

January 29, 1998

Ms. Blanca S. Bayo, Director  
Division of Record and Reporting  
Florida Public Service Commission  
2540 Shumard Oak Blvd.  
Tallahassee, FL 32399-0868

**Re: Conservation Cost Recovery**

Dear Ms. Bayo:

Enclosed for filing in Docket No. 980002-EG, please find the original and 10 copies of City Gas Company of Florida's Prehearing Statement along with a copy on diskette.

Should you have any questions with respect to this filing, please contact me at (305) 691-8710, ext. 5207.

Sincerely,



Michael A. Palecki  
Vice President of Regulatory Affairs

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AFA Uendover  
APP \_\_\_\_\_  
CAF \_\_\_\_\_ MAP/rt  
CMU \_\_\_\_\_ Encl.  
CTR \_\_\_\_\_  
EAG Ballinger  
LES 1  
LIT 3  
OFC \_\_\_\_\_  
RDL \_\_\_\_\_  
SAC 1

DOCUMENT NUMBER-DATE

01617 JAN 30 1998  
TIC Enterprises, LLC  
Utility Business Services  
Valley Cities Gas  
Waverly Gas

NUI Companies and Affiliates:  
City Gas Company of Florida  
Elizabethtown Gas  
Elkton Gas  
North Carolina Gas

NUI Capital Corp.  
NUI Energy  
NUI Energy Brokers  
NUI Environmental Group

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In Re: Energy Conservation Cost Recovery Clause. )  
 )  
 )

DOCKET NO. 980002-EG  
Filed: February 2, 1998

CITY GAS COMPANY OF FLORIDA'S PREHEARING STATEMENT

Pursuant to Commission Order, City Gas Company of Florida files its Prehearing Statement.

a. Witnesses

<u>Witness</u>	<u>Appearing For</u>	<u>Issue #</u>
<u>Direct</u>		
Carl Smith	City Gas Company of Florida, A Division of NUI Corporation	All Issues

Rebuttal

None

b. Exhibits

<u>Witness</u>	<u>Proffered By</u>	<u>I.D. No.</u>	<u>Description</u>
Carl Smith	Carl Smith	_____ (CS-1)	Schedules C-1, C-2, C-3, C-4, and C-5.

c. Statement of Basic Position

The Commission should determine that the appropriate adjusted net true-up for City Gas Company for the period October 1996 through September 1997 is \$95,290 overrecovery. The appropriate conservation cost recovery factors for the period April 1998 through March 1999 are 6.339 cents per therm for the Residential rate classes (RS, ED and GL) and 1.711 cents per therm for the Commercial rate classes (CS, ED, LCS, CTS, and SCTS).

DOCUMENT NUMBER-DATE  
01617 JAN 30 88  
FPSC-RECORDS/REPORTING

d. **Position on the Issues**

**Generic Conservation Cost Recovery Clause Issues**

ISSUE 1: What are the appropriate adjusted net true-up amounts for City Gas for the period October 1996 through September 1997?

Position: Overrecovery of \$95,290

ISSUE 2: What are appropriate conservation cost recovery factors for City Gas for the period April, 1998 through March, 1999?

Position:	Rate Class	ECCR Factor
	Residential (RE, ED, GL)	6.339 cents / therm
	Commercial (CS, ED, LCS, CTS, SCTS)	1.711 cents / therm
	Gas Lights	1.14102 per lamp

**Company-Specific Issues**

City Gas Company of Florida has no position at this time on company-specific issues in this docket.


e. **Pending Motions**

City Gas Company of Florida has no pending motions.

f. **Other Matters**

None at this time.

Respectfully submitted this 2nd day of February, 1998.



Michael A. Palecki  
**NUI CORPORATION - SOUTHERN DIVISION**  
Vice President of Regulatory Affairs  
955 East 25 Street  
Hialeah, FL 33013-3498  
(305) 691-8710

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the City Gas Company of Florida's Prehearing Statement has been furnished by U.S. Mail to the following parties of record, this 29th day of January, 1998:

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