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February 12, 2018

**Hand Delivery**

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

**Re: DOCKET NO. 20170179-GU - Petition for rate increase and approval of depreciation study by Florida City Gas.**

**REDACTED**

Dear Ms. Stauffer:

Enclosed for filing, please find the original and seven (7) copies of Florida City Gas's Request for Confidential Classification and Motion for Protective Order for certain information provided in response to Staff's Eighth Set of Interrogatories (Nos. 110, 114, and 115) to the Company. Also included with this filing are one highlighted and two redacted copies of the referenced material.

As always, please don't hesitate to let me know if you have any questions. Thank you for your assistance with this filing.

Kind regards,

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

COMMISSION  
CLERK

2018 FEB 12 PM 4:09

RECEIVED-PPSC

- COM \_\_\_cc:/ (Service List)
- AFD \_\_\_
- APA \_\_\_
- ECO 7+1 redacted.
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**BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION**

In re: Petition for rate increase by Florida City  
Gas.

DOCKET NO. 20170179-GU

DATED: February 12, 2018

**REQUEST FOR CONFIDENTIAL CLASSIFICATION  
AND MOTION FOR PROTECTIVE ORDER**

FLORIDA CITY GAS (FCG or the Company), by and through undersigned counsel, and pursuant to Rule 25-22.006, Fla. Admin. Code, requests that the Florida Public Service Commission (the Commission) enter an order protecting from public disclosure information contained in the Company's response to Staff Interrogatories 114 and 115, as well as information in the attachment provided along with the Company's response to Interrogatory 110. In support of this request, the Company states:

1. On October 23, 2017, FCG filed its Petition for Rate Increase, and *inter alia*, the prefiled direct testimony and supporting exhibits of its witnesses and Minimum Filing Requirements.

2. On January 16, 2018, the Staff of the Commission (Staff), served FCG with its Eighth Set of Interrogatories (Nos. 99-115). Information provided in the Company's responses to Interrogatories 114 and 115, contains a customer name, which, in context, provides information that FCG treats as highly confidential, which has not otherwise been publicly disclosed. Similarly, information provided in the Attachment ROG 8-110 also contains competitively sensitive information of a marketer/third party supplier on FCG's system. Given the nature of the information provided, the Company believes that disclosure of any of this information would cause harm to FCG and its customers.

3. The information for which FCG seeks confidential classification is information that meets the definition of “proprietary confidential business information” as set forth in Section 366.093(3), Florida Statutes, which provides:

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

Proprietary confidential business information includes, but is not limited to:

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

4. With regard to the Company’s responses to Staff’s Interrogatories 114 and 115, identification of the customer name provides customer-specific contractual information that the

Company treats as confidential. Disclosure of this information would impair FCG's competitive interests by enabling competitors to target customers identified in the document and would harm FCG's customers, as well as FCG's business relationship with these customers, by disclosing customer-specific information that has, to date, been maintained as confidential. As such, disclosure of this information as a public document would cause harm to both the Company and its ratepayers.

5. As for the Attachment ROG 8-110, the highlighted information reveals the name of a marketer/third party supplier on FCG's system, including account specific information. This information too is competitively sensitive information for the identified marketer/third party supplier and information that FCG strives to maintain as confidential in accordance with tariff and contractual provisions. To the extent that FCG is aware, this information has not otherwise been publicly disclosed.

6. FCG seeks confidential classification as of the highlighted information in FCG's responses to Staff's Interrogatories Nos. 114 and 115 to the Company as proprietary, confidential business information consistent with the definition set forth in Section 366.093(3)(d) and (e), Florida Statutes. FCG also seeks confidential classification of the information on Attachment ROG 8-110, Transportation Contract Balancing Statement, of the highlighted information in the line "Marketer Name," as well as the highlighted numbers in the lines/categories under "Imbalance Calculation" and "Adjustments and Trades."

7. Release of any of this information would ultimately impair the Company's ability to contract for services on reasonable terms, which would ultimately be to the detriment of FCG's ratepayers.

8. Submitted herewith, in compliance with Rule 25-22.006, Florida

Administrative Code, are one highlighted, and two redacted copies of the referenced information.

9. FCG further requests that the Commission issue a protective order, in accordance with Rule 25-22.006(6), Florida Administrative Code, to protect this information when provided to the Office of Public Counsel, which is a party to this proceeding.

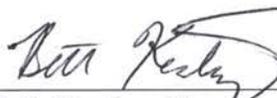
**WHEREFORE**, FCG respectfully requests that:

1. The Commission enter an order protecting the identified information in Florida City Gas's Responses to Staff Interrogatories Nos. 114 and 115, and in Attachment ROG 8-110, from public disclosure as proprietary confidential business information, as described herein;

2. The Commission issue a protective order, in accordance with Rule 25-22.006(6), Florida Administrative Code, to protect this information when provided to the Office of Public Counsel; and

2. The Commission grant confidential classification for this information for a period of at least 18 months.

Respectfully submitted this 12th day of February, 2018, by:



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Beth Keating, Esquire  
Florida Bar No. 0022756  
Gunster Law Firm  
215 South Monroe Street Suite 601  
Tallahassee, FL 32301  
*Attorneys for Florida City Gas*

**CERTIFICATE OF SERVICE**

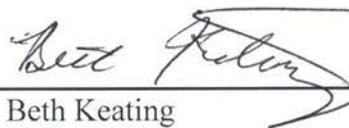
I hereby certify that a true and correct copy of the foregoing filing has been served by Hand Delivery or Electronic Mail (redacted only) this 12th day of February, 2018, upon the following:

Walter Trierweiler  
Florida Public Service Commission  
General Counsel's Office  
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By:



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Transportation Contract Balancing Statement

Marketer Name: [REDACTED]

Bill Month: December 2017

Imbalance Calculation - All Volumes in DTHs

Scheduled Supply	[REDACTED]
ADDQ	[REDACTED]
Amount to Allocate	[REDACTED]
Burner Tip Consumption	[REDACTED]
Fuel Retention	[REDACTED]
City Gate Consumption	[REDACTED]
Balance	[REDACTED]
<b>Cashout Balance</b>	[REDACTED]

Adjustments and Trades

Supply Adjustment	[REDACTED]
BurnerTip Adjustment	[REDACTED]
Fuel Retention Adjustment	[REDACTED]
Daily Balance Trade Adjustment	[REDACTED]
Commodity Trade - Purchase	[REDACTED]
Commodity Trade - Sell	[REDACTED]
Daily Bal.Trade - Purchase	[REDACTED]
Daily Bal.Trade - Sell	[REDACTED]

**Redacted**

114. Referring to the cost of service study prepared by witness Nikolich, please state which customers are included in the “Contract Demand” column.

**FCG Response:**

This is the same class as KDS and includes one customer, 

***Respondent: Daniel Nikolich***

**Redacted**

115. Referring to the testimony of witness Nikolich, page 29, lines 12-14, and state which customer(s) are in KDS customer class.

**FCG Response:**

The KDS class includes one customer, [REDACTED]

***Respondent: Daniel Nikolich***