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January 16, 2015

**HAND DELIVERY**

Ms. Carlotta Stauffer, Clerk  
Florida Public Service Commission  
2540 Shumard Oak Boulevard  
Tallahassee, FL 32399-0850

RECEIVED-FPSC  
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COMMISSION  
CLERK

**Re: New Docket - Petition for Approval of Transportation Service Agreement with Florida Division of Chesapeake Utilities Corporation, by Peninsula Pipeline Company, Inc.**

Dear Ms. Stauffer:

Enclosed for filing, please find the original and seven copies of Peninsula Pipeline Company, Inc.'s Request for Confidential Classification of information contained in Exhibit A to its Petition for Approval of Transportation Service Agreement with the Florida Division of Chesapeake Utilities Corporation. Also included with this Request are the required number of highlighted and redacted copies of the referenced pages containing confidential information.

Please do not hesitate to contact me if you have any questions whatsoever regarding this filing.

Sincerely,

Beth Keating  
Gunster, Yoakley & Stewart, P.A.  
215 South Monroe St., Suite 601  
Tallahassee, FL 32301  
(850) 521-1706

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BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Petition for Approval of Transportation Service Agreement with the Florida Division of Chesapeake Utilities Corporation by Peninsula Pipeline Company, Inc. ) Docket No. )  
 ) Filed: January 16, 2015 )  
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**PENINSULA PIPELINE COMPANY, INC.'S REQUEST FOR CONFIDENTIAL CLASSIFICATION**

Peninsula Pipeline Company, Inc. ("Peninsula" or "Company") by and through its undersigned counsel, pursuant to Section 366.093, Florida Statutes, and consistent with Rule 25-22.006(4), Florida Administrative Code, hereby submits its Request for Confidential Classification for information contained in Exhibit A (Transportation Services Agreement) to its Petition for Approval of Firm Transportation Service Agreement with the Florida Division of Chesapeake Utilities Corporation ("CHPK") for an extension and service in the vicinity of Haines City, Florida. In support thereof, Peninsula hereby states:

1. Peninsula seeks confidential classification of the highlighted rates and terms in the Company's Exhibit A to the Firm Transportation Service Agreement, which represent contractual information that both Peninsula and CHPK treat as proprietary confidential business information consistent with the definition of that term in Section 366.093, Florida Statutes, as well as cost information that Peninsula also considers proprietary confidential business information.
2. The information for which Peninsula seeks confidential classification is information that CHPK and Peninsula both treat as confidential, and that meets the definition of "proprietary confidential business information" as set forth in Section 366.093(3), Florida Statutes, which provides:

Request for Confidential Classification/  
Peninsula-Chesapeake Transportation Agreement

(3) Proprietary confidential business information means information, regardless of form or characteristics, which is owned or controlled by the person or company, is intended to be and is treated by the person or company as private in that the disclosure of the information would cause harm to the ratepayers or the person's or company's business operations, and has not been disclosed unless disclosed pursuant to a statutory provision, an order of a court or administrative body, or private agreement that provides that the information will not be released to the public. Proprietary confidential business information includes, but is not limited to:

- (a) Trade secrets.
- (b) Internal auditing controls and reports of internal auditors.
- (c) Security measures, systems, or procedures.
- (d) Information concerning bids or other contractual data, the disclosure of which would impair the efforts of the public utility or its affiliates to contract for goods or services on favorable terms.
- (e) Information relating to competitive interests, the disclosure of which would impair the competitive business of the provider of the information.
- (f) Employee personnel information unrelated to compensation, duties, qualifications, or responsibilities.

3. Specifically, Peninsula seeks confidential classification of the highlighted information in Exhibit A to the Firm Transportation Service Agreement, at p. 8. The subject information is set forth and referenced as follows:

- Data associated with lines/columns identified as: "Total MDTQ (Dekatherms)" and "MDTQ, in Dekatherms, excluding Fuel Retention", page 9
- Data associated with and in the first line of section titled: "Monthly Reservation Charge", page 9
- Data associated with the "MHTP", page 9
- Amount associated with the "Unauthorized Use Charge", page 9

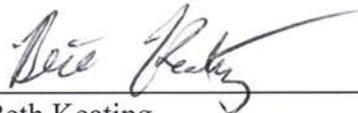
4. Included with this Request is a highlighted copy of the Exhibit A to the Firm Transportation Service Agreement reflecting the confidential information. Also enclosed are two redacted copies of Exhibit A.

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5. Peninsula asks that confidential classification be granted for a period of at least 18 months. Should the Commission determine that it no longer needs to retain the information, the Company respectfully requests that the confidential information be returned to the Company.

WHEREFORE, Peninsula respectfully requests that the highlighted information contained in Exhibit A to the Firm Transportation Service Agreement be classified as “proprietary confidential business information,” and thus, exempt from Section 119.07, Florida Statutes.

RESPECTFULLY SUBMITTED this 16th day of January, 2015.



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Beth Keating  
Gunster, Yoakley & Stewart, P.A.  
215 South Monroe St., Suite 601  
Tallahassee, FL 32301  
(850) 521-1706

CERTIFICATE OF SERVICE

I HEREBY ATTEST that a true and correct copy of the foregoing Petition has been served upon the following by U.S. Mail this 16th day of January, 2015:

Honorable J.R. Kelly  
Office of Public Counsel  
c/o the Florida Legislature  
111 West Madison Street, Rm 812  
Tallahassee, FL 32399-1400



Beth Keating, Esq.  
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