

955 East 25th Street
Hialeah
Florida 33013-3498
Tel: (305) 691-8710
Fax: (305) 691-7112

June 11, 1996

Ms. Blanca S. Bayo, Director
Division of Records and Reporting
Florida Public Service Commission
2540 Shumard Oak Boulevard, Rm. 110
Tallahassee, Fl 32399-0850

Re: Amendment to Docket No. 950003-GU, Purchased Gas Adjustment Cost
April 1996

Dear Ms. Bayo:

At the request of Commission Staff, enclosed please find original and sixteen (16) copies of amendments to City Gas Company of Florida's April 1996 Purchase Gas Adjustment filing. The Company revised Schedules A-1R, A-1 Supporting Detail and A-2.

The Company requests specified confidential treatment of portions of Schedule A-1R as described in Exhibit A. The confidential document is filed under separate cover (copy enclosed).

Please acknowledge receipt and filing of the above by stamping the duplicate copy of this letter and returning same to me.

Thank you for your assistance in connection with this matter.

Sincerely,

Zuzka Scala
for Michael A. Palecki

Michael A. Palecki
Vice President of Regulatory Affairs

Enclosures

DOCUMENT NUMBER-DATE

06290 JUN 12 88

FPSC-RECORDS/REPORTING

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Purchased Gas)
Adjustment Cost Recovery)
_____)

Docket No. 950003-GU
Filed: June 11, 1996

CITY GAS COMPANY OF FLORIDA REQUEST
FOR SPECIFIED CONFIDENTIAL TREATMENT

City Gas Company of Florida ("City Gas" or "the Company"), pursuant to section 366.093, Florida Statutes, submits the following Request for Specified Confidential Treatment of portions of its Amended Purchased Gas Adjustment (PGA) filing for the months of April 1996. In support thereof, City Gas states:

1. City Gas' amended PGA filing for the months of April 1996 consists of Schedule A-1R and A-1 Supporting Details. The confidential version of City Gas' filing for this month is submitted in a sealed envelope concurrently with this request.
2. Attached hereto as Exhibit "A" is a detailed justification for the requested confidential treatment of the highlighted portions of City Gas' filing referenced above.
3. The material for which confidential classification is sought is intended to be and is treated by City Gas as proprietary and has not been publicly disclosed.
4. City Gas requests that the information for which it seeks confidential classification not be declassified for a period of eighteen months as provided in section 366.093 (4), Florida Statutes. The time period requested is necessary to allow City

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FPSC-RECORDS/REPORTING

Gas to negotiate future gas purchase contracts with suppliers/competitors (and other customers having access to information which would adversely affect the ability of the Company to negotiate such future contracts) on favorable terms.

Wherefore, City Gas Company of Florida respectfully requests the Commission grant its petition for Specified Confidential Treatment of the information identified in Exhibit "A."

Dated this June 11, 1996

City Gas Company of Florida
A Division of NUI Corporation
955 East 25th Street
Hialeah, FL 33013

Michael A. Palecki
Vice President of Regulatory Affairs

EXHIBIT "A"
CITY GAS COMPANY OF FLORIDA

Data Elements for the December 1995 and January 1996 PGA for which Confidential Treatment is Requested

Schedule Number, or Other Identifier	Page	Lines	Columns	Justification (See "Notes" Below)
A-1R	2	1-6	A, B, C, E, F, G	(2, 3)
		7-8	A, B, C, E, F, G	(3)
		15-20	A, B, C, E, F, G	(2, 3)
		21-22	A, B, C, E, F, G	(3)
		28	A, B, C, E, F, G	(1)
		31	A, B, C, E, F, G	(1)
A-1 Supporting Details	3	All	A, B, C	(3)

Notes To Exhibit "A" Regarding Justification:

- (1) Line 28 and 31 of Schedule A-1 and A-1R contain City Gas' Weighted Average Cost of Gas (WACOG) for the current month. Dissemination of this information could adversely influence the Company's ability to effectively negotiate for low-cost gas supplies. If gas suppliers know the Company's WACOG, they may tend to quote future gas prices at or above the weighted level. Likewise, vendors who previously supplied gas to the Company at prices below the average cost could tend to resist making future price concessions. As a consequence, ratepayers may pay higher gas costs. Public knowledge of City Gas' WACOG "would impair the efforts of the Company to contract for goods or services on favorable terms," Section 366.093(3)(d), Florida Statutes.
- (2) Disclosure of lines 4 and 18, Schedules A-1 and A-1R, will allow suppliers to derive the price that the Company pays third-party suppliers. Dividing line 4, Cost of Gas Purchased, by line 18, Therms Purchased, yields the WACOG that appears on line 31. As explained above, publication of the information on line 31 could diminish the Company's ability to constructively negotiate for gas supplies. Therefore, any information that could provide competitors with the contents of line 31 should be also granted confidentiality. Public knowledge of this information "would impair the efforts of City Gas to contract for goods or services on favorable terms," Section 366.093(3)(d), Florida Statutes.
- (3) Lines 1-6, 7-8, 15-22, Schedules A-1 and A-1R, contain components of arithmetical calculations used to derive the per therm price of gas. Disclosure of these numbers is "reasonably likely" to impair the Company's efforts to contract for goods and services on favorable terms. Similarly, the Company further requests confidentiality for Schedule A-1, Supporting Details, with respect to the columns named Therms, Invoice Amount and Cost per Therm. This schedule shows the derivation and arithmetic manipulation of information on Schedule A-1 and A-1R. Publication of the supporting details for these Schedules "would also impair the efforts of City Gas to contract for goods or services on favorable terms," Section 366.093(3)(d), Florida Statutes.

COMPANY:
CITY GAS COMPANY OF FLORIDA

COMPARISON OF ACTUAL VERSUS FLEX-DOWN ESTIMATE
OF THE PURCHASED GAS ADJUSTMENT COST RECOVERY FACTOR
ESTIMATED FOR THE PERIOD OF:

SCHEDULE A-1/R
(REVISED 6/08/94)
(Flex Down) PAGE 2 OF 11

	APRIL 96		Through		MARCH 97		PERIOD TO DATE	
			DIFFERENCE				DIFFERENCE	
	(A) ACTUAL	(B) ORG. EST.	(C) AMOUNT	(D) %	(E) ACTUAL	(F) ORG. EST.	(G) AMOUNT	(H) %
COST OF GAS PURCHASED								
1 COMMODITY (Pipeline) Includes No Notice Commodity Adjustment				-1.64				-1.64
2 NO NOTICE SERVICE RESERVATION (Line 29 A-1 support detail)				0.00				0.00
3 SWING SERVICE				---				---
4 COMMODITY (Other)				-3.06				-3.06
5 DEMAND (Line 32-29 A-1 support detail)				-0.73				-0.73
6 OTHER				90.38				90.38
LESS END-USE CONTRACT								
7 COMMODITY (Pipeline)				0.00				0.00
8 DEMAND				0.00				0.00
9	0	0	0	---	0	0	0	---
10 Second Prior Month Purchase Adj. (OPTIONAL)	0	0	0	---	0	0	0	---
11 TOTAL C (1+2+3+4+5+6+10)-(7+8+9)	3,317,453	3,394,783	(77,330)	-2.28	3,317,453	3,394,783	(77,330)	-2.28
12 NET UNBILLED	0	0	0	---	0	0	0	---
13 COMPANY USE	(7,070)	(7,293)	223	0.00	(7,070)	(7,293)	223	0.00
14 TOTAL THERM SALES	2,968,402	3,382,214	(415,812)	-12.29	2,968,402	3,382,214	(415,812)	-12.29
THERMS PURCHASED								
15 COMMODITY (Pipeline) Billing Determinants Only				-13.85				-13.85
16 NO NOTICE SERVICE RESERVATION Bill. Determinants Only (Line 29 A-1 support detail)				0.00				0.00
17 SWING SERVICE Commodity				---				---
18 COMMODITY (Other) Commodity				-13.85				-13.85
19 DEMAND Billing Determinants Only (Line 32-29 A-1 support detail)				-59.71				-59.71
20 OTHER Commodity				39.36				39.36
LESS END-USE CONTRACT								
21 COMMODITY (Pipeline)				0.00				0.00
22 DEMAND				0.00				0.00
23	0	0	0	---	0	0	0	---
24 TOTAL PURCHASES (17+18+20)-(21+23)	6,034,084	6,997,684	(963,600)	-13.77	6,034,084	6,997,684	(963,600)	-13.77
25 NET UNBILLED	0	0	0	---	0	0	0	---
26 COMPANY USE	(16,752)	(15,000)	(1,752)	0.00	(16,752)	(15,000)	(1,752)	0.00
27 TOTAL THERM SALES (24-26 Estimated only)	9,219,663	6,982,684	2,236,979	32.04	9,219,663	6,982,684	2,236,979	32.04
CENTS PER THERM								
28 COMMODITY (Pipeline) (1/15)				14.20				14.20
29 NO NOTICE SERVICE (2/16)	0.00694	0.00694	0.00000	0.00	0.00694	0.00694	0.00000	0.00
30 SWING SERVICE (3/17)	---	---	---	---	---	---	---	---
31 COMMODITY (Other) (4/18)				12.52				12.52
32 DEMAND (5/19)	0.14653	0.05948	0.08707	148.43	0.14653	0.05948	0.08707	148.43
33 OTHER (6/20)	0.56512	0.41366	0.15146	36.61	0.56512	0.41366	0.15146	36.61
LESS END-USE CONTRACT								
34 COMMODITY Pipeline (7/21)	0.00000	0.00000	0.00000	---	0.00000	0.00000	0.00000	---
35 DEMAND (8/22)	0.00000	0.00000	0.00000	---	0.00000	0.00000	0.00000	---
36 (9/23)	---	---	---	---	---	---	---	---
37 TOTAL COST (11/24)	0.54979	0.48513	0.06466	13.33	0.54979	0.48513	0.06466	13.33
38 NET UNBILLED (12/25)	---	---	---	---	---	---	---	---
39 COMPANY USE (13/26)	0.42206	0.48620	-0.06414	-13.19	0.42206	0.48620	-0.06414	-13.19
40 TOTAL THERM SALES (11/27)	0.35982	0.48617	-0.12635	-25.99	0.35979	0.48513	0.06466	13.33
41 TRUE-UP (E-2)	(0.00180)	(0.00180)	0.00000	0.00	(0.00180)	(0.00180)	0.00000	0.00
42 TOTAL COST OF GAS (40+41)	0.35802	0.48437	-0.12635	-26.08	0.35799	0.48333	0.06466	13.38
43 REVENUE TAX FACTOR	1.00378	1.00378	0.00000	0.00	1.00378	1.00378	0.00000	0.00
44 PGA FACTOR ADJUSTED FOR TAXES (42x43)	0.35937	0.48619	-0.12682	-26.08	0.35005	0.48515	0.06490	13.38
45 PGA FACTOR ROUNDED TO NEAREST .001	0.359	0.486	-0.12682	-26.08	0.35000	0.48500	0.06500	13.40

COMPANY:
CITY GAS COMPANY OF FLORIDA

PURCHASED GAS ADJUSTMENT
COST RECOVERY CLAUSE CALCULATION
SCHEDULE A-1 SUPPORTING DETAIL

PAGE 3 OF 11

FOR THE PERIOD: APRIL 96 THROUGH MARCH 97

CURRENT MONTH: 04/96

	(A)	(B)	(C)
COMMODITY (Pipeline)	THERMS	INV. AMOUNT	COST PER THERM
1 Commodity Pipeline - Scheduled FTS			
2 Commodity Pipeline - Scheduled ITS			
3 No Notice Commodity Adjustment			
4 Commodity Adjustments			
5 Commodity Adjustments			
6 Commodity Adjustments			
7			
8 TOTAL COMMODITY (Pipeline)	Sched A-1 Ln 15	Sched A-1 Ln 1	Sched A-1 Ln 28
SWING SERVICE			
9 Swing Service Scheduled			
10 Alert Day Volumes - FGT			
11 Operational Flow Order Volumes - FGT			
12 Less Alert Day Volumes Direct Billed to Others			
13 Operating Account Balancing			
14 Other - Net market delivery imbalance			
15			
16 TOTAL SWING SERVICE	Schedule A-1 Line 17	Schedule A-1 Line 3	Schedule A-1 Line 30
COMMODITY OTHER			
17 Commodity Other - Scheduled FTS			
18 Commodity Other - Scheduled ITS			
19 Imbalance Cashout - FGT			
20 Imbalance Cashout - Other Shippers			
21 Imbalance Cashout - Transporting Cust.			
22 Commodity Adjustment			
23 No Notice Commodity Adjustment			
24 TOTAL COMMODITY (Other)	Schedule A-1 Line 18	Schedule A-1 Line 4	Schedule A-1 Line 31
DEMAND			
25 Demand (Pipeline) Entitlement			
26 Less Relinquished to End-Users			
27 Less Relinquished Off System			
28 Other - Firm winter supply			
29 Demand - No Notice			
30 Revenue Sharing - FGT			
31 Other - Storage Demand			
32 TOTAL DEMAND	Sched A-1 Line 19+16	Sched A-1 Line 5+2	Sched A-1 Line 32 & 29
OTHER			
33 Other - Monthly purchase from Peoples Gas			
34 Peak Shaving			
35 Storage withdrawal			
36 Other			
37 Other			
38 Other			
39 Other			
40 TOTAL OTHER	Schedule A-1 Line 20	Schedule A-1 Line 6	Schedule A-1 Line 33

COMPANY:		CALCULATION OF TRUE-UP AND INTEREST PROVISION						SCHEDULE A-2	
CITY GAS COMPANY OF FLORIDA								(REVISED 6/08/94)	
FOR THE PERIOD OF:		APRIL 96		Through		MARCH 97		PAGE 4 OF 11	
	CURRENT MONTH: 04/96		DIFFERENCE		PERIOD TO DATE		DIFFERENCE		
	(A)	(B)	(C)	(D)	(E)	(F)	(G)	(H)	
	ACTUAL	ESTIMATE	AMOUNT	%	ACTUAL	ESTIMATE	AMOUNT	%	
TRUE-UP CALCULATION									
1	PURCHASED GAS COST (Sch A-1 Flx down line 4+6)	2,346,708	2,416,596	69,888	2.89%	2,346,708	2,416,596	69,888	2.89%
2	TRANSP GAS COST (Sch A-1 Flx down line 1+2+3+5)	970,745	978,187	7,442	0.76%	970,745	978,187	7,442	0.76%
3	TOTAL	3,317,453	3,394,783	77,330	2.28%	3,317,453	3,394,783	77,330	2.28%
4	FUEL REVENUES (Sch A-1 Flx down line 14) (NET OF REVENUE TAX)	2,966,402	3,382,214	415,812	12.29%	2,966,402	3,382,214	415,812	12.29%
5	TRUE-UP (COLLECTED) OR REFUNDED	12,755	12,755	0	0.00%	12,755	12,755	0	0.00%
6	FUEL REVENUE APPLICABLE TO PERIOD * (LINE 4 (+ or -) LINE 5)	2,979,157	3,394,969	415,812	12.25%	2,979,157	3,394,969	415,812	12.25%
7	TRUE-UP PROVISION - THIS PERIOD (LINE 6 - LINE 3)	(338,296)	186	338,482	181979.57%	(338,296)	186	338,482	181979.57%
8	INTEREST PROVISION-THIS PERIOD (21)	(7,046)	2,575	9,621	373.63%	(7,046)	2,575	9,621	373.63%
9	BEGINNING OF PERIOD TRUE-UP AND INTEREST	(1,376,495)	573,226	1,949,721	340.13%	(1,376,495)	573,226	1,949,721	340.13%
10	TRUE-UP COLLECTED OR (REFUNDED) (REVERSE OF LINE 5)	(12,755)	(12,755)	0	0.00%	(12,755)	(12,755)	0	0.00%
10a	Refund (if applicable)	0	0	0	—	0	0	0	—
10b	Refund of interim rate increase	0	0	0	—	0	0	0	—
11	TOTAL ESTIMATED/ACTUAL TRUE-UP (7+8+9+10+10a)	(1,734,592)	563,232	2,297,824	407.97%	(1,734,592)	563,232	2,297,824	407.97%
INTEREST PROVISION									
12	BEGINNING TRUE-UP AND INTEREST PROVISION (9)	(1,376,495)	573,226	1,949,721	340.13%				
13	ENDING TRUE-UP BEFORE INTEREST (12 + 10a + 10b + 7 - 5)	(1,727,546)	560,657	2,288,203	408.13%				
14	TOTAL (12+13)	(3,104,041)	1,133,883	4,237,924	373.75%				
15	AVERAGE (50% OF 14)	(1,552,021)	566,942	2,118,963	373.75%				
16	INTEREST RATE - FIRST DAY OF MONTH	0.05500	0.05500	0.00000	0.00%				
17	INTEREST RATE - FIRST DAY OF SUBSEQUENT MONTH	0.05400	0.05400	0.00000	0.00%				
18	TOTAL (16+17)	0.10900	0.10900	0.00000	0.00%				
19	AVERAGE (50% OF 18)	0.05450	0.05450	0.00000	0.00%				
20	MONTHLY AVERAGE (19/12 Months)	0.00454	0.00454	0.00000	0.04%				
21	INTEREST PROVISION (15x20)	(7,046)	2,575	9,621	373.63%				

* If line 5 is a refund add to line 4
If line 5 is a collection () subtract from line 4