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Public Service Commission FPSC

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-M-E-M-O-R-A-N-D-U-M- COMMISSION CLERK

DATE: February 18, 2004

TO: Division of Commission Clerk and Administrative Services

FROM: Sam Merta, SM Professional Accountant Specialist, Division of Economic Regulation

RE: Indiantown Gas Company Inc., Docket No. 030954-GU

Attached is a February 13, 2004 letter from Stephen C. Reilly, Office of Public Counsel, to Marshall W. Willis, Chief of Rate Filings, requesting staff to furnish their office with copies of all discovery requested and the utility's responses to those requests in the above docket. Attachment A reflects data requests. Mr. Reilly requests staff to formally request the information contained in the data requests or if staff does not wish to seek the information, to advise him. Please include this letter in the above docket file.

Cc: Division of Economic Regulation (Rendell)

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JAMES E. "JIM" KING, JR.
President



Harold McLean
Public Counsel

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OFFICE OF PUBLIC COUNSEL

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ECONOMIC REGULATION

JOHNNIE BYRD
Speaker



Stephen C. Reilly
Associate Public Counsel

February 13, 2004

Marshall W. Willis
Chief of Rate Cases
Division of Economic Regulation
Florida Public Service Commission
2540 Shumard Oak Boulevard
Tallahassee, Florida 32399-0850

RE: Indiantown Gas Company
Docket No. 030954-GU

Dear Marshall:

The Office of Public Counsel requests the Commission's Staff ("Staff") to furnish our office with copies of all discovery requests propounded upon Indiantown Gas Company ("Utility" or "Company"), and the Utility's responses to those requests in the above docket. To the extent Staff has not already sought the information outlined in the attached Exhibit "A", we request Staff to formally request this information from the Utility. If for any reason Staff has not previously sought nor desires to seek information requested in Exhibit "A", please let me know as soon as possible.

It is our intention to closely monitor and participate in this docket without formally intervening in order to restrain rate case expense. It is our hope that if some of our concerns can be addressed prior to Staff issuing its recommendation and the Commission issuing its PAA Order, the likelihood of a Protest being filed to the PAA Order will be reduced.

Sincerely,

Handwritten signature of Stephen C. Reilly in black ink.
Stephen C. Reilly
Associate Public Counsel

Attachment

cc: Robert Scheffel Wright, Esquire

ATTACHMENT "A"

Indiantown Gas Company

1. Refer to B Powers Direct Testimony Page 23 concerning the purchase of a used backhoe. Does the company plan to sell the backhoe purchased in 1996? If so, what will the salvage cost be? If not, what does the company plan to do with this equipment?
2. Refer to Schedule G-1 pages 5 and 7 lines 12. Please explain the fluctuation of cash from a low of \$15,182 to a high of \$343,290 for Base Year +1 and a low of negative \$26,130 to a high of \$273,304 in projected TY '04. Why would the company keep such large quantities of cash on hand?
3. Refer to G-1 page 3 of 28, line 2. Please explain the adjustment to reduce accounts payable by \$4,660 for the projected test year.
4. Refer to Schedule I-4 page 1 of 1. For vehicles #4, 5, and 6 please explain what the vehicles are used for and which employees use them. What are the expected retirement dates for vehicles listed here?
5. Refer to MFR Schedule H-3 page 5 of 5:
 - a. Line 9: Why are "Proposed Demand Charges (Monthly)" included for TS-1 and TS-2 but are not stated on the company's proposed tariffs?
 - b. Line 1: Please state the amount of "Target Revenues" that is attributed to the demand charge for each class of customer?
 - c. Line 15: Please explain the difference for TS-1 stated here at \$.09250 and in the proposed tariff stated at \$.0950
6. Refer to MFR Schedule G-2, page 30 of 31, line 3. Please explain why interest is not synchronized for this calculation?
7. Refer to MFR Schedule C-31, page 1 of 1, line 5. Please explain in detail what AGDF dues are and what comprises the total of \$2,800.
8. What is the square footage of showroom space for the sale of appliances at the company's offices compared to the total square footage of the building occupied by the utility?
9. What percentage of appliances sold by the company use propane and what percentage use natural gas?
10. Are other business activities being conducted at the company's offices at 16600 S.W. Warfield Blvd other than the propane, gas, and appliance sales operations?
11. Is the company involved in appliance service work or the sales and service of appliances

other than stoves/ovens, refrigerators, and gas logs?

- 12.. Please provide all workpapers prepared by the company or its consultants to project customer growth. Electronic format is preferred.
13. Please provide copies of all board minutes recorded for the years 2002, 2003, and 2004.

For PSC Staff (Public Records Request)

1. Please provide a compilation of all complaints filed against Indiantown gas for the last two years.
2. Please provide all discovery requests and responses that staff or any other party has propounded or received in this case.