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September 10, 2008

**VIA HAND DELIVERY**

Ms. Ann Cole  
Office of the Commission Clerk  
Florida Public Service Commission  
2540 Shumard Oak Boulevard  
Tallahassee, FL 32399-0850

**Re: Docket No. 080004-GU – Natural Gas Conservation Cost Recovery**

Dear Ms. Cole:

Enclosed for filing in the above referenced Docket, please find an original and 15 copies of Florida City Gas's Petition and the Direct Testimony and Exhibits of Ms. Carolyn Bermudez.

Your assistance in this matter is greatly appreciated.

Sincerely,

**Beth Keating**  
**AKERMAN SENTERFITT**  
106 East College Avenue, Suite 1200  
Tallahassee, FL 32302-1877  
Phone: (850) 224-9634  
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**BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION**

**In re: Natural Gas Conservation  
Cost Recovery**

**Docket No. 080004-GU  
Filed: September 10, 2008**

**PETITION OF FLORIDA CITY GAS  
FOR APPROVAL OF CONSERVATION COST RECOVERY FACTORS**

Florida City Gas, a division of Pivotal Utility Holdings, Inc. (“Florida City Gas” or “the Company”) hereby petitions the Commission for Approval of the Company’s conservation cost recovery factors for the period January 1, 2009 through December 31, 2009. In support thereof, the Company says:

1. For the period January 1, 2009 through December 31, 2009, Florida City Gas projects its total incremental conservation costs to be \$2,417,425 (Schedule C-2). Florida City Gas’ true-up for the period January 1, 2008 through December 31, 2008, is an under-recovery of \$786,742, resulting in a total of \$3,204,167, of conservation costs to be recovered during the January 1, 2009 through December 31, 2009 period.

2. When the required true-up and projected expenditures are spread over the projected term sales and expanded for taxes, the required conservation cost recovery factors for the period January 1, 2009 through December 31, 2009, are:

GS-1, GS-100, GS-220 (Sales & Transportation)	\$0.09304
GS-600 (Sales & Transportation)	\$0.04875
GS-1200 (Sales & Transportation)	\$0.03115

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GS-6k (Sales & Transportation)	\$0.02499
GS-25000 (Sales & Transportation)	\$0.02452
GS-60000 (Sales & Transportation)	\$0.02394
Gas Lights	\$0.04846
GS-120000 (Sales & Transportation)	\$0.01785
GS-250000 (Sales & Transportation)	\$0.01643

3. The Company's calculation of the Conservation Cost Recovery Factors is consistent with the Commission's methodology, and supported by the Direct Testimony of Carolyn Bermudez, and Schedules C-1 through C-3 and C-5, which are included in Exhibit No. CB-2.

WHEREFORE, Florida City Gas requests that its Conservation Cost Recovery Factors for the period January 1, 2009 through December 31, 2009 be approved.



Beth Keating  
Akerman Senterfitt Attorneys at Law  
106 East College Avenue  
Highpoint Center, 12<sup>th</sup> Floor  
Tallahassee, FL 32301  
(850) 224-9634

**CERTIFICATE OF SERVICE**


I HEREBY CERTIFY that a true and correct copy of the Petition of Florida City Gas supported by the Direct Testimony and Exhibit of Carolyn Bermudez, has been furnished by U.S. Mail to the following parties of record this 10th day of September, 2008:

Florida Public Utilities Company Mehrdad Khojasteh 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 H. Horton, Jr. P.O. Box 15579 Tallahassee, FL 32317	Office of Public Counsel J.R. Kelly/Patricia Christensen/S.Burgess c/o The Florida Legislature 111 West Madison Street Room 812 Tallahassee, FL 32399-1400
Peoples Gas System Paula Brown 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 Melvin Williams 955 East 25 <sup>th</sup> Street Hialeah, FL 33013-3498	Katherine Fleming * Florida Public Service Commission 2540 Shumard Oak Boulevard Tallahassee, FL 32399
Florida City Gas Jay Sutton 4180 South US Hwy. 1 Rockledge, FL 32955-5309	Charles A. Costin Costin and Costin Law Firm P.O. Box 98 Port Saint Joe, FL 32457-1159
Florida Division of Chesapeake Utilities Corporation Thomas A. Geoffroy P.O. Box 960	Indiantown Gas Company Brian J. Powers P.O. Box 8 Indiantown, FL 34956-0008

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\* Hand Delivery

Winter Haven, FL 33882-0960	
Sebring Gas System, Inc. Jerry H. Melendy, Jr. 3515 U.S. Highway 27 South Sebring, FL 33870	Robert Scheffel Wright 225 South Adams Street, Suit 200 Tallahassee, FL 32301



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