

Hopping Green & Sams

Attorneys and Counselors

Writer's Direct Dial No.
(850) 425-2359

December 12, 2003

BY HAND DELIVERY

Blanca Bayó
Director, Records and Reporting
Florida Public Service Commission
2540 Shumard Oak Boulevard
Tallahassee, FL 32399

Re: City Gas Company of Florida -- Docket No. 030569-GU
CONFIDENTIAL MATERIAL ENCLOSED

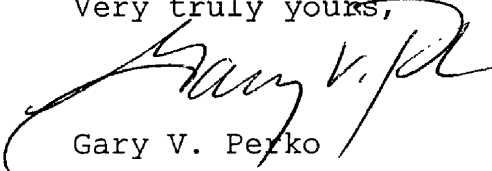
Dear Ms. Bayó:

Enclosed for filing on behalf of City Gas Company of Florida are the following:

1. The original and fifteen copies of City Gas Company of Florida's Notice of Intent to Request Confidential Classification; and
2. A confidential envelope containing one copy of the material for which Confidential Classification is being requested.

By copy of this letter, the Notice of Intent to Request Confidential Classification has been furnished to the parties on the attached service list. If you have any questions regarding this filing, please call.

Very truly yours,


Gary V. Perko

GVP/mee
Enclosures
cc: Certificate of Service

DOCUMENT NUMBER-DATE

12970 DEC 12 03

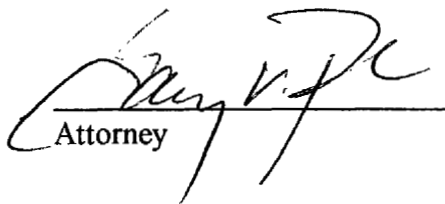
CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing has been furnished by regular U.S. mail and/or hand-delivery (*) to the following in Docket No. 030569-GU this 12th day of December, 2003.

Ralph Jaeger *
Staff Attorney
Florida Public Service Commission
2540 Shumard Oak Boulevard
Tallahassee, FL 32399-0850

City Gas Company of Florida
Gloria L. Lopez
955 East 25th Street
Hialeah, FL 33013-3498

Office of Public Counsel
Charles Beck
111 W. Madison Street
812 Claude Pepper Building
Tallahassee, FL 32399-1400


Attorney

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Request for rate increase by)
City Gas Company of Florida)
_____)

Docket No. 030569-GU

Filed: December 12, 2003

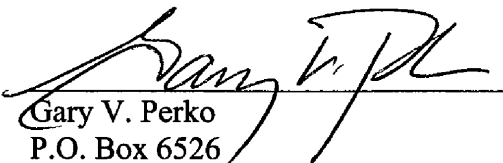
NOTICE OF INTENT TO REQUEST CONFIDENTIAL CLASSIFICATION

NUI City Gas Company of Florida ("City Gas"), by and through its undersigned attorneys and pursuant to Rule 25-22.006, Florida Administrative Code, hereby gives notice that it intends to request confidential classification for confidential materials being produced in response to Staff's Third Set of Interrogatories (Nos. 34-39), Staff's Fourth Set of Interrogatories (No. 45), and Staff's Fourth Request for Production of Documents (Nos. 13, 14, and 15). Copies of the specific requests for the confidential materials are appended hereto. A copy of the confidential materials is being provided in the enclosed envelope labeled "Confidential - Docket No. 030569-GU."

These materials contain proprietary confidential business information regarding trade secrets, contractual and bid information, and information relating to competitive interests the disclosure of which would cause irreparable harm to City Gas within the meaning of Section 366.093(3), Florida Statutes. The information for which confidential classification is sought is intended to be and is treated by City Gas as private. A formal request for confidential classification will be filed within the time period specified in Rule 25-22.006 (3)(a), Florida Administrative Code, if the Staff determines that the information will be retained by the Commission and not returned to the company within the specified time period.

RESPECTFULLY SUBMITTED this 12th day of December, 2003.

HOPPING GREEN & SAMS, P.A.

By: 
Gary V. Perko
P.O. Box 6526
Tallahassee, FL 32314
(850) 425-2359

Attorneys for City Gas Company of Florida

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Application for rate
increase by City Gas Company of
Florida.

DOCKET NO. 030569-GU

DATED: NOVEMBER 13, 2003

STAFF'S THIRD SET OF INTERROGATORIES TO
CITY GAS COMPANY OF FLORIDA (NOS. 34 - 40)

The Staff of the Florida Public Service Commission, by and through its undersigned attorney, propounds the following interrogatories, pursuant to Rule 1.340, Florida Rules of Civil Procedure, to City Gas Company of Florida. These interrogatories shall be answered under oath by you or your agent, who is qualified and who will be identified, with the answers being served as provided by the Rules of Civil Procedure. As provided by Rule 1.340(a), Florida Rules of Civil Procedure, each interrogatory shall be answered separately and fully in writing under oath unless it is objected to. Each answer shall be signed by the person making it.

Give the name, address and relationship to City Gas Company of Florida of those persons providing the answers to each of the following interrogatories.

If an interrogatory contained herein asks for information that has already been provided or is in the process of being provided to the Commission through a Commission audit, please so state,

STAFF'S THIRD SET OF INTERROGATORIES TO
CITY GAS COMPANY OF FLORIDA (NOS. 34-40)
DOCKET NO. 030569-GU
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indicating the date provided and the audit document/record request number.

INTERROGATORIES

34. Please provide, by month and by customer class, the number of customers and the associated number of therms that the utility projected would be sold as a result of the Clewiston expansion during the period October 2001 through September 2003.

35. Please provide, by month and by customer class, the actual number of customers and the associated number of therms that were sold by the utility as a result of the Clewiston expansion during the period October 2001 through September 2003.

STAFF'S THIRD SET OF INTERROGATORIES TO
CITY GAS COMPANY OF FLORIDA (NOS. 34-40)
DOCKET NO. 030569-GU
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36. Please refer to Schedule G-2, pp. 1-3 of the utility's Minimum Filing Requirements (MFRs). Please provide, for each non-homogeneous customer, the corresponding data associated solely with the Clewiston expansion. This information should be provided, by individual customer name, by column heading and line number, in a format consistent with Schedule G-2, pp. 1-3.
37. Please refer to Schedule G-2, pp. 4-5 of the utility's MFRs. Please provide, for each non-homogeneous customer, the corresponding data associated solely with the Clewiston expansion. This information should be provided, by individual customer name, by month and by line number, in a format consistent with Schedule G-2, pp. 4-5.

38. Please refer to Schedule G-2, pp. 6-11F of the utility's MFRs.

Please provide the corresponding customer data associated solely with the Clewiston expansion. This information should be provided for each non-homogeneous customer, by month and by individual customer name, in a format consistent with Schedule G-2, pp. 6-11F.

39. Please refer to Schedule G-5 of the utility's MFRs. Please provide the corresponding customer data associated solely with the Clewiston expansion. This information should be provided for each non-homogeneous customer in a format consistent with Schedule G-5.

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Application for rate
increase by City Gas Company of
Florida.

DOCKET NO. 030569-GU

DATED: NOVEMBER 20, 2003

STAFF'S FOURTH REQUEST FOR PRODUCTION OF DOCUMENTS
TO CITY GAS COMPANY OF FLORIDA (NOS. 9 - 16)

Pursuant to Rule 25-22.034, Florida Administrative Code, and Rule 1.350, Florida Rules of Civil Procedure, the Staff of the Florida Public Service Commission, by and through its undersigned attorney, hereby serves the following Request for Production of Documents upon City Gas Company of Florida.

Please produce the following documents at the Florida Public Service Commission, 2540 Shumard Oak Boulevard, Gerald L. Gunter Building, Tallahassee, Florida 32399-0850, no later than thirty days after service of this request for the purpose of inspection and copying:

DEFINITION

As used herein, the word "documents" shall mean the original and any non-identical copies of any writing or record, including but not limited to a book, pamphlet, periodical, letter, memorandum, telegram, report, study, interoffice or intraoffice memorandum, memorandum reflecting an oral communication, handwritten or other notes, working paper, draft, application,

12. Please provide a copy of the BEBR projections that were referred to on p. 38, line 14.

13. Please refer to the statement "Potential industrial customers ... became concerned that the capital investment required to convert to gas was not warranted under the circumstances at the time." contained on p. 45, lines 17-21.
 - (a) Please provide all documents and analysis relating to US Sugar's concern that the capital investment to convert to natural gas was not warranted at that time.
 - (b) Please provide all documents and analysis relating to Florida Crystal's Osceola sugar mill's concern that the capital investment to convert to natural gas was not warranted at that time.
 - (c) Please provide all documents and analysis relating to the Sugar Cane Growers Cooperative's concern that the capital investment to convert to natural gas was not warranted at that time.
 - (d) Please provide all documents and analysis relating to Southern Garden Citrus's concern that the capital investment to convert to natural gas was not warranted at that time.

STAFF'S FOURTH REQUEST FOR PRODUCTION OF DOCUMENTS TO
CITY GAS COMPANY OF FLORIDA (NOS. 9-16)
DOCKET NO. 030569-GU
PAGE 5

14. Please refer to the statement "These potential customers ... remain interested in natural gas service and continue to meet with the Company's representatives." contained on p. 46, lines 3-6. Please provide all documents and analysis which relate to this statement.

15. Please refer to p. 47, lines 3-4. Please provide all documents and analysis which relates to this statement.

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Application for rate
increase by City Gas Company of
Florida.

DOCKET NO. 030569-GU

DATED: NOVEMBER 20, 2003

STAFF'S FOURTH SET OF INTERROGATORIES TO
CITY GAS COMPANY OF FLORIDA (NOS. 41 - 58)

The Staff of the Florida Public Service Commission, by and through its undersigned attorney, propounds the following interrogatories, pursuant to Rule 1.340, Florida Rules of Civil Procedure, to City Gas Company of Florida. These interrogatories shall be answered under oath by you or your agent, who is qualified and who will be identified, with the answers being served as provided by the Rules of Civil Procedure. As provided by Rule 1.340(a), Florida Rules of Civil Procedure, each interrogatory shall be answered separately and fully in writing under oath unless it is objected to. Each answer shall be signed by the person making it.

Give the name, address and relationship to City Gas Company of Florida of those persons providing the answers to each of the following interrogatories.

If an interrogatory contained herein asks for information that has already been provided or is in the process of being provided to the Commission through a Commission audit, please so state,

STAFF'S FOURTH SET OF INTERROGATORIES TO
CITY GAS COMPANY OF FLORIDA (NOS. 41-58)
DOCKET NO. 030569-GU
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45. Please refer to p. 40, lines 15-21.

- a. Please provide, by potential customer name, each industrial customer that the utility is pursuing in its Palm Beach Division. The information should be provided in the format shown below:

<u>Potential</u> <u>Industrial</u> <u>Customer</u>	<u>Potential Service</u> <u>Address (Including</u> <u>City and County)</u>	<u>New Industrial</u> <u>Facility or Gas</u> <u>Conversion</u>	<u>Anticipated Annual</u> <u>Therms</u>
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- b. Please provide, in a format consistent with (a) above, the same information that was included by the utility as part of its forecast in Docket No. 000768-GU.