

ORIGINAL

STATE OF FLORIDA

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OFFICE OF THE GENERAL COUNSEL
HAROLD A. MCLEAN
GENERAL COUNSEL
(850) 413-6199

Public Service Commission

June 11, 2003

STAFF'S FIRST DATA REQUEST

Robert Scheffel Wright, Esquire
John T. LaVia, III, Esquire
Landers & Parsons, P. A.
310 West College Avenue
Tallahassee, Florida 32301

Re: Docket No. 030462-GU - Petition of Indiantown Gas Company for Approval of Transition Cost Recovery Charge and For Approval of Final Purchased Gas Adjustment True-Up Credit.

Dear Mr. Wright and Mr. LaVia:

By this letter, the Commission staff requests that Indiantown Gas Company (Indiantown) please provide responses to the following data requests:

1. Please provide all invoices for expenses listed on Exhibit C.
2. Please provide all invoices for the December, 2002, bookout adjustments (alert day charges) listed on Exhibit B.
3. Please explain the rationale behind the methodology used to allocate the \$55,117 of expense among the rate classes shown on Exhibit D.
4. Does the citrus plant hold capacity on the Florida Gas Transmission (FGT) system?
5. Does the citrus plant have electronic monitoring?
6. If the citrus plant has electronic monitoring, when was the equipment installed and who paid for the equipment?
7. Please state what were the actual costs incurred for the transition of the citrus plant to transportation in August, 2001?
8. Please explain, in detail, what actions were required to transition the citrus plant to transportation in August, 2001?

AUS _____
 CAF _____
 CMP _____
 COM _____
 CTR _____
 ECR _____
 GCL _____
 OPC _____
 MMS _____
 SEC _____
 OTH _____

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9. Please provide the dollar amount for each action in Data Request No. 6 and identify the associated invoices as provided in response to Data Request No. 1.
10. Why is Indiantown proposing to allocate expenses incurred in 2002 and 2003, listed on Exhibit C, to the citrus plant?
11. Please state the actual costs incurred for the transition of the residential and small commercial customer to transportation.
12. Please explain, in detail, the actions that were required to transition residential and small commercial customers to transportation.
13. Please provide the dollar amount for each action listed in Data Request No. 12 and identify the associated invoices as provided in response to Data Request No. 1.
14. Please explain why Indiantown is proposing to allocate expenses incurred in 2001 and part of 2002, listed on Exhibit C, to the residential, small commercial customers, and the cogeneration plant.
15. Please explain why Exhibit C shows the total Transition Cost Recovery (TCR) costs as \$55,048.52 and Exhibit D shows the 2002 allocated TCR costs as \$55,117.00.
16. Please explain why Indiantown has proposed to issue credits to the residential customers while issuing checks to the commercial customers.
17. Please state when Indiantown released capacity to Peninsular Energy Services Company (PESCO).
18. Please state what services PESCO provides Indiantown.
19. Who did Indiantown bookout with in December, 2002?
20. Please state when Indiantown released capacity to Infinite Energy.
21. Please state what services Infinite Energy provides Indiantown.
22. If Indiantown does not hold any capacity, please explain how it incurred alert day charges, listed on Exhibit B.

Robert Scheffel Wright, Esquire
John T. LaVia, III, Esquire
Page 3
June 11, 2003

Please file the original and five copies of the requested information by July 7, 2003, with Ms. Blanca Bayo, Director, Division of the Commission Clerk and Administrative Services, 2540 Shumard Oak Boulevard, Tallahassee, Florida 32399-0850. If you have any further questions regarding this matter, please feel free to contact me at (850) 413-6218 or Wayne Makin, Economic Analyst, at (850) 413-6644.

Sincerely,



Katherine E. Fleming
Office of the General Counsel

KEF:jb

cc: Brian J. Powers, Indiantown Gas Company
Division of the Commission Clerk and Administrative Services
Division of Competitive Markets & Enforcement (Makin, Bulecza-Banks, Casey, Marshall)

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