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NUI Corporation (NYSE: NUI)

January 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

Docket No. 990002-EG Re:

Conservation Cost Recovery

Dear Ms. Bayo:

Enclosed for filing in the above docket is an original and 10 copies of City Gas Company of Florida's Preliminary List of Issues and Positions.

	i nank you for your assistance.	
ACK AFA APP CAF CMU CTR EAG LEG LIN OPC RCH SEC WAS	BallyAP/rt I Encl.	Sincerely, Michael A. Palecki Attorney, Legal & Regulatory Affairs NUI Corporation

NUI Companies and Affiliates:

City Gas Company of Florida Elizabethtown Gas Elkton Gas North Carolina Gas

NUI Capital Corp. NUI Energy NUI Energy Brokers NUI Environmental Group DOCUMENT NUMBER-DATE

TIC Enterprises, LLC Utility Business Services TRSC-RECOROS/REPORTING Valley Cities Gas Waverly Gas

ORIGINAL

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In Re: Conservation Cost Recovery)	DOCKET NO. 990002-EG
Clause.)	Filed: January 14, 1999
)	

CITY GAS COMPANY OF FLORIDA PRELIMINARY LIST OF ISSUES AND POSITIONS

City Gas Company of Florida, a division of NUI Corporation (NUI/City Gas), hereby submits its preliminary list of issues and positions.

1. What is the appropriate end-of-period final true-up amount for the period October 1, 1997, through March 31, 1998?

Position:

\$262,971

2. What are the appropriate conservation cost recovery factors for the period April 1999 through December 1999?

Position:

Residential (RS, ED & GL) \$00.03678

Commercial (CS, ED, CTS & SCTS) \$00.00861

Commercial Large Volume (LCS) \$00.00704

Respectfully Submitted,

Michael A. Palecki

NUI CORPORATION

Attorney, Legal and Regulatory Affairs

955 East 25th Street

Hialeah, FL 33013-3498

(305) 691-8710

DOCUMENT NUMBER - DATE

00513 JAN 148

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the City Gas Company of Florida's Preliminary List of Issues and Positions has been furnished by U.S. Mail to the following parties of record, this 14th day of January, 1999:

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