

**BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION**

In re: Natural gas conservation cost recovery.

DOCKET NO. 090004-GU

DATED: OCTOBER 12, 2009

COMMISSION  
CLERK

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**INDIANTOWN GAS COMPANY'S PREHEARING STATEMENT  
OF ISSUES AND POSITIONS**

Pursuant to Order No. PSC-09-0186-PCO-GU, issued March 27, 2009, establishing the prehearing procedure in this docket, Indiantown Gas Company ("Company") hereby files its Prehearing Statement of Issues and Positions.

**A. APPEARANCES:**

**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. WITNESSES:**

Melissa M. Powers  
Chief Financial Officer  
Indiantown Gas Company

True-up and ECCR Charges

Issues 1-5

**C. EXHIBITS:**

<u>Exhibit</u>	<u>Witness</u>	<u>Description</u>
<u>                    </u> (IGC-1)	Melissa M. Powers	Schedules C-1 through C-3 and C-5; True-up, ECCR costs, and ECCR Factors

DOCUMENT NUMBER-DATE

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FPSC-COMMISSION CLERK

**D. STATEMENT OF BASIC POSITION:**

Indiantown Gas Company's proposed true-up, ECCR costs, and proposed ECCR factors for 2010 are fair, just, reasonable, and prudent, and the Commission should approve the Company's proposed ECCR factors for the period January 2010 through December 2010.

**E. ISSUES AND POSITIONS**

**ISSUE 1:** What are the final conservation cost recovery true-up amounts for the period January 2008 through December 2008?

**IGC POSITION:** \$33,917 over-recovery, including interest.

**ISSUE 2:** What are the actual/estimated conservation cost recovery true-up amounts for the period January 2009 through December 2009?

**IGC POSITION:** \$13,601 under-recovery.

**ISSUE 3:** What are the total conservation cost recovery amounts to be collected during the period January 2010 through December 2010?

**IGC POSITION:** \$32,470 to be recovered during January 2010 through December 2010.

**ISSUE 4:** What are the conservation cost recovery factors for the period January 2010 through December 2010?

**IGC POSITION:** The appropriate conservation cost recovery factors for Indiantown Gas Company for the period January 2010 through December 2010 are as follows:

TS-1	\$0.05836
TS-2	\$0.01012
TS-4	\$0.00448

**ISSUE 5:** 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 2010 through December 2010.

**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.

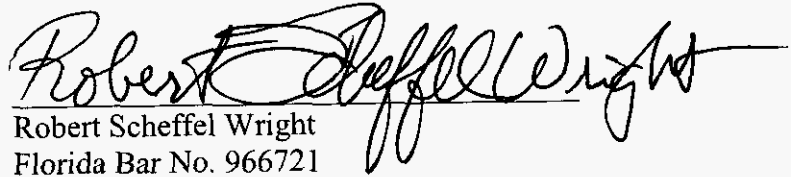
**J. OBJECTIONS TO QUALIFICATIONS OF WITNESSES**

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 12th day of October, 2009.

A handwritten signature in black ink, reading "Robert Scheffel Wright". The signature is written in a cursive style with a horizontal line extending from the end.

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Attorneys for Indiantown Gas Company

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of INDIANTOWN GAS COMPANY'S PRELIMINARY LIST OF ISSUES AND POSITIONS has been furnished to the following by electronic and U. S. mail this 12th day of October, 2009.

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