

October 13, 1998

Federal Express

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. 980002-EG
Conservation Cost Recovery**

Dear Ms. Bayo:

Enclosed for filing in the above docket are 1) an original and 10 copies of City Gas Company of Florida's petition for approval of conservation cost recovery factors and 2) an original and 10 copies of the testimony of Carl Smith relating to the aforementioned petition, with attached Schedules C-1 through C-3, and C-5.

ACK _____
AFA Handover Thank you for your assistance.

APP _____

CAF _____

CMJ _____

CTR _____

EM Ballinger

LEI 1

LIT 3 to MAP/H

OF _____ Encl.

REI _____

SEL 1

WAS _____

OTH _____

Sincerely,

Michael A. Palecki

Michael A. Palecki
Attorney, Legal & Regulatory Affairs
NUI Corporation

Testimony
DOCUMENT NUMBER: 11474
DATE: OCT 14 98

Petition
DOCUMENT NUMBER: 11473
DATE: OCT 14 98

RECORDS & REPORTING

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Conservation Cost Recovery
 Clause

) DOCKET NO. 980002-IG
) Filed: October 13, 1998
)

**PETITION OF CITY GAS COMPANY OF FLORIDA
 FOR APPROVAL CONSERVATION COST RECOVERY FACTOR**

City Gas Company of Florida, a division of NUI Corporation ("NUI/City Gas" or "the Company") hereby petitions the Commission for Approval of the Company's conservation cost recovery factor for the period January 1, 1999 through December 31, 1999. In support thereof, the Company says:

1. For the period April 1, 1999 through December 31, 1999, NUI/City Gas projects its total incremental conservation costs to be \$1,640,769, (Schedule C-2). NUI/City Gas' true-up for the period April 1998 through March 1999 (five months actual and seven months estimated) is an overrecovery of \$474,320, resulting in a total of \$1,166,449 of conservation costs to be recovered during the January 1999 through December 1999 period.
2. When the required true-up and projected expenditures are spread over the projected therm sales and expanded for taxes, the required conservation cost recovery factors for the period for the period January 1999 through December 1999, are:

Residential (RS, ED & GL)	\$00.03678
Commercial (CS, ED, CTS & SCTS)	\$00.00861
Commercial Large Volume (LCS)	\$00.00704

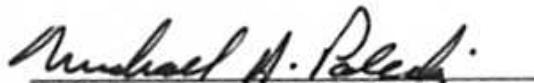
DOCUMENT NUMBER-DATE

11473 OCT 14 88

FPSC-RECORDS/REPORTING

3. The Company's calculation of the Conservation Cost Recovery Factors are consistent with the Commission's methodology, and supported by the Direct Testimony of Carl Smith, and Schedules C-1 through C-3, and C-5.

WHEREFORE, City Gas Company of Florida requests that its Conservation Cost Recovery Factor for the period January 1, 1999 through December 31, 1999, be approved.



Michael A. Palecki
Attorney, Legal & Regulatory Affairs
NUI CORPORATION
955 East 25th Street
Hialeah, FL 33013-3498
(305)694-6160

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the Petition of City Gas Company of Florida has been furnished by U.S. Mail to the following parties of record, this 14th day of October, 1998:

Bob Elias, Esq.
Division of Legal Services
Florida Public Service Commission
2540 Shumard Oak Blvd.
Tallahassee, FL 32399

Debra Swim
Gail Kamaras
LEAF
1114 Thomasville Road, Ste E
Tallahassee, FL 32303-6290

G. Edison Holland, Esq.
Jeffrey A. Stone, Esq.
Beggs and Lane
Post Office Box 12950
Pensacola, FL 32576

Mollie Lampi
Pace University Energy Project
122 S. Swan Street
Albany, NY 12110

Norman Horton, Esq.
Messer, Vickers, Caparello,
Madsen, Lewis & Metz
215 South Monroe Street
Suite #701
Tallahassee, FL 32301

John Roger Howe
Office of the Public Counsel
The Claude Pepper Building
111 West Madison Street
Suite #812
Tallahassee, FL 32399

Charles A. Guyton, Esq.
Steel Hector and Davis
Florida Power & Light Company
215 South Monroe Street
Suite 601
Tallahassee, FL 32301

Lee L. Willis, Esq.
James D. Beasley, Esq.
Ausley, McMullen, McGehee,
Carothers and Proctor
227 S. Calhoun Street
Tallahassee, FL 32301

Stuart L. Shoaf, Esq.
Debbie Stitt
St. Joes Natural Gas Company, Inc.
P. O. Box 549
Port St. Joe, FL 32456

James A. McGee, Esq.
Florida Power Corporation
P. O. Box 14042
St. Petersburg, FL 33733


Wayne L. Schiefelbein, Esq.
Ruden, McCloski, Smith
Chesapeake Utilities
215 South Monroe Street
Tallahassee, FL 32301

Matthew R. Costa
MacFarlane, Ferguson, Allison,
and Kelley
P. O. Box 1531
Tampa, FL 33601

Florida Industrial Power Users Group
John W. McWhirter, Jr.
McWhirter Law Firm
Post Office Box 3350
Tampa, FL 33601

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

Kenneth Hoffman, Esq.
Rutledge, Ecenia, Underwood
215 South Monroe Street
Suite 420
Tallahassee, FL 32302-0551


Michael A. Palecki
Attorney, Legal & Regulatory Affairs
NUI CORPORATION
955 East 25th Street
Hialeah, FL 33013-3498
(305)694-6160