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October 18, 2001

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. 010003-GU

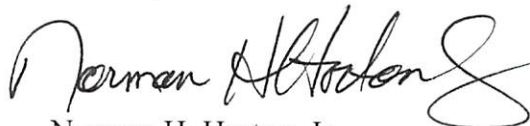
Dear Ms. Bayo:

Enclosed for filing on behalf of South Florida Natural Gas are an original and 10 copies of South Florida Natural Gas' Preliminary List of Issues and Positions in the above-referenced docket.

Please acknowledge receipt of these documents by stamping the extra copy of this letter "filed" and returning the same to me.

Thank you for your assistance.

Sincerely,



Norman H. Horton, Jr.

NHH/amb
Enclosures

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

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FPSC-COMMISSION CLERK

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Purchased Gas Adjustment)
_____)

Docket No. 010003-GU
Filed: October 18, 2001

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, 2001 in this docket.

Issue 1: **What is the appropriate final purchased gas adjustment true-up amount for the period January, 2000 through December, 2000?**

SFNG's Position: \$211,238 (overrecovery)

Issue 2: **What is the estimated purchased gas adjustment true-up amount for the period January, 2001 through December, 2001?**

SFNG's Position: \$211,229 (overrecovery)

Issue 3: **What is the total purchased gas adjustment true-up amount to be collected in the January, 2002 through December, 2002 period?**

SFNG's Position: \$10 (underrecovery)

Issue 4: **What is the appropriate levelized purchased gas cost recovery (cap) factor to be charged during the period January, 2002 through December, 2002?**

SFNG's Position: 98.183 cents per therm..

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, 2002, beginning with the first or applicable billing cycle for the period January, 2002 through December, 2002.

Dated this 18th day of October, 2001.

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NORMAN H. HORTON, JR., ESQ.

Attorneys for South Florida Natrual Gas

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that true and correct copies of South Florida Natural Gas' Preliminary List of Issues and Positions in Docket No. 010003-GU have been served by U. S. Mail this 18th day of October, 2001 upon the following:

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