BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Natural gas conservation cost recovery.

DOCKET NO. 080004-GU DATED: OCTOBER 10, 2008 CLERK

INDIANTOWN GAS COMPANY'S PREHEARING STATEMENT OF ISSUES AND POSITIONS

Pursuant to Order No. PSC-08-0170-PCO-GU, issued March 20, 2008 and Order No. PSC-08-0363-PCO-GU, issued May 30, 2008, establishing the prehearing procedure in this docket, Indiantown Gas Company ("Company") hereby files its Prehearing Statement of Issues and Positions.

A. <u>APPEARANCES</u>:

ROBERT SCHEFFEL WRIGHT, Young van Assenderp, P.A., 225 South Adams Street, Suite 200, Tallahassee, Florida 32301, and

On Behalf of Indiantown Gas Company.

B. <u>WITNESSES</u>:

Melissa M. Powers	True-up and ECCR Charges	Issues 1-5
Chief Financial Officer		
Indiantown Gas Company		

C. <u>EXHIBITS:</u>

	<u>Exhibit</u>	Witness	Description	
	(IGC-1)	Melissa M. Powers	Schedules CT-1 through CT-3 and CT-5; True-up, ECCR costs, and ECCR Factors	
RCP SSC D STATEMENT OF BASIC POSITION: SGA				

LK for 2009 are fair, just, reasonable, and prudent, and the Commission should approve the Company's proposed ECCR factors for the period January 2009 through December 2009.

DOCUMENT NUMBER-DATE

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E. <u>ISSUES AND POSITIONS</u>

- **<u>ISSUE 1</u>**: What are the final conservation cost recovery true-up amounts for the period January 2007 through December 2007?
- **IGC POSITION:** \$1,390 over-recovery, including interest.
- **ISSUE 2**: What are the actual/estimated conservation cost recovery true-up amounts for the period January 2008 through December 2008?
- **IGC POSITION:** \$21,610 over-recovery.
- **<u>ISSUE 3</u>**: What are the total conservation cost recovery amounts to be collected during the period January 2009 through December 2009?
- **IGC POSITION:** \$7,378 to be recovered during January 2009 through December 2009.
- **<u>ISSUE 4</u>**: What are the conservation cost recovery factors for the period January 2009 through December 2009?
- **IGC POSITION:** The appropriate conservation cost recovery factors for Indiantown Gas Company for the period January 2009 through December 2009 are as follows:

TS-1 \$0.01339

TS-2 \$0.00233

TS-4 \$0.00087

<u>ISSUE 5</u>: What should be the effective date of the new conservation cost recovery factors for billing purposes?

IGC POSITION: The Company's conservation cost recovery factors should be effective beginning with the specified conservation cost recovery cycle and remain in effect thereafter for the period January 2009 through December 2009.

F. STIPULATED ISSUES

Indiantown Gas Company is not a party to any stipulations at this time.

G. PENDING MOTIONS

Indiantown Gas Company has no motions pending before the Prehearing Officer or the Commission at this time.

H. PENDING REQUESTS OR CLAIMS FOR CONFIDENTIALITY

Indiantown Gas Company has no pending claims or requests for confidential treatment of its information.

I. NOTICE OF INTENT TO USE CONFIDENTIAL INFORMATION

As of the filing of this Prehearing Statement, Indiantown Gas Company does not intend to use confidential documents at hearing.

J. OBJECTIONS TO QUALIFICATIONS OF WITNESSES

As of the filing of this Prehearing Statement, Indiantown Gas Company does not expect to challenge the qualifications of any witness.

K. REQUIREMENTS OF THE ORDER ESTABLISHING PROCEDURE

Indiantown Gas Company is not aware of any requirements of the Order Establishing Procedure with which it cannot comply, and believes that it has complied with all applicable requirements of that Order.

Dated this 10th day of October, 2008.

Robert Schelfel Wright Florida Bar No. 966721 Young van Assenderp, P.A. 225 South Adams Street, Suite 200 Tallahassee, Florida 32301 (850) 222-7206 Telephone (850) 561-6834 Facsimile

Attorneys for Indiantown Gas Company

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of INDIANTOWN GAS COMPANY'S PREHEARING STATEMENT OF ISSUES AND POSITIONS has been

furnished to the following by electronic and U. S. mail this 10th day of October, 2008:

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