BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

OF

PREPARED DIRECT TESTIMONY

RAYMOND A. DeMOINE

PLEASE STATE YOUR NAME AND BUSINESS ADDRESS. O.

My name is Raymond A. DeMoine My business address is One Elizabethtown 7 A

Plaza, Union, New Jersey 07083. 8

BY WHOM ARE YOU EMPLOYED, AND IN WHAT CAPACITY. Q. 9

I am currently employed as Director of Rates and Regulatory Affairs for NUI 10 A.

Corporation which includes the Florida operating division, City Gas Company of 11

Florida. 12

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PLEASE DESCRIBE YOUR PRIOR UTILITY RELATED EXPERIENCE. Q.

Upon graduation from Rider College in 1983, I was employed by the State of New A. 14

Jersey as an Auditor/Investigator with the Division of Criminal Justice I audited 15

various types of business entities, primarily for the detection of fraud 16

December 1986, I accepted a professional staff position with the certified public 17

accounting firm of Arthur Young (now Ernst and Young), a worldwide accounting

and consulting firm. My experience with this public accounting firm included

auditing and consulting engagements on a variety of entities and exposure to

varied accounting systems

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FPSC-RECORDS/REPORTING

In July 1989, I was hired as Administrator of External Reporting by Elizabethtown Gas Company. In that role, I was responsible for the coordination of the Accounting Department's efforts in all regulatory proceedings

In March 1995, I was promoted to Manager of Regulatory Affairs in the Company's Rate Department, in July 1995, I assumed additional responsibility as Manager of Rates and Regulatory Affairs.

In November 1996, I was promoted to Director of Rates and Regulatory

Affairs.

O. PLEASE DESCRIBE YOUR EDUCATIONAL BACKGROUND.

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A. I received a Bachelor of Science in Commerce degree, with a major in Accounting, from Rider College in June 1983. In June 1990, I received a Master of Business Administration degree from Rider College. I am a Certified Public Accountant in the State of New Jersey, and a member of the American Institute of Certified Public Accountants and the New Jersey State Society of Certified Public Accountants.

Q. MR. DeMOINE, WHAT IS THE PURPOSE OF YOUR TESTIMONY?

The purpose of my testimony is to present the revised estimate of the Company's projection of gas costs for the period April 1996 through March 1997. I will describe generally the Company's projection of gas costs and the development of the maximum rate to be charged to customers for the period April 1997, through March 1998.

- Q. HAS THE COMPANY PREPARED THE FORMS AS PRESCRIBED BY
 THIS COMMISSION FOR THIS PURPOSE.
- 45 A. Yes. The forms prescribed by the Commission are being filed at this time Copies

 46 are attached to my testimony.
- 47 Q. CAN YOU EXPLAIN THE PROJECTION METHODOLOGY?
- Yes. Under this methodology, which was adopted by Order No PSC-93-0708-48 A. FOF-GU of this Commission on May 10, 1993, gas companies are to project their 49 gas costs each twelve months for the ensuing twelve-month period ending in 50 March. A rate per therm is developed for the weighted average cost of gas 51 (WACOG). this rate, based on the average of the winter and summer seasons 52 would lead to over or underrecoveries of gas costs in the two seasons 53 problem is mitigated by establishing a maximum levelized purchased gas factor 54 based on the company's expected winter cost of gas, thereby eliminating the large 55 underrecovery in that season. The Company is then able to flex downward in the 56 summer in order to match market conditions and eliminate the potential for a large 57 overrecovery for the reminder of the period 58
- 59 Q. WHAT IF THE ACTUAL COST EXCEEDS THE MAXIMUM RATE AS
 60 PROJECTED?
- 61 A If re-projected gas costs for the remaining period exceed projected recoveries by at
 62 least 10% for the twelve-month period, a mid-course correction may formally be
 63 requested by the Company.

64	Q.	WHAT HAPPENS TO THE DIFFERENCES THAT RESULT FROM
65		MISESTIMATES, THAT IS, THE MISMATCHES BETWEEN ACTUAL
66		AND ESTIMATED COSTS?
67	A.	The forms take this into consideration. Form E-2 calculates the projected
68		differences using estimated figures, and form E-4 calculates the final true-up using
69		actual figures. These difference are flowed back to customers through the true-up
70		factor included in gas costs billed in the subsequent twelve-month period
71	Q.	ARE ANY FGT RATE CHANGES PROPOSED WHICH ARE
72		REFLECTED IN THIS FILING?
73	A.	Yes. On August 30, 1996, FGT filed with the FERC for a general rate increase in
74		Docket No. RP96-366. The FERC subsequently issued an Order accepting FGT's
75		filing and suspending the proposed rates for five months. The suspension period
76		will end on March 1, 1997, at which time FGT's proposed rates will go into effect
77		This filing incorporates the rates contained in FGT's filing as of that date
78	Q.	HAVE YOU MADE ANY MODIFICATIONS TO THE COMMISSION
79		PRESCRIBED FORMS?
80	A.	Yes. On Form E-2, lines 4a and 4b were added The reason these lines were
81		added was that gas costs rose significantly in the period December 1996 through
82		March 1997. In order to recover the level of revenues presented on line 4, City
83		Gas would have had to charge a PGA rate in excess of its cap Therefore, line 4a
84		represents the difference in revenue between the Company's cap of \$0 42184 and
85		the amount which would have been charged if the Company could exceed its cap

86 Q. CAN YOU SUMMARIZE THE CONTENTS OF THE SCHEDULES 87 SUBMITTED AS PART OF THIS FILING?

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Yes. For the projected period April 1997 through March 1998, we estimate the gas purchases for resale will be 78,469,076 therms at a total cost of \$35,356,950. with a resulting WACOG of 45.058 cents per therm (before the application of the true-up factor and the regulatory assessment fee) The difference between the estimated actual and actual true-up for the prior period April 1995 through March 1996 is an underrecovery of \$1,223,433 The projected true-up for the current period April 1996 through March 1997 is an underrecovery of \$3,290,895. The total true-up as shown on Schedule E-4 is an underrecovery of \$4,514,328 for a true-up factor of 5.753 cents per therm that would be applied during the projected period. This true-up factor increases the gas cost factor during the April 1997 through March 1998 period, to 50.811 cents per therm (before the regulatory assessment fee) With the regulatory assessment fee added, the PGA factor is 51.003 cents per therm based on the average of the winter and summer seasons City Gas however has chosen to establish a maximum levelized purchased gas factor based on the Company's expected winter cost of gas as follows

Winter Average

104	Total Cost (Line 11)	\$20,240,298
105	Total Therm Sales (Line 27)	42,427,535
106	(11/27)	\$0 47706
107	True-up	0 05753

108	Before Regulatory Assess 0.53459
109	Revenue Tax Factor 1 00376
110	Purchased Gas Factor \$0 53660
1!1	As shown above, the maximum levelized purchased gas factor based on the
112	Company's expected winter cost of gas is 53.459 cents per therm before the
113	regulatory assessment fee. This is the maximum gas cost factor that City Gas may
114	charge its customers for the period April 1997 through March 1998
115 Q.	DOES THIS CONCLUDE YOUR TESTIMONY?
116 A.	Yes, it does.