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October 5, 2005

VIA HAND DELIVERY

Blanca Bayo
Director, Office of Commission Clerk and Administrative Services
Florida Public Service Commission
2540 Shumard Oak Boulevard
Tallahassee, FL 32399-0850

Re: Docket No. 050003-GU

Dear Ms. Bayo:

Enclosed for filing on behalf of Florida City Gas Company ("Company") are the original and fifteen copies of the Company's Preliminary Statement of Issues and Positions in the above-referenced docket.

By copy of this letter, these documents have been furnished to the parties on the attached certificate of service.

Please stamp and return the enclosed extra copy of this filing. If you have any questions regarding this filing, please give me a call at 224-9634.

Sincerely,

Bill L. Bryant Jr.

Enclosures

cc: Certificate of Service

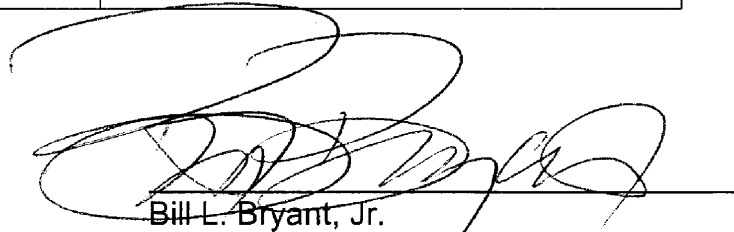
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DOCUMENT NUMBER-DATE
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FPSC-COMMISSION CLERK

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing has been furnished by U.S. Mail or hand delivery to the following parties of record this 5th day of October, 2005:

Florida Public Utilities Company John T. English/Cheryl Martin P.O. Box 3395 West Palm Beach, FL 33402-3395	MacFarlane Ferguson Law Firm Ansley Watson, Jr. P.O. Box 1531 Tampa, FL 33601-1531
Messer Law Firm Norman Horton, Jr./Floyd R. Self P.O. Box 1876 Tallahassee, FL 32302-1876	Office of Public Counsel Harold McLean/Patricia Christensen c/o The Florida Legislature 111 West Madison Street Room 812 Tallahassee, FL 32399-1400
People Gas System Ms. Angela L. Llewellyn Regulatory Affairs P.O. Box 111 Tampa, FL 33601-0111	St. Joe Natural Gas Company, Inc. Mr. Stuart L. Shoaf P.O. Box 549 Port St. Joe, FL 32457-0549
TECO Energy, Inc. Matthew Costa P.O. Box 111 Tampa, FL 33601-0111	AGL Resources Inc. Elizabeth Wade Ten Peachtree Place Location 1470 Atlanta, GA 30309
Florida City Gas Charles A. Rawson, III 955 East 25 th Street Hialeah, FL 33013-3498	Katherine Fleming Florida Public Service Commission 2540 Shumard Oak Boulevard Tallahassee, FL 32399



Bill L. Bryant, Jr.
Akerman Senterfitt Attorneys at Law
106 East College Avenue, Suite 1200
Tallahassee, FL 32301
(850) 224-9634

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In Re: Purchased Gas Adjustment)
(PGA) True-up)
_____)

Docket No. 050003-GU

Filed: October 5, 2005

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

Florida City Gas submits this preliminary statement of issues and positions based on its Petition filed September 23, 2005:

Issue 1: What are the appropriate final purchased gas adjustment true-up amounts for the period January 2004 through December 2004?

Florida City Gas: \$117,948 over-recovery

Issue 2: What are the estimated purchased gas adjustment true-up amounts for the period January 2005 through December 2005?

Florida City Gas: \$3,439,924 under-recovery

Issue 3: What are the total purchased gas adjustment true-up amounts to be collected during the period January 2006 through December 2006?

Florida City Gas: \$3,321,976 under-recovery

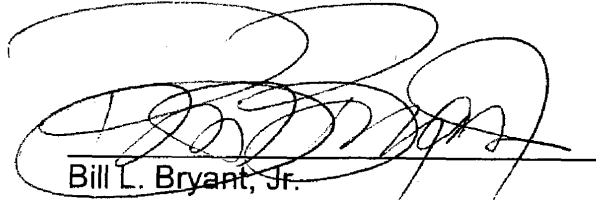
Issue 4: What are the appropriate levelized purchased gas cost recovery (cap) factors for the period January 2006 through December 2006?

Florida City Gas: 164.027 cents/therm

Issue 5: What should be the effective date of the new purchased gas adjustment charge for billing purposes?

Florida City Gas: The factors should be effective for all meter readings on or after January 1, 2006 and should apply for bills rendered for meter readings taken between January 1, 2006 and December 31, 2006.

RESPECTFULLY SUBMITTED this 5th day of October, 2005.

A handwritten signature in black ink, appearing to read "Bill L. Bryant, Jr.", written over a horizontal line.

Bill L. Bryant, Jr.
Akerman Senterfitt Attorneys at Law
106 East College Avenue, Suite 1200
Tallahassee, FL 32301
(850) 224-9634