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ORIGINAL
FILE COPY

February 8, 1995

Blanca S. Bayo, Director
Division of Records & Reporting
Florida Public Service Commission
101 East Gaines Street
Tallahassee, FL 32399-0850

HAND DELIVERY

Re: Docket No. 94062 -GU
Application for a rate increase by FLORIDA PUBLIC UTILITIES
COMPANY.

Dear Ms. Bayo:

Enclosed on behalf of Florida Public Utilities Company for filing in the above docket are an original and 15 copies of its Motion for Leave to File Supplemental Testimony and Exhibits.

Please acknowledge receipt of the foregoing by stamping the enclosed extra copy of this letter and returning same to my attention. Thank you for your assistance.

Sincerely,

Wayne L. Schiefelbein
Wayne L. Schiefelbein

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APP _____
CAF Pruitt
CMU _____
CTR _____
EAG WLS/ldvMcCormick
ENCLOSURES
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DOCUMENT NUMBER-DATE

01475 FEB-89

FPSC-RECORDS/REPORTING

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Application for a rate) Docket No. 940620-GU
increase by FLORIDA PUBLIC UTILITIES)
COMPANY) Filed: February 8, 1995

MOTION FOR LEAVE TO FILE
SUPPLEMENTAL TESTIMONY AND EXHIBITS

FLORIDA PUBLIC UTILITIES COMPANY (FPUC), by and through its undersigned counsel, hereby requests leave to file supplemental prefiled direct testimony and exhibits, and in support states the following:

1. On September 23, 1994, FPUC submitted its application for a rate increase, and the Minimum Filing Requirements (MFRs) and prefiled direct testimony in support of its application.

2. Said prefiled direct testimony included that of Mr. Marc L. Schneidermann, FPUC's Manger of Engineering and Gas Supply. (MFRs, Volume 1, pp. 165 - 193). Mr. Schneidermann also sponsors the cost of service information filed with his testimony. (MFRs, Volume 4, Sections E and H).

3. It has now come to FPUC's attention that its cost of service analysis requires corrections and modifications. Specifically, the cost of service information that has been prefiled contains an error in the direct assignment of plant to the Large Volume Interruptible (LVI) Service and Transportation rates. The majority of plant directly assigned to LVI has been rebuilt to handle elevated delivery pressures requested by the LVI customer. To effectuate the elevated pressure, the customer contributed the full cost of the upgrade. This contribution was omitted in the

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prefiled cost of service information. In addition, FPUC had, in its MFRs, modified Staff's model regarding the allocation of customer advances. However, it was determined in FPUC's last rate case that Staff would not accept this modified allocation methodology, with Staff, instead, reverting to it's original methodology. FPUC has determined that it will accept Staff's original methodology in the current rate case.

4. Accordingly, FPUC requests leave to submit supplemental prefiled testimony and exhibits of Mr. Schneidermann, which would simultaneously incorporate the LVI rate base revision and customer advance allocation modification.

5. Such supplemental testimony and exhibits would avoid confusion and promote an orderly examination of their subject matter.

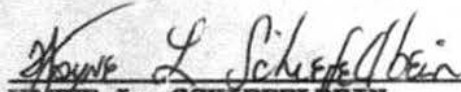
6. FPUC is preparing such supplemental testimony and exhibits at this time. Such testimony and exhibits are anticipated to be ready for filing by February 16, 1995.

7. The undersigned counsel has consulted with Staff Counsel Vicki D. Johnson, and she has indicated that Staff would not oppose this motion.

Wherefore, Florida Public Utilities Company requests leave to submit prefiled supplemental testimony and exhibits of Mr. Marc L. Schneidermann addressing the Large Volume Interruptible rate base revision and customer advance allocation methodology, as discussed

hereinabove, by February 16, 1995.

Respectfully submitted,



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Attorneys for FLORIDA PUBLIC
UTILITIES COMPANY

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that Florida Public Utilities Company's Motion for Leave to File Supplemental Testimony and Exhibits has been furnished on this 8th day of February, 1995 by hand-delivery to VICKI D. JOHNSON, ESQ., Division of Legal Services, Florida Public Service Commission, 101 East Gaines Street, Tallahassee, Florida 32399-0863.


WAYNE L. SCHIEFELBEIN