

ORIGINAL

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Petition for a rate increase)
by Florida Division of Chesapeake)
Utilities Corporation.)

Docket No. 0000108-GU

MOTION FOR LEAVE TO FILE SUPPLEMENTAL DIRECT TESTIMONY

The Florida Division of Chesapeake Utilities Corporation, through its undersigned counsel, requests leave to file supplemental direct testimony and in support states the following.

1. On May 15, 2000, the Company satisfied the Minimum Filing Requirements for the instant rate case. The prehearing conference is scheduled for September 28, 2000, and the hearing is set for October 16, 2000.
2. Recently, the Company became aware of an error in its rate filing. The Company improperly recognized an interest synchronization adjustment of \$217,321. No such adjustment should have been recognized, since the Company had used the amount of interest derived from the utility's adjusted capital structure in its calculation of income tax expense.
3. Eliminating this erroneous adjustment would reduce the achieved Net Operating Income by \$217, 321, thus increasing the revenue deficiency by \$364,752, using the Company-filed multiplier of 1.6784, or \$350,191, using a multiplier of 1.6114 as used by the Commission in setting interim rates.
4. The Company proposes no increase in the amount of the requested \$1,826,569 increase in its annual revenue requirement. The Company seeks only to have its improper interest synchronization adjustment corrected as an offset to any adjustments reducing its requested increase in the revenue requirement, up to the extent of this correction.
5. Submitted herewith is the prefiled supplemental direct testimony of Thomas A. Geoffroy as support for the correction of the Company's error.
6. The Company requests that an extended opportunity be provided for intervenor and Commission Staff to address this matter through prefiled testimony.

Wherefore the Company requests leave to file supplemental testimony of Thomas A. Geoffroy.

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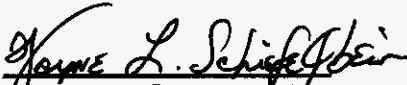
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DOCUMENT NUMBER-DATE

1160 SEP-88

FPSC-RECORDS/REPORTING

Respectfully submitted,


Wayne L. Schiefelbein
P.O. Box 15856
Tallahassee, FL 32317-5856
(850) 422-1013

Attorney for Chesapeake Utilities Corporation,
Florida Division

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing has been hand-delivered to Cochran Keating, Esq., Florida Public Service Commission, 2540 Shumard Oak Boulevard, Tallahassee, FL 32399-0850, on this 8th day of September, 2000.


Wayne L. Schiefelbein

Wayne L. Schiefelbein
Attorney At Law

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(850) 422-1013 • (850) 531-0011 Fax

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RECORDS AND
REPORTING

September 8, 2000

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

Re: Docket No. 0000108-GU Chesapeake Utilities Corporation

Dear Ms. Bayo:

Enclosed on behalf of Chesapeake Utilities Corporation for filing in the above docket are an original and twenty copies of:

1. Motion for Leave to File Supplemental Direct Testimony; 11160-00
2. Supplemental Direct Testimony of Thomas A. Geoffroy; 11161-00
3. Company Response to Audit Report; 11162-00
4. Company Response to Engineering Report; and 11163-00
5. Notice of Appearance. 11164-00

Please acknowledge receipt of the foregoing by stamping the enclosed duplicate of this letter.

Thank you.

Sincerely,



Wayne L. Schiefelbein

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