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IN REPLY REFER TO:
Ansley Watson, Jr.
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e-mail: aw@macfar.com

October 5, 2005

VIA E-FILING

Blanca S. Bayo, Director Division of Commission Clerk & Administrative Services Florida Public Service Commission 2540 Shumard Oak Boulevard Tallahassee, Florida 32399-0850

Re: Docket No. 050004-GU - Natural gas conservation cost recovery

Dear Ms. Bayo:

Enclosed for filing with the Commission, please find Peoples Gas System's Preliminary List of Issues and Positions for the hearing scheduled to commence in the above docket on November 7, 2005.

Thank you for your usual assistance.

Sincerely,

Ansley Watson, Jr.

AWjr/a Enclosures

cc: Mrs. Kandi M. Floyd

Matthew R. Costa, Esquire

Parties of Record

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Natural gas conservation cost)	DOCKET NO. 050004-GU
recovery.)	Submitted for filing:
•)	10-5-05

PEOPLES GAS SYSTEM'S PRELIMINARY LIST OF ISSUES AND POSITIONS

Peoples Gas System ("PGS"), by its undersigned attorneys, submits the following Preliminary List of Issues and Positions:

Generic Conservation Issues

ISSUE 1: What is the final end of the period true-up amount for the period January 2004 through December 2004?

PGS (except West Florida): \$1,573,605 overrecovery

PGS (West Florida): \$2,114,460 underrecovery

ISSUE 2: What are the appropriate conservation cost recovery factors for the period January 2006 through December 2006?

PGS (except West Florida):

Rate Class	ECCR Factor (per therm)
Residential	\$0.03814
Small General Service	\$0.03260
General Service 1	\$0.01310
General Service 2	\$0.01069
General Service 3	\$0.00879
General Service 4	\$0.00808
General Service 5	\$0.00460
Commercial Street Lighting	g \$0.00572
Natural Gas Vehicle Service	

PGS (West Florida):

Rate Class	ECCR Factor (per therm)
Residential	\$0.16931
Small General Service	\$0.20030
General Service 1	\$0.05824
General Service 2	\$0.04676
General Service 3	\$0.03906

General Service 4	\$0.03550
General Service 5	\$0.01979
Commercial Street Lighting	\$0.02486
Natural Gas Vehicle Service	\$0.02486

<u>ISSUE 3</u>: What should be the effective date of the cost recovery factors for billing purposes?

PGS: The factors should be effective beginning with the specified conservation cost recovery cycle and thereafter for the period January 2006 through December 2006. Billing cycles may start before January 1, 2006, and the last cycle may be read after December 31, 2006, so that each customer is billed for twelve months regardless of when the adjustment factor became effective.

Respectfully submitted,

Ansley Watson, Jr.

Macfarlane Ferguson & McMullen

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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that true and correct copies of the foregoing Preliminary List of Issues and Positions has been furnished by U. S. Mail this 5th day of October, 2005, to the following:

Martha Brown, Esquire
Office of General Counsel
Florida Public Service Commission
2540 Shumard Oak Boulevard
Tallahassee, FL 32399-0850

Mr. Thomas A. Geoffroy Florida Division Chesapeake Utilities Corporation P. O. Box 960 Winter Haven, FL 33882-0960

Bill L. Bryant, Jr., Esquire Akerman Senterfitt P.O. Box 1877 Tallahassee, FL 32302-1877

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Ms. Angela L. Llewellyn Regulatory Affairs Peoples Gas System P. O. Box 111 Tampa, FL 33601-0111 Mr. Charles A. Rawson, III Florida City Gas 955 East 25th Street Hialeah, FL 33013-3498

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Mr. Stuart L. Shoaf St. Joe Natural Gas Company, Inc P. O. Box 549 Port St. Joe, FL 32457-0549

Anslev Watson, Jr.