O.T. does provide a 5-year work program outlining which roadways they will be working on, we do not have specific design details until the project is very near construction.

For each project involving D.O.T., please provide the year of the retirement, the original cost of the retirement, the cost of removal, the related reserve balance, and the amount of reimbursement from D.O.T.

A. Please refer to the attached "exhibit B" for the requested information. In general, we do not receive any reimbursement from the Florida D.O.T. for relocations and removals of our facilities within their rights-of-way.

Measuring and Regulating Station Equipment - General and City Gate (Accounts 378 and 379)

Staff finds the Company proposed life and salvage factors to be reasonable and in line with industry averages.

Services (Accounts 380 and 380.02)

While staff finds the Company proposed service lives and curve shapes for these accounts to be reasonable, staff is still reviewing the expected future removal costs for these accounts. What are the total number of service lines that make up the October 1, 1996 investment in these accounts?

A. As of December 31, 1995, there were 202,767 service lines in the system as reported on the annual D.O.T. report. During the first five months of 1996, the Company experienced a net loss of approximately 1,400 service lines. Assuming this trend continues through September, we project the number of service lines system wide as of October 1, 1996 to be approximately 200,500.

Meters (Account 381)

Staff finds the Company proposed life and salvage factors to be reasonable and in line with industry averages.

Meter and Regulator Installations (Accounts 382 and 384)

Staff is not prepared to make a proposal on curve shapes or life and salvage factors until further information is received on these accounts. Generally, it has been the industry view that meter and regulator installations are only retired when the meter and regulator is removed from the location and a new one is not installed, or when service through the meter or regulator is cut off. In other words, the life of these installations have been expected to be very similar to the life of Services. In the past, the company also took the position that meter and regulator installations were not retired until the associated service line was retired. This is no longer the company's position.

In response to staff's initial review, the company states that its detailed enhancements to its existing software allows the company to generate a monthly report that lists all meters that have been removed for various reasons. With this report, meter and regulator installations are retired on a monthly basis from the corresponding plant accounts for the same vintages the meters removed were originally installed.

Is it the company's position that when a meter is removed, the meter and/or regulator installation should also be retired? If so, is this a company policy? Is the monthly retirement of meter and regulator installations an accounting entry or are the retirements physically being made? How does the company track removal costs related to each of these retirements? Beginning with the removal of a meter, please provide a detailed description of the sequence of events that occur up to the retirement of the meter and/or regulator installation.

A. Yes, the Company's position is that when a meter is removed for inactivity, customer loss, etc., the meter and regulator installations are retired. This policy does not apply to meter change-outs (scheduled PT, change for cause, etc.). This position is the result of an executive directive which is being incorporated into the Company's Standard Policy and Procedures.

In addition to recording the proper accounting entries, the retirement of a meter and regulator installation involves the physical removal of certain materials, i.e. swivels and pipe fittings, at the time the meter is removed. The removal costs related to these retirements are tracked via our Service Order System. A transaction code 24, meter removal, in this system directs the charges to the AFR (Retirement Work In Progress).

The Service Order System produces a monthly report for Plant Accounting, showing all meter removals for the period and the corresponding installation information. This report lists individual removals by vintage of premise installation date prior to October, 1995. From October, 1995 forward the report provides the vintage by meter installation date. These are checked against our Continuing Property Records for accounts 382 and 384, then appropriate retirements records are made from these vintages. Retirements are removed monthly from Plant-in-Service and placed Retirement Work In Progress (R.W.I.P.). Removal costs are accumulated in R.W.I.P. as they occur. Finally, R.W.I.P. is closed to depreciation reserve on a quarterly basis.

If a meter is removed for inactivity, is it generally the result of service line inactivity?

A. Yes, in the sense that the customer is no longer using gas. It does not necessarily mean that the service line has been inactive long enough to require that it be cut and capped.

Regulators (Account 383)

Staff finds the company proposed life and salvage factors to be reasonable and in line with industry averages.

Industrial Installations (Account 385)

Staff finds the company proposed 32 year service life, 2-5 year remaining life, and zero net salvage to be reasonable and acceptable.

Other Distribution Equipment (Account 387)

This account is comprised of miscellaneous distribution system equipment such as leak detectors, pipe locators, odometers and corrosion test equipment. The company proposed life and salvage factors appear to be reasonable. Using a S2 curve shape, an average age of 7.1 years, and a service life of 16 years, results in an average remaining life of 9.4 years. Zero net salvage as proposed by the company is also acceptable.

GENERAL PLANT

Structures and Improvements (Account 390)

Staff understands that the Company's headquarters building is being leased. Further, any improvements made to the building are paid for by the owner of the building and not the Company. In the event that circumstances change before the next scheduled depreciation represcription, leasehold improvements should be assigned a 10% depreciation rate (10 years service life with zero salvage). This rate is predicated on the idea that improvements to buildings are expected to be changed out periodically over the life of the building. If the Company purchases a headquarters building, the investment should be assigned a 2.5% depreciation rate (40 year service life with zero net salvage).

Company Response

The Company does not totally agree with Staff on the issue of leasehold improvements. The Company has always followed the Code of Federal Regulations 18, Part 201 - Uniform System of Accounts Prescribed for Natural Gas Companies (Revised as of April 1, 1993). Under the heading of Gas Plant Instructions No. 6 *Expenditures on leased property* it states: "If the service life of the improvements is terminable by action of the lease, the cost, less net salvage, of the improvements shall be spread over the life of the lease by charges to account 404.3, Amortization of Other Limited-Term Gas Plant." Staff's proposal does apply in certain situations per Instruction No 6. The Instruction states: "However, if the service life is not terminated by action of the lease but by depreciation proper, the cost of the improvements, less net salvage, shall be accounted for as depreciable plant." All of our property leases are for a specific term and, therefore, we amortize any leasehold improvements over the term of the lease.

The Company agrees with staff on the 2.5% depreciation rate (40 year service life with zero net salvage) in the event we were to purchase a headquarters building.

Office Furniture (Account 391)

The company's analysis of the activity in this account indicates an average service life of approximately 15 years. In response to staff's initial review, the company stated that approximately 44% of the investment in this account is related to modular furniture. Staff believes that modular furniture tends to have a shorter life expectancy than traditional wood furniture or its equivalent. Staff proposes an average service life of 15 years which is more in line with the expected activity in this account. The 15 years represents a composite of an 18-20 year life for the wood furniture and a 10-12 year life for modular. Using a Rl curve shape and an age of 6.6 years, results in an average remaining life of 10.4 years.

Company Response

The Company agrees to Staff's proposal.

Computer Equipment (Account 391.01)

Staff finds the Company proposed life and salvage factors to be reasonable. With the technological changes occurring in the computer industry, we are seeing lives for this type of equipment in the 3-5 year range. Recognizing however, that a major portion of this account's investment (56%) is associated with mainframe software systems having an age in excess of 7 years, the company proposed life and salvage factors are reasonable. Please provide a description of these software systems and explain the function they perform. Were these systems internally generated or purchased from a vendor?

A. Account 391.01 Major Software

Description	Function	Developer
Walker	Accts. Pay./Materials Mgmt./Purchase Orders	Vendor
CIS	Customer Information/Billing System	In-House
Service Orders	Processing of Service Orders	In-House
Automated Timesheets	Processing of Timesheet Information	In-House
SIRS	Processing Requests for Gas Service	In-House
MACS	Meter Accounting and Control System	In-House
MARS	Meter Automated Reading System	In-House
GOFR	Gas Online Flow Reporting	Vendor
Automated Cashiering	Processing of Customer Payments	Vendor
MOPS	Monthly Operating Report System	In-House

Office Machines (Account 391.02)

Generally, this account is comprised of such things as typewriters, calculators, billing machines, etc.. Before we make a proposal on this account, please provide a description of the minor items referenced in Filing requirement 6(e), page 4 of your study.

A. The minor items retired from account 391.02, office machines, consisted of 298 items with an original cost of less than $500.00. The types of items were adding machines, calculators, dictating machines, mailing scales, vacuum cleaners, microfiche viewers, microwave ovens, slide projectors, VCRs, and training videos. All of these items were purchased and capitalized prior to establishment of the Commission's $500 minimum capitalization rule. Therefore, we no longer capitalize these low cost, short lived items.

Automobiles and Light Trucks (Account 392.01)

The Company proposed service life, remaining life, and net salvage factors of 8 years, 4.7 years and 10%, respectively, are in line with the activity of this account and are acceptable.

Airplanes (Account 392.03)

The Company has not retired the single aircraft in the account but it does anticipate replacing the airplane in the near future. Although staff has no objection to the company proposed average service life and age of this account, we would like to know approximately when the company expects to replace this aircraft.

A. No decision has been made at this time regarding when the Company's aircraft will be replaced. The purchase of a new aircraft will most likely occur after our fiscal year 1997 as no provision has been made in the FY1997 capital budget.

Other Transportation Equipment (Account 392.04)

The Company proposed average service life of 20 years and net salvage of 14% is reasonable and acceptable to staff. However, the Company proposed SI curve shape does not appear indicative of company activity. Staff proposes using a S3 curve shape which is more in line with company activity. Using the S3 curve shape, an average service life of 20 years and an average age of 9 years results in an average remaining life of 11.1 years.

Company Response

The Company agrees to Staff's proposal.

Trucks Over 1 Ton (Account 392.05)

Staff finds the Company proposed 12 year service life, 4.6 year remaining life, and 5% net salvage to be reasonable and acceptable. The use of a S4 curve shape is also acceptable.

Stores Equipment (Account 393)

Staff finds the Company proposed life and salvage factors of a 19 year average service life, a 3.3 year average remaining life, and zero net salvage reasonable and acceptable for this account.

Tools, Shop and Garage Equipment (Account 394)

The Company proposed life and salvage factors are reasonable and acceptable. Using a Sl curve shape, an average service life of 15 years, and an average age of 6.6 years results in an average remaining life of 9.4 years.

Laboratory Equipment (Account 395)

The Company's study indicates an average service life of 18.5 years. Although the account activity is limited, there is no indication that the pattern of activity will change. This being the case, staff finds no compelling reason to maintain the current average service life of 25 years. Staff therefore proposes a 20 year average service life. Using a S1 curve, a 20 year average service life, and an average age of 4.6, results in an average remaining life of 15.7 years. The net salvage of zero, as indicated in the study, is acceptable.

Company Response

The Company agrees to Staff's proposal.

Power Operated Equipment (Account 396)

The company proposes to maintain the current life and salvage factors for this account. This is acceptable to staff. Using a S4 curve shape, a 15 year average service life and an average age of 8.3 years results in an average remaining life of 6.1 years. Staff also has no objection to the company's proposal to maintain a net salvage of 5%.

Communications Equipment (Account 397)

The study indicated an average service life of 9.7 years. However, the Company proposes using a 12 year average service life which it states is the company's current prescribed average service life. Staff examined the company's last depreciation order (Order No. 25229, issued 10/18/91) and found that it currently has a 10 year average service life prescribed for this account. Nevertheless, staff proposes an average service life of 10 years which is in line with the expected activity of this equipment. Using a S3 curve shape and an average age of 6.4 years, results in an average remaining life of 4 years.

Company Response

The Company agrees to Staff's proposal.

Miscellaneous Equipment (Account 398)

The company is proposing to maintain its current 20 year average service life for this account in spite of the fact that the study indicates an average service life of approximately 16.6 years. According to the company, the data for this account is limited and may not be indicative of a proper service life for this account. However, the retirement ratio for the 1990-1995 period has averaged 3.2%, and the industry average life for this investment is 17 years. Staff, therefore, proposes an average service life of 17 years with an R2 curve shape and an average age of 4.3 years yielding an average remaining life of 13.2 years.

Company Response

The Company agrees to Staff's proposal.

GMC TRUCK

Dear GMC Truck NGV Owner.

This notice is sent to you in accordance with the requirements of the National Traffic and Motor Vehicle Safety Act.

REASON FOR THIS RECALL

Production Automotive Systems, Inc. (PAS, Inc.) has determined, and General Motors agrees, that a defect which relates to motor vehicle safety exists on certain 1992-93 GMC Truck C model Sierra pickups modified by PAS, Inc. to operate solely on compressed natural gas. These vehicles were produced with compressed natural gas storage tanks which over time may develop stress cracks in the E-glass wrap on the external surface of the tank. Cracking in the external surface may lead to tank ruptures and possible injury to individuals in or near the vehicle if a rupture occurs.

WHAT WE WILL DO

To correct this condition, GMC Truck will replace the natural gas pickup truck with a comparable 1994 two wheel drive, gasoline powered Sierra pickup or refund your purchase price if you respond to this letter by April 30, 1994. After April 30, 1994, the vehicles will be repurchased for your purchase price less depreciation allowance of .001% of the purchase price for each accrued mile on the vehicle.

WHAT YOU SHOULD DO

All NGV trucks should be removed from service immediately. The engine should be run until the fuel gauge reads below one quarter tank and the vehicle stored and not operated in any manner.

Faxed 4/12/94 2:15PM

Please complete the attached forms and fax them to (810) 456-6052. Upon receipt of your completed forms, your designated representative will be contacted by GMC Truck Division if required. Equipment installed by you should be removed in anticipation of being reinstalled on the replacement truck. Reimbursement for the removal and reinstallation of equipment will be made by GMC Truck upon submission of suitable documentation. Submit this documentation to GMC Truck Division, 31 Judson St., Mail Code 1607-07, Pontiac, MI 48342-2230, Attention NGV Coordinator.

Replacement of your vehicle is dependent upon your prompt return of the attached forms. All 1994 replacement truck orders must be received and entered into the production system no later than April 30, 1994. If you have any questions about this process, please call GMC Truck at 1-800-462-7000.

After contacting GMC Truck, if you are still not satisfied that we have done our best to remedy this condition without charge within a reasonable time, you may wish to write the Administrator, National Highway Traffic Safety Administration, 400 Seventh Street, S.W., Washington, D.C., 20590, or call 1-800-424-9393 (Washington, D.C. residents use 366-0123).

We are sorry to cause you this inconvenience. General Motors is firmly committed to alternative fuel vehicles and will continue to develop the technology needed to deliver the next generation vehicle designed to operate on compressed natural gas.

GMC TRUCK DIVISION
GENERAL MOTORS CORPORATION

Attachment

PEOPLES GAS SYSTEM, INC.
DOCKET NO. 960404-GU
DEPRECIATION STUDY
STAFF'S REPORT
EXHIBIT B

PEOPLES GAS SYSTEMS, INC.
MAIN RETIREMENTS DUE TO F.D.O.T. CONSTRUCTION
FIVE YEAR PERIOD F/Y 91 THRU F/Y 95

A.F.R. NUMBER	YEAR RET'D	ORIGINAL COST	COST OF REMOVAL	DOLLARS CLOSED TO RESERVE
010189102142	9303	1549.84	2520.31	4070.15
010189302124	9303	1164.80	737.00	1901.80
010189402101	9403	1681.00	184.96	1865.96
010189402113	9403	82.66	260.89	343.55
010189402120	9403	949.65	1074.87	2024.52
010189402122	9503	26491.00	11444.53	37935.53
010189502109	9503	5108.91	3846.39	8955.30
010189502110	9503	7588.37	1390.66	8979.03
010289302115	9303	23792.83	21617.06	45409.89
010289302125	9403	2530.54	29907.83	32438.37
010289302142	9403	2213.64	18171.62	20385.26
010289402107	9503	16050.53	19590.71	35641.24
010289502110	9503	1920.00	4202.97	6122.97
010289502114	9503	2284.00	7115.23	9399.23
010489202108	9503	34871.76	39.40	34911.16
010489302103	9303	4396.37	1604.34	6000.71
010489302107	9303	5666.11	0.00	5666.11
010489302110	9503	44030.27	4187.48	48217.75
010489502103	9503	369.60	6412.63	6782.23
010489502111	9503	16.80	1756.48	1773.28
010689302102	9303	9123.41	0.00	9123.41
010789302123	9503	895.00	789.15	1684.15
010789502111	9503	114.38	995.29	1109.67
011189302121	9303	1320.85	800.65	2121.50
011189502104	9503	4368.97	2520.00	6888.97
011189502106	9503	9511.25	7500.00	17011.25