

# MACFARLANE FERGUSON & McMULLEN

ATTORNEYS AND COUNSELORS AT LAW

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

ONE TAMPA CITY CENTER, SUITE 2000  
201 NORTH FRANKLIN STREET  
P.O. BOX 1531 (ZIP 33601)  
TAMPA, FLORIDA 33602  
(813) 273-4200 FAX (813) 273-4396

625 COURT STREET  
P. O. BOX 1669 (ZIP 33757)  
CLEARWATER, FLORIDA 33756  
(727) 441-8966 FAX (727) 442-8470

[www.mfmlegal.com](http://www.mfmlegal.com)

EMAIL: [info@mfmlegal.com](mailto:info@mfmlegal.com)

IN REPLY REFER TO:

October 6, 2004

Ansley Watson, Jr.  
P.O. Box 1531  
Tampa, Florida 33601  
e-mail: [aw@macfar.com](mailto:aw@macfar.com)

## VIA E-FILING

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. 040003-GU – Purchased gas adjustment (PGA) true-up**

Dear Ms. Bayo:

Enclosed for filing with the Commission, please find Peoples Gas System's Preliminary List of Issues and Positions for the hearing scheduled to be held in the above docket November 8-10, 2004.

Thank you for your usual assistance.

Sincerely,



Ansley Watson, Jr.

AWjr/a  
Enclosure

cc: Mrs. Kandi M. Floyd  
Matthew R. Costa, Esquire  
Parties of Record

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Purchased gas adjustment )  
(PGA) true-up. )  
\_\_\_\_\_ )

DOCKET NO. 040003-GU  
Submitted for filing:  
10-6-04

**PEOPLES GAS SYSTEM'S  
PRELIMINARY LIST OF ISSUES AND POSITIONS**

Peoples Gas System ("PGS"), by its undersigned attorneys, submits the following Preliminary List of Issues and Positions:

**Generic Purchased Gas Adjustment Issues**

**ISSUE 1: What are the appropriate final purchased gas adjustment true-up amounts for the period January 2003 through December 2003?**

PGS: \$7,268,762 underrecovery

**ISSUE 2: What are the estimated purchased gas adjustment true-up amounts for the period January 2004 through December 2004?**

PGS: \$10,448,229 overrecovery

**ISSUE 3: What are the total purchased gas adjustment true-up amounts to be collected or refunded during the period January 2005 through December 2005?**

PGS: \$3,179,465 overrecovery

**ISSUE 4: What are the appropriate levelized purchased gas cost recovery (cap) factors for the period January 2005 through December 2005?**

PGS: \$0.99037 per therm

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

PGS: The factor should be effective for all bills from the first billing cycle in January 2005 through and including the last billing cycle in December 2005.

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: [aw@macfar.com](mailto:aw@macfar.com)

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](mailto:mcosta@tecoenergy.com)

## CERTIFICATE OF SERVICE

I HEREBY CERTIFY that true and correct copies of the foregoing Preliminary List of Issues and Positions has been furnished by U. S. Mail this 6th day of October, 2004, to the following:

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

Ms. Gloria L. Lopez  
City Gas Company of Florida  
955 East 25th Street  
Hialeah, FL 33013-3498

Robert Vandiver, Esquire  
Office of the Public Counsel  
c/o The Florida Legislature  
111 W. Madison St. - #812  
Tallahassee, FL 32399-1400

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

Gary Perko, Esquire  
Hopping, Green, Sams & Smith  
P.O. Box 6526  
Tallahassee, FL 32314

Norman H. Horton, Jr., Esquire  
Messer, Caparello & Self, P.A.  
P.O. Box 1876  
Tallahassee, FL 32302-1876

Mr. Jerry Melendi  
Sebring Gas System, Inc.  
3515 Highway 27 South  
Sebring, FL 33870-5452

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

Ms. Angela L. Llewellyn  
Regulatory Affairs  
Peoples Gas System  
P. O. Box 111  
Tampa, FL 33601-0111



Ansley Watson, Jr.