



JACK SHREVE
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OFFICE OF THE PUBLIC COUNSEL

c/o The Florida Legislature
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October 24, 2001

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Ms. Blanca S. Bayó, Director
Division of Records and Reporting
Florida Public Service Commission
2540 Shumard Oak Boulevard
Tallahassee, FL 32399-0870

RE: Docket No. 010003-GU

Dear Ms. Bayó:

Enclosed are an original and fifteen copies of the Public Counsel's Prehearing Statement in the above-referenced docket.

Also enclosed is a 3.5 inch diskette containing the Public Counsel's Prehearing Statement in WordPerfect for Windows 6.1. Please indicate receipt of filing by date-stamping the attached copy of this letter and returning it to this office. Thank you for your assistance in this matter.

Sincerely,

Robert D. Vandiver
Associate Public Counsel

RDV/dsb

Enclosures

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DOCUMENT NUMBER-DATE

13494 OCT 24 01

FPSC-COMMISSION CLERK

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In Re: Purchased Gas Adjustment)
True-up)
_____)

DOCKET NO. 010003-GU
FILED: October 24, 2001

PREHEARING STATEMENT OF THE OFFICE OF PUBLIC COUNSEL

The Citizens of the State of Florida, through the Office of Public Counsel, pursuant to the Order Establishing Procedure in this docket, Order No. PSC-0664PCO-GU, issued March 16, 2001, submit this Prehearing Statement.

APPEARANCES: .

ROBERT D. VANDIVER, Esquire
Associate Public Counsel
Office of Public Counsel
c/o The Florida Legislature
111 West Madison Street, Room 812
Tallahassee, Florida 32399-1400
On behalf of the Citizens of the State of Florida

A. WITNESSES:

None.

B. EXHIBITS:

None.

C. STATEMENT OF BASIC POSITION

None necessary.

DOCUMENT NUMBER - DATE

13494 OCT 24 01

FPS-COMMISSION CLERK

D. STATEMENT OF FACTUAL ISSUES AND POSITIONS

Generic Purchased Gas Adjustment Issues

ISSUE 1: What are the appropriate final purchased gas adjustment true-up amounts for the period January, 2000 through December, 2000?

POSITION: No position at this time.

ISSUE 2: What are the estimated purchased gas adjustment true-up amounts for the period January, 2001 through December, 2001?

POSITION: No position at this time.

ISSUE 3: What are the total purchased gas true-up amounts to be collected during the period January, 2002 through December, 2002?

POSITION: No position at this time.

ISSUE 4: What are the appropriate levelized purchased gas cost recovery (cap) factors for the period January, 2002, through December, 2002?

POSITION: No position at this time.

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

OPC: The factor should be effective for all meter readings on or after January 1, 2002, beginning with the first or applicable billing cycle for the period January, 2002 through December, 2002.

Company-Specific Purchased Gas Adjustment Issues

ISSUE: Should voluntary funding of the Gas Research Institute (GRI) surcharge be recovered through the purchased gas adjustment true-up cost recovery clause as proposed by Peoples Gas System?

OPC: No. Voluntary contributions should be just that. Therefore stockholders should make these “voluntary” payments rather than forced extractions from ratepayers.

E. STATEMENT OF LEGAL ISSUES AND POSITIONS: None at this time.

F. STATEMENT OF POLICY ISSUES AND POSITIONS: None at this time.

G. STIPULATED ISSUES: None.

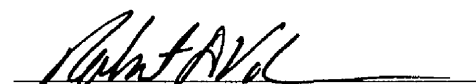
H. PENDING MOTIONS: None.

I. STATEMENT OF COMPLIANCE WITH ORDER ESTABLISHING PROCEDURE:

There are no requirements of the Order Establishing Procedure with which the Office of Public Counsel cannot comply.

Respectfully submitted,

JACK SHREVE
Public Counsel


Robert D. Vandiver
Deputy Public Counsel

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Attorneys for the Citizens
of the State of Florida

**CERTIFICATE OF SERVICE
DOCKET NO. 010003-GU**

I HEREBY CERTIFY that a true and correct copy of the foregoing PREHEARING STATEMENT OF THE OFFICE OF PUBLIC COUNSEL has been furnished by U.S. Mail or by *hand-delivery to the following persons on this 24th day of October, 2001.

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