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November 1, 2016

BY HAND DELIVERY

Ms. Callotta Stauffer, Director
Office of the Commission Clerk
Florida Public Service Commission
2540 Shumard Oak Boulevard
Tallahassee, FL 32399-0850

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2016 NOV -1 AM 9:30
COMMISSION
CLERK

REDACTED

Re: Docket No. 160175-GU

Dear Ms. Stauffer:

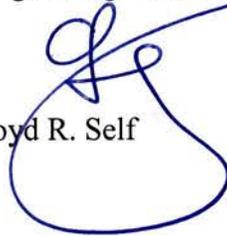
Enclosed for filing are an original and seven copies of the Florida City Gas ("FCG") Request for Confidential Classification ("Request") which contains the confidential documents associated with FCG's Responses to Staff's First Set of Data Requests. Included with this Request in a sealed envelope marked "CONFIDENTIAL" is one highlighted copy of each confidential document or Responses page along with a CD-ROM. Also attached are two redacted copies of the referenced documents for which confidential classification is sought.

An extra copy of this letter is enclosed. Please date stamp this copy and return it to me.

Thank you for your assistance with this filing. If you have any questions, please contact me directly.

Sincerely,

Berger Singerman LLP


Floyd R. Self

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- CLK _____

FRS:AM
Enclosures

BEFORE THE PUBLIC SERVICE COMMISSION

In Re: Petition for Review and) Docket No.: 160175-GU
Determination on the Project Construction)
and Gas Transportation Agreement By and) Filed: November 1, 2016
Between NUI Utilities, Inc. d/b/a City Gas)
Company of Florida and Florida Crystals)
Corporation dated April 24, 2001 and)
Approval of an Interim Service Arrangement)
_____)

**FLORIDA CITY GAS
REQUEST FOR CONFIDENTIAL CLASSIFICATION FOR THE RESPONSES
TO STAFF'S FIRST SET OF DATA REQUESTS**

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(4), Florida Administrative Code, hereby files this Request for Confidential Classification ("Request") for the confidential portions of its Responses to Staff's First Set of Data Requests. Specifically the documents containing confidential information include: Confidential Exhibit No. 2A, Confidential Exhibit No. 3A (2016) to 3A (2031), Attachment DR6, and data request responses 1, 3, 5, 8, 11, and 12. Also included is a CD-ROM containing the unlocked native Excel spreadsheets for Confidential Exhibit No. 2A, Confidential Exhibit No. 3A (2016) to 3A (2031), and Attachment DR6. In support of this Request, FCG states as follows:

1. On July 22, 2016, FCG petitioned this Commission to determine that the Project Construction and Gas Transportation Agreement By and Between NUI Utilities, Inc. d/b/a City Gas Company of Florida and Florida Crystals Corporation dated April 24, 2001 ("GTA") is not a legally effective or enforceable special contract under Florida law. Recognizing the unique service conditions for Florida Crystals, FCG also requested that the Commission approve, as an interim service arrangement, certain rates, terms, and conditions that should remain in effect until this Commission approves a successor transportation service special contract that complies with

Florida law or issues such other final order regarding the interim service arrangement.

2. On October 10, 2016, the Commission Staff served Staff's First Data Request on FCG. In preparing its responses to these data requests, FCG prepared three documents containing confidential information which can be summarized as follows:

a. Confidential Exhibit No. 2A. This is the revised revenue requirements study to replace Confidential Exhibit No. 2 filed with the Petition. FCG prepared this document in order to assess the historic service information as well as forecasted volumes and revenues under the Extended Term of the GTA. This document contains the updated historical information as well as the updated results of FCG's confidential cost of service study and customer specific information regarding volumes of gas transported on an historic and projected basis pursuant to the confidential GTA, FCG's revised revenue requirement associated with service to Florida Crystals, the actual or forecasted margin for such service, whether the revenue exceeds the revenue requirement, and that actual revenue received from Florida Crystals on a yearly basis.

b. Confidential Exhibit No. 3A (2016) to 3A (2031). This is the revised and expanded revenue requirements analysis that backs up Exhibit No. 2A that has been expanded at Staff's request to include years 2016 through 2031, and which also provides updated rates and cost support for the proposed interim service arrangement. These spreadsheets contain corrected FCG proprietary information regarding the margin reserve analysis and the cost to serve analysis, as well as updated rates for the interim special service arrangement that FCG is proposing until such time as the parties are able to negotiate a new, special service contract or the PSC issues such other appropriate order. The updated rate analyses are based upon the specific volume and service characteristics

associated with service to Florida Crystals and the corrected financial analysis.

c. Attachment DR6. This is the bypass analysis that Staff requested in Data Request No. 6. This contains FCG's analysis of potential bypass costs for Florida Crystals utilizing FCG's proprietary cost information and expenses and projected information regarding Florida Crystals potential bypass service.

3. In addition to these three confidential attachments, data request responses 1, 3, 5, 8, 11, and 12 each contain FCG confidential information regarding Confidential Exhibit No. 2A or Confidential Exhibit No. 3A (2016) to 3A (2031). Accordingly, the justification for Confidential Exhibit No. 2A and/or Confidential Exhibit No. 3A (2016) to 3A (2031) would equally apply to those documents.

4. The Revenue Requirement Study, the Revenue Requirements Analysis, the Bypass Analysis, and the relevant data request responses for 1, 3, 5, 8, 11, and 12 each meet the statutory requirements for (1) trade secrets (Section 366.093(3)(a)), (2) information concerning contractual data which if disclosed would impair the efforts of FCG to negotiate with other large volume customers (Section 366.093(3)(d)), and (3) competitive information the disclosure of which would impair the competitive business of FCG to acquire and serve other large scale natural gas transportation customers who usually have alternative fuel sources or who can fund transportation bypass alternatives (Section 366.093(3)(e)). The information on these three Exhibits constitutes "proprietary confidential business information" entitled to protection under Section 366.093, Florida Statutes, and Rule 25-22.006(4), Florida Administrative Code. If other customers had access to this information FCG would be at a competitive disadvantage in seeking to negotiation contract specific rates, terms, and conditions as those customers would have access to FCG's cost study and methodology, FCG's cost to serve, FCG's revenue requirements,

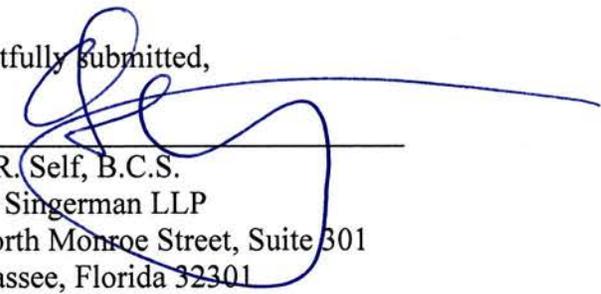
customer-specific contract terms including rates, and a deep understanding as to how FCG analyzes and calculates customer-specific rates. All of this type of information has been previously determined by the PSC to be confidential and exempt from public disclosure. *See, e.g.,* Order No. PSC-15-0505-CFO-GU (October 27, 2015); Order No. PSC-15-0162-CFO-GU (April 30, 2015); Order No. PSC-15-0163-CFO-GU (April 30, 2015); Order No. PSC-15-0164-CFO-GU (April 30, 2015); Order No. PSC-15-0165-CFO-GU (April 30, 2015); Order No. PSC-13-0246-CFO-GU (June 4, 2013). Because the confidential information in the Responses are the same information from the Revenue Requirement Study, the Revenue Requirements, and the Bypass Analysis, the same justifications for those three exhibits would equally apply to the Responses pages that use or reflect this confidential information in the exhibits.

5. Attached to this Request is an envelope marked “CONFIDENTIAL” containing one copy of each of the confidential documents for which the confidential information is highlighted – i.e., the Revenue Requirement Study, the Revenue Requirements Analysis, and the Bypass Analysis, – along with a CD-ROM containing the unlocked Excel spreadsheets that are Responses Confidential Exhibit No. 2A, Confidential Exhibit No. 3A (2016) to 3A (2031), and Attachment DR6. Two public, redacted versions of the confidential information are also provided with this Request. The Responses as publically filed was a redacted copy utilizing the same redacted pages as are included with this Request.

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.

WHEREFORE, Florida City Gas requests that confidential classification be granted to the confidential information presented in Confidential Responses Confidential Exhibit No. 2A, Confidential Exhibit No. 3A (2016) to 3A (2031), Attachment DR6, data request responses 1, 3, 5, 8, 11, and 12, and the three Excel files on the CD-ROM reflecting Confidential Responses Confidential Exhibit No. 2A, Confidential Exhibit No. 3A (2016) to 3A (2031), and Attachment DR6.

Respectfully submitted,



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Counsel for Florida City Gas

Attachment 1
 FCG Request for Confidential Classification, November 1, 2016
 Line-by-Line Justification
 Docket No. 160175

DOCUMENT	PAGE NO(S).	COLUMNS	LINE NO(S).	STATUTORY JUSTIFICATION
Response Exhibit 2A, FCG Revenue Requirement Study	Page 1 (entire document)	A-G	1-43	<p>This document contains FCG's compilation of actual, budgeted, and forecasted natural gas volumes transported or estimated to be transported by FCG for Florida Crystals. In addition it includes on a year-by-year basis FCG's Revenue Requirement, FCG's Actual or Forecasted Margin/Revenue, whether FCG's revenues exceed or fall below FCG's revenue requirement, and the actual revenue received from Florida Crystals for each year. This type of customer-specific volumes and revenues and customer-specific margin information is not released to the public, including the customer it is derived from. This information, if made public, would negatively impact the competitive interests of the company (and hence FCG's ratepayers) in the company's negotiations of other service agreements. Moreover, this would be an unfair and inappropriate disclosure of customer information. Finally, this information is based upon FCG trade secret information in terms of the method of calculation such revenue requirements and margins.</p>

Confidential Exhibit No. 3A (2017), Revenue Requirement Analysis	Page 1 Page 2 Page 3 Page 4 Page 5 Page 6 Page 7 Page 8 Page 9 (entire document)	A-D A-D A-G A-I J-V W-AH A-D A-F A-D	1-41 1-37 1-45 1-41 1-41 1-41 1-36 1-45 1-70	The proprietary information presented in this document includes the backup calculations for the information presented in Petition Confidential Exhibit No. 2A recalculated for 2017 as well as the proposed interim service arrangement rates and how such rates were calculated. This spreadsheet also includes detailed accumulated depreciation information not included in the original Exhibit No. 3. These analyzes are based upon the unique customer-specific volumes and revenues and customer-specific margin information presented in Confidential Petition Exhibit No. 2A. This information is not released to the public, including the customer it is derived from. This information, if made public, would negatively impact the competitive interests of the company (and hence FCG's ratepayers) in the company's negotiations of other service agreements. Moreover, this would be an unfair and inappropriate disclosure of customer information. Finally, this information is based upon FCG trade secret information in terms of the method of calculation such revenue requirements and margins.
Confidential Exhibit No. 3A (2018), Revenue Requirement Analysis	Page 1 Page 2 Page 3 Page 4 Page 5 Page 6 Page 7 Page 8 Page 9 (entire document)	A-D A-D A-G A-J K-V W-AH A-D A-F A-D	1-41 1-27 1-48 1-41 1-41 1-41 1-36 1-45 1-69	The proprietary information presented in this document includes the backup calculations for the information presented in Petition Confidential Exhibit No. 2A recalculated for 2018 as well as the proposed interim service arrangement rates and how such rates were calculated. This spreadsheet also includes detailed accumulated depreciation information not included in the original Exhibit No. 3. These analyzes are based upon the unique customer-specific volumes and revenues and customer-specific margin information presented in Confidential Petition Exhibit No. 2A. This information is not released to the public, including the customer it is derived from. This information, if made public, would negatively impact the competitive interests of the company (and hence FCG's ratepayers) in the company's negotiations of other service agreements. Moreover, this would be an unfair and inappropriate disclosure of customer information. Finally, this information is based upon FCG trade secret information in terms of the method of calculation such revenue requirements and margins.

<p>Confidential Exhibit No. 3A (2019), Revenue Requirement Analysis</p>	<p>Page 1 Page 2 Page 3 Page 4 Page 5 Page 6 Page 7 Page 8 Page 9 (entire document)</p>	<p>A-D A-D A-G A-J K-V W-AH A-D A-F A-D</p>	<p>1-41 1-27 1-46 1-39 1-39 1-39 1-36 1-45 1-68</p>	<p>The proprietary information presented in this document includes the backup calculations for the information presented in Petition Confidential Exhibit No. 2A recalculated for 2019 as well as the proposed interim service arrangement rates and how such rates were calculated. This spreadsheet also includes detailed accumulated depreciation information not included in the original Exhibit No. 3. These analyzes are based upon the unique customer-specific volumes and revenues and customer-specific margin information presented in Confidential Petition Exhibit No. 2A. This information is not released to the public, including the customer it is derived from. This information, if made public, would negatively impact the competitive interests of the company (and hence FCG's ratepayers) in the company's negotiations of other service agreements. Moreover, this would be an unfair and inappropriate disclosure of customer information. Finally, this information is based upon FCG trade secret information in terms of the method of calculation such revenue requirements and margins.</p>
<p>Confidential Exhibit No. 3A (2020), Revenue Requirement Analysis</p>	<p>Page 1 Page 2 Page 3 Page 4 Page 5 Page 6 Page 7 Page 8 Page 9 (entire document)</p>	<p>A-D A-D A-G A-J K-W X-AH A-D A-F A-D</p>	<p>1-41 1-24 1-46 1-39 1-39 1-39 1-36 1-45 1-69</p>	<p>The proprietary information presented in this document includes the backup calculations for the information presented in Petition Confidential Exhibit No. 2A recalculated for 2020 as well as the proposed interim service arrangement rates and how such rates were calculated. This spreadsheet also includes detailed accumulated depreciation information not included in the original Exhibit No. 3. These analyzes are based upon the unique customer-specific volumes and revenues and customer-specific margin information presented in Confidential Petition Exhibit No. 2A. This information is not released to the public, including the customer it is derived from. This information, if made public, would negatively impact the competitive interests of the company (and hence FCG's ratepayers) in the company's negotiations of other service agreements. Moreover, this would be an unfair and inappropriate disclosure of customer information. Finally, this information is based upon FCG trade secret information in terms of the method of calculation such revenue requirements and margins.</p>

<p>Confidential Exhibit No. 3A (2021), Revenue Requirement Analysis</p>	<p>Page 1 Page 2 Page 3 Page 4 Page 5 Page 6 Page 7 Page 8 Page 9 (entire document)</p>	<p>A-D A-D A-G A-J K-W X-AH A-D A-F A-D</p>	<p>1-41 1-27 1-45 1-39 1-39 1-39 1-36 1-45 1-69</p>	<p>The proprietary information presented in this document includes the backup calculations for the information presented in Petition Confidential Exhibit No. 2A recalculated for 2021 as well as the proposed interim service arrangement rates and how such rates were calculated. This spreadsheet also includes detailed accumulated depreciation information not included in the original Exhibit No. 3. These analyzes are based upon the unique customer-specific volumes and revenues and customer-specific margin information presented in Confidential Petition Exhibit No. 2A. This information is not released to the public, including the customer it is derived from. This information, if made public, would negatively impact the competitive interests of the company (and hence FCG's ratepayers) in the company's negotiations of other service agreements. Moreover, this would be an unfair and inappropriate disclosure of customer information. Finally, this information is based upon FCG trade secret information in terms of the method of calculation such revenue requirements and margins.</p>
<p>Confidential Exhibit No. 3A (2022), Revenue Requirement Analysis</p>	<p>Page 1 Page 2 Page 3 Page 4 Page 5 Page 6 Page 7 Page 8 Page 9 (entire document)</p>	<p>A-D A-D A-G A-J K-X Y-AH A-D A-F A-D</p>	<p>1-41 1-27 1-45 1-41 1-41 1-41 1-36 1-44 1-70</p>	<p>The proprietary information presented in this document includes the backup calculations for the information presented in Petition Confidential Exhibit No. 2A recalculated for 2022 as well as the proposed interim service arrangement rates and how such rates were calculated. This spreadsheet also includes detailed accumulated depreciation information not included in the original Exhibit No. 3. These analyzes are based upon the unique customer-specific volumes and revenues and customer-specific margin information presented in Confidential Petition Exhibit No. 2A. This information is not released to the public, including the customer it is derived from. This information, if made public, would negatively impact the competitive interests of the company (and hence FCG's ratepayers) in the company's negotiations of other service agreements. Moreover, this would be an unfair and inappropriate disclosure of customer information. Finally, this information is based upon FCG trade secret information in terms of the method of calculation such revenue requirements and margins.</p>

<p>Confidential Exhibit No. 3A (2023), Revenue Requirement Analysis</p>	<p>Page 1 Page 2 Page 3 Page 4 Page 5 Page 6 Page 7 Page 8 Page 9 (entire document)</p>	<p>A-D A-D A-G A-I J-V W-AH A-D A-F A-D</p>	<p>1-41 1-27 1-46 1-41 1-41 1-41 1-36 1-45 1-70</p>	<p>The proprietary information presented in this document includes the backup calculations for the information presented in Petition Confidential Exhibit No. 2A recalculated for 2023 as well as the proposed interim service arrangement rates and how such rates were calculated. This spreadsheet also includes detailed accumulated depreciation information not included in the original Exhibit No. 3. These analyzes are based upon the unique customer-specific volumes and revenues and customer-specific margin information presented in Confidential Petition Exhibit No. 2A. This information is not released to the public, including the customer it is derived from. This information, if made public, would negatively impact the competitive interests of the company (and hence FCG's ratepayers) in the company's negotiations of other service agreements. Moreover, this would be an unfair and inappropriate disclosure of customer information. Finally, this information is based upon FCG trade secret information in terms of the method of calculation such revenue requirements and margins.</p>
<p>Confidential Exhibit 3A (2024), Revenue Requirement Analysis</p>	<p>Page 1 Page 2 Page 3 Page 4 Page 5 Page 6 Page 7 Page 8 Page 9 (entire document)</p>	<p>A-D A-D A-G A-J K-W X-AH A-D A-F A-D</p>	<p>1-40 1-25 1-51 1-40 1-40 1-40 1-35 1-45 1-69</p>	<p>The proprietary information presented in this document includes the backup calculations for the information presented in Petition Confidential Exhibit No. 2A recalculated for 2024 as well as the proposed interim service arrangement rates and how such rates were calculated. This spreadsheet also includes detailed accumulated depreciation information not included in the original Exhibit No. 3. These analyzes are based upon the unique customer-specific volumes and revenues and customer-specific margin information presented in Confidential Petition Exhibit No. 2A. This information is not released to the public, including the customer it is derived from. This information, if made public, would negatively impact the competitive interests of the company (and hence FCG's ratepayers) in the company's negotiations of other service agreements. Moreover, this would be an unfair and inappropriate disclosure of customer information. Finally, this information is based upon FCG trade secret information in terms of the method of calculation such revenue requirements and margins.</p>

<p>Confidential Exhibit No. 3A (2025), Revenue Requirement Analysis</p>	<p>Page 1 Page 2 Page 3 Page 4 Page 5 Page 6 Page 7 Page 8 Page 9 (entire document)</p>	<p>A-D A-D A-G A-J K-W X-AH A-D A-F A-D</p>	<p>1-40 1-25 1-49 1-40 1-40 1-40 1-35 1-45 1-70</p>	<p>The proprietary information presented in this document includes the backup calculations for the information presented in Petition Confidential Exhibit No. 2A recalculated for 2025 as well as the proposed interim service arrangement rates and how such rates were calculated. This spreadsheet also includes detailed accumulated depreciation information not included in the original Exhibit No. 3. These analyzes are based upon the unique customer-specific volumes and revenues and customer-specific margin information presented in Confidential Petition Exhibit No. 2A. This information is not released to the public, including the customer it is derived from. This information, if made public, would negatively impact the competitive interests of the company (and hence FCG's ratepayers) in the company's negotiations of other service agreements. Moreover, this would be an unfair and inappropriate disclosure of customer information. Finally, this information is based upon FCG trade secret information in terms of the method of calculation such revenue requirements and margins.</p>
<p>Confidential Exhibit No. 3A (2026), Revenue Requirement Analysis</p>	<p>Page 1 Page 2 Page 3 Page 4 Page 5 Page 6 Page 7 Page 8 Page 9 (entire document)</p>	<p>A-D A-D A-G A-J K-W X-AH A-D A-F A-D</p>	<p>1-40 1-27 1-48 1-40 1-40 1-40 1-36 1-45 1-70</p>	<p>The proprietary information presented in this document includes the backup calculations for the information presented in Petition Confidential Exhibit No. 2A recalculated for 2026 as well as the proposed interim service arrangement rates and how such rates were calculated. This spreadsheet also includes detailed accumulated depreciation information not included in the original Exhibit No. 3. These analyzes are based upon the unique customer-specific volumes and revenues and customer-specific margin information presented in Confidential Petition Exhibit No. 2A. This information is not released to the public, including the customer it is derived from. This information, if made public, would negatively impact the competitive interests of the company (and hence FCG's ratepayers) in the company's negotiations of other service agreements. Moreover, this would be an unfair and inappropriate disclosure of customer information. Finally, this information is based upon FCG trade secret information in terms of the method of calculation such revenue requirements and margins.</p>

<p>Confidential Exhibit No. 3A (2027), Revenue Requirement Analysis</p>	<p>Page 1 Page 2 Page 3 Page 4 Page 5 Page 6 Page 7 Page 8 Page 9 (entire document)</p>	<p>A-D A-D A-G A-J K-W X-AH A-D A-F A-D</p>	<p>1-40 1-27 1-47 1-39 1-39 1-39 1-35 1-45 1-70</p>	<p>The proprietary information presented in this document includes the backup calculations for the information presented in Petition Confidential Exhibit No. 2A recalculated for 2027 as well as the proposed interim service arrangement rates and how such rates were calculated. This spreadsheet also includes detailed accumulated depreciation information not included in the original Exhibit No. 3. These analyzes are based upon the unique customer-specific volumes and revenues and customer-specific margin information presented in Confidential Petition Exhibit No. 2A. This information is not released to the public, including the customer it is derived from. This information, if made public, would negatively impact the competitive interests of the company (and hence FCG's ratepayers) in the company's negotiations of other service agreements. Moreover, this would be an unfair and inappropriate disclosure of customer information. Finally, this information is based upon FCG trade secret information in terms of the method of calculation such revenue requirements and margins.</p>
<p>Confidential Exhibit No. 3A (2028), Revenue Requirement Analysis</p>	<p>Page 1 Page 2 Page 3 Page 4 Page 5 Page 6 Page 7 Page 8 Page 9 (entire document)</p>	<p>A-D A-D A-G A-J K-X Y-AH A-D A-F A-D</p>	<p>1-40 1-26 1-47 1-41 1-41 1-41 1-36 1-45 1-70</p>	<p>The proprietary information presented in this document includes the backup calculations for the information presented in Petition Confidential Exhibit No. 2A recalculated for 2028 as well as the proposed interim service arrangement rates and how such rates were calculated. This spreadsheet also includes detailed accumulated depreciation information not included in the original Exhibit No. 3. These analyzes are based upon the unique customer-specific volumes and revenues and customer-specific margin information presented in Confidential Petition Exhibit No. 2A. This information is not released to the public, including the customer it is derived from. This information, if made public, would negatively impact the competitive interests of the company (and hence FCG's ratepayers) in the company's negotiations of other service agreements. Moreover, this would be an unfair and inappropriate disclosure of customer information. Finally, this information is based upon FCG trade secret information in terms of the method of calculation such revenue requirements and margins.</p>

<p>Confidential Exhibit No. 3A (2029), Revenue Requirement Analysis</p>	<p>Page 1 Page 2 Page 3 Page 4 Page 5 Page 6 Page 7 Page 8 Page 9 (entire document)</p>	<p>A-D A-D A-G A-I J-V W-AH A-D A-F A-D</p>	<p>1-40 1-26 1-46 1-38 1-38 1-38 1-35 1-45 1-69</p>	<p>The proprietary information presented in this document includes the backup calculations for the information presented in Petition Confidential Exhibit No. 2A recalculated for 2029 as well as the proposed interim service arrangement rates and how such rates were calculated. This spreadsheet also includes detailed accumulated depreciation information not included in the original Exhibit No. 3. These analyzes are based upon the unique customer-specific volumes and revenues and customer-specific margin information presented in Confidential Petition Exhibit No. 2A. This information is not released to the public, including the customer it is derived from. This information, if made public, would negatively impact the competitive interests of the company (and hence FCG's ratepayers) in the company's negotiations of other service agreements. Moreover, this would be an unfair and inappropriate disclosure of customer information. Finally, this information is based upon FCG trade secret information in terms of the method of calculation such revenue requirements and margins.</p>
<p>Confidential Exhibit No. 3A (2030), Revenue Requirement Analysis</p>	<p>Page 1 Page 2 Page 3 Page 4 Page 5 Page 6 Page 7 Page 8 Page 9 (entire document)</p>	<p>A-D A-D A-G A-J K-W X-AH A-D A-F A-D</p>	<p>1-40 1-26 1-48 1-39 1-39 1-39 1-36 1-45 1-70</p>	<p>The proprietary information presented in this document includes the backup calculations for the information presented in Petition Confidential Exhibit No. 2A recalculated for 2030 as well as the proposed interim service arrangement rates and how such rates were calculated. This spreadsheet also includes detailed accumulated depreciation information not included in the original Exhibit No. 3. These analyzes are based upon the unique customer-specific volumes and revenues and customer-specific margin information presented in Confidential Petition Exhibit No. 2A. This information is not released to the public, including the customer it is derived from. This information, if made public, would negatively impact the competitive interests of the company (and hence FCG's ratepayers) in the company's negotiations of other service agreements. Moreover, this would be an unfair and inappropriate disclosure of customer information. Finally, this information is based upon FCG trade secret information in terms of the method of calculation such revenue requirements and margins.</p>

<p>Confidential Exhibit No. 3A (2031), Revenue Requirement Analysis</p>	<p>Page 1 Page 2 Page 3 Page 4 Page 5 Page 6 Page 7 Page 8 Page 9 (entire document)</p>	<p>A-D A-D A-G A-J K-X Y-AH A-D A-F A-D</p>	<p>1-40 1-25 1-46 1-41 1-41 1-41 1-36 1-45 1-70</p>	<p>The proprietary information presented in this document includes the backup calculations for the information presented in Petition Confidential Exhibit No. 2A recalculated for 2031 as well as the proposed interim service arrangement rates and how such rates were calculated. This spreadsheet also includes detailed accumulated depreciation information not included in the original Exhibit No. 3. These analyzes are based upon the unique customer-specific volumes and revenues and customer-specific margin information presented in Confidential Petition Exhibit No. 2A. This information is not released to the public, including the customer it is derived from. This information, if made public, would negatively impact the competitive interests of the company (and hence FCG's ratepayers) in the company's negotiations of other service agreements. Moreover, this would be an unfair and inappropriate disclosure of customer information. Finally, this information is based upon FCG trade secret information in terms of the method of calculation such revenue requirements and margins.</p>
<p>Confidential Attachment DR6 Bypass Analysis</p>	<p>Page 1 (entire document)</p>	<p>A-F</p>	<p>1-56</p>	<p>This document is a proprietary bypass analysis prepared in response to the Staff's Data Request that reflects FCG-specific data utilized to create a customer-specific bypass analysis. Such customer-specific information was developed specifically for this docket and is not released to the public. This analysis and the corresponding numbers and calculations utilizes trade secret information of FCG and reflects information concerning bids or other contractual data, the disclosure of which would impair the efforts of FCG to contract for goods and services. Further, this analysis reflects information concerning the competitive interests of the company (and hence ratepayers) in the company's negotiations of other agreements and, if disclosed, would impair the competitive interests of the company.</p>

<p>CD-ROM containing the native unlocked Excel spreadsheets for Petition Confidential Exhibits 2A and 3A(XXXX), where (XXXX) is the specific year of the analysis, and Attachment DR6.</p>				<p>Justification is the same as above.</p> <p>Confidential Exhibit No. 2A is: Revenue Requirement Study</p> <p>Confidential Exhibit No. 3A (2016 to 2031) is: Revenue Requirements Analysis</p> <p>Confidential Attachment DR6 is: Bypass Analysis</p>
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CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing has been furnished by E-

Mail on this 1st day of November, 2016, to the following:

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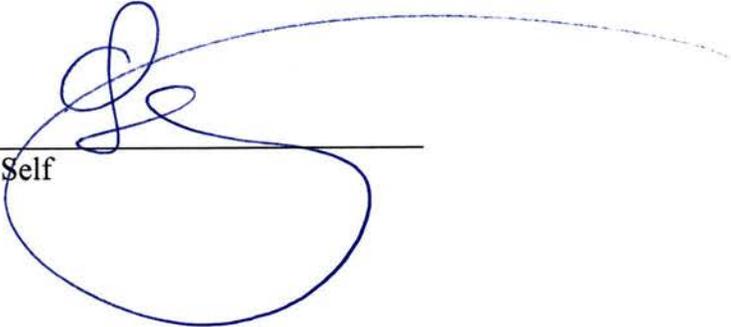
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Floyd R. Self



Response to Staff's First Set of
Data Requests
November 1, 2016

Redacted Version:
Pages 1, 2, 3, 5, 6, and 7 of Response

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In Re: Petition for Review and)
Determination on the Project Construction)
and Gas Transportation Agreement By and) Docket No.: 160175-GU
Between NUI Utilities, Inc. d/b/a City Gas)
Company of Florida and Florida Crystals)
Corporation dated April 24, 2001 and)
Approval of an Interim Service Arrangement)
_____)

**FLORIDA CITY GAS RESPONSES TO
STAFF'S FIRST SET OF DATA REQUESTS**

Florida City Gas ("FCG" or "Company"), hereby provides its Responses to the Staff's First Set of Data Requests served on October 10, 2016.

1. *Please refer to the July 22 petition, page 6, paragraph 14, and to Confidential Exhibit No. 2 filed concurrently with the petition, cells C3 through C32.*
 - (a) *Given consideration of the values in Cells 3 through C17 and, in particular, Cells C14 through C17, please explain and provide support for why FCG believes that the values shown in Cells C18 through C32 are likely to occur.*

FCG Response:

Cells C18 through C32 reflect the maximum volume of gas that Florida Crystals may transport during the third phase or the "Extended Term" of the GTA. These numbers are based upon Section 8 of the GTA (Confidential Exhibit No. 1 at 13 of 46), which provides



While Florida Crystals may not transport _____, under the GTA FCG must reserve this level of capacity for Florida Crystals' use and therefore cannot make that capacity available to provide firm service to other customers. Thus, from a forecast standpoint, FCG must assume _____. Moreover, as is referenced in paragraph 14 of the Petition, the 2015 discussions between the parties led FCG to conclude that Florida Crystals intends to ramp up production at the Okeelanta mill and take the maximum permissible volumes, especially if there was not going to be an expansion of service to the Osceola mill. Actual transportation volumes for the last 12 months reflect multiple months where Florida Crystals moved gas at or near the maximum monthly amount.

On Confidential Exhibit No. 2, Cells C3 through C16 reflect the actual volumes that the Florida Crystals marketer delivered to the Florida City Gas distribution system from 2002 to 2015. Note, all the data on Confidential Exhibit No. 2 reflects an October to September 12-month period and not a calendar year basis. At the time that the Petition was filed, Cell C17 reflected FCG's 2016 (October 2015 to September 2016) estimated transportation volume based on recent consumption. In the updated Confidential Exhibit No. 2A discussed below, the volume in C17 reflects FCG's 2016 (October 2015-September 2016) actual transportation volume.

(b) Given the value in Cell C16, please explain the first sentence in paragraph 14 of the petition.

FCG Response:

The first sentence in paragraph 14 of the Petition referenced the fact that in November 2015, Florida Crystals exceeded [REDACTED] that applies during the Make-Up Period.

- 2. Please refer to Confidential Exhibit No. 2 to the July 22 petition. Also, please refer to Exhibit A to Florida Crystals Corporation (Crystals') September 19 Response in Opposition to FCG's Motion for Approval of Temporary Interim Service Arrangement. Please explain each of the differences between the values shown in Exhibit A to Crystals' September 19 pleading as compared to the values shown in Cells G3 through G16 in FCG's Confidential Exhibit No. 2.*

FCG Response:

Overall, the differences may be due to the fact that the information provided by FCG on Confidential Exhibit No. 2 reflects an October-September year whereas the Florida Crystals Exhibit A appears to reflect information from a calendar year basis. FCG has confirmed the actual revenues and transportation volumes billed to Florida Crystals for the period November 2001 through September 2016 in the updated Confidential Exhibit No. 2 and Confidential Exhibit No. 3 provided in response to Staff's Data Request No. 3 below, identified as Confidential Exhibit No. 2A and Confidential Exhibit No. 3A. Confidential Exhibit No. 2A reflects slightly different revenues for 2002 and 2003 than are present in Confidential Exhibit No. 2, but this does not account for the disparity in 2002 and 2003 data between the parties and FCG does not have any records that would support the Florida Crystals information. Further, since service began in 2002, and there was no pipeline in service to the Okeelanta mill prior to 2002, FCG is at a loss regarding the calendar year 2000 payment reported by Florida Crystals on its Exhibit A.

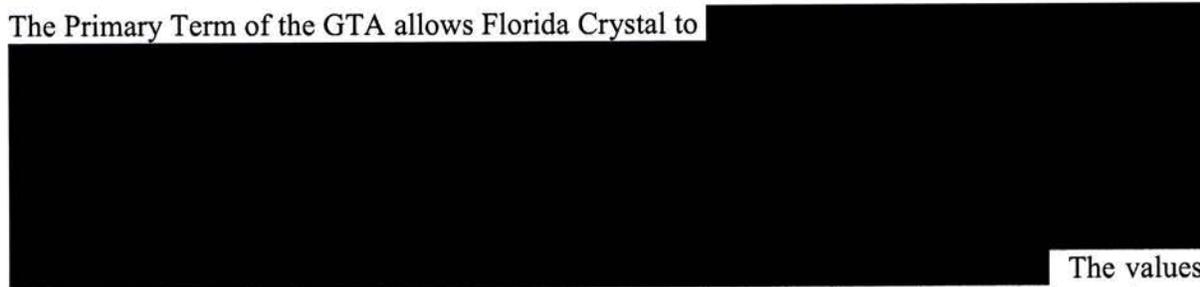
- 3. Please refer to Confidential Exhibit No. 2 to the July 22 petition. Please provide an explanation of the values shown in Cells G5 through G9 and G12 in the context of their relationship with the values shown in Cells C5 through C9 and C12. Also, please provide an explanation of the values shown in Cells G14 and G16 in the context of their relationship with the values shown in Cells C14 and C16. Please include in each of the respective discussions the effects, if applicable, of sections 9B and 9C of the confidential GTA exhibit, pages 15 and 16 of 46.*

FCG Response:

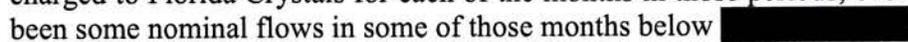
In the process of responding to these Data Requests, FCG discovered that despite its best efforts it used some incorrect data sources in preparing Confidential Exhibit No. 2 and Confidential Exhibit No. 3. On the basis of that review, and in the course of responding to several of these Data Requests, FCG has prepared updated versions of these exhibits which it is designating as Confidential Exhibit No. 2A and Confidential Exhibit No. 3A(XXXX), where (XXXX) is the specific year of the analysis, such as is requested in Data Requests Nos. 4(a) and 4(b). To the extent these revised confidential exhibits impact the Petition, FCG shall separately file any appropriate pages with the Commission Clerk's Office.

Although some of the numbers have changed in these revised exhibits, the explanation requested in this Data Request is applicable to both Confidential Exhibit No. 2 and Confidential Exhibit No. 2A.

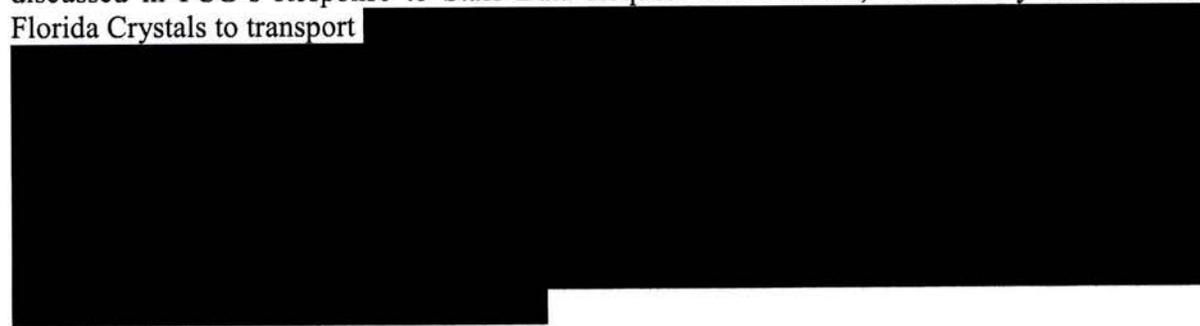
The Primary Term of the GTA allows Florida Crystal to



The values in cells G5 through G9 and in G12 represent the revenues associated with the minimum therms charged to Florida Crystals for each of the months in those periods, even though there may have been some nominal flows in some of those months below



With respect to Cells C14 and C16, and the corresponding revenues in G14 and G16, as is discussed in FCG's Response to Staff Data Request No. 1 above, the Primary Term allows Florida Crystals to transport



4. *Please refer to Confidential Exhibit No. 2 to the July 22 petition.*
 - (a) *For the entry shown in Cell A17, please provide an exhibit similar to Confidential Exhibit No. 3 and explain the difference between the values in Cells D17 and D18.*

FCG Response:

In the process of responding to these Data Requests, FCG discovered that despite its best efforts that it used some incorrect data sources in preparing Confidential Exhibit No. 2 and Confidential Exhibit No. 3. On the basis of that review, and in the course of responding to several of these Data Requests, FCG has prepared updated versions of these exhibits which it is designating as Confidential Exhibit No. 2A and Confidential Exhibit No. 3A(XXXX), where (XXXX) is the specific year of the analysis, such as is requested in Data Requests Nos. 4(a) and 4(b).

The reasons for the differences in the values shown on the original Confidential Exhibit No. 2, Cells D17 and D18 is as follows:

1. The plant investment used to compute the 2016 revenue requirement in Cell D17 did not fully reflect the investment in East-West Pipeline in 2016 that was reflected in the investment used to compute the 2017 revenue requirement in Cell D18 (2017);
2. Incorrect factors were used to allocate the portion of the East-West Pipeline and the resulting cost required to deliver the volume of gas to Florida Crystals as provided in the GTA; and
3. Additional accumulated depreciation as the result of passage of an additional year.

In general, the explanation above with respect to the original Confidential Exhibit No. 2 applies to the revised version of this exhibit which is identified as Confidential Exhibit No. 2A. See Confidential Exhibit No. 3A(2016) that shows the calculation of the value on Confidential Exhibit No. 2A, Cell D17. Confidential Exhibit No. 3A(2017) shows the calculation of the value on Confidential Exhibit No. 2A, Cell D18.

(b) Please provide comparable information to support the values in Cells D19 through D32.

FCG Response:

In the process of responding to these Data Requests, FCG discovered that despite its best efforts that it used some incorrect data sources in preparing Confidential Exhibit No. 2 and Confidential Exhibit No. 3. On the basis of that review, and in the course of responding to several of these Data Requests, FCG has prepared updated versions of these exhibits which it is designating as Confidential Exhibit No. 2A and Confidential Exhibit No. 3A(XXXX), where (XXXX) is the specific year of the analysis requested in Data Request No. (b) that corresponds to Cells D19 through D32.

5. *Is Crystals the largest gas customer of FCG? Please provide the percentage of FCG's system sales and throughput that Crystals currently represents.*

FCG Response:

From 2002 through 2012 Florida Crystals usage represented about [REDACTED] of the FCG total system sales and total margins, and Florida Crystals was not FCG's largest customer. Starting in 2013 Florida Crystals usage [REDACTED] FCG's total system sales, which [REDACTED] in 2014 and [REDACTED] in 2015, and at that time Florida Crystals [REDACTED]. However, the correlating margins for 2013 through 2015 remained at [REDACTED] of total Florida City Gas margins. Based on the allowed usage and discount rates included the Extended Term of the GTA, the usage percentage in 2017 will [REDACTED] of total FCG system sales, which given the current customer profiles [REDACTED]

[REDACTED] Please see the various versions of Confidential Exhibit No. 3A(XXXX) provided in response to Staff Data Request No. 4(b) to compare various years.

- 6. Please identify and discuss any potentially viable bypass opportunities of which FCG is aware that might be available to Crystals. If potentially viable bypass opportunities exist, please provide, to the extent that such information is readily available, estimated costs and associated cost support for each bypass option.*

FCG Response:

FCG has been unable to locate in its records any bypass analysis information for Florida Crystals. In order to be responsive to this request, FCG had its engineering group identify and evaluate any potential bypass opportunities that may be available to Florida Crystals through a direct connect with Florida Gas Transmission ("FGT") using FCG's current cost structure for large projects. This information is provided in Confidential Attachment DR-6 to this Data Response. FCG notes that whether interconnection and bypass with FGT is feasible will depend upon various variables outside FCG's analysis including the availability of capacity on FGT's system.

- 7. Please refer to the GTA (Confidential Exhibit No. 1 to the July 22 petition), page 6 of 46. Please confirm that the facility referred to under the fourth topic heading was not built.*

FCG Response:

The Osceola Facility was constructed but FCG does not provide natural gas transportation service to this facility for Florida Crystals.

- 8. Does FCG serve any other customers via the infrastructure used to serve Crystals' Okeelanta site? If so, please provide the percentage of the total throughput transported via this infrastructure on behalf of other customers and the percentage of total capacity reserved on this infrastructure for other customers.*

FCG Response:

FCG does not serve other customers via the lateral off of the East-West Pipeline that is used to serve the Florida Crystals Okeelanta site. With respect to the overall East-West Pipeline serving Florida Crystals and other customers in the western Palm Beach County-Hendry County area, the actual throughput for the other customers using the East-West Pipeline represents [REDACTED] of

the total throughput of the East-West Pipeline flowed in the last 12 months. However, based on the total capacity of the East-West Pipeline and the [REDACTED] capacity reserved for Florida Crystals as is required by the GTA, Florida Crystals represents [REDACTED] of the total capacity on that line and [REDACTED] is currently committed to use by other customers, which presently leaves [REDACTED] available for new customers.

9. *Please refer to the confidential redacted portion of paragraph 41 on pages 17 and 18 of the July 22 petition. Also, please refer to the GTA (Confidential Exhibit No. 1), section 9A, page 13 of 46. The referenced GTA section and the redacted portion of the referenced petition paragraph identify a specific rate schedule as being the source of the rates negotiated for the GTA. The actual rate is stated on the first and third redacted lines on page 18 of the July 22 petition and in section 9A of the GTA.*

According to Commission records, the stated rate referred to above was associated with an earlier canceled version of the relevant rate schedule and is not the rate associated with the version of that rate schedule which was actually in effect as of the date of the execution of the GTA. Please explain why the rate from the rate schedule in effect as of the date of the execution of the GTA was not used given the statement in the un-redacted portion of petition paragraph 43 that: "on their face the rates for the Primary Term and the Make-Up Period have some colorable relationship to the tariff. . ."

FCG Response:

At the time the Petition was prepared, counsel used tariff pages from the 2003 rate case which appeared to be in effect at the time the GTA was executed. Based upon the tariff pages provided by the Commission Staff in connection with this Data Request, FCG would agree that none of the GTA rates have any relationship to the then applicable tariff. Based upon the correct tariff pages provided by the Commission Staff, FCG would need to modify some of the confidential language in paragraph 41. To the extent this tariff analysis impacts any confidential portions of the Petition, FCG shall separately file any appropriate pages with the Commission Clerk's Office. In addition, we would revise the first sentence of paragraph 43 to read as follows (edits shown in track changes):

While ~~on their face~~ the rates for the Primary Term and the Make-Up Period are materially below the rates in the then applicable ~~have some colorable relationship to the tariff, for the even-lower~~ Extended Term rates do not have any connection to the tariff, and FCG has not located any original economic analysis or justification for these rates.

10. *Please refer to section 10 of the confidential GTA exhibit, page 23 of 46. To date, has FCG paid any costs pursuant to section 10 of the GTA? If so, please provide a breakdown by year of the costs paid and discuss the project circumstances associated with why the costs were paid.*

FCG Response:

FCG has not paid any costs pursuant to Section 10 of the GTA.

11. *Please refer to Confidential Exhibit No. 3 to the July 22 petition, page 1 of 7, Cells A26 and B26. Please provide documentation to support the value shown in Cell B26.*

FCG Response:

With respect to the proposed interim rates contained in original Confidential Exhibit No. 3, they were designed to be somewhat similar to those contained in the GTA. Specifically, [REDACTED]

Based upon the updates to original Confidential Exhibit No. 2 and original Confidential Exhibit No. 3 discussed above, FCG has had to further revise the proposed interim rates to reflect the updated cost study analysis. The new proposed interim rates are shown on Confidential Exhibit 3A(2017), at Cells A-B24, A-B25, and A-B26. [REDACTED]

[REDACTED] See Confidential Exhibit 3A(2017), at Cells A-B34, A-B35, and A-B36 and the associated information in Cells C37-43 and D37-43.

12. *Please refer to Confidential Exhibit No. 3 to the July 22 petition, page 2 of 7. Please provide an explanation and support to show how the formula used to calculate the value in Cell C21 was derived.*

FCG Response:

Cell C21 of Exhibit No. 3, Page 2 of 7, is the sum of the capacity provided to Florida Crystals during its peak month and the capacity provided to Florida Crystals during an average month. As is further discussed in response to Staff Data Request No. 1 above, under the GTA FCG is required to provide Florida Crystals the ability to transport [REDACTED]

[REDACTED] While today Florida Crystals may not transport [REDACTED] during every month of the year, FCG must still reserve this level of capacity for Florida Crystals' use and therefore cannot use the capacity to provide firm service to other customers. If Florida Crystals increases its operations at the mill to year round, then Florida Crystals may be in a position to take the maximum volume of therms permitted by the GTA for the Extended Term each and every month. As a result, the capacity devoted to Florida Crystals is the [REDACTED] [REDACTED] This did not change in the revised exhibit, Confidential Exhibit No. 3A (2017) or any of the years analyzed. The calculation of the peak plus average is:

Peak Month	[REDACTED]
Average Month	[REDACTED]
Peak +Average	[REDACTED]

13. *Please refer to Confidential Exhibit No. 3 to the July 22 petition, page 5 of 7. Please provide support to show how the values shown in Cells C9 and C11 were derived.*

FCG Response:

The 2015 Property Taxes in Cell C9 is the property tax recorded in 2015 as shown on page 23 of the Florida City Gas 2015 FERC Form II. The Net Utility Plant January 1, 2015 is the Florida City Net Utility Plant as of January 1, 2015 as shown on the Florida City Gas 2015 FERC Form II. The relevant pages from the FERC Form II that is referenced are attached as Attachment DR-13. Note that in updating Confidential Exhibit No. 3 to Confidential Exhibit No. 3A(2017), the property tax values in Cells C9 and C11 did not change. However, the Property Tax number in Cell C17 that is used on Confidential Exhibit No. 3A(2017), Page 1 of 7, Cell B10, did change because the allocation of the East-West Pipeline to Florida Crystals changed. See the discussion in response to Staff Data Request No. 8 above and compare Confidential Exhibit No. 3, Page 5 of 7, Cells C15 and C17 with Confidential Exhibit No. 3A(2017), Page 7 of 9, Cells C18 and C20. To be responsive to the Staff's Data Request, additional information was provided in Confidential Exhibit No. 3A(2017) than in the original Confidential Exhibit No. 3, so the pages do not line up exactly and formatting changes mean that the cells from the original exhibit are not always the same in the revised exhibit.

Respectfully submitted,

/s/ Floyd R. Self

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CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing has been furnished by E-

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