

October 24, 2001

#### VIA FEDERAL EXPRESS

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

Re: Docket No. 010003-GU - Purchased Gas Adjustment (PGA)
Prehearing Statement

Dear Ms. Bayo:

Enclosed for filing in the above docket on behalf of Peoples Gas System, Inc. ("Peoples"), please find the original and 15 copies of its Prehearing Statement.

Please acknowledge your receipt and filing of the enclosures by stamping the duplicate copy of this letter that is enclosed and returning the same to the undersigned.

Thank you for your assistance.

Sincerely,

Matt Costa

Corporate Counsel

**Enclosures** 

cc: Ms. Angie Llewellyn

Mr. W. Edward Elliott Ms. Wraye Grimard All Parties of Record

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# BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

	Purchased ( ment (PGA)		) ) )		DOCKET NO Filed: 10-25-		ìU
	PREI	HEARING	S STATEMEN	IT OF PEOPLES	GAS SYSTE	<u>EM</u>	
<u>A.</u>	APPEARA	NCES:					
	TEC	CO ENER	R. COSTA, Es GY, INC. , Tampa, Flori				
В.	WITNESSE	ES:					
	Witness		Subject Matt	e <u>r</u>		Issues	
1.	W. Edward Elliott (Peoples)		Projected gas costs, therm sales and weighted average cost of gas ("WACOG") final PGA true-up amount for January 2000 – December 2000; Estimated PGA true-up amounts For January 2001 – December 2001 – December 2002 – December 2002; and levelized PGA cost recovery (cap) factor for January 2002 – December 2002.		00; nts r 2001; or 02; ery	1-5	
<u>C.</u>	EXHIBITS	<u>:</u>					
	<u>Exhibit</u>	Witne	<u>ss</u>	Description			
	(EE-1)	Elliott		Calculation of January 2000 – (Schedules A-	- December 20	000	
		Elliott		Calculation of January 2001 - Total true-up f December 200 Factor for Janu (Schedules E-1	- December 20 or January 20 2; Calculation ary 2002 – D	001; 02 – 1 of PGA	02

#### D. STATEMENT OF BASIC POSITION:

## Peoples' Statement of Basic Position:

The Commission should approve Peoples' final PGA true-up amount for the period January 2000 through December 2000 of \$13,661,513 (underrecovery), its estimated PGA true-up amount of \$17,264,427 (overrecovery) for the period January 2001 through December 2001, and its levelized PGA (cap) factor of \$0.98473 per therm for application to customers' bills during the period January 1, 2002 through December 31, 2002.

# E. STATEMENT OF ISSUES AND POSITIONS:

Generic Purchased Gas Adjustment Issues

<u>ISSUE 1:</u> What is the appropriate final purchased gas adjustment true-up

amount for the period January 2000 through December 2000?

POSITION:

Peoples: \$13,661,513 underrecovery. (Elliott)

<u>ISSUE 2</u>: What is the appropriate estimated purchased gas adjustment true-

up amount for the period January 2001 through December 2001?

**POSITION**:

Peoples: \$17,264,427 overrecovery. (Elliott)

ISSUE 3: What is the total purchased gas adjustment true-up amount to be

collected or refunded during the period January 2002 through

December 2002?

**POSITION**:

Peoples: \$3,600,915 overrecovery. (Elliott)

ISSUE 4: What is the appropriate levelized purchased gas cost recovery

(cap) factor for the period January 2002 through December 2002?

POSITION:

Peoples: \$0.98473 per therm. (Elliott)

ISSUE 5: What should be the effective date of the new purchased gas

adjustment charge for billing purposes?

# **POSITION:**

Peoples:

Agree with Staff. (Elliott)

Company-Specific Purchased Gas Adjustment Issues

ISSUE 6\*:

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?

## **POSITION**:

Peoples:

Peoples believes it is appropriate to recover GRI expenses through the purchased gas adjustment true-up cost recovery clause. Peoples reserves the right to file supplemental materials and/or present testimony at the hearing regarding this matter.

# F. STIPULATED ISSUES:

None as to Peoples at this time.

#### G. MOTIONS:

Peoples has no pending motions at this time.

## H. OTHER MATTERS:

None as to Peoples at this time.

Dated this 24<sup>th</sup> day of October, 2001.

Respectfully submitted,

Matthew R. Costa, Esq.

Corporate Counsel

TECO ENERGY. INC.

P.O. Box 111

Tampa, Florida, 33601

(813) 228-4938

<sup>•</sup> Peoples did not include this issue in it's Preliminary List of Issues and Positions since it was raised for the first time by the Staff in its Preliminary List of Issues and Positions.

#### BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In Re: Purchased Gas	)	DOCKET NO. 010003-GU
Adjustment (PGA) True-Up	)	Filed: 10-25-01

#### CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing **PEOPLES GAS SYSTEM'S PREHEARING STATEMENT**, has been furnished by regular U.S.

Mail this 24<sup>th</sup> day of October 2001 to all know parties of record in Docket No. 010003
GU as follows:

City Gas Company of Florida Mary Patricia Keefe One Elizabethtown Plaza P.O. Box 3175 Union, NJ 07083

Chesapeake Utilities Corporation P.O. Box 960 1015 Sixth Street, N.W. Winter Haven, FL 33882-0960

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

Florida Public Utilities Company George Bachman P.O. Box 3395 West Palm Beach, FL 33402-3395

Messer Lawn Firm Norman H. Horton, Jr. P.O. Box 1876 Tallahassee, FL 32302-1876

Ausley Law Firm James D. Beasley/Lee Willis P.O. Box 391 Tallahassee, FL 32302 Tampa Electric Company Angela Llewelyn P.O. Box 111 Tampa, FL 33601-0111

Indiantown Gas Company Brian J. Powers P.O. Box 8 Indiantown, FL 34956-0008

Sebring Gas System Jerry Melendy 3515 U.S. Highway 27 South Sebring, FL 33870-5452

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Mr. Al Kara South Florida Natural Gas P.O. Box 248 New Smyrna Beach, FL 32170-0248 Mr. Stuart L. Shoaf St. Joe Natural Gas Company P.O. Box 549 Port St. Joe, FL 32457-0549

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