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September 23, 2004

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IN REPLY REFER TO:

Ansley Watson, Jr. P.O. Box 1531 Tampa, Florida 33601 e-mail: <u>aw@macfar.com</u>

1501 SOUTH FLORIDA AVENUE LAKELAND, FLORIDA 33803 (863) 680-9908 FAX (863) 683-2849

VIA FEDEX

Blanca S. Bayo, Director Division of Commission Clerk & Administrative Services Florida Public Service Commission 2540 Shumard Oak Boulevard Tallahassee, Florida 32399-0850

Re: Docket No. 040004-GU – Natural gas conservation cost recovery

Dear Ms. Bayo:

Enclosed herewith for filing in the above docket on behalf of Peoples Gas System, please find the following:

10383-04	Peoples' Petition for Approval of Conservation Cost Recovery Fa	actors;
CMP	Direct Testimony of Kandi M. Floyd on behalf of Peoples (includir containing such testimony in MS Word format); and	ıg diskette
сом <u>5</u>	Exhibits(KMF-3) and(KMF-4), consisting of the conserv recovery projection forms prescribed by the Commission Staff.	ation cost
	direct testimony of Mrs. Floyd and the referenced exhibits will be	
No. 101, 1912	the hearing in this docket, currently scheduled for November 8-10,	2004.
1.43.40	se acknowledge your receipt of the enclosures on the duplicate co eturn the same to me in the enclosed preaddressed envelope.	opy of this
RCA	k you for your usual assistance	
SCR	nk you for your usual assistance.	
SEC RECEIVE	ED & FILED	AT MINDED DATE
OTH	DUCOM:	INT NI MBERI DATE
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FPSC-COMMISSION CLERK

Blanca S. Bayo September 23, 2004 Page 2

Sincerely, anxey water

ANSLEY WATSON, JR.

AWjr/a Enclosures

cc: Ms. Angela Llewellyn Ms. Kandi M. Floyd Parties of Record

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

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In re: Natural gas conservation cost recovery.

Docket No. 040004-GU Submitted for Filing: 9-24-04

PETITION OF PEOPLES GAS SYSTEM FOR APPROVAL OF CONSERVATION COST RECOVERY FACTORS

Peoples Gas System ("Peoples"), through undersigned counsel and pursuant to

Rule 25-17.015, Florida Administrative Code, petitions the Commission for approval of

its conservation cost recovery factors for the period January 1 through December 31,

2005, and in support thereof says:

1. The name and address of the Petitioner are:

Peoples Gas System P. O. Box 2562 Tampa, Florida 33601-2562

2. The persons to whom notices, orders, pleadings and correspondence in

this docket should be addressed are:

Ansley Watson, Jr. Macfarlane Ferguson & McMullen P. O. Box 1531 Tampa, Florida 33601-1531

Matthew R. Costa Corporate Counsel TECO Energy, Inc. P. O. Box 111 Tampa, Florida 33601-0111 Ms. Angela L. Llewellyn Regulatory Affairs Peoples Gas System P. O. Box 111 Tampa, Florida 33601-0111

3. For Peoples' divisions other than the West Florida Region, Peoples projects total conservation program expenses of \$7,882,651 for the period January 1 through December 31, 2005. The estimated true-up for these divisions is an overrecovery of \$436,782. After decreasing the projected conservation expenses by

the amount of this overrecovery, \$7,445,869 remains to be recovered during the January - December 2005 period. When this expense is allocated to the affected rate classes pursuant to the methodology approved by the Commission, and expanded for taxes, the recovery factors for the period January - December 2005 required to recover such expense are as follows:

Rate Class	ECCR Factor (per therm)
Residential	\$0.05205
Small General Service	\$0.04404
General Service 1	\$0.01728
General Service 2	\$0.01404
General Service 3	\$0.01180
General Service 4	\$0.01064
General Service 5	\$0.00606
Commercial Street Lightin	g \$0.00753
Commercial Street Lightin Natural Gas Vehicle Servi	če \$0.00906

4. For Peoples' West Florida Region, Peoples projects total conservation program expenses of \$2,258,300 for the period January 1 through December 31, 2005. The estimated true-up for the West Florida Region is an underrecovery of \$1,794,458. After increasing the projected conservation expenses by the amount of this underrecovery, \$4,052,758 remains to be recovered during the January - December 2005 period. When this expense is allocated to the affected rate classes pursuant to the methodology approved by the Commission, and expanded for taxes, the recovery factors for the period January - December 2005 required to recover such expense are as follows:

Rate Class	ECCR Factor (per therm)
Residentia	\$0.19387
Small General Service	\$0.17525
General Service 1	\$0.07171
General Service 2	\$0.05681
General Service 3	\$0.04756
General Service 4	\$0.04315
General Service 5	\$0.02394
Commercial Street Lighting	g \$0.03033
Natural Gas Vehicle Service	e \$0.03033

WHEREFORE, Peoples Gas System respectfully requests that the Commission grant this petition and approve:

A. the conservation adjustment factors for the period January 1 through December 31, 2005 set forth in paragraph 3 of this petition to be applied in Peoples' divisions other than the West Florida Region; and

B. the conservation adjustment factors for the period January 1 through December 31, 2005 set forth in paragraph 4 of this petition to be applied in Peoples' West Florida Region.

Respectfully submitted,

Ansley Watson, 'Jr. Macfarlane Ferguson & McMullen P. O. Box 1531 Tampa, Florida 33601-1531 Phone: (813) 273-4321 Fax: (813) 273-4396 E-mail: <u>aw@macfar.com</u>

Attorneys for Peoples Gas System

Matthew R. Costa Corporate Counsel TECO Energy, Inc. P. O. Box 111 Tampa, Florida 33601-0111 Phone: (813) 228-4938 Fax: (813) 228-1328 E-mail: mcosta@tecoenergy.com

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that true and correct copies of the foregoing petition, together with copies of the Direct Testimony of Kandi M. Floyd and Exhibits (KMF-3) and (KMF-4), have been furnished by U. S. Mail, this 23rd day of September, 2004, to the following:

Martha Brown, Esquire Office of General Counsel Florida Public Service Commission 2540 Shumard Oak Boulevard Tallahassee, FL 32399-0850

Mr. Thomas A. Geoffroy Florida Division Chesapeake Utilities Corporation P. O. Box 960 Winter Haven, FL 33882-0960

Gary Perko, Esquire Hopping Law Firm P.O. Box 6526 Tallahassee, FL 32314

Wayne L. Schiefelbein, Esquire Rose Law Firm 2548 Blairstone Pines Dr. Tallahassee, FL 32301

Ms. Angela L. Llewellyn Regulatory Affairs Peoples Gas System P. O. Box 111 Tampa, FL 33601-0111 Ms. Gloria L. Lopez City Gas Company of Florida 955 East 25th Street Hialeah, FL 33013-3498

Florida Public Utilities Company John T. English/George Bachman P. O. Box 3395 West Palm Beach, FL 33402-3395

Norman H. Horton, Jr., Esquire Messer Law Firm P.O. Box 1876 Tallahassee, FL 32302-1876

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

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Ansley Watson, Jr.