

ORIGINAL

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REPORTING

October 26, 1998

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

HAND DELIVERY

Re: South Florida Natural Gas Company; Docket No. 980003-GU

Dear Ms. Bayo:

Enclosed for filing on behalf of South Florida Natural Gas Company in connection with the hearings scheduled to begin November 23, 1998 in this docket are the original and 10 copies of the Preliminary Statement of Issues and Positions. Also enclosed is a diskette with the document on it in WordPerfect 6.1 format.

Please acknowledge receipt of these documents by stamping the enclosed extra copy of this letter. Thank you for your assistance.

Yours very truly,

Norman H. Horton, Jr.
Norman H. Horton, Jr.

RECEIVED & FILED

FPSC-BUREAU OF RECORDS

- ACK _____
- AFA Vandiver
- APP _____
- CAF _____
- CMU _____
- CTR _____
- EAG _____
- LEG 1
- LIN 3
- OPC _____
- RCH _____
- SEC 1
- WAS _____
- OTH _____

NHH/amb
Enclosures
cc: Mr. Al Kara
Ms. Anne V. Wood
Mr. John Davis
Parties of Record

DOCUMENT NUMBER - DATE

11930 OCT 26 1998

WORK PRODUCT - NOT FOR DISTRIBUTION

ORIGINAL

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In Re: Purchased Gas Adjustment)
_____)

Docket No 980003-GU

SOUTH FLORIDA NATURAL GAS
PRELIMINARY STATEMENT OF ISSUES AND POSITIONS

South Florida Natural Gas ("SFNG") hereby submits its preliminary statement of issues and positions to be taken up at the hearing now scheduled to begin on November 23, 1998 in this docket.

Issue 1: What is the appropriate final purchased gas adjustment true-up amount for the period April, 1997 through March, 1998?

SFNG's Position: \$19,668 underrecovery.

Issue 2: What is the estimated purchased gas adjustment true-up amount for the period April, 1998 through December, 1998?

SFNG's Position: \$101,779 overrecovery.

Issue 3: What is the total purchased gas adjustment true-up amount to be collected in the January, 1999 - December, 1999 period?

SFNG's Position: \$82,111 overrecovery.

Issue 4: What is the appropriate levelized purchased gas cost recovery (cap) factor to be charged during the period January, 1999 through December, 1999?

SFNG's Position: 30.644 cents per therm.

Issue 5: What should be the effective date of the new purchased gas adjustment charge for billing purposes?

DOCUMENT NUMBER DATE

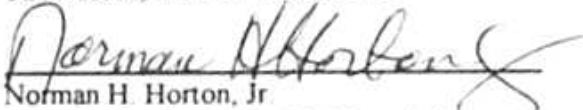
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FLORIDA PUBLIC SERVICE COMMISSION

SFNG's Position:

The factor should be effective for all meter readings on or after January 1, 1999, beginning with the first or applicable billing cycle for the period January, 1999 through December, 1999.

Respectfully submitted,
MESSER, CAPARELLO, & SELF, P A
215 S. Monroe St.
Suite 701, First Florida Bank Building
Post Office Box 1876
Tallahassee, Florida 32302-1876


Norman H. Horton, Jr.
Attorney for South Florida Natural Gas

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that true and correct copies of South Florida Natural Gas Company's Preliminary Statement of Issues and Positions in Docket No. 980003-GU have been served by hand delivery (*) and/or U. S. Mail this 26th day of October, 1998 upon the following:

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NORMAN H. HORTON, JR.

SOUTH FLORIDA NATURAL GAS
PRELIMINARY STATEMENT
DISK/FILE SPECIFICATIONS
DOCKET 980003-GU

File Name:	PGAPRELS
Density of Diskette:	High
Operating System:	DR DOS Version 5
Software:	WordPerfect Version 6.1

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