

LAW OFFICES  
**MESSER, CAPARELLO & SELF**  
A PROFESSIONAL ASSOCIATION

215 SOUTH MONROE STREET, SUITE 701  
POST OFFICE BOX 1876  
TALLAHASSEE, FLORIDA 32302-1876  
TELEPHONE: (850) 222-0720  
TELECOPIER: (850) 224-4359  
INTERNET: www.lawfla.com

October 18, 2000

**BY HAND DELIVERY**

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

Re: South Florida Natural Gas, Docket No. 000003-GU

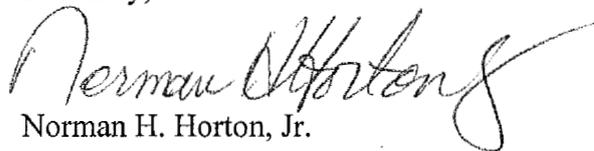
Dear Ms. Bayo:

Enclosed for filing on behalf of South Florida Natural Gas in this docket are an original and ten copies of its Statement of Preliminary Issues and Positions.

Please acknowledge receipt of these documents by stamping the enclosed extra copy of this letter.

Thank you for your assistance.

Sincerely,



Norman H. Horton, Jr.

NHH/amb

Enclosures

cc: Mr. Al Kara  
Parties of Record

DOCUMENT NUMBER-DATE

13270 OCT 18 8

FPSC-RECORDS/REPORTING

**BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION**

In re: Purchased Gas Cost Recovery )  
\_\_\_\_\_ )

Docket No. 000003-GU  
Filed: October 18, 2000

**SOUTH FLORIDA NATURAL GAS**  
**STATEMENT OF PRELIMINARY ISSUES AND POSITIONS**

South Florida Natural Gas ("SFNG") hereby submits its preliminary issues and positions to be taken up at the hearing scheduled to begin on November 20, 2000 in this docket.

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

**SFNG's Position:**     \$92,457 (underrecovery)

**Issue 2:**        **What is the estimated purchased gas adjustment true-up amount for the period January, 2000 through December, 2000?**

**SFNG's Position:**     \$69,863 (underrecovery)

**Issue 3:**        **What is the total purchased gas adjustment true-up amount to be collected in the January, 2001 through December, 2001 period?**

**SFNG's Position:**     \$162,320 (underrecovery)

**Issue 4:**        **What is the appropriate levelized purchased gas cost recovery (cap) factor to be charged during the period January, 2001 through December, 2001?**

**SFNG's Position:**     79.208 cents

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

**SFNG's Position:**     The factor should be effective for all meter readings on or after January, 2001, beginning with the first or applicable billing cycle for the period January, 2001 through December, 2001.

Dated this 18<sup>th</sup> day of October, 2000.

MESSER, CAPARELLO & SELF, P.A.  
Suite 701, SunTrust Bank Building  
Post Office Box 1876  
Tallahassee, FL 32302-1876  
(850) 222-0720

  
NORMAN H. HORTON, JR., ESQ.  
FLOYD R. SELF, ESQ.

Attorneys for South Florida Natural Gas

**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that true and correct copies of South Florida Natrual Gas' Statement of Preliminary Issues and Positions in Docket No. 000003-GU have been served by hand delivery (\*) and/or U. S. Mail this 18th day of October, 2000 upon the following:

Cochran Keating, Esq.\*  
Division of Legal Services  
Florida Public Service Commission  
2540 Shumard Oak Blvd., Room 370  
Tallahassee, FL 32399-0850

Lee L. Willis, Esq.  
James D. Beasley, Esq.  
Ausley & McMullen  
Post Office Box 391  
Tallahassee, FL 32302

Ms. Angela Llewellyn  
Administrator, Regulatory Coordination  
Tampa Electric Co.  
P.O. Box 111  
Tampa, FL 33601-0111

Joseph A. McGlothlin, Esq.  
McWhirter, Reeves, McGlothlin,  
Davidson Rief & Bakas, P.A.  
117 S. Gadsden St  
Tallahassee, FL 32301

Stephen C. Burgess  
Deputy Public Counsel  
Office of the Public Counsel  
111 West Madison St., Rm 812  
Tallahassee, FL 32399-1400

Wayne L. Schiefelbein, Esq.  
P.O. Box 15856  
Tallahassee, FL 32317-5856

Ansley Watson, Jr., Esq.  
MacFarlane, Ferguson, Allison  
& Kelly  
Post Office Box 1531  
Tampa, FL 33601

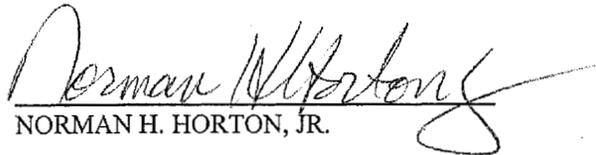
John W. McWhirter, Esq.  
McWhirter, Reeves, McGlothlin,  
Davidson, Rief & Bakas, P.A.  
Post Office Box 3350  
Tampa, FL 33601-3350

Mr. Robert Cooper  
U.S. Gypsum Company  
P.O. Box 806278  
Chicago, IL 60680-4124

Mr. John T. English  
President  
Florida Public Utilities Company  
P.O. Box 3395  
West Palm Beach, FL 33402-3395

Mr. David M. Nicholson  
Mrs. Ellen W. Anderton  
Corporate Counsel  
TECO Energy, Inc.  
P.O. Box 111  
Tampa, FL 33601-0111

Mr. David M. Nicholson  
Mrs. Ellen W. Anderton  
Corporate Counsel  
TECO Energy, Inc.  
P.O. Box 111  
Tampa, FL 33601-0111

  
NORMAN H. HORTON, JR.