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May 5, 2017

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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2017 MAY -5 PM 3: 05
COMMISSION
CLERK

Re: Docket No. 160175-GU

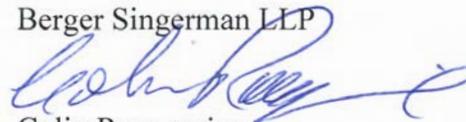
Dear Ms. Stauffer:

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 the Joint Petition filed in this docket on May 4, 2017. Included with this Request in a sealed envelope marked “CONFIDENTIAL” is one highlighted copy of each confidential document along with a CD-ROM. Also attached are two public, redacted versions of the confidential information 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

Colin Rognarine
Floyd R. Self

COM _____
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FRS:AM
Enclosures

REDACTED

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: May 5, 2017
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
JOINT PETITION EXHIBITS A, C, AND D**

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 Exhibits A, C, and D to the Joint Petition filed on May 4, 2017. Specifically the documents containing confidential information include: Exhibit A (the Amended and Restated GTA, only five pages of which contain confidential information), Confidential Exhibit C (Cost Study documentation, all of which is confidential), and Confidential Exhibit D (True Up Calculations, all of which is confidential). Also included is a CD-ROM containing the unlocked native Excel spreadsheets for Confidential Exhibit No. C. In support of this Request, FCG states as follows:

1. On May 4, 2017, FCG and Florida Crystals Corporation (“Florida Crystals”) filed their Joint Petition to Approve the *Amended and Restated 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, As Amended _____, 2017* (“Joint Petition”) in order to establish going forward rates, terms, and conditions between the Parties for natural gas transportation services provided by FCG to Florida Crystals and to resolve, settle, and

conclude all of the issues in this docket. Integral to the Joint Petition are four exhibits, three of which contain confidential information as follows:

a. Exhibit A. This is the Amended and Restated GTA that is the proposed going forward special service contract for the natural gas transportation service FCG is to provide Florida Crystals. Most of this document is public, but customer specific rates, volumes of gas to be transported, annual rate adjustment terms, and certain commercially sensitive terms and conditions are being treated as confidential.

b. Confidential Exhibit C. This document is confidential in its entirety. It contains two one-page summary analyses of historic and projected revenues and revenue requirements at 20 million therms and 28.8 million therms for the period 2001 through 2031. These two documents are identified as Joint Petition Exhibit C-2B (28.8M) and Joint Petition Exhibit C-2C (20M). These spreadsheets present information similar to the information presented in FCG's original July 22, 2016, Petition Exhibit No. 2 and FCG's Data Request Response Exhibit 2A. The remaining pages in Joint Petition Exhibit C are detailed year by year analyses of projected revenues and revenue requirements at 20 million therms and 28.8 million therms for the period 2017 through 2031. These documents are identified as Joint Petition Exhibit C-3B (28.8M) (XXXX) and Joint Petition Exhibit C-3C (20M) (XXXX), where (XXXX) represents specific years 2017 through 2031. These year specific spreadsheets present information similar to the information presented in FCG's responses to the Commission Staff Data Requests and identified as Exhibit 3A (XXXX). Together, all of Exhibit C reflects the updated results of FCG's confidential cost of service study and customer specific information regarding volumes of gas to be transported under certain situations, FCG's revised revenue

requirement associated with service to Florida Crystals, the actual or forecasted margin for such service, and whether the revenue exceeds the revenue requirement for each year. A significant change to the overall analysis has been a reevaluation of the Clewiston pipeline usage and the maximum Florida Crystals demand in order to more realistically calculate the pipeline allocation factor along with other corrections to the model and input data to thus more accurately reflect FCG's cost to serve. Upon further investigation, the allocation factor used in the Staff Data Request Responses had a number of significant errors. Finally, the updated analyses in Exhibit C are based upon the rates set forth in the Amended and Restated GTA and certain volume assumptions.

c. Exhibit D. This is a preliminary true up analysis based upon the December 2016 through March 2017 billing invoices. This Exhibit consists of a three page spreadsheet that captures the actual volumes and rates billed under the Temporary Rates approved by the PSC in Order No. PSC-16-0581-PCO-GU, issued December 27, 2016, and the revised amounts due under the true up requirements and the PSC's approval of the Amended and Restated GTA. The remaining 8 pages are the invoices FCG rendered to Florida Crystals in December 2016 through March 2017. This documentation is provided to show the Commission FCG's methodology and inputs for calculating any refund due upon the approval of the Amended and Restated GTA. The document contains both customer-specific usage information and proprietary, customer-specific rates.

2. The confidential Amended and Restated GTA customer-specific rates, terms, and conditions in Exhibit A, the cost of service study information presented in Exhibit C, and the true up information in Exhibit D 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 designated confidential 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 negotiate 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 submitted to the PSC in this docket except for the true up information subject to several requests for confidential classification. Further, in prior orders, the PSC has determined this type of information 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).

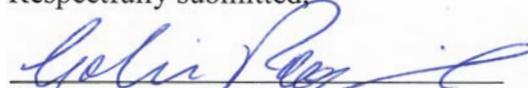
3. Attached to this Request is an envelope marked “CONFIDENTIAL” containing one copy of each of the confidential documents for which the confidential information is highlighted along with a CD-ROM containing the unlocked Excel spreadsheets that are the basis

for Confidential Exhibit C. Two public, redacted versions of the confidential information are also provided with this Request. The redacted copies of the Exhibits filed with the Joint Petition are the same redacted pages included with this Request.

4. 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 the Joint Petition Exhibit No. A (the Amended and Restated GTA, only parts of five pages), Confidential Exhibit C (Cost Study documentation, all confidential), and Confidential Exhibit D (True Up Calculations, all confidential) along with the unlocked Excel files contained on the CD-ROM also being provided as backup to Exhibit C.

Respectfully submitted,



Colin Roopnarine, B.C.S.

Floyd R. Self, B.C.S.

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Counsel for Florida City Gas

CERTIFICATE OF SERVICE

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

Mail on this 5th day of May, 2017, to the following:

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Colin Roopnarine

Attachment 1
 FCG Request for Confidential Classification May 5, 2017
 Line-by-Line Justification
 Docket No. 160175

DOCUMENT	PAGE NO(S).	COLUMNS	LINE NO(S).	STATUTORY JUSTIFICATION
Joint Petition Exhibit A, Amended and Restated GTA	8	N/A	11 and 21	This is selected pages from the Amended and Restated Natural Gas Transportation service agreement between FCG and Florida Crystals. By agreement of the parties, only price and customer sensitive information is to be treated as confidential. This document reflects trade secrets of FCG, including customer specific rates, gas volumes to be transported, rate adjustment terms, and related commercially sensitive conditions of service being made available to Florida Crystals that are not available to any other customer. Such customer-specific information is not released to the public and if disclosed, would harm FCG and Florida Crystals. If the rates and other terms were made public, such disclosure would harm FCG's competitive interests by impairing the ability to negotiate future special contracts with other customers.
	9	N/A	31-32 and 34-37	
	10	N/A	1, 7, and 9-23	
	15	N/A	29 and 30	

<p>Joint Petition, Exhibit C-2B (28.8M) FCG Summary Revenue Requirement Study</p>	<p>Page 1 (entire document)</p>	<p>A-F</p>	<p>1-44</p>	<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>
<p>Joint Petition Exhibit C-3B (28.8M) (2017), Revenue Requirement Analysis</p>	<p>Page 1 Page 2 Page 3 Page 4 Page 5 (entire document)</p>	<p>A-E A-D A-G A-D A-F</p>	<p>1-27 1-38 1-46 1-17 1-43</p>	<p>The proprietary information presented in this document includes the year by year cost and revenue analysis for the Extended Term of the Amended and Restated GTA that underlies the information presented in the Joint Petition Exhibit C-3B (28.8M), FCG Summary Revenue Requirement Study. These analyzes are based upon the unique customer-specific volumes and revenues and customer-specific margin information. 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>Joint Petition Exhibit C-3B (28.8M) (2018), Revenue Requirement Analysis</p>	<p>Page 1 Page 2 Page 3 Page 4 Page 5 (entire document)</p>	<p>A-E A-D A-G A-D A-F</p>	<p>1-28 1-42 1-45 1-35 1-45</p>	<p>The proprietary information presented in this document includes the year by year cost and revenue analysis for the Extended Term of the Amended and Restated GTA that underlies the information presented in the Joint Petition Exhibit C-3B (28.8M), FCG Summary Revenue Requirement Study. These analyzes are based upon the unique customer-specific volumes and revenues and customer-specific margin information. 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>Joint Petition Exhibit C-3B (28.8M) (2019), Revenue Requirement Analysis</p>	<p>Page 1 Page 2 Page 3 Page 4 Page 5 (entire document)</p>	<p>A-E A-D A-G A-D A-F</p>	<p>1-28 1-42 1-46 1-35 1-45</p>	<p>The proprietary information presented in this document includes the year by year cost and revenue analysis for the Extended Term of the Amended and Restated GTA that underlies the information presented in the Joint Petition Exhibit C-3B (28.8M), FCG Summary Revenue Requirement Study. These analyzes are based upon the unique customer-specific volumes and revenues and customer-specific margin information. 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>Joint Petition Exhibit C-3B (28.8M) (2020), Revenue Requirement Analysis</p>	<p>Page 1 Page 2 Page 3 Page 4 Page 5 (entire document)</p>	<p>A-E A-D A-G A-D A-F</p>	<p>1-28 1-42 1-46 1-35 1-45</p>	<p>The proprietary information presented in this document includes the year by year cost and revenue analysis for the Extended Term of the Amended and Restated GTA that underlies the information presented in the Joint Petition Exhibit C-3B (28.8M), FCG Summary Revenue Requirement Study. These analyzes are based upon the unique customer-specific volumes and revenues and customer-specific margin information. 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>Joint Petition Exhibit C-3B (28.8M) (2021), Revenue Requirement Analysis</p>	<p>Page 1 Page 2 Page 3 Page 4 Page 5 (entire document)</p>	<p>A-E A-D A-G A-D A-F</p>	<p>1-28 1-42 1-45 1-35 1-45</p>	<p>The proprietary information presented in this document includes the year by year cost and revenue analysis for the Extended Term of the Amended and Restated GTA that underlies the information presented in the Joint Petition Exhibit C-3B (28.8M), FCG Summary Revenue Requirement Study. These analyzes are based upon the unique customer-specific volumes and revenues and customer-specific margin information. 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>Joint Petition Exhibit C-3B (28.8M) (2022), Revenue Requirement Analysis</p>	<p>Page 1 Page 2 Page 3 Page 4 Page 5 (entire document)</p>	<p>A-E A-D A-G A-D A-F</p>	<p>1-28 1-42 1-46 1-35 1-45</p>	<p>The proprietary information presented in this document includes the year by year cost and revenue analysis for the Extended Term of the Amended and Restated GTA that underlies the information presented in the Joint Petition Exhibit C-3B (28.8M), FCG Summary Revenue Requirement Study. These analyzes are based upon the unique customer-specific volumes and revenues and customer-specific margin information. 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>Joint Petition Exhibit C-3B (28.8M) (2023), Revenue Requirement Analysis</p>	<p>Page 1 Page 2 Page 3 Page 4 Page 5 (entire document)</p>	<p>A-E A-D A-G A-D A-F</p>	<p>1-28 1-42 1-46 1-35 1-45</p>	<p>The proprietary information presented in this document includes the year by year cost and revenue analysis for the Extended Term of the Amended and Restated GTA that underlies the information presented in the Joint Petition Exhibit C-3B (28.8M), FCG Summary Revenue Requirement Study. These analyzes are based upon the unique customer-specific volumes and revenues and customer-specific margin information. 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>Joint Petition Exhibit C-3B (28.8M) (2024), Revenue Requirement Analysis</p>	<p>Page 1 Page 2 Page 3 Page 4 Page 5 (entire document)</p>	<p>A-E A-D A-G A-D A-F</p>	<p>1-28 1-42 1-47 1-35 1-45</p>	<p>The proprietary information presented in this document includes the year by year cost and revenue analysis for the Extended Term of the Amended and Restated GTA that underlies the information presented in the Joint Petition Exhibit C-3B (28.8M), FCG Summary Revenue Requirement Study. These analyzes are based upon the unique customer-specific volumes and revenues and customer-specific margin information. 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>Joint Petition Exhibit C-3B (28.8M) (2025), Revenue Requirement Analysis</p>	<p>Page 1 Page 2 Page 3 Page 4 Page 5 (entire document)</p>	<p>A-E A-D A-G A-D A-F</p>	<p>1-29 1-42 1-47 1-35 1-45</p>	<p>The proprietary information presented in this document includes the year by year cost and revenue analysis for the Extended Term of the Amended and Restated GTA that underlies the information presented in the Joint Petition Exhibit C-3B (28.8M), FCG Summary Revenue Requirement Study. These analyzes are based upon the unique customer-specific volumes and revenues and customer-specific margin information. 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>Joint Petition Exhibit C-3B (28.8M) (2026), Revenue Requirement Analysis</p>	<p>Page 1 Page 2 Page 3 Page 4 Page 5 (entire document)</p>	<p>A-E A-D A-G A-D A-F</p>	<p>1-28 1-42 1-47 1-35 1-45</p>	<p>The proprietary information presented in this document includes the year by year cost and revenue analysis for the Extended Term of the Amended and Restated GTA that underlies the information presented in the Joint Petition Exhibit C-3B (28.8M), FCG Summary Revenue Requirement Study. These analyzes are based upon the unique customer-specific volumes and revenues and customer-specific margin information. 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>Joint Petition Exhibit C-3B (28.8M) (2027), Revenue Requirement Analysis</p>	<p>Page 1 Page 2 Page 3 Page 4 Page 5 (entire document)</p>	<p>A-E A-D A-G A-D A-F</p>	<p>1-28 1-42 1-47 1-35 1-45</p>	<p>The proprietary information presented in this document includes the year by year cost and revenue analysis for the Extended Term of the Amended and Restated GTA that underlies the information presented in the Joint Petition Exhibit C-3B (28.8M), FCG Summary Revenue Requirement Study. These analyzes are based upon the unique customer-specific volumes and revenues and customer-specific margin information. 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>Joint Petition Exhibit C-3B (28.8M) (2028), Revenue Requirement Analysis</p>	<p>Page 1 Page 2 Page 3 Page 4 Page 5 (entire document)</p>	<p>A-E A-D A-G A-D A-F</p>	<p>1-28 1-42 1-47 1-35 1-45</p>	<p>The proprietary information presented in this document includes the year by year cost and revenue analysis for the Extended Term of the Amended and Restated GTA that underlies the information presented in the Joint Petition Exhibit C-3B (28.8M), FCG Summary Revenue Requirement Study. These analyzes are based upon the unique customer-specific volumes and revenues and customer-specific margin information. 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>Joint Petition Exhibit C-3B (28.8M) (2029), Revenue Requirement Analysis</p>	<p>Page 1 Page 2 Page 3 Page 4 Page 5 (entire document)</p>	<p>A-E A-D A-G A-D A-F</p>	<p>1-28 1-42 1-47 1-35 1-45</p>	<p>The proprietary information presented in this document includes the year by year cost and revenue analysis for the Extended Term of the Amended and Restated GTA that underlies the information presented in the Joint Petition Exhibit C-3B (28.8M), FCG Summary Revenue Requirement Study. These analyzes are based upon the unique customer-specific volumes and revenues and customer-specific margin information. 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>Joint Petition Exhibit C-3B (28.8M) (2030), Revenue Requirement Analysis</p>	<p>Page 1 Page 2 Page 3 Page 4 Page 5 (entire document)</p>	<p>A-E A-D A-G A-D A-F</p>	<p>1-28 1-42 1-47 1-35 1-45</p>	<p>The proprietary information presented in this document includes the year by year cost and revenue analysis for the Extended Term of the Amended and Restated GTA that underlies the information presented in the Joint Petition Exhibit C-3B (28.8M), FCG Summary Revenue Requirement Study. These analyzes are based upon the unique customer-specific volumes and revenues and customer-specific margin information. 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>Joint Petition Exhibit C-3B (28.8M) (2031), Revenue Requirement Analysis</p>	<p>Page 1 Page 2 Page 3 Page 4 Page 5 (entire document)</p>	<p>A-E A-D A-G A-D A-F</p>	<p>1-28 1-42 1-47 1-35 1-45</p>	<p>The proprietary information presented in this document includes the year by year cost and revenue analysis for the Extended Term of the Amended and Restated GTA that underlies the information presented in the Joint Petition Exhibit C-3B (28.8M), FCG Summary Revenue Requirement Study. These analyzes are based upon the unique customer-specific volumes and revenues and customer-specific margin information. 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>Joint Petition, Exhibit C-2C (20M) FCG Summary</p>	<p>Page 1 (entire)</p>	<p>A-F</p>	<p>1-42</p>	<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</p>

Revenue Requirement Study	document)			<p>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>
Joint Petition Exhibit C-3C (20M) (2017), Revenue Requirement Analysis	Page 1 Page 2 Page 3 Page 4 Page 5 (entire document)	A-E A-D A-F A-D A-F	1-28 1-37 1-44 1-18 1-43	<p>The proprietary information presented in this document includes the year by year cost and revenue analysis for the Extended Term of the Amended and Restated GTA that underlies the information presented in the Joint Petition Exhibit C-3B (28.8M), FCG Summary Revenue Requirement Study. These analyzes are based upon the unique customer-specific volumes and revenues and customer-specific margin information. 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>Joint Petition Exhibit C-3C (20M) (2018), Revenue Requirement Analysis</p>	<p>Page 1 Page 2 Page 3 Page 4 Page 5 (entire document)</p>	<p>A-E A-D A-F A-D A-F</p>	<p>1-27 1-41 1-41 1-17 1-44</p>	<p>The proprietary information presented in this document includes the year by year cost and revenue analysis for the Extended Term of the Amended and Restated GTA that underlies the information presented in the Joint Petition Exhibit C-3B (28.8M), FCG Summary Revenue Requirement Study. These analyzes are based upon the unique customer-specific volumes and revenues and customer-specific margin information. 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>Joint Petition Exhibit C-3C (20M) (2019), Revenue Requirement Analysis</p>	<p>Page 1 Page 2 Page 3 Page 4 Page 5 (entire document)</p>	<p>A-E A-D A-G A-D A-F</p>	<p>1-28 1-39 1-40 1-16 1-44</p>	<p>The proprietary information presented in this document includes the year by year cost and revenue analysis for the Extended Term of the Amended and Restated GTA that underlies the information presented in the Joint Petition Exhibit C-3B (28.8M), FCG Summary Revenue Requirement Study. These analyzes are based upon the unique customer-specific volumes and revenues and customer-specific margin information. 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>Joint Petition Exhibit C-3C (20M) (2020), Revenue Requirement Analysis</p>	<p>Page 1 Page 2 Page 3 Page 4 Page 5 (entire document)</p>	<p>A-E A-D A-G A-D A-F</p>	<p>1-28 1-39 1-42 1-16 1-44</p>	<p>The proprietary information presented in this document includes the year by year cost and revenue analysis for the Extended Term of the Amended and Restated GTA that underlies the information presented in the Joint Petition Exhibit C-3B (28.8M), FCG Summary Revenue Requirement Study. These analyzes are based upon the unique customer-specific volumes and revenues and customer-specific margin information. 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>Joint Petition Exhibit C-3C (20M) (2021), Revenue Requirement Analysis</p>	<p>Page 1 Page 2 Page 3 Page 4 Page 5 (entire document)</p>	<p>A-E A-D A-G A-D A-F</p>	<p>1-28 1-38 1-43 1-18 1-45</p>	<p>The proprietary information presented in this document includes the year by year cost and revenue analysis for the Extended Term of the Amended and Restated GTA that underlies the information presented in the Joint Petition Exhibit C-3B (28.8M), FCG Summary Revenue Requirement Study. These analyzes are based upon the unique customer-specific volumes and revenues and customer-specific margin information. 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>Joint Petition Exhibit C-3C (20M) (2022), Revenue Requirement Analysis</p>	<p>Page 1 Page 2 Page 3 Page 4 Page 5 (entire document)</p>	<p>A-E A-D A-G A-D A-F</p>	<p>1-28 1-37 1-40 1-16 1-44</p>	<p>The proprietary information presented in this document includes the year by year cost and revenue analysis for the Extended Term of the Amended and Restated GTA that underlies the information presented in the Joint Petition Exhibit C-3B (28.8M), FCG Summary Revenue Requirement Study. These analyzes are based upon the unique customer-specific volumes and revenues and customer-specific margin information. 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>Joint Petition Exhibit C-3C (20M) (2023), Revenue Requirement Analysis</p>	<p>Page 1 Page 2 Page 3 Page 4 Page 5 (entire document)</p>	<p>A-E A-D A-G A-D A-F</p>	<p>1-28 1-40 1-41 1-34 1-44</p>	<p>The proprietary information presented in this document includes the year by year cost and revenue analysis for the Extended Term of the Amended and Restated GTA that underlies the information presented in the Joint Petition Exhibit C-3B (28.8M), FCG Summary Revenue Requirement Study. These analyzes are based upon the unique customer-specific volumes and revenues and customer-specific margin information. 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>Joint Petition Exhibit C-3C (20M) (2024), Revenue Requirement Analysis</p>	<p>Page 1 Page 2 Page 3 Page 4 Page 5 (entire document)</p>	<p>A-E A-D A-G A-D A-F</p>	<p>1-28 1-40 1-39 1-18 1-44</p>	<p>The proprietary information presented in this document includes the year by year cost and revenue analysis for the Extended Term of the Amended and Restated GTA that underlies the information presented in the Joint Petition Exhibit C-3B (28.8M), FCG Summary Revenue Requirement Study. These analyzes are based upon the unique customer-specific volumes and revenues and customer-specific margin information. 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>Joint Petition Exhibit C-3C (20M) (2025), Revenue Requirement Analysis</p>	<p>Page 1 Page 2 Page 3 Page 4 Page 5 (entire document)</p>	<p>A-E A-D A-G A-D A-F</p>	<p>1-28 1-39 1-44 1-35 1-45</p>	<p>The proprietary information presented in this document includes the year by year cost and revenue analysis for the Extended Term of the Amended and Restated GTA that underlies the information presented in the Joint Petition Exhibit C-3B (28.8M), FCG Summary Revenue Requirement Study. These analyzes are based upon the unique customer-specific volumes and revenues and customer-specific margin information. 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>Joint Petition Exhibit C-3C (20M) (2026), Revenue Requirement Analysis</p>	<p>Page 1 Page 2 Page 3 Page 4 Page 5 (entire document)</p>	<p>A-E A-D A-G A-D A-F</p>	<p>1-28 1-40 1-41 1-35 1-44</p>	<p>The proprietary information presented in this document includes the year by year cost and revenue analysis for the Extended Term of the Amended and Restated GTA that underlies the information presented in the Joint Petition Exhibit C-3B (28.8M), FCG Summary Revenue Requirement Study. These analyzes are based upon the unique customer-specific volumes and revenues and customer-specific margin information. 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>Joint Petition Exhibit C-3C (20M) (2027), Revenue Requirement Analysis</p>	<p>Page 1 Page 2 Page 3 Page 4 Page 5 (entire document)</p>	<p>A-E A-D A-G A-D A-F</p>	<p>1-28 1-39 1-45 1-35 1-44</p>	<p>The proprietary information presented in this document includes the year by year cost and revenue analysis for the Extended Term of the Amended and Restated GTA that underlies the information presented in the Joint Petition Exhibit C-3B (28.8M), FCG Summary Revenue Requirement Study. These analyzes are based upon the unique customer-specific volumes and revenues and customer-specific margin information. 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>Joint Petition Exhibit C-3C (20M) (2028), Revenue Requirement Analysis</p>	<p>Page 1 Page 2 Page 3 Page 4 Page 5 (entire document)</p>	<p>A-E A-D A-G A-D A-F</p>	<p>1-28 1-42 1-45 1-35 1-45</p>	<p>The proprietary information presented in this document includes the year by year cost and revenue analysis for the Extended Term of the Amended and Restated GTA that underlies the information presented in the Joint Petition Exhibit C-3B (28.8M), FCG Summary Revenue Requirement Study. These analyzes are based upon the unique customer-specific volumes and revenues and customer-specific margin information. 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>Joint Petition Exhibit C-3C (20M) (2029), Revenue Requirement Analysis</p>	<p>Page 1 Page 2 Page 3 Page 4 Page 5 (entire document)</p>	<p>A-E A-D A-G A-D A-F</p>	<p>1-28 1-42 1-46 1-35 1-45</p>	<p>The proprietary information presented in this document includes the year by year cost and revenue analysis for the Extended Term of the Amended and Restated GTA that underlies the information presented in the Joint Petition Exhibit C-3B (28.8M), FCG Summary Revenue Requirement Study. These analyzes are based upon the unique customer-specific volumes and revenues and customer-specific margin information. 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>Joint Petition Exhibit C-3C (20M) (2030), Revenue Requirement Analysis</p>	<p>Page 1 Page 2 Page 3 Page 4 Page 5 (entire document)</p>	<p>A-E A-D A-G A-D A-F</p>	<p>1-28 1-42 1-45 1-35 1-45</p>	<p>The proprietary information presented in this document includes the year by year cost and revenue analysis for the Extended Term of the Amended and Restated GTA that underlies the information presented in the Joint Petition Exhibit C-3B (28.8M), FCG Summary Revenue Requirement Study. These analyzes are based upon the unique customer-specific volumes and revenues and customer-specific margin information. 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>Joint Petition Exhibit C-3C (20M) (2031), Revenue Requirement Analysis</p>	<p>Page 1 Page 2 Page 3 Page 4 Page 5 (entire document)</p>	<p>A-E A-D A-G A-D A-F</p>	<p>1-28 1-42 1-46 1-35 1-45</p>	<p>The proprietary information presented in this document includes the year by year cost and revenue analysis for the Extended Term of the Amended and Restated GTA that underlies the information presented in the Joint Petition Exhibit C-3B (28.8M), FCG Summary Revenue Requirement Study. These analyzes are based upon the unique customer-specific volumes and revenues and customer-specific margin information. 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>CD-ROM containing the native unlocked Excel spreadsheets for all of the spreadsheets consisting of Joint Petition Exhibits C and D.</p>				<p>Justification is the same as above.</p> <p>Confidential Joint Petition Exhibit C</p> <p>Confidential Joint Petition D</p>
<p>Joint Petition Exhibit D, True Up Analysis</p>	<p>Page 1 Page 2 Page 3 Page 4 Pages 5-12 (all pages) (entire document)</p>	<p>A-J A-I J-R S-Z</p>	<p>1-35 1-28 1-28 1-28</p>	<p>Pages 1-3 of this Exhibit consist of FCG's calculation of the Florida Crystals true up amounts based upon service for the billing period December 2016 to March 2017. Pages 4-11 of this Exhibit are the actual customer bills of Florida Crystals. This Exhibit reflects the same confidential rate information reflected in Exhibit C above to be applicable upon approval under the Amended and Restated GTA as well as the confidential temporary rates approved by the PSC in Order No. PSC-16-0581-PCO-GU, issued December 27, 2016. As a customer bill, this contains the actual gas volumes and the confidential temporary rates. This document reflects trade secrets of FCG, including customer specific rates, gas volumes to be transported, rate adjustment terms, and related commercially sensitive conditions of service being made available to Florida Crystals that are not available to any other customer. Such customer-specific information is not released to the public and if disclosed, would harm FCG and Florida Crystals. If the rates and other terms were made public, such disclosure would harm FCG's competitive interests by impairing the ability to negotiate future special contracts with other customers.</p>

1 this Agreement and the terms of either the Tariff or the KDS rate schedule, the order of priority
2 shall be as follows: (1) the terms of this Agreement, (2) the terms of the KDS rate schedule, and
3 (3) the other terms of the Tariff. The KDS rate schedule, like its predecessor Rate Schedule
4 KTS, provides for a negotiated rate structure and the Parties have agreed to establish the
5 negotiated rates set forth in this Agreement.

6
7 **8. QUANTITY**
8

9 The Maximum Daily Contract Quantity of gas that Customer shall be entitled to receive
10 and that Company shall be obligated to deliver to Customer, on a Firm Service basis, on any Gas
11 Day during the Extended Term of this Agreement shall be [REDACTED]. Notwithstanding the
12 foregoing, Customer acknowledges and recognizes that the quantity and pressure of gas that
13 Company shall actually be obligated to accept at the Point of Receipt and able to deliver to the
14 Point of Delivery may be limited or restricted by the failure of FGT to deliver gas to the Point of
15 Receipt at a sufficient delivery pressure and/or the quantity of gas that Customer or Customer's
16 agent has Scheduled for delivery at the Point of Receipt. Company shall have no liability to
17 Customer for its failure or refusal to accept gas for or on behalf of Customer at the Point of
18 Receipt or to deliver gas to Customer at the Point of Delivery if such failure or refusal is a direct
19 result of the events described in this Article 8 or in Article 19 of this Agreement. Commencing
20 at the beginning of the Extended Term, Customer will have the right to schedule and receive an
21 additional [REDACTED] of gas transportation service above the Maximum Daily
22 Contract Quantity on an Interruptible Service basis; provided, that Customer shall give Company
23 appropriate notice (of volumes and other information reasonably requested by Company) by
24 electronic mail or facsimile transmission to the Company's Gas Control personnel identified in
25 Section 21 of this Agreement no later than 12:00 P.M. on the day preceding the day on which
26 Customer desires to schedule and receive any Interruptible Service volumes. Such notification
27 from Customer shall be in addition to, and not in lieu of, all nomination notices and procedures
28 applicable to Customer's Third Party Supplier, including, without limitation, those set forth in
29 Section 12 – "Transportation - Special Conditions" of the Rules and Regulations of the Tariff
30 and the Third Party Supplier Rate Schedule in the Tariff. Company will notify Customer (or its
31 Third Party Supplier) by 8 a.m. of the Gas Day on which delivery is requested if Company is
32 unable to deliver all or a portion of the requested Interruptible Service volumes. Other
33 provisions of Company's Tariff may also apply to the transportation of firm or interruptible gas
34 by Customer or its suppliers, including but not limited to Section 12, Transportation – Special
35 Conditions, and the Third Party Supplier ("TPS") rate schedule. The rates applicable to all
36 volumes delivered during the Extended Term, including both Firm Service volumes and
37 Interruptible Service volumes, are those set forth in Paragraph 9.D.1 of this Agreement.

1 Interruptible Service basis, shall be billed at a rate of [REDACTED] (as
2 adjusted in accordance with the previous sentence), exclusive of applicable taxes
3 and other adjustments, fuel and transportation shrinkage, as such may be
4 applicable to Service provided on the Project. All subsequent thermes delivered
5 during each Contract Year of the Extended Term, again regardless whether such
6 thermes are delivered on a Firm Service basis or an Interruptible Service basis,
7 shall be billed at a rate of [REDACTED] (as adjusted in accordance with the
8 first sentence of this Section 9.D.(1)) up to a total maximum Contract Year
9 quantity of [REDACTED]

10 [REDACTED]
11 [REDACTED]
12 [REDACTED]
13 [REDACTED]
14 [REDACTED]
15 [REDACTED].

16
17 (2) Commencing with the [REDACTED] Contract Year of the Extended Term, the annual
18 increase, if any, in the rate per therm [REDACTED]

19 [REDACTED]
20 [REDACTED]
21 [REDACTED]
22 [REDACTED]
23 [REDACTED].

24
25 **E. Call Rights**

26
27 The Parties agree that that their respective prior rights and obligations under the Call
28 Rights provisions of Section 9.E.(1) of this Agreement have either been satisfied or are no longer
29 applicable.

30
31 **10. CONVERSION COSTS**

32
33 The Parties agree that that their respective prior rights and obligations under Article 10 of
34 this Agreement have either been satisfied or are no longer applicable.

35
36 **11. PAYMENT TERMS**

1 acknowledge, and reaffirm that the original GTA between the Parties shall remain confidential in
2 its entirety until such time as the Parties may agree to a redacted version of the original GTA or
3 the complete declassification of the original GTA. The terms of this Article 17 shall survive
4 termination of this Agreement.

5
6 **18. EXCLUSIVITY**
7

8 A. Subject to the provisions of Sections 18.B. and 18.C. below, during the Extended Term of
9 this Agreement, Customer agrees that it will not receive or permit the receipt of any
10 natural gas deliveries to the Okeelanta Facility, other than through facilities owned and
11 operated by Company, regardless of any other natural gas pipelines or distribution
12 systems that may be built in the area, provided that Customer's and Company's
13 obligations under this Article 18 shall be limited to the maximum capacity available on
14 the Project, as determined by Company at the time that Customer seeks to obtain
15 additional service. Upon written request from Customer, Company shall provide in
16 writing to Customer, within thirty (30) days of Customer's written request, the capacity
17 available on the Project for commitment by Company to Customer.

18
19 B. In the event that at any time during the Extended Term of this Agreement, Customer
20 seeks to increase its transportation capacity entitlement at the Okeelanta Facility above
21 the MDCQ set forth in Article 8, Customer agrees (a) that it shall enter good faith
22 negotiations with Company for Company to provide such additional capacity to
23 Customer, either from capacity then available or capacity to be added by Company, and
24 (b) if such negotiations are unsuccessful within ninety (90) days after initiation of such
25 negotiations, Customer may contract for service with third parties, provided that any such
26 third-party contracts shall not affect Customer's obligations to Company under this
27 Agreement.

28
29 C. The provisions of this Article 18 shall not apply in the event that Customer [REDACTED]
30 [REDACTED].
31
32

33 **19. FORCE MAJEURE**
34

35 A. If either Party hereto is rendered unable, wholly or in part, by an event of Force Majeure,
36 as defined below in Section 19.B. of this Agreement, to carry out its obligations pursuant
37 to the terms of this Agreement, then upon such Party's giving written notice (including
38 full particulars) as soon as reasonably possible, but no later than seventy-two (72) hours

Docket No. 160175-GU
Joint Petition Exhibit C
May 4, 2017
Confidential Cost Study Support
Documentation

Redacted Version:
Redacted in its Entirety
152 Pages

Confidential Study includes printed
spreadsheets and CD-ROM with
additional workpapers

Docket No. 160175-GU
Joint Petition Exhibit D
May 4, 2017
Confidential True-Up Documentation

Redacted Version:
Redacted in its Entirety
12 Pages

Confidential True-Up includes Florida
Crystals customer bills and calculation of
rates from the Temporary Rates to the
Proposed Amended and Restated GTA
Extended Term Rates