



JACK SHREVE  
PUBLIC COUNSEL

STATE OF FLORIDA  
OFFICE OF THE PUBLIC COUNSEL

c/o The Florida Legislature  
111 West Madison St.  
Room 812  
Tallahassee, Florida 32399-1400  
850-488-9330

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REPLYING

November 2, 1998

Ms. Blanca S. Bayó, Director  
Division of Records and Reporting  
Florida Public Service Commission  
2540 Shumard Oak Boulevard  
Tallahassee, FL 32399-0870

RE: Docket No. 980003-GU

Dear Ms. Bayó:

Enclosed are an original and fifteen copies of the Public Counsel's Prehearing Statement in the above-referenced docket.

Also enclosed is a 3.5 inch diskette containing the Public Counsel's Prehearing Statement in WordPerfect for Windows 6.1. Please indicate receipt of filing by date-stamping the attached copy of this letter and returning it to this office. Thank you for your assistance in this matter.

RECEIVED & FILED  
*JRH*  
FPSO-BUREAU OF RECORDS

Sincerely,

*John Roger Howe*  
John Roger Howe  
Deputy Public Counsel

- ACK \_\_\_\_\_
- AFA Vandiver
- APP \_\_\_\_\_
- CAF \_\_\_\_\_
- CMU Enclosures
- CTR \_\_\_\_\_
- EAG Makin
- LEG 1
- LIN 3
- OPC \_\_\_\_\_
- RCH \_\_\_\_\_
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BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In Re: Purchased Gas Adjustment )  
True-up )  
\_\_\_\_\_ )

DOCKET NO. 980003-GU  
FILED: November 2, 1998

PREHEARING STATEMENT OF THE OFFICE OF PUBLIC COUNSEL

The Citizens of the State of Florida, through the Office of Public Counsel, pursuant to the Order Establishing Procedure in this docket, Order No. PSC-98-1098-PCO-GU, issued August 17, 1998, submit this Prehearing Statement.

APPEARANCES:

JOHN ROGER HOWE, Esquire  
Deputy Public Counsel  
Office of Public Counsel  
c/o The Florida Legislature  
111 West Madison Street, Room 812  
Tallahassee, Florida 32399-1400  
On behalf of the Citizens of the State of Florida

A. WITNESSES:

None.

B. EXHIBITS:

None.

C. STATEMENT OF BASIC POSITION

None necessary.

D. STATEMENT OF FACTUAL ISSUES AND POSITIONS

Generic Purchased Gas Adjustment Issues

ISSUE 1: What are the appropriate final purchased gas true-up amounts for the period April, 1997, through March, 1998?

POSITION:

CHESAPEAKE: No position at this time.  
CITY GAS: No position at this time.  
FPUC: No position at this time.  
INDIANTOWN: No position at this time.  
PEOPLES GAS: No position at this time.  
SEBRING: No position at this time.  
SOUTH FLORIDA: No position at this time.  
ST. JOE: No position at this time.

ISSUE 2: What are the estimated purchased gas adjustment true-up amounts for the period April, 1998, through December, 1998?

POSITION:

CHESAPEAKE: No position at this time.  
CITY GAS: No position at this time.  
FPUC: No position at this time.  
INDIANTOWN: No position at this time.  
PEOPLES GAS: No position at this time.  
SEBRING: No position at this time.  
SOUTH FLORIDA: No position at this time.  
ST. JOE: No position at this time.

ISSUE 3: What are the total purchased gas true-up amounts to be collected during the period January, 1999, through December, 1999?

POSITION:

CHESAPEAKE: No position at this time.  
CITY GAS: No position at this time.  
FPUC: No position at this time.  
INDIANTOWN: No position at this time.  
PEOPLES GAS: No position at this time.

SEBRING: No position at this time.  
SOUTH FLORIDA: No position at this time.  
ST. JOE: No position at this time.

ISSUE 4: What are the appropriate levelized purchased gas cost recovery (cap) factors for the period January, 1999, through December, 1999?

POSITION:

CHESAPEAKE: No position at this time.  
CITY GAS: No position at this time.  
FPUC: No position at this time.  
INDIANTOWN: No position at this time.  
PEOPLES GAS: No position at this time.  
SEBRING: No position at this time.  
SOUTH FLORIDA: No position at this time.  
ST. JOE: No position at this time.

ISSUE 5: What should be the effective date of the new purchased gas adjustment charge for billing purposes?

OPC: The factor should be effective for all meter readings on or after January 1, 1999, beginning with the first or applicable billing cycle for the period January, 1999 through December, 1999.

Company Specific Issues

OPC knows of no Company Specific Issues at this time.

E. STATEMENT OF LEGAL ISSUES AND POSITIONS: None at this time.

F. STATEMENT OF POLICY ISSUES AND POSITIONS: None at this time.

G. STIPULATED ISSUES: None.

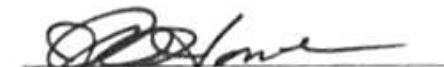
H. PENDING MOTIONS: None.

I. STATEMENT OF COMPLIANCE WITH ORDER ESTABLISHING PROCEDURE:

There are no requirements of the Order Establishing Procedure with which the Office of Public Counsel cannot comply.

Respectfully submitted,

JACK SHREVE  
Public Counsel

  
\_\_\_\_\_  
John Roger Howe  
Deputy Public Counsel

Office of Public Counsel  
c/o The Florida Legislature  
111 West Madison Street  
Room 812  
Tallahassee, FL 32399-1400

(850) 488-9330

Attorneys for the Citizens  
of the State of Florida

**CERTIFICATE OF SERVICE  
DOCKET NO. 980003-GU**

I HEREBY CERTIFY that a true and correct copy of the foregoing PREHEARING STATEMENT OF THE OFFICE OF PUBLIC COUNSEL has been furnished by U.S. Mail or by \*hand-delivery to the following persons on this 2nd day of November, 1998:

William Cochran Keating, IV, Esquire  
Florida Public Service Commission  
Room 370, Gunter Building  
2540 Shumard Oak Boulevard  
Tallahassee, Florida 32399-0850

John W. McWhirter, Jr., Esquire  
McWhirter, Reeves, McGlothlin,  
Davidson, Rief & Bakas, P.A.  
Post Office Box 3350  
Tampa, Florida 33601

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

Colette M. Powers, Esquire  
Indiantown Gas Company  
P.O. Box 8  
Indiantown, Florida 34956

Michael A. Palecki  
Attorney, Legal & Regulatory Affairs  
NUI Corporation  
955 East 25th Street  
Hialeah, Florida 33013-3498

Kenneth A. Hoffman, Esquire  
Rutledge, Ecenia, Underwood,  
Purnell & Hoffman, P.A.  
Post Office Box 551  
Tallahassee, Florida 32302-0551

Wayne L. Schiefelbein, Esquire  
Ruden, McClosky, Smith,  
Schuster & Russell, P.A.  
215 S. Monroe Street, Suite 815  
Tallahassee, Florida 32301

Norman H. Horton, Jr., Esquire  
Messer, Caparello & Self, P.A.  
215 S. Monroe Street, Suite 701  
Post Office Box 1876  
Tallahassee, Florida 32302-1876

David M. Nicholson, Esquire  
Macfarlane Ferguson & McMullen  
Post Office Box 1531  
Tampa, Florida 33601-1531

  
John Roger Howe  
Deputy Public Counsel