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September 13, 2011

BY HAND DELIVERY

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

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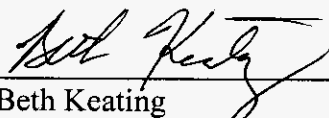
Re: **Docket No. 110004-GU - Natural Gas Conservation Cost Recovery Clause.**

Dear Ms. Cole:

Enclosed for filing in the referenced Docket, please find the original and 15 copies of Florida City Gas's Petition for Approval of Conservation Cost Recovery Factors, along with the supporting Testimony of Ms. Carolyn Bermudez and her Composite Exhibit CB-2. The referenced Attachment is also provided in native format on CD.

Thank you for your assistance with this filing. If you have any questions whatsoever, please do not hesitate to let me know.

Sincerely,


Beth Keating
Gunster, Yoakley & Stewart, P.A.
215 South Monroe St., Suite 601
Tallahassee, FL 32301
(850) 521-1706

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BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Natural Gas Conservation Cost)
Recovery)
_____)

Docket No. 110004-GU
Filed: September 13, 2011

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, 2012 through December 31, 2012. In support thereof, the Company says:

1. For the period January 1, 2012 through December 31, 2012, Florida City Gas projects its total incremental conservation costs to be \$4,249,810 (Schedule C-2). Florida City Gas' true-up for the period January 1, 2011 through December 31, 2011, is an under-recovery of \$1,608,810 resulting in a total of \$5,858,620, of conservation costs to be recovered during the January 1, 2012 through December 31, 2012 period.

2. When the required true-up and projected expenditures are spread over the projected therm sales and expanded for taxes, the required conservation cost recovery factors for the period January 1, 2012 through December 31, 2012, are:

GS-1, GS-100, GS-220 (Sales & Transportation)	\$0.17120
GS-600 (Sales & Transportation)	\$0.09061
GS-1200 (Sales & Transportation)	\$0.05493
GS-6k (Sales & Transportation)	\$0.04551
GS-25000 (Sales & Transportation)	\$0.04526

GS-60000 (Sales & Transportation)	\$0.04425
Gas Lights	\$0.08821
GS-120000 (Sales & Transportation)	\$0.03161
GS-250000 (Sales & Transportation)	\$0.02966

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, which are included in Exhibit No. - (CB-2).

WHEREFORE, Florida City Gas requests that its Conservation Cost Recovery Factors for the period January 1, 2012 through December 31, 2012 be approved.



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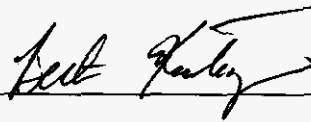
Attorneys for Florida City Gas

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the Petition of Florida City Gas, as well as the Direct Testimony and Exhibit CB-2 of Carolyn Bermudez, has been furnished by U.S. Mail to the following parties of record this 13th day of September, 2011:

Florida Public Utilities Company Tom Geoffroy 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 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/David Weaver Ten Peachtree Place Location 1470 Atlanta, GA 30309
Florida City Gas Melvin Williams 933 East 25 th Street Hialeah, FL 33013-3498	Katherine Fleming Florida Public Service Commission 2540 Shumard Oak Boulevard Tallahassee, FL 32399

Florida Division of Chesapeake Utilities Corporation Thomas A. Geoffroy P.O. Box 960 Winter Haven, FL 33882-0960	FPUC/Indiantown Division Tom Geoffroy P.O. Box 3395 West Palm Beach, FL 33402-3395
Sebring Gas System, Inc. Jerry H. Melendy, Jr. 3515 U.S. Highway 27 South Sebring, FL 33870	



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