## LAW OFFICES MESSER, CAPARELLO & SELF ORIGINAL

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July 31, 2000



### BY HAND DELIVERY

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

Re: Florida Public Utilities Company; Docket No. 000003-GU

Dear Ms. Bayo:

Enclosed for filing on behalf of Florida Public Utilities Company in this docket are the following documents:

1. An original and 5 copies of Florida Public Utilities Company's Request for Specified Confidential Treatment;

2. An original and 5 copies of the redacted Workpapers;

3. An envelope containing a copy of the confidential Workpapers.

Please acknowledge receipt of these documents by stamping the enclosed extra copy of this letter.

Thank you for your assistance.

Sincerely, Norman H. Horton, Jr.

NHH/amb Enclosures Mr. George Bachman cc: Parties of Record Control & FILED

FPSC-BUREAU OF NECORDS

DOCUMENT NUMBER-DATE

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FPSC-RECORDS/REPORTING

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### **BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION**

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In Re: Purchased Gas Adjustment (PGA) True-Up

Docket No.000003-GU Filed: July 31, 2000

### FLORIDA PUBLIC UTILITIES COMPANY'S REQUEST FOR CONFIDENTIAL CLASSIFICATION

Florida Public Utilities Company ("FPU"), pursuant to section 366.093, Florida Statutes, and Rule 25-22.006(3)(a)2. and (4), Florida Administrative Code, submits this Request for Confidential Classification of the documents and information described below provided to the Florida Public Service Commission Staff in connection with the staff audit of FPU's purchased gas adjustment for the period ending December 31, 1999. In support of this Request for Confidential Classification, FPU states as follows:

1. On July 10, 2000, FPU was notified of the completion of the field work in association with an audit of the Purchased Gas Adjustment for the year ended December 31, 1999. During the course of this audit, Staff was provided work papers and documents containing information which FPU considers to be "proprietary confidential business information" under Section 366.093(3), Florida Statutes. These workpapers and documents were incorporated with the audit workpapers filed with the Commission.

2. The specific workpapers are listed on Exhibit "A" hereto. These workpapers include some documents which have previously been found to be proprietary and these are so noted. For those not previously filed with the Commission a justification for the classification is given.

3. FPU requests that the above-described information be classified as "proprietary confidential business information" within the meaning of Section 366.093(3), Florida Statutes. The

DOCUMENT NUMBER-DATE 09179 JUL 318 FPSC-RECORDS/REPORTING information and documents at issue are intended to be and are treated by FPU as proprietary and confidential.

4. An unedited version of the above-described documents has been submitted to the Division of Records and Reporting on this date under a separate cover with the information asserted to be confidential highlighted. An edited version of the documents on which the information asserted to be confidential has been blocked out is enclosed herewith as Exhibit "B."

5. FPU requests that the information for which it seeks confidential classification remain confidential for a period of at least 18 months as provided in Section 366.093(4), Florida Statutes. The time period requested is necessary to allow FPU to negotiate future gas purchase contracts on favorable terms.

WHEREFORE, for the foregoing reasons, FPU respectfully requests that its Request for Confidential Classification be granted.

Dated this 31st day of July, 2000.

MESSER, CAPARELLO & SELF, P.A. 215 S. Monroe Street, Suite 701 Post Office Box 1876 Tallahassee, FL 32302-1876 (850) 222-0720

NORMAN H. HORTON, JR., ESQ. FLOYD R. SELF, ESQ.

Attorneys for Florida Public Utilities Company

### EXHIBIT "A"

Justification for Confidentiality Data Obtained During a PSC Audit of Florida Public Utilities
Company's Purchased Gas Adjustment Docket No. 000003-GU,/audit Control No. 00-003-4-1

WORK PAPER PAGE	<u>LINES</u>	<u>COLUMNS</u>	<u>RATIONALE</u>
41-1/6/3/1	10-25	B & C	See Below
41-2/5-2/1	10-25	B & C	See Below
41-3/1	All	All	See Below
41-3/3	10-13	A, B, C	See Below
	19	E, F, G, H	See Below
	27-30	A, B, C	See Below
	36-48	H, I J, K	See Below
	50	Κ	See Below
	57-62	F, G	See Below
41-3/6	All	All	See Below
41-3/8	10-13	A, B, C	See Below
	19	E, F, G, H	See Below
	27-30	A, B, C	See Below
	36-48	H, I J, K	See Below
	50	К	See Below
	57-62	F, G	See Below

### RATIONALE

The information contained within these columns represent negotiated gas supplies purchased from suppliers other than Florida Gas Transmission Company and deliveries by gate station as well as competitively made Off System Sales data. Prices vary based on the operational flexibility of each contract. These data contain the names of gas suppliers from whom FPU is purchasing gas supplies. Release of supplier names and gas tendered by gas station would be detrimental to the interest of FPU and its customers since it would provide a competitor with a list of FPU's suppliers and operating information. These data also contain information concerning the totals paid to gas suppliers. Releasing such information could provide competing gas suppliers with an advantage over FPU. Suppliers may be less likely to make price concessions. Release of such information has the potential to lead to inflated price fixing by suppliers. Potentially, release of the aforementioned information may result in higher costs which would have to be passed along to FPU's customers.

These items also represent transactions by Florida Public Utilities Company and affect its PGA for imbalances traded and as an alternative to Florida Gas Transmission Company's cash out program. Transactions of these types are with other pipeline customers. For competitive purposes only, FPU must be assured that no other pipeline customer will be able to ascertain the parties involved in this transaction with FPU nor the prices of the components of such transactions nor the quantities involved in this transaction. Otherwise future transactions of this type may be put at undue risk.

This information is contractual information which, if made public, "would impair the efforts of Florida Public Utilities Company to contract for goods or services on favorable terms." Section 366.093(3)(d), Florida Statutes.

The following workpapers contain documents determined to be confidential pursuant to Order No. PSC-99-1249-CFO-GU, issued June 24, 1999:

41-3/4 43-1 43-1/10

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The following workpapers contain documents determined to be confidential pursuant to Order No. PSC-99-1699-CFO-GU, issued August 31, 1999:

43-1/7 43-1/8 43-1/9

The following workpapers contain documents determined to be confidential pursuant to Order No. PSC-00-0491-CFO-GU, issued March 7, 2000:

41-3/9 43-2 43-2/8 43-2/9 43-2/10

### CERTIFICATE OF SERVICE

I HEREBY CERTIFY that true and correct copies of Florida Public Utilities Company's Request for Specified Confidential Classification in Docket No. 000003-GU have been served by hand delivery (\*) and/or U. S. Mail this 31st day of July, 2000 upon the following:

Cochran Keating, Esq.\* Division of Legal Services Florida Public Service Commission 2540 Shumard Oak Blvd., Room 370 Tallahassee, FL 32399-0850

Lee L. Willis, Esq. James D. Beasley, Esq. Ausley & McMullen Post Office Box 391 Tallahassee, FL 32302

Ms. Angela Llewellyn Administrator, Regulatory Coordination Tampa Electric Co. P.O. Box 111 Tampa, FL 33601-0111

Joseph A. McGlothlin, Esq. McWhirter, Reeves, McGlothlin, Davidson Rief & Bakas, P.A. 117 S. Gadsden St Tallahassee, FL 32301

Stephen C. Burgess Deputy Public Counsel Office of the Public Counsel 111 West Madison St., Rm 812 Tallahassee, FL 32399-1400

Wayne L. Schiefelbein, Esq. Wiggins & Villacorta P.O. Drawer 1657 Tallahassee, FL 32302

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John W. McWhirter, Esq. McWhirter, Reeves, McGlothlin, Davidson, Rief & Bakas, P.A. Post Office Box 3350 Tampa, FL 33601-3350 Mr. Robert Cooper U.S. Gypsum Company P.O. Box 806278 Chicago, IL 60680-4124

Mr. John T. English President Florida Public Utilities Company P.O. Box 3395 West Palm Beach, FL 33402-3395

Mr. David M. Nicholson Mrs. Ellen W. Anderton Corporate Counsel TECO Energy, Inc. P.O. Box 111 Tampa, FL 33601-0111

Mr. David M. Nicholson Mrs. Ellen W. Anderton Corporate Counsel TECO Energy, Inc. P.O. Box 111 Tampa, FL 33601-0111

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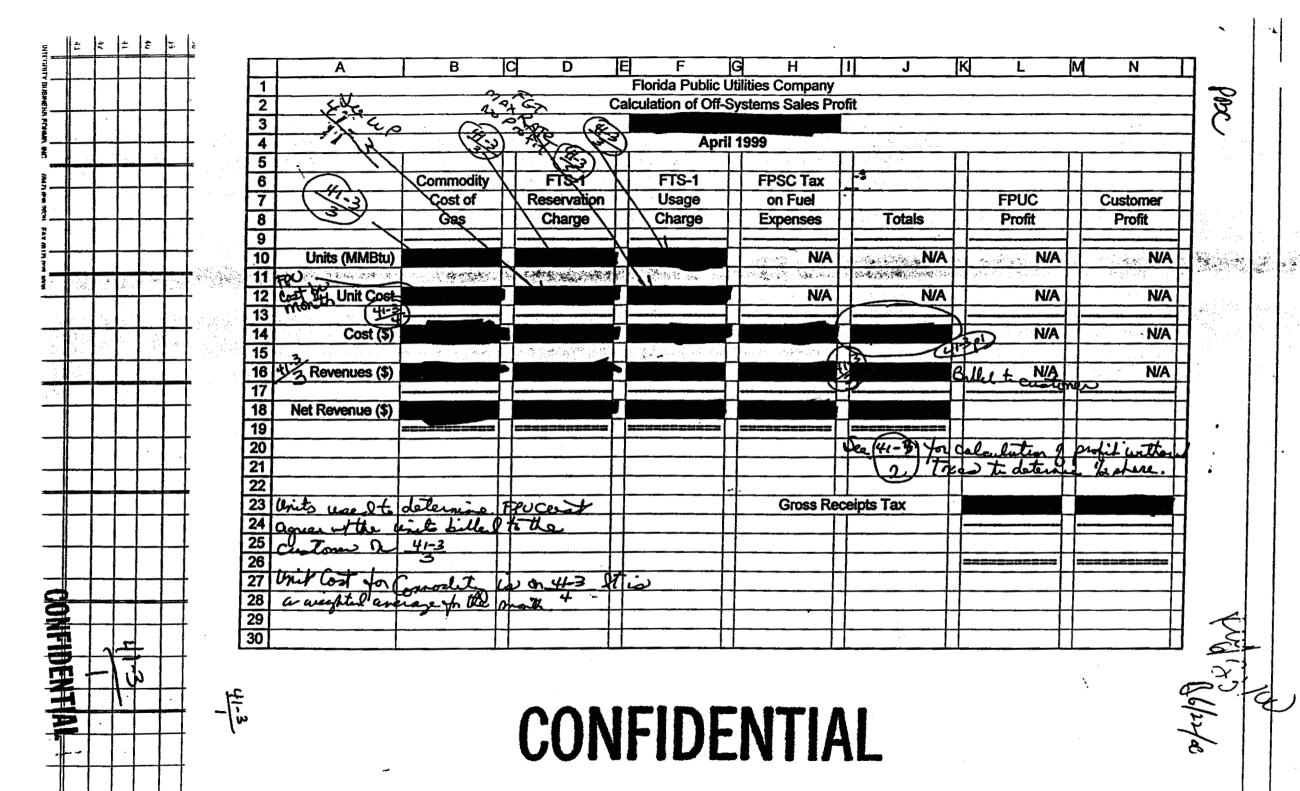
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INTEGRITY BUSIN	ESS FORMS, INC. (847) 698-262	26 FAX (847) 008-4008			3 2 3



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Image: State	Public       Florida Public Utilities Company       B         Company       Post Office Box 3395, West Paim Beach FL 33401-5888       B         Company       Post Office Box 3395, West Paim Beach FL 33401-5888       MME OFECK PUMALE TO FINAL STORED COMPANY         Company       S       Post Office Box 3395, West Paim Beach FL 33401-5888         Company       S       Post Office Box 3395, West Paim Beach FL 33401-5888         Company       Post Office Box 3395, West Paim Beach FL 33402 3395         Concrement And Resource on Internal stat       Post Office Box 3395, West Paim Beach FL 33402 3395         Concrement And Resource on Internal stat       CURRENT         ACCOUNT       Balance Beforg         CURRENT       CURRENT         Off-86451-7137       S.000         Concrement Profess Internal Flores       CURRENT         Concrement Profess Internal Flores       Mary 1, 1999         Concrement Profess Internal Flores       Mary 1, 1999         Concrement Profess Internal Flores       Mary 1, 1999         Control Flores Exclose Flores       Mary 1, 1999         Controlice Cost of Gas *       Ther 1
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Company     Poet Office Box 3365, Weat Pain Beach, FL 33401-8888       Barbon MANY     MAR Since Aviau To FF advance Aviau To FF	Company     Post Office Box 3366, West Palm Beach FL 33401-5686       MAXE OPEC NAME     MAXE OPEC NAME TO FRU ASAMBICOME       MAXE OPEC NAME TO Sample Call     NAME OPEC NAME TO Sample Call       MAXE OPEC NAME TO Sample Call     NAME OPEC NAME TO Sample Call       Discriming Account Guides and the sample Call     S       Outcomes As resource to recover and NUMBER     S       Outcomes As resource to recover and NUMBER     Clurkiter Charger Science and Science and Science and Science and Science and Science and Science and NUMBER     Clurkiter Charger Science and Science and Science and Science and Science and Science and Science and Science and Science and Science and Science and Science and Science and Scien
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FLORIDA PUBLIC UTILITIES COMPANY         ATTENTION CHRISTOPHER M BNYDER         PO BOX 3395         PO BOX 3395         ACCOUNT         NUMBER         YCURRENT Charges         ACCOUNT         Balance Before         CURRENT         To naurie Porso Onson method State         Port Office Box 3355, West Paim Beach FL 33401-6686         Ges Supply (55) 838-1723         Port Office Box 3355, West Paim Beach FL 33401-6686         Ges Supply (55) 838-1723         Port Gros as as supply (55) 838-1723         Meter Read Date:       Mary 1, 1699         Commodity Cost of Ges *       Ter 1         <	Point Provide All Resultance on Reveal and a second state of the Month of April 1999       FLORIDA PUBLIC UTILITIES COMPANY ATTENTION CHRISTOPHER M SHYDER         PO BOX 3396       PO BOX 3396       PO BOX 3396         ACCOUNT CHANGE ALL RESULTED ON REVEALE AND REVEALE OF TALL 3402 3395       CURRENT Charges         ACCOUNT DUMBER       Balance Before       CURRENT TOTAL         O'-86481-7137       0.00       CURRENT Charges         Portide Public Utilities Company       Post Office Box 3395, West Paim Beach FL 33401-5883       May 11, 1999         Portide Public Utilities Company       Post Office Box 3395, West Paim Beach FL 33401-5883       May 1, 1999         Post Office Box 3395, West Paim Beach FL 33401-5883       Gas Supply (56) 838-1723       May 1, 1999         Post Office Box 3395, West Paim Beach FL 33401-5883       Gas Supply (56) 838-1723       May 1, 1999         Post Office Box 3395, West Paim Beach FL 33401-5883       May 1, 1999       Rate Schedule:       OSSS-1         Off Systems Sales Service for the Month of April 1999       April 1999       April 1999       April 1999       April 1999         PTS-1 Reservation Charge       Ther 1       MMBbu       Mag 1       April 1999       MMBbu       April 1999       April 1, 1
FLORIDA PUBLIC UTILITIES COMPANY         ATTENTION CHRISTOPHER M BNYDER         PO BOX 3396         PO BOX 3396         CORCURRE # ACCOUNT CONDEX AR REQUERTED ON REVERT BOARD AND REVERT PALM BEACH FL 33402 3395         ACCOUNT         NUMBER         CURRENT Charges         ACCOUNT         NUMBER         Port Office Box 3355, West Paim Beach FL 33401-6888         Gas Supply (561) 53-1723         QT         Basing Control         Account Number:         Off Systems Sales Service for the Month of         April 1999         Commodity Cost of Gas*         Ther 1       MMBU         Commodity Cost of Gas*         Ther 2       MMBU         Ther 3       MMBU         Ther 4       MMBU         Ther 5       M	Pictor       FLORIDA PUBLIC UTILITIES COMPANY         ATTENTION CHRISTOPHER M SHYDER         PO BOX 3396         PO BOX 3396         WEST PALM BEACH FL 33402 3395         ACCOUNT         Balance Before         CURRENT Charges         ACCOUNT         Balance Before         CURRENT Charges         ACCOUNT         Balance Before         CURRENT Charges         ACCOUNT         Down Pole Action         Pot Notice Before         CURRENT Charges         ACCOUNT         Pot Notice Before         CURRENT Charges         ACCOUNT         Both Pole Action         Pot Notice Before         CURRENT Charges         ACCOUNT DUE         Pot Notice Both Pole Action         Pot Office Box 3385, West Paim Beach FL 33401-5883         Ges Supply (56) 838-1723         Pot Account Number:         Ort-8481-7137         April 1999         Account Number:         Ort-8481-7137         April 1999         Account Number:         Ort-8481-7137         April 1999         Account Number:         Ort-8481-7137
Piece Home P Account Curves All Recurring on Revealed and the second of the second	Picket Hard       Picket Hard       Picket Hard       Picket Hard         Concernance Account Counters All Resultance Before       CURRENT       TOTAL       CURRENT Charges         Concernance Account Counters All Resultance Before       CURRENT       TOTAL       CURRENT Charges         D1-86451-7137       0.00       Enderse Account Towners All Resultance Before       CURRENT       CURRENT Charges         D1-86451-7137       0.00       Picket Charges       AMOUNT DUE       May 11, 1999         Post Office Data Status       Fordid Public Utilities Company       May 11, 1999       May 11, 1999         Post Office Data Status       Common Number:       01-86461-7137       May 1, 1999         Post Office Data Status       Common Number:       01-86461-7137       May 1, 1999         Post Office Data Status       Common Number:       01-86461-7137       May 1, 1999         Post Office Data Status       May 1, 1999       Rate Schedule:       May 1, 1999         Commodity Cost of Gas*       Ther 1       Mathetic       OSS-1         Off Systems Sales Service for the Month of       April 1999       Ther 2       MMBbu         Commodity Cost of Gas*       Ther 3       MMBbu       Price 3       MmBbu         FTS-1 Leservation Charge       MMBbu       Ther 6
FLORIDA PUBLIC UTILITIES COMPANY ATTENTION CHUREN AMENDARISOPHERM BINDER PO 8 0X 3365         ORIGINAR PARAMENTICAL CHURENT AMENDER PO 8 0X 3365         ACCOUNT       Balance Beforg CURRENT Charges CURRENT Charges CURRENT Charges CURRENT Charges COMPANY AND	FLORIDA PUBLIC UTILITIES COMPANY ATTENTION CHIRSTOPHER MENYDER PO 80X 3386         OCKCKHARE # ACCOUNT CHURCE ARE RECOVERED ON ROVERS BOD ACCOUNT NUMBER       Statance Before (CURRENT Charges)         OL-86451-7137       D.00         D1-86451-7137       D.00         To Houting open onephing (CURRENT Charges)       AMOUNT DUE         Period       Paint State (CURRENT Charges)         D1-86451-7137       D.00         To Houting open onephing (CURRENT Charges)       AMOUNT DUE         Period Public Utilizes Company (Post Office Public) Utilizes Company (Post Offi
ATTENTION CHIRSTOPHER M SNYDER         PO BOX 3396         CHECKHER # ACCOUNT CHINGE AR REQUERED OF REVENTIONS AND REVENT CHIRSTOPHER M SNYDER         ACCOUNT       Balance Before         NUMBER       CURRENT CHINGE AR REQUERED OF REVENTION CHIRSTOPHER M SNYDER         NUMBER       CURRENT CHINGE AR REQUERENT CHIRTY CHIRT CHIRTY         NUMBER       CURRENT CHINGE AND REVENTION CHIRTY	ATTENTION_CHIRSTOPHER M BNYDER         PO BOX 3396         WEST PALM BEACH FL 33402 3395         Ordeck Hase # Account outwase and         ACCOUNT         Balance Before         CURRENT         OT - Bolance Before         CURRENT Charges         AMOUNT DUE         Balance Before         Course Course         Mathematic         Bala         Mathematic         Bala         Course Course         Mathematic      <
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NUMBER       CURRENT Charges       AMOUNT DUE       Paet Due Or         01-85481-7137       0.00       Image: Charges       AMOUNT DUE       May 11, 1999         To mount rhorsh onson, yrin reares       Forida Public Utilities Company       May 11, 1999       May 11, 1999         Post Office Box 3355, West Pain Beach FL 33401-5886       Ges Supply (651) 838-1723       May 1, 1999       Invoice Date:       May 1, 1999         Invoice Date:       May 1, 1999       Account Number:       O1-85481-7137       O1-85481-7137         Off Systems Sales Service for the Month of       April 1999       Meter Read Date:       May 1, 1999         Description       Tiler 1       MMBtu       OSSS-1         Off Systems Sales Service for the Month of       April 1999       OSSS-1         Off Systems Sales Service for the Month of       April 1999       OSSS-1         Commodity Cost of Gas *       Tiler 1       MMBtu       Erics*         Tiler 4       MMBtu       Tiler 6       MMBtu       FTS-1 Reservation Charge       MMBtu         FTS-1 Lesenvation Charge       MMBtu       Tiler 6       MMBtu       FTS-1 Starges       FTS-1 Sta	NUMBER       CURRENT Charges       AMOUNT DUE       Past Due Or         01-85481-7137       0.00       May 11, 1999       May 11, 1999         Forde Public Utilities Company         Forde Public Utilities Company         Post Office Box 3395, West Paim Basch FL 33401-5886         Gas Supply (561) 838-1723         1       1nvoice Date:       May 1, 1999         2       2       Account Number:       01-85461-7137         1       0       Account Number:       01-85461-7137         2       0       Rate Schedule:       OSSS-1         0ff Systems Sales Service for the Month of       April 1999       April 1999       May 1, 1999         Commodity Cost of Gas *       Ter 1       MMBiu         Ter 4       MMBiu         Ter 5       MMBiu         Ter 6       MMBiu         Ter 7
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To mount if the control with PANEN           Florida Public Utilities Company           Florida Public Utilities Company           Orto The Box 3995, West Paim Basch FL 33401-5686           Gas Supply (561) 838-1723           Orto The Month of Supply (561) 838-1723           Invoice Date:         May 1, 1999           Account Number:         Of -85481-7137           Meter Read Date:         Meter Read Date:           Meter Read Date:         Meter Read Date:           Description           Dif Systems Sales Service for the Month of         April 1999           Description         Class Charge           Commodity Cost of Gas *         Ther 1         MMBtu           Ther 3         MMBtu           Ther 4         MMBtu           Ther 6	To insume Profes Oneshin, resse paradir and nervisi, rine Formon until PANKEN       Florida Public Utilities Company       Post Office Box 3395, West Palm Baach FL 33401-5886       Ges Supply (561) 838-1723       7
Florida Public Utilities Company         Post Office Box 3395, West Palm Beach FL 33401-5686         Gas Supply (561) 838-1723         Invoice Date:         May 1, 1999         Account Number:         Of Systems Sales Service for the Month of         April 1999         Dif Systems Sales Service for the Month of         Description         Dif Systems Sales Service for the Month of         April 1999         Commodity Cost of Gas *         Tier 1         MMBtu         Tier 2         MMBtu         Tier 3         MMBtu         Tier 7	Fortida Public Utilities Company         Poet Office Box 3395, West Palm Basch FL 33401-5686         Gas Supply (561) 838-1723         1       Invoice Date:       May 1, 1999         2       Account Number:       Off-85481-7137         1       Meter Read Date:       May 1, 1999         2       Rate Schedule:       OSSS-1         0/f Systems Sales Service for the Month of       April 1999       Tier 1       MMBtu         Description         Tier 1       MMBtu         Description       Tier 2       MMBtu         Tier 3       MMBtu         Tier 3       MMBtu         Tier 3       MMBtu         Tier 4       MMBtu         Tier 6       MMBtu         Tier 6       MMBtu         Tier 7       MMBtu         Tier 6       MMBtu         Tier 7       MMBtu         Tier 8       MMBtu         Tier 8       MMBtu         Tier 7       MMBtu         Tier 7       MMBtu         Tier 8       MMBtu
Florida Public Utilities Company         Post Office Box 3395, West Paim Beach FL 33401-5686         Gas Supply (561) 838-1723         Invoice Date:         May 1, 1999         Account Number:         Of Systems Sales Service for the Month of         April 1999         Dif Systems Sales Service for the Month of         Dascription         Dif Systems Sales Service for the Month of         Dif Systems Sales Service for the Month of         Dascription         Dif Systems Sales Service for the Month of         Description         Dif Systems Sales Service for the Month of         Description         Dif Systems Sales Service for the Month of         Description         Dif Systems Sales Service for the Month of         Tier 1         MMBtu </td <td>Fortida Public Utilities Company         Poet Office Box 3395, West Palm Basch FL 33401-5686         Gas Supply (561) 838-1723         1       Invoice Date:       May 1, 1999         2       Account Number:       Of-85481-7137         1       Meter Read Date:       May 1, 1999         2       Rate Schedule:       OSSS-1         0ff Systems Sales Service for the Month of       April 1999       Tier 1       MMBtu         Description       Tier 1       MMBtu         Tier 1       MMBtu         Description       Tier 2       MMBtu         Tier 3       MMBtu         Tier 3       MMBtu         Tier 4       MMBtu         Tier 6       MMBtu         Tier 7       MMBtu         Tier 6       MMBtu         Tier 7       MMBtu         Tier 7       MMBtu         Tier 8       MMBtu         Tier 7       MMBtu         Tier 8       MMBtu         Tier 7       MMBtu         Tier 8       MMBtu       Tier 7     &lt;</td>	Fortida Public Utilities Company         Poet Office Box 3395, West Palm Basch FL 33401-5686         Gas Supply (561) 838-1723         1       Invoice Date:       May 1, 1999         2       Account Number:       Of-85481-7137         1       Meter Read Date:       May 1, 1999         2       Rate Schedule:       OSSS-1         0ff Systems Sales Service for the Month of       April 1999       Tier 1       MMBtu         Description       Tier 1       MMBtu         Tier 1       MMBtu         Description       Tier 2       MMBtu         Tier 3       MMBtu         Tier 3       MMBtu         Tier 4       MMBtu         Tier 6       MMBtu         Tier 7       MMBtu         Tier 6       MMBtu         Tier 7       MMBtu         Tier 7       MMBtu         Tier 8       MMBtu         Tier 7       MMBtu         Tier 8       MMBtu         Tier 7       MMBtu         Tier 8       MMBtu       Tier 7     <
Post Office Box 3395, West Palm Beach FL 33401-5686 Gas Supply (561) 838-1723 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1	Post Office Box 3395, West Paim Beach FL 33401-5686         Gas Supply (561) 838-1723         1       Invoice Date:         Meter Read Date:       May 1, 1999         Account Number:       01-85481-7137         Meter Read Date:       May 1, 1999         Rate Schedule:       OSSS-1         Diff Systems Sales Service for the Month of       April 1999         Description       Tier 1         MMBtu       Tier 2         MMBtu       Tier 4         MMBtu       Tier 6         Tier 6       MMBtu         Tier 7       MMBtu         Tier 8       MMBtu         Tier 9       MMBtu         Tier 6       MMBtu         Tier 7       MMBtu         Tier 8       MMBtu         Tier 9       MMBtu         Tier 7       MMBtu         Tier 8       MMBtu         TorAL currer       MMBtu         Pricing Dete       Publication         Units       Price         April 1, 1999       Inside FERC
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Invoice Date:     May 1, 1999       Account Number:     01-85481-7137       Meter Read Date:     May 1, 1999       Rate Schedule:     OSSS-1       Off Systems Sales Service for the Month of     April 1999       Description     Tier 1       MBtu     Tier 1       Commodity Cost of Gas*     Tier 1       MBtu     Tier 2       MMBtu     Tier 3       MMBtu     Tier 4       Tier 5     MMBtu       Tier 6     MMBtu       Tier 7     MMBtu       FTS-1 Reservation Charge     MiMBtu       FTS-1 Reservation Charge     MiMBtu       FTS-1 Reservation Charge     MiMBtu       FTS-1 Reservation Charge     MiMBtu       FPU Administrative Charge     MiMBtu       April 5, 1999     Ges Daily       April 6, 1999     Ge	Invoice Dete:     May 1, 1999       Account Number:     01-85481-7137       Meter Read Dete:     May 1, 1999       Rate Schedule:     OSSS-1       Off Systems Sales Service for the Month of     April 1999       Description     Iler       Baals     Units       Prices     Millsu       Tier 1     Millsu       Tier 2     Millsu       Tier 3     Millsu       Tier 4     Millsu       Tier 5     Millsu       Tier 6     Millsu       Tier 7     Millsu       Tier 7     Millsu       ToTAL CURRENT CHARGES     Millsu       Y     Pricing Dete       Publication     Units       Prices     Set (A) Files
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Account Number:     01-85481-7137       Meter Read Date:     May 1, 1999       Rate Schedule:     0585-1       Off Systems Sales Service for the Month of     April 1999       Description     Iler       Ther 2     MMBtu       Ther 3     MMBtu       Ther 4     MMBtu       Ther 6     MMBtu       Ther 7     MMBtu       Descripti	Account Number:     01-85481-7137       Meter Read Date:     May 1, 1999       Rate Schedule:     OSSS-1       Off Systems Sales Service for the Month of     April 1999       Description     Iter 1       MMBtu     Tier 1       Commodity Cost of Gas*     Tier 1       MMBtu     Tier 3       MMBtu     Tier 3       MMBtu     Tier 6       MMBtu     Tier 6       MMBtu     Tier 6       MMBtu     Tier 7       MMBtu     Tier 7       FTS-1 Reservation Charge     MMBtu       FTS-1 Usage Charge     MMBtu       <
Meter Read Date:     May 1, 1999       Off Systems Sales Service for the Month of     April 1999       Description     Tier       Basis     Units       Prices     April 1999       Commodity Cost of Gas     Tier 1       MMBtu     Tier 2       MMBtu     Tier 3       MMBtu     Tier 4       MMBtu     Tier 6       MMBtu     Tier 7       Pricing Date     MMBtu       Pricing Date     Publication       Units     Price       April 1, 1999     Inside FERC       April 5, 1999     Ges Daily       April 9, 1999     Ges Daily       April 9, 1999     Ges Daily	Meter Read Date:       May 1, 1999         Rate Schedule:       OSSS-1         Off Systems Sales Service for the Month of       April 1999         Description       Tier         Basis       Units         Commodity Cost of Gas *       Tier 1         MMBtu       Tier 2         MMBtu       Tier 3         MMBtu       Tier 4         MMBtu       Tier 5         MMBtu       Tier 6         MMBtu       Tier 7         MMBtu       Tier 7         FTS-1 Reservation Charge       MMBtu         FTS-1 Usage Charge       MMBtu         FTS-1 Usage Charge       MMBtu         FTOTAL CURRENT CHARGES       MMBtu         Pricing Date       Publication         Units       Price         April 1, 1999       Inside FERC
Rate Schedule:       OSSS-1         Off Systems Sales Service for the Month of       April 1999       Image: Construction       Image: Construction         Description       Image: Construction       Image: Construction       Image: Construction       Image: Construction         Commodity Cost of Gas *       Image: Construction       Image: Construction       Image: Construction       Image: Construction       Image: Construction         Commodity Cost of Gas *       Image: Construction       Image: Constructi	April 1999   Off Systems Sales Service for the Month of   April 1999   Commodity Cost of Gas*   Commodity Cost of Gas*   Image: Cost of Gas*
Off Systems Sales Service for the Month of     April 1999       Description     Tier     Basis       Commodity Cost of Gas *     Tier 1     MMBtu       Commodity Cost of Gas *     Tier 2     MMBtu       Tier 3     MMBtu     Tier 3     MMBtu       Tier 4     MMBtu     Tier 6     MMBtu       Tier 5     MMBtu     Tier 7     MMBtu       FTS-1 Reservation Charge     MMBtu     Tier 7     MMBtu       FTS-1 Usage Charge     MMBtu     MMBtu     MMBtu       FTU Administrative Charge     MMBtu     MMBtu       TOTAL CURRENT CHARGES     MMBtu     Hirz       *     Pricing Date     Publication     Units       April 1, 1999     Inside FERC     Statu       April 5, 1999     Ges Daily     (41-3)	Off Systems Sales Service for the Month of       April 1999         Description       Tier       Basis       Units       Erice."       Amounties         Commodity Cost of Gas *       Tier 1       MMBtu       MMBtu       Tier 3       MMBtu         Commodity Cost of Gas *       Tier 4       MMBtu       Tier 3       MMBtu       Tier 4       MMBtu         Commodity Cost of Gas *       Tier 5       MMBtu       Tier 6       MMBtu       Tier 5       MMBtu       Tier 5       MMBtu       Tier 7       Tie
Description     Tier     Basis     Units     Erica*     Amo       Commodity Cost of Gas*     Tier 1     MMBtu     Tier 2     MMBtu     Image: State of Gas     Image: State of Gas <td< td=""><td>Description     Tier     Basis     Units     Price*       Commodity Cost of Gas*     Tier 1     MMBtu       Tier 2     MMBtu       Tier 3     MMBtu       Tier 4     MMBtu       Tier 5     MMBtu       Tier 6     MMBtu       Tier 7     MMBtu       Tier 7     MMBtu       Tier 7     MMBtu       Tier 7     MMBtu       ToTAL CURRENT CHARGES     MMBtu       *     Pricing Date       Pricing Date     Publication       Units     Price       April 1, 1999     Instde FERC</td></td<>	Description     Tier     Basis     Units     Price*       Commodity Cost of Gas*     Tier 1     MMBtu       Tier 2     MMBtu       Tier 3     MMBtu       Tier 4     MMBtu       Tier 5     MMBtu       Tier 6     MMBtu       Tier 7     MMBtu       Tier 7     MMBtu       Tier 7     MMBtu       Tier 7     MMBtu       ToTAL CURRENT CHARGES     MMBtu       *     Pricing Date       Pricing Date     Publication       Units     Price       April 1, 1999     Instde FERC
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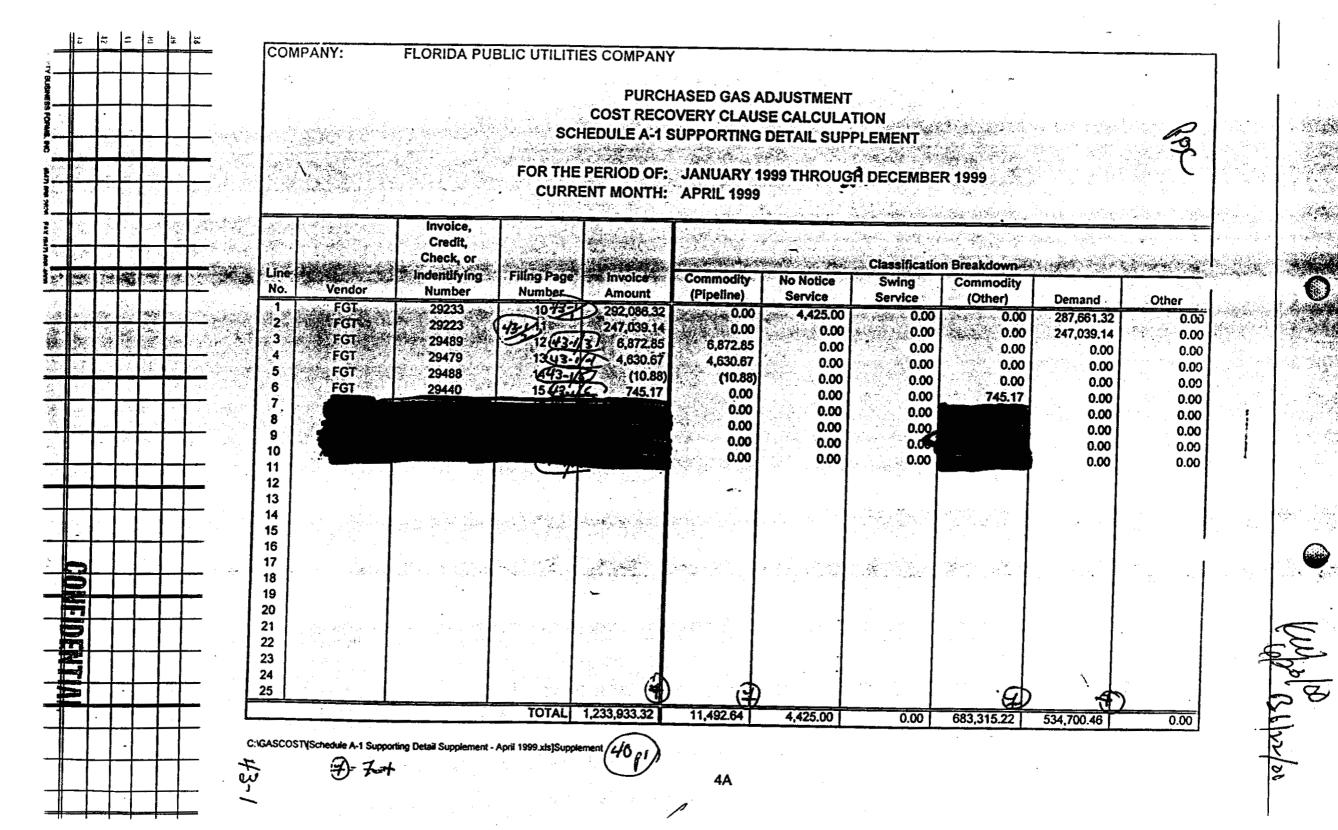
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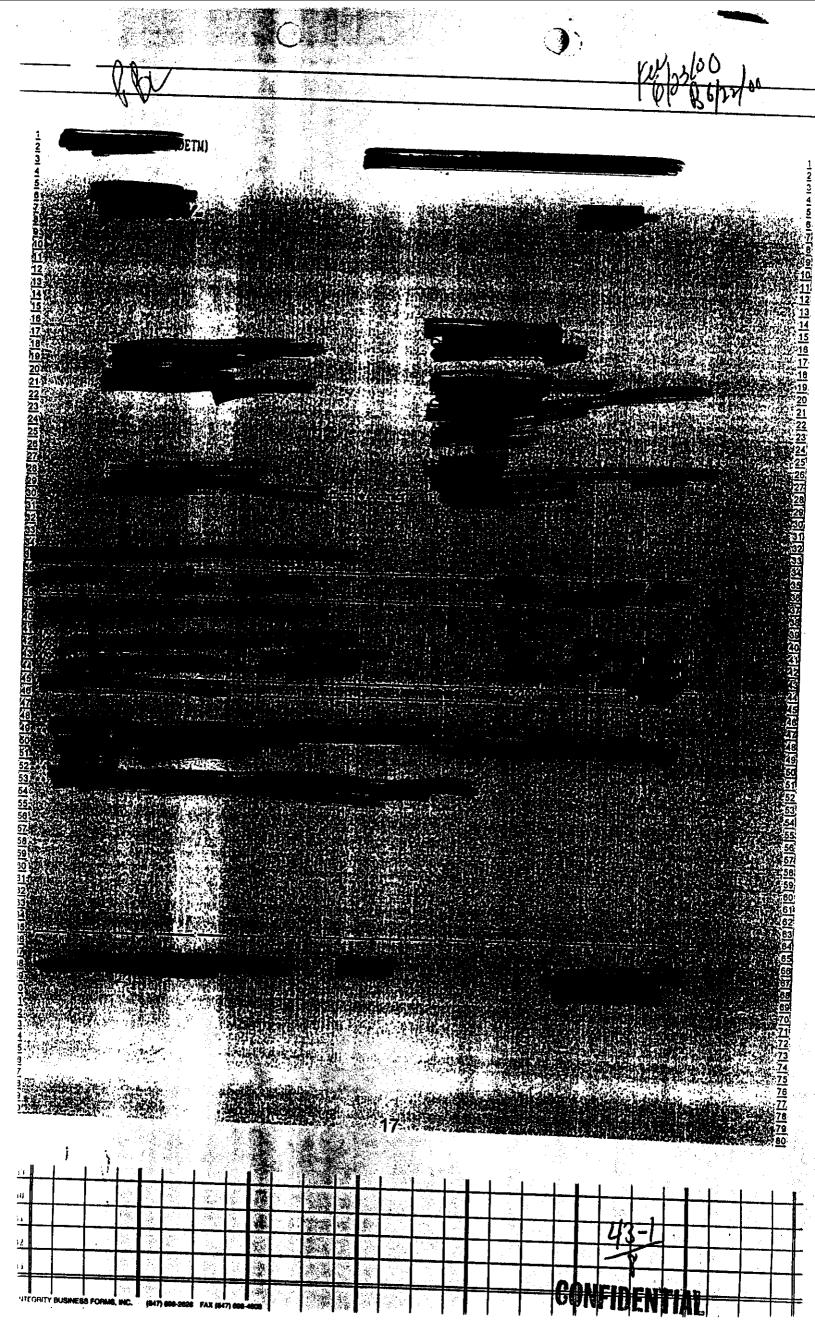
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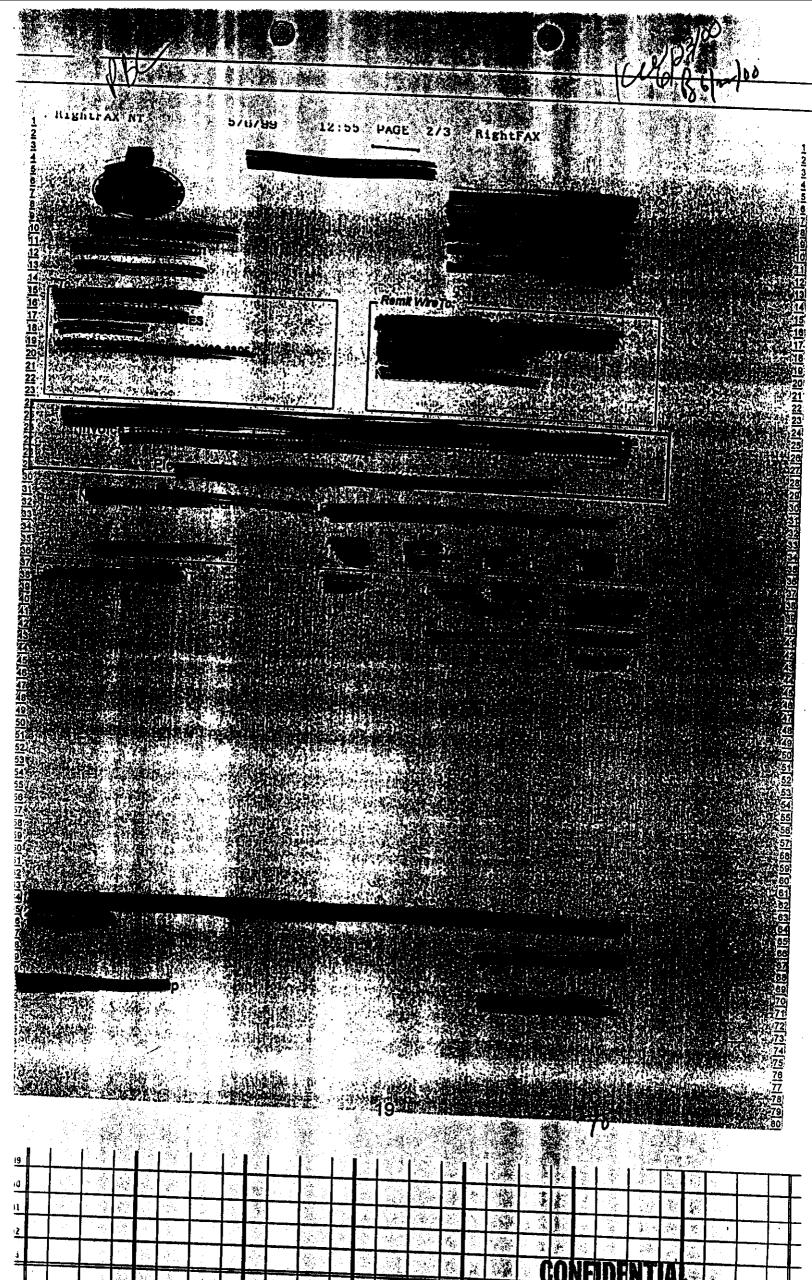
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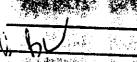
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