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ORIGINAL

RECORDS AND
REPORTING

OCT 18 PM 1:59

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October 18, 1999

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; Docket No. 990003-GU

Dear Ms. Bayo:

Enclosed for filing on behalf of South Florida Natural Gas are the following documents:

1. An original and 10 copies of South Florida Natural Gas Preliminary List of Issues and Positions; 12688-99
2. A 3 1/2" diskette with the Preliminary List of Issues and Positions on it.
3. An original and 10 copies of Amended Petition for Approval of South Florida Natural Gas' Purchased Gas Adjustment Factor; 12687-99
4. An original and 10 copies of the Amended Direct Testimony of Al Kara; 12689-99
5. An original and 10 copies of Amended Exhibit AK-1. 12690-99

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APP _____
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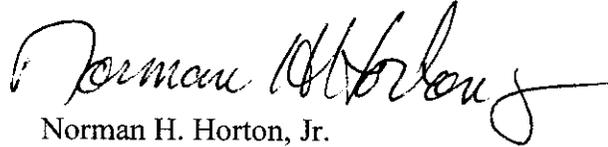
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FPSC-BUREAU OF RECORDS

Ms. Blanca Bayo, Director
October 18, 1999
Page 2

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

Sincerely,

A handwritten signature in cursive script, reading "Norman H. Horton, Jr.", with a long horizontal flourish extending to the right.

Norman H. Horton, Jr.

NHH/amb

Enclosures

cc: Mr. Al Kara
Mr. James A. Williams
Mr. John Davis
Parties of Record

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

ORIGINAL

In re: Purchased Gas Adjustment)
_____)

Docket No. 990003-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 22, 1999 in this docket.

Issue 1: What is the appropriate final purchased gas adjustment true-up amount for the period April, 1998 through December, 1999?

SFNG's Position: \$26,970 overrecovery.

Issue 2: What is the estimated purchased gas adjustment true-up amount for the period January, 1999 through December, 1999?

SFNG's Position: \$115,104 overrecovery.

Issue 3: What is the total purchased gas adjustment true-up amount to be collected in the January, 2000 – December, 2000 period?

SFNG's Position: \$142,074 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: 31.066 cents per therm.

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

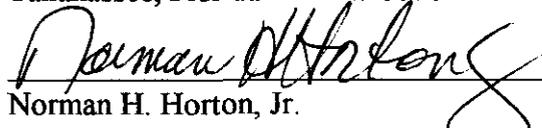
DOCUMENT NUMBER-DATE

12688 OCT 18 99

FPSC-RECORDS/REPORTING

SFNG's Position: The factor should be effective for all meter readings on or after January 1, 2000, beginning with the first or applicable billing cycle for the period January, 2000 through December, 2000.

Respectfully submitted,
MESSER, CAPARELLO, & SELF, P. A.
215 S. Monroe Street
Suite 701, First Florida Bank Building
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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' Preliminary Statement of Issues and Positions in Docket No. 990003-GU have been served by hand delivery (*) and/or U. S. Mail this 18th day of October, 1999 upon the following:

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