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850 224 9634 tel 850 222 0103 fax

October 17, 2005

#### VIA HAND DELIVERY

Ms. Blanca Bayo Director Office of the Commission Clerk and Administrative Services Florida Public Service Commission 2540 Shumard Oak Boulevard Tallahassee, FL 32399-0850

Re: Docket No. 050004-GU

Dear Ms. Bayo:

Enclosed for filing on behalf of Florida City Gas Company (Company) are the original and fifteen copies of the Company's Prehearing Statement in the above docket, along with a diskette containing the document in Adobe Acrobat format.

By copy of this letter, these documents have been furnished to the parties on the attached certificate of service.

Please stamp and return the enclosed extra copy of this filing. If you have any questions regarding this filing, please give me a call at (850) 224-9634.

Sincerely,

Bill L. Bryant Jr.

Enclosures

cc: Certificate of Service

#### **CERTIFICATE OF SERVICE**

**I HEREBY CERTIFY** that a true and correct copy of Florida City Gas Company's Prehearing Statement in Docket No. 050004-GU has been furnished by U.S. mail or hand delivery to the following parties of record this 17<sup>th</sup> day of October, 2005:

Elizabeth Wade AGL Resources Inc. Ten Peachtree Place Location 1470 Atlanta, GA 30309

Mr. Geoff Hartman Florida Public Utilities Company Post Office Box 3395 West Palm Beach, FL 33402-3395

Ansley Watson, Jr.
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Charles A. Rawson, Ill Florida City Gas 955 East Street Hialeah, FL 33013-3498 Mr. Thomas A. Geoffroy Florida Division of Chesapeake Utilities Corp. Post Office Box 960 Winter Haven, FL 33882-0960

Ms. Angela L. Llewellyn People Gas System Regulatory Affairs Post Office Box 111 Tampa, FL 33601-0111

Mr. Stuart L. Shoaf St. Joe Natural Gas Company, Inc. Post Office Box 549 Port St. Joe, FL 32457-0549

Matthew Costa TECO Energy, Inc. Post Office Box 111 Tampa, FL 33601-0111

Martha Brown Florida Public Service Commission 2540 Shumard Oak Boulevard Tallahassee, FL 32399

Bill L. Bryant, Jr.

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# BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Conservation Cost Recovery Clause	)	Docket No. 050004-GU
	)	Filed: October 17, 2005

# FLORIDA CITY GAS COMPANY'S PREHEARING STATEMENT

Pursuant to the requirements of the Order on Procedure (Order No. PSC-05-0276-PCO-GU), Florida City Gas hereby submits its Prehearing Statement.

### A. Known Witnesses

Florida City Gas intends to offer the direct testimony of Rosie Abreu filed on May 2, 2005 and Ramiro Sicre filed on September 23, 2005.

Rosie Abreu Issue 1

Ramiro Sicre Issues 2 & 3

## B. Known Exhibits

Florida City Gas intends to sponsor the following exhibits:

Abreu RA-1 Schedules CT-1, CT-2 and CT-3

Sicre RS-1 Schedules C-1, C-2, C-3 and C-5

## C. Basic Position

The Company's true-up amounts and conservation cost recovery factors as shown in Issues 1 through 3 are appropriate and should be approved.

#### D. - F. Issues

1. What is the final end-of-period true-up amount for the period January 2004 through December 2004?

Florida City Gas: An over-recovery of \$38,881.

2. What are the appropriate conservation cost recovery factors for the period January 2006 through December 2006?

Florida City Gas: The appropriate factors are:

Rate Class	<u>Factor</u>
GS-1, GS-100, GS-220 (Sales & Transportation	\$0.05701
GS-600 (Sales & Transportation)	\$0.03065
GS-1200 (Sales & Transportation)	\$0.01897
GS-6k (Sales & Transportation)	\$0.01550
GS-25000 (Sales & Transportation)	\$0.01527
GS-60000 (Sales & Transportation)	\$0.01495
Gas Lights	\$0.03054
GS-120000 (Sales & Transportation)	\$0.01102
GS-250000 (Sales & Transportation)	\$0.01088

3. 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 2006 through December 2006. Billing cycles may start before January 1, 2006, and the last cycle may be read after December 31, 2006, so that each customer is billed for twelve months regardless of when the adjustment factor became effective.

# G. <u>Stipulated Issues</u>

Florida City Gas is not a party to any stipulations at this time, although it believes that it should be possible to reach a stipulation on each of the above issues as they relate to Florida City Gas.

## H. Pending Motions

Florida City Gas has no pending motions or other matters requiring attention at this time.

## I. Pending Confidentiality Requests

Florida City Gas has no pending confidentiality requests.

# J. Compliance With Order on Procedure

Florida City Gas believes that this Prehearing Statement fully complies with the requirements of the Order on Procedure.

# K. Objections to Witness Qualifications

Florida City Gas has no objection to the qualifications of any expert witness.

RESPECTFULLY SUBMITTED this 17th day of October, 2005.

Bill L. Bryant, Jr.

Akerman Senterfitt Attorneys at Law

106 East College Avenue

Suite 1200

Tallahassee, FL 32301

(850) 224-9634

Attorneys for Florida City Gas Company