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October 16, 2002

Blanca Bayó  
Director, Division of Commission Clerk  
Florida Public Service Commission  
2540 Shumard Oak Boulevard  
Tallahassee, FL 32399

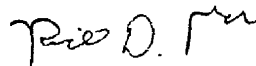
Re: Docket No. 020004-GU

Dear Ms. Bayó:

Enclosed for filing on behalf of City Gas Company of Florida are the original and fifteen copies of its Preliminary Statement of Issues and Positions and diskette.

Please acknowledge receipt and filing of the above by stamping the duplicate copy of this letter and returning it to me. Please call me if you have any questions at 850/425-2313.

Very truly yours,



Richard D. Melson

RDM/jlm  
Enclosures  
cc: Certificate of Service

DOCUMENT NUMBER-DATE

11231 OCT 16 2002

FPSC-COMMISSION CLERK

**BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION**

In re: Conservation Cost Recovery ) Docket No. 020004-GU  
Clause ) Filed: October 16, 2002

**CITY GAS COMPANY OF FLORIDA  
PRELIMINARY STATEMENT OF ISSUES AND POSITIONS**

The following is NUI City Gas Company of Florida's preliminary statement of issues and positions:

1. What is the final end-of-period true-up amount for the period January 2001 through December 2001?

City Gas: An over-recovery of \$745,761.

2. What are the appropriate conservation cost recovery factors for the period January 2003 through December 2003?

City Gas: The appropriate factors are:

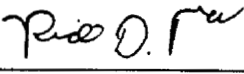
<u>Rate Class</u>	<u>Factor</u>
Residential (RS, ED & GL)	7.799 cents/therm
Commercial (CS, ED & SCTS)	2.272 cents/therm
Commercial Large Volume (LCS & CTS)	1.494 cents/therm
Industrial (IP & ITS)	1.363 cents/therm

3. What should be the effective date of the conservation cost recovery factors for billing purposes?

City Gas: The factors should be effective beginning with the specified conservation cost recovery cycle and thereafter for the period January, 2003, through December, 2003. Billing cycles may start before January 1, 2003, and the last cycle may be read after December 31, 2003, so that each customer is billed for twelve months regardless of when the adjustment factor became effective.

RESPECTFULLY SUBMITTED this 16th day of October, 2002.

HOPPING GREEN & SAMS, P.A.

By: 

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Attorneys for City Gas Company of Florida

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing has been furnished by U.S. Mail to the following parties of record this 16th day of October, 2002:

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City Gas Company of Florida  
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Winter Haven, FL 33882-0960

Florida Public Utilities Company  
Mr. George Bachman  
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