

Miami Division 955 East 25th Street Hialeah, FL 33013-3498 Tel (305) 691-8710 www.nui.com

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NUI Corporation (NYSE: NUI)

AU TING & HANGIAL ANALYSIS DIS

August 13, 1998

Federal Express

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

981039-GU

Re: Request for Authorization to Keep Records
Out-of-State by City Gas Company of Florida

Dear Ms. Bayo:

Enclosed for filing please find the original and 15 copies of City Gas Company of Florida's Request for Authorization to keep Records Out-of-State.

Thank you for your assistance.

Sincerely,

Michael A. Palecki

Vice President of Regulatory Affairs

Number of A Black.

MAP/rt

Encl.

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In Re: Request For Authorization)	DOCKET NO.
to Keep Records Out-of-State by City Gas)	
Company of Florida.)	Submitted for Filing
)	August 14, 1998

REQUEST FOR AUTHORIZATION TO KEEP RECORDS OUT-OF-STATE

City Gas Company of Florida, an operating division of NUI Corporation ("NUI/City Gas" or "the Company"), pursuant to Rule 25-7.015, Florida Administrative Code, requests the authorization of the Florida Public Service Commission to keep business records out-of -state, and in support thereof states:

The name of petitioner and the mailing address of its principal office is:

City Gas Company of Florida, a Division of NUI Corporation 955 East 25th Street Hialeah, Florida 33013-3498

The name and mailing address of the persons authorized to receive notice are:

Michael Palecki NUI/City Gas 955 East 25th Street Hialeah, Florida 33013-3498

M. Patricia Keefe NUI Corporation One Elizabethtown Plaza Post Office Box 3175 Union, NJ 07083-1975

3. Rule 25-7.015, Florida Administrative Code, allows a utility to keep records outof state when so authorized by the Florida Public Service Commission. The Rule also provides that such records shall be open for inspection by the Commission, and that any utility authorized to keep its records outside of the state shall reimburse the Commission for its reasonable travel expense for any out-of-state audit.

TELL PLANNER DRITING

- 4. As part of a reorganization process designed to improve efficiency, all accounting and bookkeeping functions for NUI's various operating divisions have been centralized, so that these functions will no longer need to be performed at the location of the operating divisions. These bookkeeping and accounting functions will be performed at NUI headquarters in New Jersey. As part of this process, NUI Corporation, upon receiving Commission authorization, plans to keep the records of City Gas Company of Florida at its corporate headquarters in New Jersey.
- Improvements in efficiency, and resulting cost savings will be achieved if NUI
 Corporation is able to keep the records of its Florida, North Carolina, Maryland,
 Pennsylvania, New York, and New Jersey operating divisions at a single, central
 location.
- 6. In accordance with Rule 25-7.015, Florida Administrative Code, all records will be open for inspection by the Commission, and the Company will provide reimbursement for all travel expenses incurred by the Commission or its authorized representatives to inspect records or perform out-of state audits. Past audits conducted by Commission Staff at NUI headquarters in New Jersey under this procedure have proven expedient and satisfactory to the Company, and Commission Staff. The Company believes that savings resulting from maintenance of a single, central location for business records, rather than several scattered locations, will outweigh the cost of reimbursement for travel expenses.

WHEREFORE, NUI/City Gas respectfully requests the authorization of the Florida Public Service Commission to keep its records out-of state.

Respectfully submitted this 13 day of Aug., 1998.

Michael A. Palecki

NUI City Gas Company of Florida Vice President of Regulatory Affairs 955 East 25th Street

Hialeah, FL 33013-3498