

MESSER CAPARELLO & SELF, P.A.

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11 SEP 13 PM 3:39

COMMISSION CLERK

September 13, 2011

BY HAND DELIVERY

Ms. Ann Cole, Commission Clerk
Office of Commission Clerk
Room 110, Easley Building
Florida Public Service Commission
2540 Shumard Oak Blvd.
Tallahassee, Florida 32399-0850

claim of confidentiality
 notice of intent
 Request for confidentiality
 filed by OPC
For ID# 06594-11, which
is in the public domain, you must be
authorized to view this DR-CLK

Re: Docket No. 090539-GU

Dear Ms. Cole:

Enclosed for filing on behalf of Florida City Gas is an original and seven copies of Florida City Gas' Revised Request for Confidential Classification in the above referenced docket.

Please acknowledge receipt of these documents by stamping the extra copy of this letter "filed" and returning the same to me.

Thank you for your assistance with this filing.

Sincerely yours,

Floyd R. Self

FRS/amb

Enclosure

- COM _____
- APA _____
- ECR 8
- GCL 1
- RAD _____
- SRC _____
- ADM _____
- OPC _____
- CLK 1

cc: Shannon O. Pierce, Esq.
Parties of Record

DOCUMENT NUMBER DATE
06594 SEP 13 =
FPSC-COMMISSION CLERK

BEFORE THE PUBLIC SERVICE COMMISSION

In re: Petition for approval of Special Gas
Transportation Service agreement with Florida
City Gas by Miami-Dade County through
Miami-Dade Water and Sewer Department

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Docket No. 090539-GU
Date filed: September 13, 2011

FLORIDA CITY GAS' REVISED
REQUEST FOR CONFIDENTIAL CLASSIFICATION

Florida City Gas ("FCG" or "Company"), by and through its undersigned counsel, and pursuant to Section 366.093, Florida Statutes, and Rule 25-22.006, Florida Administrative Code, hereby files this revised request for confidential classification for the cost of service analysis and bypass analysis documents that are a part of the proposed settlement agreement package between the parties. In support of this Revised Request, FCG states as follows:

1. FCG is withdrawing its Request for Confidential Classification filed in this docket on August 29, 2011.
2. On June 1, 2011, the parties reached a resolution of the issues in this docket and requested that the hearing scheduled to begin on June 1, 2011, be abated pending the opportunity for the parties to write up the necessary documentation reflecting their settlement.
3. Two of the documents associated with the settlement documents are the cost of service analysis (one page) and the Miami-Dade Water and Sewer Department bypass analysis (six pages). The cost of service analysis contains FCG's proprietary analysis supporting the specific contract rates that FCG has agreed to for service to the MDWASD. This rate analysis involves volume specific rates based upon the terms and conditions of service to MDWASD. The MDWASD bypass analysis incorporates a detailed standalone analysis of the cost to serve MDWASD's Hialeah and Alexander Orr plants if MDWASD was to bypass FCG and serve

DOCUMENT NUMBER - DATE

06594 SEP 13 =

FPSC-COMMISSION CLERK

those two plants directly. These documents together constitute commercially sensitive and valuable information – if other customers had access to this information FCG would be at a competitive disadvantage in seeking to negotiation contract specific rates

3. The confidential portions of the cost of service analysis and the bypass analysis being provided to the Commission fall within the statutory definitions of trade secrets, information concerning contractual data, and competitive information, the disclosure of which would cause harm to FCG and its ratepayers, and therefore constitutes proprietary confidential business information entitled to protection under section 366.093, Florida Statutes, and Rule 25-22.006, Florida Administrative Code.

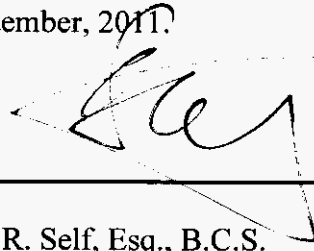
4. Attached to this Request is an envelope marked “CONFIDENTIAL” containing one copy of the highlighted confidential information being provided. Two public, redacted versions of the confidential information are also provided with this Request.

5. Attachment 1 to this Request consists of a chart, which specifically sets forth a line-by-line justification for maintaining specific information in the cost of service analysis and bypass analysis. To be clear, this information has not been released to the public, and is treated by FCG as private, confidential information, the release of which could have an adverse impact on the business operations and future contract rate negotiations. The subject information is therefore proprietary confidential business information and is entitled to protection under Section 366.093, Florida Statutes, and Rule 25-22.006, Florida Administrative Code.

6. Pursuant to Section 366.093(4), Florida Statutes, and Rule 25-22.006(9), Florida Administrative Code, FCG requests that the information described above as proprietary confidential business information be protected from disclosure for a period of at least 18 months

and all information be returned to FCG as soon as the information is no longer necessary for the Commission to conduct its business.

Respectfully submitted this 13th day of September, 2011.



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Counsel for Florida City Gas

EXHIBIT "A"

DOCUMENT	PAGE NO(S).	COLUMNS	LINE NO(S).	STATUTORY JUSTIFICATION
FCG's Confidential Settlement Cost Analysis	1	C	26, 27, 28, 31, 32, and 33	These proprietary numbers contain customer-specific information, or information from which customer-specific information may be easily derived. Such customer-specific information is not released to the public and if disclosed, harms ratepayers' rights to privacy. These numbers also, if made public, would negatively impact the competitive interests of the company (and hence ratepayers) in the company's negotiations of other agreements.
FCG's Confidential Settlement Cost Analysis	1	E and G	26, 27, 28, 31, 32, and 33	These proprietary numbers contain customer-specific information, or information from which customer-specific information may be easily derived. Such customer-specific information is not released to the public and if disclosed, harms ratepayers' rights to privacy. These numbers also, if made public, would negatively impact the competitive interests of the company (and hence ratepayers) in the company's negotiations of other agreements.
FCG's Confidential MDWASD Bypass Analysis	Page 1 of 6	H and I	3, 4, 5, 6, 9, 13, 17, 18, and 21	These proprietary numbers contain customer-specific information, or information from which customer-specific information may be easily derived. Such customer-specific information is not released to the public and if disclosed, harms ratepayers' rights to privacy. These numbers also, if made public, would negatively impact the competitive interests of the company (and hence ratepayers) in the company's negotiations of other agreements.

EXHIBIT "A"

FCG's Confidential MDWASD Bypass Analysis	Page 5 of 6	E - F	3 - 48	These proprietary numbers contain customer-specific information, or information from which customer-specific information may be easily derived. Such customer-specific information is not released to the public and if disclosed, harms ratepayers' rights to privacy. These numbers also, if made public, would negatively impact the competitive interests of the company (and hence ratepayers) in the company's negotiations of other agreements.
FCG's Confidential MDWASD Bypass Analysis	Page 6 of 6	E - F	3 - 50	These proprietary numbers contain customer-specific information, or information from which customer-specific information may be easily derived. Such customer-specific information is not released to the public and if disclosed, harms ratepayers' rights to privacy. These numbers also, if made public, would negatively impact the competitive interests of the company (and hence ratepayers) in the company's negotiations of other agreements.

	A	B	C	D	E	F	G
1	Line No.	Description	Alexander Orr		Hialeah Total		Source
2		(a)	(b)				(d)
3							
4	1	Plant in Service	\$ 1,118,074		\$ 38,354		Revised Staff 83 NBV
5	2	Accumulated Prov.	(1,378,271)		\$ (27,074)		Revised Staff 83 NBV
6	3	Net Plant	\$ (260,197)		\$ 11,280		Line 1 + Line 2
7							
8	4	Appr. Rate of Return	7.36%		7.36%		Approved Rate PSC-04-0128-PPA-GU
9							
10	5	Return	-		830		Line 3 x Line 4
11	6	Interest Exp.	-		(326)		Weighted debt cost of 2.89% from PSC-04-0128-PPA-GU
12	7	Taxable Income	\$ -		\$ 504		
13							
14	8	Effective Tax Rate	0.3763		0.3763		5.5% State and 34% Federal
15							
16	9	Income Taxes	\$ -		\$ 304		
17							
18	10	O&M	\$ 67,868		\$ 53,709		Incremental O&M for each plant
19	11	Depreciation	-		1,151		Effective rate of 3%
20	12	Taxes Other	-		228		2.019% effective property tax rate
21	13	Total Expenses	\$ 67,868		\$ 55,392		Sum of Lines 9 through 12
22							
23	14	Total Cost of Service	\$ 67,868		\$ 56,222		Line 5 + 13
24							
25							Total Volumes
26	15	Volumes (therms) Low					
27	16	Volumes (therms) Mid					
28	17	Volumes (therms) High					
29	18	Average 3 Year Volumes	3,008,214		2,036,155		
30							
31	19	Rate High					
32	20	Rate Mid					
33	21	Rate Low					
34							
35	22	Rate Average	0.0226		0.0276		Line 14 / Line 18
36							
37	23	Alternative pre-settlement COS	\$ 85,034		\$ 87,547		COS with CB-4 O&M
38	24	Rate using Average Volumes	\$ 0.0283		\$ 0.0430		Line 23 / Line 18
39							

	A	B	C	D	E	F	G	H	I	J
1		FGT Construction Estimates			TNT Estimates			Standalone Bypass Estimates		
2		Alexander Orr	Hialeah		Alexander Orr	Hialeah		Alexander Orr	Hialeah	
3	Construction Cost	\$ 914,252.00	\$ 3,680,042.00		\$ 610,000.00	\$ 1,145,000.00				
4	Tap Cost				\$ 32,000.00	\$ 32,000.00				
5	Oper., Safety, Regulatory one time estimated costs									
6	Total Const Cost	\$ 914,252.00	\$ 3,680,042.00		\$ 642,000.00	\$ 1,177,000.00				
7										
8	All In Debt Rate	4%	4%		4%	4%		4%	4%	
9	Total Debt	\$ 1,462,803.20	\$ 5,888,067.20		\$ 1,027,200.00	\$ 1,883,200.00				
10										
11	Maintenance Cost				\$ 500,000.00	\$ 500,000.00		\$ 3,036,326.60	\$ 1,518,163.30	
12										
13	Total Costs:	\$ 1,462,803.20	\$ 5,888,067.20		\$ 1,527,200.00	\$ 2,383,200.00				
14										
15	Consumption	120,368,720	81,283,160		120,368,720	81,283,160		120,368,720	81,283,160	
16										
17	By-Pass COS	0.01215	0.07244		0.01269	0.02932				
18										
19	Calculated COS	0.02260	0.02760		0.02260	0.02760		0.02260	0.02760	
20										
21	Difference	(0.01045)	0.04484		(0.00991)	0.00172				

	A	B	C	D
1	Miami Dade Plants - Estimated Operations & Maintenance Expenses			
2	Estimated Avg. Inflation:	1.60%		
3				
4	Estimated Operations & Maintenance total Costs:			130,809
5	Less: One time estimated costs:			(18,500)
6	Estimated annual costs:			112,309
7				
8	Years	Estimated Annual Amt	Estimated Total Expenses	
9	3	112,309.48	336,928.44	
10	6	114,106.43	342,319.30	
11	9	115,932.13	347,796.40	
12	12	117,787.05	353,361.15	
13	15	119,671.64	359,014.92	
14	18	121,586.39	364,759.16	
15	21	123,531.77	370,595.31	
16	24	125,508.28	376,524.83	
17	27	127,516.41	382,549.23	
18	30	129,556.67	388,670.02	
19	36	131,629.58	394,888.74	
20	39	133,735.65	401,206.96	
21	40	135,875.42	135,875.42	
22	Total Oper&Maint:		4,554,489.89	

	A	B	C	D	E	F	G	H
1	Task	Responsible Dept.	Bid Pricing Request	# Professional FTE	Total WorkHours	Total hours	# Skilled FTE	Total Workhours
2	Prepare OPM (One manual to cover all work)	Operations Support	One Time	0	0	0	0	0
3	Prepare Emergency Manual (Plant specific)	Operations Support	One Time	0	0	0	0	0
4	Prepare DIMP Plan	Operations Support	One Time	0	0	0	0	0
5	OQ documented program	Safety & Crisis Management	One Time	0	0	0	0	0
6	Initial Training and Setup of OQ	Safety & Crisis Management	One Time	0	0	0	0	0
7	Establish Public Awareness Program	Regulatory	One Time	0	0	0	0	0
8	Participate in marking out locate requests/ One call	Operations Support - Damage Prevention	Annual	0	0	0	0	0
9	Cathodic protection testing and documentation	Corrosion-Southern	Annual	0	0	0	0	0
10	Atmospheric corrosion inspection and documentation	Corrosion-Southern	Annual	0	0	0	0	0
11	Updates to both OPM and EM	Operations Support	Annual	1	0	16	0	0
12	Leak survey of ROW	Operations Support	Annual	0	0	0	0	0
13	Maintain all records according to code of above inspections	Miami Service Center	Annual	1	0	160	0	0
14	Internal inspection & rebuild of pressure regulators and relief valves	Gas Measurement	Annual	0	0	0	1	32
15	Inspect and lubricate manual valves	Gas Measurement	Annual	0	0	0	1	32
16	Administration of OQ Program	Safety & Crisis Management	Annual	0	0	0	0	0
17	OQ process to maintain records	Safety & Crisis Management	Annual	0	0	0	0	0
18	Evaluator Authorization	Safety & Crisis Management	Annual	0	0	0	0	0
19	Administration of Drug and Alcohol Program	Safety & Crisis Management	Annual	0	0	0	0	0
20	Replace of one set of filters (filters will be supplied)	Gas Measurement	Annual	0	0	0	1	16
21	Maintain Odorant Tank	Gas Measurement	Annual	0	0	0	1	16
22	Visual inspection of above ground facilities	Gas Measurement	Annual	0	0	0	1	16
23	Maintain check measurement equipment/ perform witness testing of CTMeters	Gas Measurement	Annual	0	0	0	1	16
24	Perform general tap heater maintenance	Gas Measurement	Annual	0	0	0	1	16
25	Document Public Awareness Program	Regulatory	Annual	0	0	0	0	0
26	Investigate Leaks	Operations	Continuous					
27	Repair and Maintain Services	Operations	Continuous					
28	Repair and Maintain Mains	Operations	Continuous					
29	Repair and Maintain Meter and Reg Stations	Operations	Continuous					
30								

	I	J	K	L	M	N	O
1	Drive Time	# Vehicles	Mileage	Overnight Total	OC Amount \$	Total Cost	Comments
2	0	0	0	0	\$ 4,000	\$ 4,000	\$4000 Per Ben Ward
3	0	0	0	0	\$ 4,000	\$ 4,000	\$4000 Per Ben Ward
4	0	0	0	0	\$ 2,500	\$ 2,500	Per Rick Lonn - SHRIMP
5	0	0	0	0	\$ 1,000	\$ 1,000	Estimate per Veriforce (Ron Foster assisted)
6	0	0	0	0	\$ 3,000	\$ 3,000	Estimate per Veriforce (Ron Foster assisted)
7	0	0	0	0	\$ 4,000	\$ 4,000	Estimate per Ben Ward
8	0	0	0	0	\$ 4,107	\$ 3,675	Estimate per Kyle (input from Rick Lonn). Total Miami Tickets/Total Miles (30/mile)*Miles of
9	0	0	0	0	\$ 4,000	\$ 4,000	Per Keith McDonald
10	0	0	0	0	\$ -	\$ -	Covered in the Corrosion Inspection and Leak Survey
11	0	0	0	0	\$ -	\$ 1,194	Estimate per Kyle w/conversations with Ben
12	0	0	0	0	\$ 2,500	\$ 2,500	Quote from Larry Smallwood - Southern Cross
13	0	0	0	0	\$ -	\$ 11,941	Estimate per Kyle
14	8	1	480	0	\$ -	\$ 2,348	Estimate per Ben Ward
15	8	1	480	0	\$ -	\$ 2,348	Estimate per Kyle
16	0	0	0	0	\$ 9,125	\$ 9,125	Took 1/2 of Veriforce Estimate
17	0	0	0	0	\$ 550	\$ 550	Estimate per Veriforce (Ron Foster assisted)
18	0	0	0	0	\$ 375	\$ 375	Estimate per Veriforce (Ron Foster assisted)
19	0	0	0	0	\$ 8,250	\$ 8,250	Estimate per Veriforce (Ron Foster assisted)
20	4	1	240	0		\$ 1,174	Estimate per Kyle
21	4	1	240	0			Four trips / 4- (1/2) days
22	4	1	240	0		\$ 1,174	Estimate per Kyle
23	2	1	240	0		\$ 1,078	Estimate per Kyle
24	2	1	240	0		\$ 1,078	Estimate per Kyle
25	0	0	0	0	\$ 15,000	\$ 15,000	Estimate Per Rick Lonn
26						\$ 6,000	Per Tommy Sipsy
27						\$ 10,000	Per Tommy Sipsy
28						\$ 16,000	Per Tommy Sipsy
29						\$ 14,500	Per Tommy Sipsy
30						\$ 130,809	

	A	B	C	D	E	F	G	H
1	Hialeah Water Treatment Plant Bypass Estimate							
2	Item	Element	Quantity	Unit	Rate	Total	FGT Total	TNT Total
3	1	Consultants						
4	1.1	NDE Contractor						
5	1.11	X-Rays	5	EA				
6	1.2	Environmental						
7	1.21	Environmental Consultant and Contamination Disposal	1	EA				
8	1.3	Engineering Design						
9	1.31	Engineering	1	EA				
10	2	Materials, including freight and tax						
11	2.1	Pipe						
12	2.11	4" STL FBE	3,000	LF				
13	2.12	4" STL TC	9,000	LF				
14	2.2	Valves & Actuators						
15	2.21	4" STL Valves	5	EA				
16	2.3	Fittings						
17	2.31	Misc Fittings Allowance	1	EA				
18	2.4	Miscellaneous Materials						
19	2.41	Pipe markers allowance	50	EA				
20	2.42	Insulators	1	EA				
21	3	Construction						\$ 1,145,000
22	3.1	Permitting						
23	3.11	Environmental - Canal Crossings	2.00	EA				
24	3.2	Construction						
25	3.21	MAIN-4 STEEL >3000 FT APPROACH OR NEW BUSINESS	3,000	LF				
26	3.22	MAIN-4 STEEL >3000 FT UNDER PAVEMENT	8,000	LF				
27	3.23	Canal Bore	1,000	LF				
28	3.24	Tap of FGT Line	1	EA				\$ 32,000
29	3.25	New Tap Station (Per South Miami AFE)	1	EA				
30	3.26	Required SCADA Equipment	1	EA				
31	3.27	Corrosion	1	EA				
32	3.28	Silt Fence	1,000	LF				
33	3.29	End User Regulator Station	1	EA				
34	3.30	Odorizer + Tank+ Odorant	1	EA				
35	3.31	Asphalt Patching	5,000	SQ Ft				
36	3.32	Sod	1,000	SQ Ft				
37	3.33	Sand	20	Ton				
38	3.34	Sidewalk Replacement	3,000	SQ Ft				
40	4	Labor Cost	\$ 138,978					
41	4.1	OHAG 7.56%						
42	4.2	Direct Internal Labor						
43	5	Finance Cost	\$ 26,230					
44	5.1	AFUDC 8.53%						
45		Life of Project		4 months				
46								
47	Total Based on +/- 30%						\$ 3,680,042	\$ 1,177,000
48								

	A	B	C	D	E	F	G	H	
1	Alexander Orr Water Treatment Plant Bypass Estimate								
2	Item	Element	Quantity	Unit	Rate	Total	FGT Total	TNT Total	
3	1	Consultants							
4	1.1	NDE Contractor							
5	1.11	X-Rays	\$ 5	DAYS					
6	1.2	Environmental							
7	1.21	Environmental Consultant and Contamination Disposal	1	EA			\$ 16,800		
8	1.3	Engineering Design							
9	1.31	Engineering - Direct Salaries		EA			\$ 3,000		
10	1.32	Engineering		EA			\$ 14,000		
11	1.33	Engineering As Built Drawings		EA			\$ 3,018		
12	1.34	Engineering	1	EA					
13	2	Materials					\$ 177,450		
14	2.1	Pipe							
15	2.11	4" STL FBE	1,300	LF					
16	2.12	4" STL TC	2,300	LF					
17	2.2	Valves & Actuators							
18	2.21	4" STL Valves	3	EA					
19	2.3	Fittings							
20	2.31	Misc Fittings Allowance	1	EA					
21	2.4	Miscellaneous Materials							
22	2.41	Pipe markers allowance	5	EA					
23	3	Construction							
24	3.1	Construction					\$ 106,600	\$ 610,000	
25	3.11	MAIN-4 STEEL >3000 FT APPROACH OR NEW BUSINESS	1,000	LF					
26	3.12	MAIN-4 STEEL >3000 FT UNDER PAVEMENT	2,600	LF					
27	3.13	Tap of FGT Line	1	EA				\$ 32,000	
28	3.14	New Tap Station (Per South Miami AFE)	1	EA					
29	3.15	Required SCADA Equipment	1	EA					
30	3.16	Corrosion	1	EA					
31	3.17	Silt Fence	500	LF					
32	3.18	Odorizer + Tank+Odorant	1	EA					
33	3.19	Asphalt Patching	2,000	LF					
34	3.20	Sod	1,000	SQ ft					
35	3.21	Sand	20	SQ ft					
37	4	Labor Cost	\$ 73,823				\$ 279,000		
38	4.1	OHAG 7.56%							
39	4.2	Direct Internal Labor							
40	5	Finance Cost	\$ 6,526						
41	5.1	AFUDC 8.53%	0.71%						
42		Life of Project	2	months					
43	6	FGT Taxes, FGT Overhead, Gross-up							
44	6.1	Tax-Material					\$ 13,144		
45	6.2	Overhead - FGT					\$ 26,325		
46	6.3	Tax Gross-up					\$ 210,981		
47	6.4	Contingency					\$ 63,934		
48									
49	Total Based on +/- 30%							\$ 914,252	642,000
50									

CERTIFICATE OF SERVICE

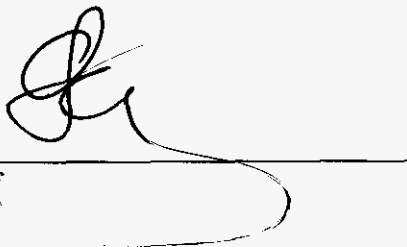
I HEREBY CERTIFY that a true and correct copy of the foregoing has been served on the following parties by Electronic Mail and/or U.S. Mail this 13th day of September, 2011.

Anna Williams Norris, Esq.
Martha Brown, Esq.
Office of the General Counsel
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A handwritten signature in black ink, appearing to read 'Floyd R. Self', is written over a horizontal line. The signature is stylized and cursive.

Floyd R. Self