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June 13, 2000

BY HAND DELIVERY

Mr. Lee Romig
Division of Auditing and Financial Analysis
Room 215, Gunter Building
Florida Public Service Commission
2540 Shumard Oak Blvd.
Tallahassee, Florida 32399-0850

Re: FPSC Docket No. ~~000643~~-GU
000634

Dear Lee:

Pursuant to your recent telephone request, enclosed please find copies of schedules detailing the calculation of revenue that would have been collected had the late payment charge been in place and the affect of those collections on the ROE. Also enclosed is a month-by-month report of customers who were delinquent and the average for the period January 1999 to April 2000. Please note that the average number of delinquent customers and the percentage of customers delinquent by month has been updated and the numbers vary slightly from those in the petition. The numbers on this schedule should be used in lieu of the petition. If you deem it necessary to file an amended petition to reflect this updated information, please let me know.

Sincerely,



Norman H. Horton, Jr.

- APP _____
- CAF _____
- CMP _____
- COM _____
- CTR _____
- ECR _____
- LEG _____
- OPC _____
- PAI _____
- RGO _____
- SEC 1
- SER _____
- OTH _____

NHH:amb
Enclosures
cc: Mr. Al Kara
Mr. Wayne Makin
Docket File

DOCUMENT NUMBER-DATE

07245 JUN 13 8

FPSC-RECORDS/REPORTING

01-1046
52758

**SOUTH FLORIDA NATURAL GAS
 REPORT OF NUMBER OF CUSTOMERS DELINQUENT
 BY MONTH FOR THE PERIOD JANUARY 1999 - APRIL 2000**

MONTH	NUMBER OF BILLS SENT	NUMBER OF DELINQUENT CUSTOMERS*	% CUSTOMERS DELINQUENT BY MONTH*	PAST DUE RECEIVABLES BY MONTH
Jan-99	4,270	448	10.49%	\$55,929.57
Feb-99	4,329	524	12.10%	\$50,572.61
Mar-99	4,352	656	15.07%	\$48,129.43
Apr-99	4,369	536	12.27%	\$56,518.37
May-99	4,298	619	14.40%	\$64,243.70
Jun-99	4,178	426	10.20%	\$42,054.87
Jul-99	4,117	510	12.39%	\$49,602.84
Aug-99	4,126	406	9.84%	\$34,630.31
Sep-99	4,115	381	9.26%	\$24,646.05
Oct-99	4,147	483	11.65%	\$44,633.80
Nov-99	4,251	386	9.08%	\$35,971.08
Dec-99	4,359	411	9.43%	\$35,537.46
Jan-00	4,412	693	15.71%	\$68,092.66
Feb-00	4,478	767	17.13%	\$75,689.71
Mar-00	4,508	815	18.08%	\$101,037.85
Apr-00	4,488	691	15.40%	\$64,852.59
Total	68,797	8752	-----	-----
Avg over period	4,300	547	12.72%	\$53,258.93

Delinquent bills are those twenty days and more past the billing date.

* Customer count numbers and % customers delinquent have been updated.

**SOUTH FLORIDA NATURAL GAS
CUSTOMER BILLING DATA AND LATE PAYMENT CHARGE CALCULATION
BY MONTH FOR THE PERIOD JANUARY 1999 - APRIL 2000
PROPOSED LATE PAYMENT CHARGE IS THE GREATER OF 1.5% OF UNPAID PRIOR MONTH BILLINGS OR \$5.00**

Month	Total customer count	Total receivable balance	Calculated total late fee
Jan-99	448	\$55,929.57	\$2,506.82
Feb-99	524	\$50,572.61	\$2,754.22
Mar-99	656	\$48,129.43	\$3,366.37
Apr-99	536	\$56,518.37	\$2,865.54
May-99	619	\$64,243.70	\$3,357.58
Jun-99	426	\$42,054.87	\$2,252.00
Jul-99	510	\$49,602.84	\$2,792.84
Aug-99	406	\$34,630.31	\$2,161.44
Sep-99	381	\$24,646.05	\$1,938.14
Oct-99	483	\$44,633.80	\$2,550.06
Nov-99	386	\$35,971.08	\$2,048.16
Dec-99	411	\$35,537.46	\$2,165.63

Jan-Dec 99 calculated late fee \$30,758.79

Jan-00	693	\$68,092.66	\$3,722.03
Feb-00	767	\$75,689.71	\$4,149.42
Mar-00	815	\$101,037.85	\$4,594.82
Apr-00	691	\$64,852.59	\$3,629.84

Jan-Apr 00 calculated late fee \$16,096.13

Customers to charge \$5.00 late fee

Month	customer count	receivable balance	\$5.00 late fee
Jan-99	419	\$28,474.86	\$2,095.00
Feb-99	497	\$32,624.90	\$2,485.00
Mar-99	644	\$38,371.33	\$3,220.00
Apr-99	518	\$38,148.92	\$2,590.00
May-99	592	\$37,738.47	\$2,960.00
Jun-99	403	\$26,255.16	\$2,015.00
Jul-99	487	\$25,746.81	\$2,435.00
Aug-99	394	\$21,867.79	\$1,970.00
Sep-99	370	\$18,770.35	\$1,850.00
Oct-99	461	\$28,296.73	\$2,305.00
Nov-99	364	\$20,760.09	\$1,820.00
Dec-99	392	\$21,828.78	\$1,960.00

Jan-Dec 99 calculated late fee \$27,705.00

Jan-00	650	\$36,623.67	\$3,250.00
Feb-00	734	\$43,728.19	\$3,670.00
Mar-00	778	\$54,049.55	\$3,890.00
Apr-00	655	\$41,196.37	\$3,275.00

Jan-Apr 00 calculated late fee \$14,085.00

Customers to charge 1.5% of receivable balance

Month	customer count	receivable balance	1.50% late fee
Jan-99	29	\$27,454.71	\$411.82
Feb-99	27	\$17,947.71	\$269.22
Mar-99	12	\$9,758.10	\$146.37
Apr-99	18	\$18,369.45	\$275.54
May-99	27	\$26,505.23	\$397.58
Jun-99	23	\$15,799.71	\$237.00
Jul-99	23	\$23,856.03	\$357.84
Aug-99	12	\$12,762.52	\$191.44
Sep-99	11	\$5,875.70	\$88.14
Oct-99	22	\$16,337.07	\$245.06
Nov-99	22	\$15,210.99	\$228.16
Dec-99	19	\$13,708.68	\$205.63

Jan-Dec 99 calculated late fee \$3,053.79

Jan-00	43	\$31,468.99	\$472.03
Feb-00	33	\$31,961.52	\$479.42
Mar-00	37	\$46,988.30	\$704.82
Apr-00	36	\$23,656.22	\$354.84

Jan-Apr 00 calculated late fee \$2,011.13

SOUTH FLORIDA NATURAL GAS

Calculation of Return on Equity affect if proposed late fee had been in affect for the year ended December 31, 1999

CALCULATION OF NET UTILITY OPERATING INCOME INCLUDING LATE FEE CHARGE:

Net Utility Operating Income	\$192,304	as reported in FPSC 12/31/99 Annual Report (page 14, line 25 (c))
increase in income due to proposed late fee charge	\$30,759	
Restated Net Utility Operating Income	\$223,063	(A)

CALCULATION OF PROPRIETARY CAPITAL INCLUDING LATE FEE CHARGE:

Total Proprietary Capital	\$2,221,883	as reported in FPSC 12/31/99 Annual Report (page 11, line 8 (d))
increase in income due to proposed late fee charge	\$30,759	
Restated Proprietary Capital	\$2,252,642	(B)

CALCULATION OF RETURN ON EQUITY INCLUDING LATE FEE CHARGE:

Restated Net Utility Operating Income	\$223,063	
Total Proprietary Capital	\$2,252,642	
Return on Equity (including late fee charge)	9.90%	(C)

SOUTH FLORIDA NATURAL GAS

Calculation of Return on Equity based on actual amounts reported in 12/31/1999 Annual Report

Net Utility Operating Income	\$192,304	as reported in FPSC 12/31/99 Annual Report (page 14, line 25 (c))
Total Proprietary Capital	\$2,221,883	as reported in FPSC 12/31/99 Annual Report (page 11, line 8 (d))
Actual Return on Equity	8.66%	(D)
Increase in Return on Equity due to late fee charges	1.24%	(C) minus (D)