

ORIGINAL



JACK SHREVE  
PUBLIC COUNSEL

STATE OF FLORIDA  
OFFICE OF THE PUBLIC COUNSEL

c/o The Florida Legislature  
111 West Madison St.  
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Tallahassee, Florida 32399-1400  
850-488-9330

February 2, 1998

Ms. Blanca S. Bayó, Director  
Division of Records and Reporting  
Florida Public Service Commission  
2540 Shumard Oak Boulevard  
Tallahassee, FL 32399-0870

RE: Docket No. 980003-GU

Dear Ms. Bayó:

Enclosed are an original and fifteen copies of the Public Counsel's Prehearing Statement in the above-referenced docket.

Also enclosed is a 3.5 inch diskette containing the Preliminary List of Issues and Positions in WordPerfect for Windows 6.1. 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.

Sincerely,

  
John Roger Howe  
Deputy Public Counsel

ACK \_\_\_\_\_  
AFA Andrew  
APP \_\_\_\_\_  
DAF \_\_\_\_\_  
DMU JRH/dsb  
DTR \_\_\_\_\_  
ENC 1  
ECL \_\_\_\_\_  
LIT 3  
CIT \_\_\_\_\_  
FAC \_\_\_\_\_  
SEL 1  
WAS \_\_\_\_\_  
OTH \_\_\_\_\_

RECORDED & FILED

BUREAU OF RECORDS

DOCUMENT NUMBER - DATE

01699 FEB-2 88

FPSC - RECORDS/REPORTING

ORIGINAL

**BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION**

In Re: Purchased Gas Adjustment )  
True-up )

DOCKET NO. 980003-GU  
FILED: February 2, 1998

**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-98-0037-PCO-GU, issued January 6, 1998, 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.

DOCUMENT NUMBER - DATE

01699 FEB-28

FPSC-RECORDS/REPORTING

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 April, 1996, through March, 1997?

POSITION:

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.

ISSUE 2: What are the estimated purchased gas adjustment true-up amounts for the period April, 1997, through March, 1998?

POSITION:

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.

ISSUE 3: What are the total purchased gas true-up amounts to be collected during the period April, 1998, through March, 1999?

POSITION:

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.

ISSUE 4: What are the appropriate levelized purchased gas cost recovery (cap) factors for the period April, 1998, through March, 1999?

POSITION:

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.

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, 1998, beginning with the first or applicable billing cycle for the period April, 1998 through March, 1999.

**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  
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(850) 488-9330

Attorneys for the Citizens  
of the State of Florida

**CERTIFICATE OF SERVICE**  
DOCKET NO 980003-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 2<sup>nd</sup> day of February, 1998

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Indiantown, Florida 34956

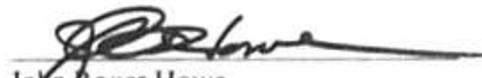
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