LAW OFFICES

# Messer, Caparello & Self

A PROFESSIONAL ASSOCIATION

215 SOUTH MONROE STREET, SUITE 701 POST OFFICE BOX 1876 TALLAHASSEE, FLORIDA 32302-1876 TELEPHONE: (850) 222-0720 TELECOPIER: (850) 224-4359 INTERNET: WWW.lawfla.com

October 18, 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 an original and ten copies of its Statement of Preliminary Issues and Positions.

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 cc: Mr. George Bachman Parties of Record

DOCUMENT NUMBER-DATE

FPSC-RECORDS/REPORTING

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

In re: Purchased Gas Cost Recovery )

Docket No. 000003-GU Filed: October 18, 2000

# FLORIDA PUBLIC UTILITIES COMPANY'S STATEMENT OF PRELIMINARY ISSUES AND POSITIONS

Florida Public Utilities Company ("FPU") hereby submits its preliminary issues and

positions to be taken up at the hearing scheduled to begin on November 20, 2000 in this docket.

# **Issue 1:** What is the appropriate final purchased gas adjustment true-up amount for the period January, 1999 through December, 1999?

<u>FPU's Position</u>: \$67,156 (underrecovery)

- **<u>Issue 2</u>**: What is the estimated purchased gas adjustment true-up amount for the period January, 2000 through December, 2000?
- <u>FPU's Position</u>: \$33,877 (overrecovery)
- **Issue 3:** What is the total purchased gas adjustment true-up amount to be collected in the January, 2001 through December, 2001 period?
- <u>FPU's Position</u>: \$33,279 (underrecovery)
- <u>Issue 4</u>: What is the appropriate levelized purchased gas cost recovery (cap) factor to be charged during the period January, 2001 through December, 2001?
- FPU's Position: 84.781 cents
- **Issue 5:** What should be the effective date of the new purchased gas adjustment charge for billing purposes?
- <u>FPU's Position</u>: The factor should be effective for all meter readings on or after January, 2001, beginning with the first or applicable billing cycle for the period January, 2001 through December, 2001.

Dated this 18<sup>th</sup> day of October, 2000.

MESSER, CAPARELLO & SELF, P.A. Suite 701, SunTrust Bank Building Post Office Box 1876 Tallahassee, FL 32302-1876 (850) 222-0720

NORMAN H. HORTON, JR., ESQ.

Attorneys for Florida Public Utilities Company

#### **CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that true and correct copies of Florida Public Utilities Company's Statement of Preliminary Issues and Positions in Docket No. 000003-GU have been served by hand delivery (\*) and/or U. S. Mail this 18th day of October, 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. P.O. Box 15856 Tallahassee, FL 32317-5856

Ansley Watson, Jr., Esq. MacFarlane, Ferguson, Allison & Kelly Post Office Box 1531 Tampa, FL 33601

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

NORMAN H. HORTON