# MACFARLANE FERGUSON & MCMULLEN

ATTORNEYS AND COUNSELORS AT LAW

P O BOX (531129 33601 P O BOX (531129 33601 TAMPA FLORDA 33602 (6111213 4200 FAX (6131213 4396

February 10, 1998

David M. Nicholson, Esq. P.O. Box 1531 Tampa, Florida 33601

625 COUNT STREET

P O BOX 1000-214 3375/1

LEARMATER PLORISA 33756

1 11 441 BIRGE FAX (8) 31 447 8471

FPSC-RECORDS/REPORTING

PSC-RECORDS/REPORTING

86

EB

66

020

86

Blanca S. Bayo, Director Division of Records & Reporting Florida Public Service Commission 2540 Shumard Oak Boulevard Tallahassee, FL 32399-0850

via FEDERAL EXPRESS

# Re: Docket No. 980003-GU -- Purchased Gas Adjustment (PGA) True-up; Amended Prehearing Statement and Revised Teae-Up Projections for April 1998 - March 1999.

Dear Ms. Bayo:

Enclosed for filing in the above docket please find the original and 15 copies of Peoples Gas System's Amended Prehearing Statement and Amended Petition for Approval of PGA factor for Application to Bills to be Rendered During the Period April 1998 Through March 1999. We also enclose a computer diskette (IBM-DOS 4.0, WP5.1) containing the same.

Enclosed also for filing on behalf of Peoples, please find 15 copies of Revised Composite

Please acknowledge your receipt and filing of the enclosures by stamping the duplicates copy of this letter which is enclosed and returning the same to the undersigned.

Thank you for your assistance.

Sincerely,

DAVID M. NICHOLSON

BBC

OF RECORDS

Enclosures

cc: Ms. Angie Llewellyn RECEIVED & FILED Mr. W. Edward Elliott All Parties of Record FPSC-BUREAU OF

FPSC-RECORDS/REPORTING

2097

FEB II 8

ORIGINAL

# BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In Re: Purchased Gas : Adjustme: (PGA) True-Up : DOCKET NO. 980003-GU Filed: 02-11-98

## AMENDED PREHEARING STATEMENT OF PEOPLES GAS SYSTEM

:

#### A. APPEARANCES:

· . . .

DAVID M. NICHOLSON, Esquire, Macfarlane Ferguson & McMullen P. O. Box 1531, Tampa, Florida 33601 On behalf of Peoples Gas System

#### B. WITNESSES:

	Witness	Subject Matter	Issues
1.	W. Edward Elliott (Peoples)	Projected gas costs, therm sales and weighted average cost of gas ("WACOG"); final PGA true- up amount for April 1996 - March 1997; estimated PGA true-up amounts for April 1997 - March 1998; total PGA true-up amounts for April 1998 - March 1999; and levelized PGA cost recovery (cap) factor for April 1998 - March 1999.	1 - 5

-----

C. EXHIBITS:

(Revised EE-3)

Exhibit	Witness	Description
(EE-1) (EE-2)	Elliott	Calculation of final true-up for April 1996 - March 1997 (Schedules A-1 through A-6)
	Elliott	Calculation of estimated true-up

Calculation of estimated true-up for April 1997 - March 1998; total true-up for April 1998 - March 1999; Calculation of PGA factor for April 1998 - March 1999 (Schedules E-1 through E-5)

> DOCUMENT NUMBER-DATE 02097 FEB II S FPSC-RECORDS/REPORTING

#### D. STATEMENT OF BASIC POSITION:

## Peoples' Statement of Basic Position:

The Commission should approve Peoples' final PGA true-up amount for the period April, 1996 through March, 1997 of \$3,911,759 (underrecovery), its estimated PGA true-up amount of \$3,918,939 (overrecovery) for the period April, 1997 through March, 1998, and its levelized PGA (cap) factor of 49.609 cents per therm for application to customers' bills, including the customers of the former West Florida Natural Gas Co., during the period April 1, 1998 through March 31, 1999.

#### E. STATEMENT OF ISSUES AND POSITIONS:

#### Generic Purchased Gas Adjustment Issues

ISSUE 1: What is the appropriate final purchased gas adjustment true-up amount for the period April, 1996 through March, 1997?

#### POSITION:

Peoples: \$3,911,759 underrecovery. (Elliott)

ISSUE 2: What is the appropriate estimated purchased gas adjustment true-up amount for the period April, 1997 through March, 1998?

#### POSITION:

Peoples: \$3,918,939 overrecovery. (Elliott)

ISSUE 3: What is the total purchased gas adjustment true-up amount to be collected or refunded during the period April, 1998 through March, 1999?

#### POSITION:

Peoples: \$7,180 overrecovery. (Elliott)

ISSUE 4: What is the appropriate levelized purchased gas cost recovery (cap) factor for the period April, 1998 through March, 1999?

# POSITION:

\*: . · ·

Peoples: 49.609 cents per therm. (Elliott)

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

POSITION:

Peoples: Agree with Staff. (Elliott)

F. STIPULATED ISSUES:

None as to Peoples at this time.

G. MOTIONS:

Peoples has no pending motions at this time.

H. OTHER MATTERS:

None as to Peoples at this time.

Dated this 11th day of February, 1998.

Respectfully submitted,

and maries

David M. Nicholson, Ansley Watson, Jr. Macfarlane Ferguson & McMullen P. O. Box 1531, Tampa, Florida 33601 (813) 273-4200 Attorneys for Peoples Gas System

# CERTIFICATE OF SERVICE

I HEREBY CERTIFY chat a true and correct copy of the foregoing Prehearing Statement of Peoples Gas System has been furnished this 10th day of February, 1998, by regular U.S. Mail, to all known parties of record in Docket No. 980003-GU.

W ( MAN

David M. Nicholson