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July 18, 2005

VIA HAND DELIVERY

Ms. Blanca Bayó Director, Office of the Commission Clerk Florida Public Service Commission 2540 Shumard Oak Boulevard Tallahassee, FL 32399

RE: Docket No. 050003-GU CONFIDENTIAL MATERIALS ATTACHED

Dear Ms. Bayo:

Enclosed for filing on behalf of Florida City Gas in the above-referenced docket are:

- (1) The original and seven copies of a Request for Confidential Classification of Staff's Audit workpapers; and
- **CMP** (2) A **CONFIDENTIAL** envelope containing one copy of the workpapers on which the confidential material has been highlighted.

COM ____

CTR By copy of this letter, the first item has been furnished to the parties on the attached certificate of service. Please stamp and return the enclosed extra copy of this filing. Should you have any questions, please feel free to contact me.

GCL

OPC

MMS

RCA

- SCR
- SEC |
- OTH Iconf records

BLB:deg Enclosures

Sincerely,

TERFITT AKERMA . Bryant, Jr.

D & FILED REC BUREAU OF RECORDS

DOCUMENT NUMBER-DATE

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Akerman Sen

Bill L. Bryant, Jr.

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Tallahassee, FL 32301

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Suite 1200

ATTORNEYS AT LAW

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In Re: Purchased Gas Adjustment) (PGA) True-Up) Docket No. 050003-GU

Filed: : July 18, 2005

REQUEST FOR CONFIDENTIAL CLASSIFICATION OF STAFF'S AUDIT WORKPAPERS BY FLORIDA CITY GAS

Pursuant to Section 366.093, Florida Statutes and Rule 25-22.006(3)(a)2 and (4), Florida Administrative Code, Florida City Gas submits this Request for Confidential Classification of the documents described below which were provided to Commission auditors as workpapers during the Florida City Gas 2004 Purchased Gas Adjustment audit for the period ending December 31, 2004 (Audit Control #05-039-4-1). In support of this request for Confidential Classification, Florida Gas states as follows:

- 1. In connection with Staff's audit in this docket, Florida City Gas provided documents to the Commission auditors containing information that is "proprietary business information" under Section 366.093(3), Florida Statutes. All items for which the company is requesting confidentiality were included with the audit workpapers filed with the Commission, have been held temporarily confidential, and should not be released to the public.
- 2. A list of the audit workpapers containing confidential information that are part of the audit report for which Florida City Gas requests confidential treatment is attached hereto as Exhibit A.
- 3. Florida City Gas requests that the above-described information be classified as "proprietary business information" within the meaning of Section 366.093(3), Florida Statutes. The information and documents at issue are intended to be, and are, treated by Florida City Gas as proprietary and confidential. Exhibit A contains a detailed BOCUMENT NUMBER-DATE

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explanation of the information and documents for which confidential treatment is requested, and justification for the requested confidential treatment of the highlighted portions of the enclosed documents.

- 4. A version of above described documents on which the information for which confidentiality is requested has been highlighted and is being submitted to the Division of Records and Reporting under a separate cover. A redacted version of the documents on which the information asserted to be confidential had been blocked out is attached hereto as Exhibit B.
- Florida City Gas requests that the information for which it seeks confidential classification remain confidential for a period of at least 18 months as provided in Section 366.093 (4), Florida Statutes.

WHEREFORE, for the foregoing reasons, Florida City Gas respectfully requests that its Request for Confidential Classification be granted.

RESPECTFULLY SUBMITTED this 18th day of July, 2005.

AKERMAN SENTERFITT 106 East College Avenue, Suite 1200 P. O. Box 1877 Tallahassee, FL 32302-1877 Phone: (850) 224-9634 Fax: (850) 222-0103 Email: bill.bryant@akerman.com

Brvant Jr., Esq.

Florida Bar Number: 179270

Attorney for Florida City Gas

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of Florida City Gas's Request for

Confidential Classification of Staff's Audit Workpapers in Docket No. 050003-GU has been

furnished by regular U.S. Mail to the following the 18th day of July 2005.

AGL Resources Inc. Elizabeth Wade Ten Peachtree Place Location 1470 Atlanta, GA 30309

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

MacFarlane Ferguson Law Firm Ansley Watson, Jr. Post Office Box 1531 Tampa, FL 33601-1531

Messer Law Firm Norman Horton, Jr./Floyd R. Self Post Office Box 1876 Tallahassee, FL 32302-1876

Office of Public Counsel Harold McLean/Patricia Christensen c/o The Florida Legislature 111 West Madison St., Room 812 Tallahassee, FL 32399-1400

Florida City Gas Thomas Kaufmann One Elizabeth Plaza Union, NJ 07083-1975 People Gas System Ms. Angela L. Llewellyn Regulatory Affairs Post Office Box 111 Tampa, FL 33601-0111

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

TECO Energy, Inc. Matthew Costa Post Office Box 111 Tampa, FL 33601-0111

Florida Public Service Commission Katherine E. Fleming 2540 Shumard Oak Blvd. Tallahassee, FL 32399-0850

Florida City Gas Charles A. Rawson, III 955 East 25th Street Hialeah, FL 33013-3498

Bryant

EXHIBIT A

FLORIDA CITY GAS

Docket No. 050003-GU

The justification for the Confidential Data provided by Florida City Gas to staff and included as workpapers to the Staffs audit report in Docket No. 050003-GU is as follows:

Document/Description	No. of Pages	Justification
Customer Bills to be tested: WP No. 41-5 / 1	6	А
Customer Bills tested: WP No. 41-5 / 2	16	А

Justification "A": The information contained herein is customer specific data (name or location, gas usage, amount billed, etc.) the disclosure of which would cause harm to the Company's business operation and would impair the competitive business interests of the Company.

EXHIBIT B

FLORIDA CITY GAS

Docket No. 050003-GU

Attached are redacted copies of the information subject

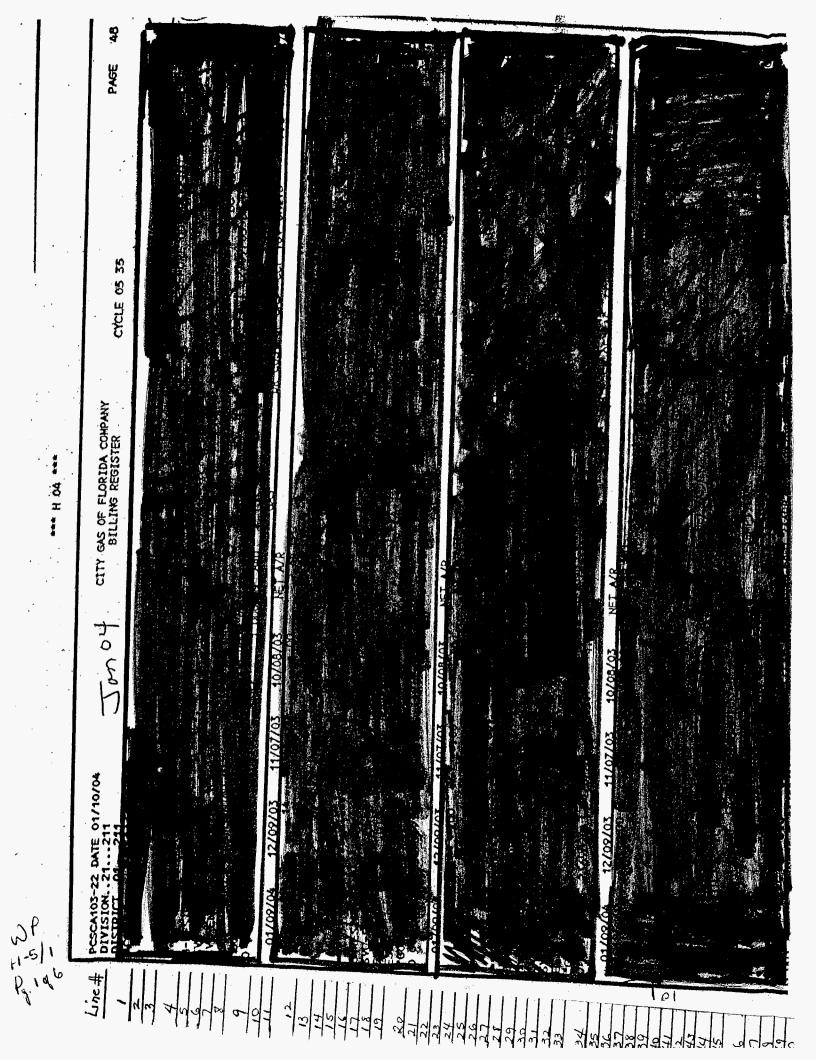
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to the Company's Request for Confidential Classification

dated July 15, 2005.

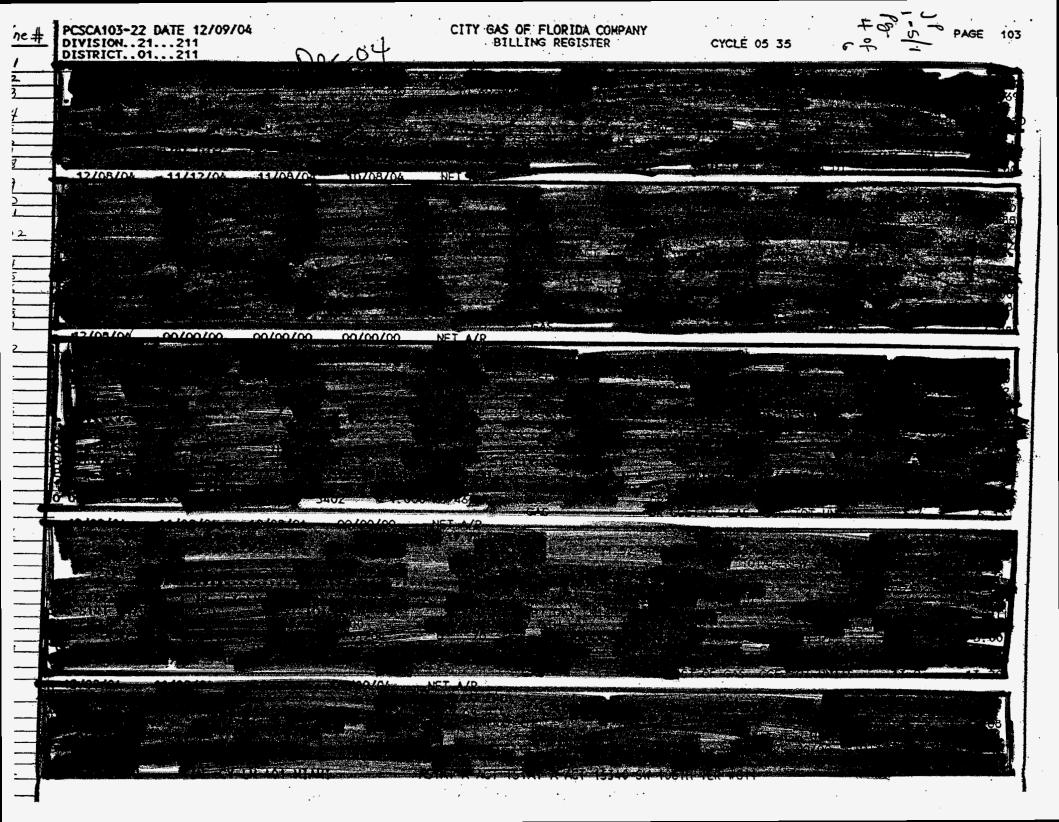
Customer Bills to be tested

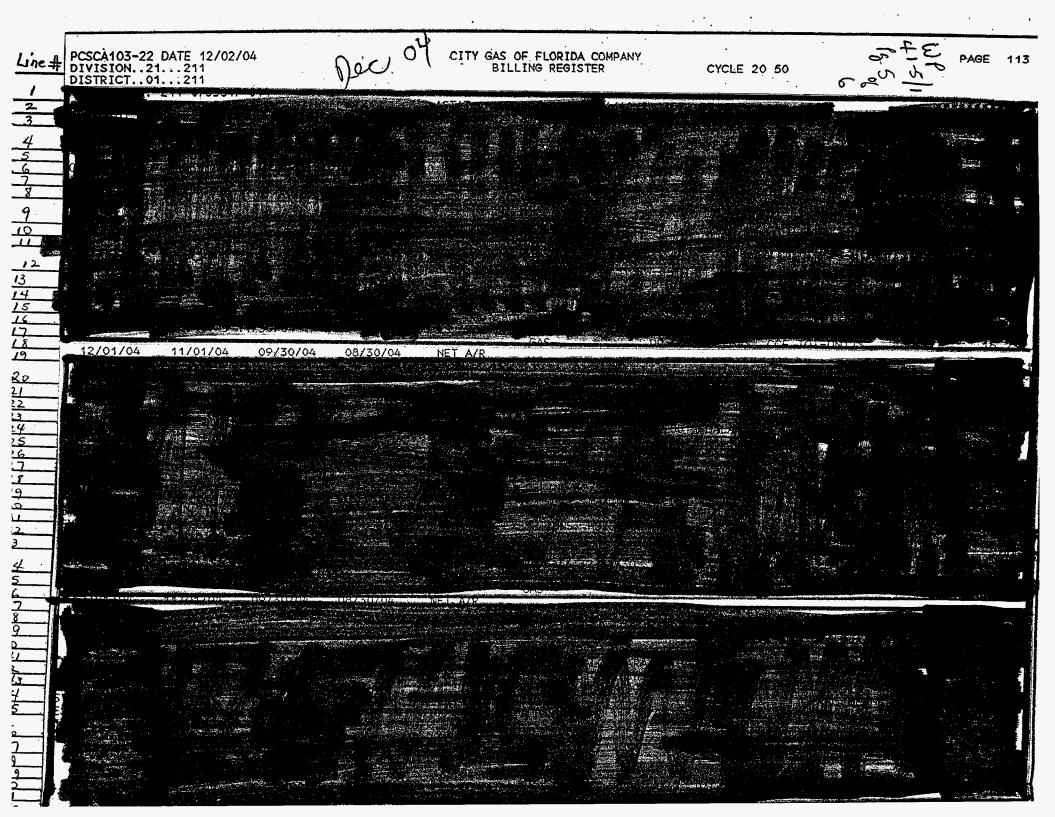
WP No. 41-5 / 1 Pg. 1-6

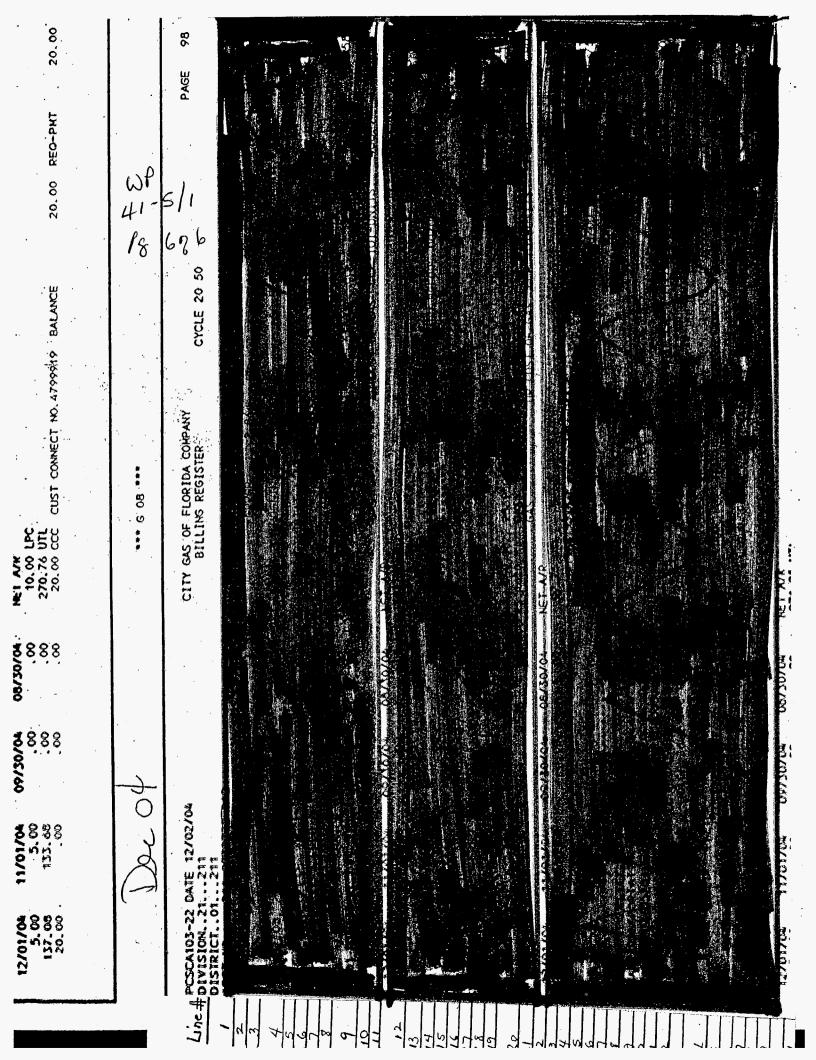


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Customer Bills tested

WP No. 41-5 / 2 Pg. 1-16

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1BC fon #1 -ine# DESC OF CHARGE USAGE ITEM AMOUNT DR/CR SPECTAL BULLING NOTES ĨŪ STATE=EXEMPT =A FRAN =EXEMPT =A UTIL = 1.30 GRRCP= .44 SURTX=EXEMPT =A EXCIS=EXEMPT =A 17 DSPLY 11 KEY TO NEW SS DSPLY KEY _0 1 Sess-1 10.70.25.7 #§ 24/22 7.5 × .066332 = 4.97 below Cap per Order No. <u>94952</u> Cap is . 95067. WP 41-5/2 16 P3-1916 41.5

you the Line# 2274 BILL COMPONENT REVIEW ***** 06/22/01 ITEM AMOUNT LA CR SPECIAL BILLING NOTES ESC OF CE STATE=EXEMPT =A FRAN =EXEMPT =A UTIL = 7.88 GRRCP= 4.34 SURTX=EXEMPT =A EXCIS=EXEMPT =A

DSPLY 11 KEY 1 Sess-1 TO NEW SS DSPLY KEY 10.70.25.7 #§ 24/22 159.4 x . 66332 = 105.73 below cap

WP 41-5/2 19.2 816

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March #3 -ine# 234 ** 067 COMPONENT 23705 PEVENITE ent: ى يەن بى ئەركە بىرىغۇ ئۇ يېچىلىرى ئىچىلىرى بىرىيى. ئەربىچە چىچىلىرى يەنچىلىرى ئېچىلىرىغان ئەربىرى دىكى ئىچىلىرى بىرى. STATE= 56.18 FRAN =EXEMPT =A UTIL = 36.59 GRRCP= 23.41 SURTX= 9.37 EXCIS=EXEMPT =A

 DSPLY 11 KEY
 TO NEW SS
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 KEY

 1 Sess-1
 10.70.25.7
 #§ 24/22

885 x .71357 = 631.51

below cap

4 - ©

WP 41-5/2 Pg 3816

March # 4 Line# - 에너석 에서 카페이의 국식 감각 214 M 20 M B M 1631 THADLER ASMOUNT. DR7CR SPROL NOTES q =A FRAN =EXEMPT =A STATE=EXEMPT UTIL = 1.97 GRRCP= .74 SURTX=EXEMPT =A EXCIS=EXEMPT =A 17 DSPLY 11 KEY TO NEW SS DSPLY KEY 1 Sess-1 10.70.25.7 #§ 24/22 15 x 71357 = 10.76 below cep WP 41-5/2 P8 4816

March 5 Line# 1234 ********* 03-1 ͲͲͳͱͳͲ COMPONENT REVIEW 1137THEM ZMOUN SPECE AN IMPROVED STREET DR/CR STATE=EXEMPT =A FRAN = 3.63 UTIL = 3.42 GRRCP= 1.5i SURTX=EXEMPT =A EXCIS=EXEMPT =A 171 DSPLY 11 KEY TO NEW SS DSPLY KEY 4 - ° 1 Sess-1 10.70.25.7 #§ 24/22 35.4 × .81407 = 28.82 below cap. WP 41-5/2 Pg 5g16

May #6 Line# 1234 547 129 12 13 4 13 14 15 16 **** MOUN NGINOIL DESC OF CHARGE JSAGE 19 FRAN =EXEMPT =A STATE= UTIL =EXEMPT =A GRRCP= .91 SURTX=EXEMPT =A EXCIS=EXEMPT =A DSPLY 11 KEY TO NEW SS DSPLY . KEY 10.70.25.7 4_C 1 Sess-1 #§ 24/22 18,3 X.81407 = 14.90 below cap WP -512 41-512 Pg-6 8 16

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Line# UTILITY BILL COM .06/23/05 **: ***** Jaka and the state ÷ DESC THE AMOUNT DR/CR SPECIAL BILLING NOTES STATE=EXEMPT =A FRAN =EXEMPT =A 1.24 GRRCP= UTIL = .40 SURTX=EXEMPT =A EXCIS=EXEMPT =A DSPLY 11 KEY TO NEW SS DSPLY KEY 4 -1 Sess-1 10.70.25.7 #§ 24/22 4.3 × . 88443 = 3.80 below cap WP 41-5/2 887712

July #8 Line# - 20174 44 - 2017 - 2018 STATE= 28.40 28.40 FRAN = UTIL = 17.24 GRRCP= 11.83 SURTX=EXEMPT =A EXCIS=EXEMPT =A DSPLY 11 KEY TO NEW SS DSPLY KEY 10.70.25.7 #\$ 24/22 1 Sess-1 369.1 X , 88443 = 326.44 below cap.

WP 41-5/2 15 188 8 15

aug # 9 Line# 가 년 대 역 이 의 의 식 의 적 인 의 ΔΜΟΙΤΝΤΥ STATE=EXEMPT 2.00 =A FRAN = UTIL = 2.04 GRRCP= .84 SURTX=EXEMPT =A EXCIS=EXEMPT =A DSPLY 11 KEY TO NEW SS DSPLY KEY 4-[©] 10.70.25.7 1 Sess-1 #§ 24/22 17.2 X.82412 = 14.17 below Cop WP 41-512 P8 9816

aug#10 Line# À 201211134 5K STATE FRAN UTIL = 3.38 GRRCP= 1.58 SURTX= .63 EXCIS=EXEMPT =A

DSPLY 11 KEY TO NEW SS DSPLY KEY 10.70.25.7 1 Sess-1 #§ 24/22

38.8 X.82412 = 31.98 bolon cap

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WP 41-5/2 PS 10816

Nov. # 11 Line# - 24 54 54 54 STATE=EXEMPT =A FRAN =EXEMPT =A UTIL = 3.52 GRRCP= 1.71 SURTX=EXEMPT =A EXCIS=EXEMPT =A DSPLY 11 KEY 1 Sess-1 TO NEW SS DSPLY KEY 10.70.25.7 4 -#§ 24/22 37.6 × .94952 = 35.70 Selow cup WP 41-5/2 Pg 11 8 16

Dec # 12 Line # <u>1</u> <u>2</u> <u>3</u> <u>4</u> BILL COMPONENT REVIEW STATE=EXEMPT =A FRAN =EXEMPT =A UTIL = 1.26 GRRCP= .46 SURTX=EXEMPT =A EXCIS=EXEMPT =A DSPLY 11 KEY TO NEW SS DSPLY KEY 4 - ¢ 1 Sess-1 10.70.25.7 #§ 24/22 6.4 × .94952 = 6.08 be low cap. WP 41-5/2 P3 12716

Dec #13 Line# 1 2 3 4 D) UTILITY 23/05 *** 1221 ** HADGH np7rp SPECTAL STATE=EXEN =A FRAN =EXEMPT =A UTIL = 1.90 GRRCP= . .78 SURTX=EXEMPT =A EXCIS=EXEMPT =A DSPLY 11 KEY TO NEW SS DSPLY KEY 4-C 1 Sess-1 10.70.25.7 #§ 24/22 13.9 x .94952 = 13.20 below cap. WP 41-5/2 Pg 13 8 16

Dec # 14 Line# 1 2 2 2 ITTITY BILL OMPONENT REVIEW ちょ ちしてい しょうしょう DESC OF CHARGE USAGE ITEM AMOUNT SPECIAL BILLING NOTES ... DR/CR STATE=EXEMPT =A FRAN =EXEMPT =A UTIL =EXEMPT =A GRRCP= .85 SURTX=EXEMPT =A EXCIS=EXEMPT =A 17 DSPLY 11 KEY TO NEW SS DSPLY KEY 1 Sess-1 10.70.25.7 #§ 24/22 16.1 × .94952 = 15,29 below Cierp. WP 41 -5 2 88- 14 9 16

Dec # 15 -ine# 1234 DESC CHARGE IIGAGE DP7CP SPECIA BILLING NOT Ē STATE= 37.67 FRAN = EXEMPT = A UTIL =EXEMPT =A GRRCP= 15.70 SURTX=EXEMPT =A EXCIS=EXEMPT =A 17 DSPLY 11 KEY TO NEW SS DSPLY KEY 0 1 Sess-1 10.70.25.7 #\$ 24/22 468.9 × .74952 = 445.23 below cap. WP 41-5/2 Ps 15 9 16

Dec. #16 Line# 4 ****** 06/23/05 UTILITY BILL COMPONENT REVIEW 1225 * 03-17 USAGE DR/CR SPECIAL BILLING NOTES DESC OF CHARGE ITEM AMOUNT STATE≈ 5.41 FRAN =EXEMPT =A UTIL =EXEMPT =A GRRCP= 2.25 SURTX=EXEMPT =A EXCIS=EXEMPT =A TO NEW SS DSPLY KEY DSPLY 11 KEY 10.70.25.7 #§ 24/22 1 Sess-1 51.5 X. 94952 = 48.90 below Cap. WB1-512 PS16816