

**BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION**

In re: Natural Gas )  
Conservation Cost Recovery )  
Clause )  
\_\_\_\_\_ )

Docket No. 080004-GU  
Filed: September 30, 2008

**FLORIDA CITY GAS**  
**Amended PRELIMINARY STATEMENT OF ISSUES AND POSITIONS**

The following is the preliminary statement of issues and positions filed on behalf of Florida City Gas, a division of Pivotal Utility Holdings, Inc.:

1. What are the final conservation cost recovery true-up amounts for the period January 2007 through December 2007?

Florida City Gas: An over-recovery of \$126,342, including interest.

2. What are the actual/estimated conservation cost recovery true-up amounts for the period January 2008 through December 2008?

Florida City Gas: An under-recovery of \$786,742.

3. What are the total conservation cost recovery amounts to be collected during the period January 2009 through December 2009?

Florida City Gas: \$3,204,167, which represents the projected costs of \$2,417,425 to be incurred during 2009, plus the estimated true-up of \$786,742 for calendar year 2008.

4. What are the conservation cost recovery factors for the period January 2009 through December 2009?

Florida City Gas: The appropriate factors are:

<u>Rate Class</u>	<u>Factor</u>
GS-1, GS-100, GS-220 (Sales & Transportation)	\$0.09304
GS-600 (Sales & Transportation)	\$0.04875
GS-1200 (Sales & Transportation)	\$0.03115

GS-6k (Sales & Transportation)	\$0.02499
GS-25000 (Sales & Transportation)	\$0.02452
GS-60000 (Sales & Transportation)	\$0.02394
Gas Lights	\$0.04846
GS-120000 (Sales & Transportation)	\$0.01785
GS-250000 (Sales & Transportation)	\$0.01643

5. What should be the effective date of the conservation cost recovery factors for billing purposes?

Florida City Gas: The factors should be effective beginning with the specified conservation cost recovery cycle and thereafter for the period January 2009 through December 2009. Billing cycles may start before January 1, 2009 and the last cycle may be read after December 31, 2009, so that each customer is billed for twelve months regardless of when the adjustment factor became effective.

RESPECTFULLY SUBMITTED this 30<sup>th</sup> day of September, 2008.



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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing has been furnished by U.S. Mail to the following parties of record this 30th day of September, 2008:

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<sup>1</sup> Hand Delivery

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Sebring Gas System, Inc. Jerry H. Melendy, Jr. 3515 U.S. Highway 27 South Sebring, FL 33870	Robert Scheffel Wright 225 South Adams Street, Suit 200 Tallahassee, FL 32301
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