

State of Florida



Public Service Commission

CAPITAL CIRCLE OFFICE CENTER • 2540 SHUMARD OAK BOULEVARD
TALLAHASSEE, FLORIDA 32399-0850

-M-E-M-O-R-A-N-D-U-M-

DATE: February 23, 2018

TO: Walter Trierweiler, Senior Attorney, Office of the General Counsel

FROM: Christopher Richards, Public Utility Analyst, Division of Accounting & Finance *CR*

RE: CONFIDENTIALITY OF CERTAIN INFORMATION
 DOCKET NO: 20170179-GU DOCUMENT NO: 10598-2017
 DESCRIPTION: FCG (Keating) – (CONFIDENTIAL) Certain portions of responses to Citizens’ revised 3rd requests for PODs No. 52.
 SOURCE: Florida City Gas

On December 29, 2017, Florida City Gas (FCG or Company) filed its response to Office of Public Counsel’s revised 3rd request for Production of Documents (POD) in the above referenced docket. Pursuant to Section 366.093(3)(e), Florida Statutes (F.S.) and Rule 25-22.006, Florida Administrative Code (F.A.C.), FCG requested confidential classification of certain information provided in Document No. 10598-2017 listed in the following table.

POD No.	Description	Page No.	Column No. / Line No.
52.1 – 52.830	Cost of Capital	All Pages	Documents in Entirety

FCG claims that the confidential information contains financial analyst reports that the Company strenuously protects, including information and strategies that pertain to entities outside to the Commission’s jurisdiction. Such information should be deemed “proprietary confidential business information,” consistent with Section 366.093 F.S., in that public disclosure would reveal competitively sensitive financial and strategic information of FCG, its parent, Southern Company Gas, as well as that of other Southern Company affiliates. Disclosure of this information would impair FCG’s, and Southern Company Gas’s, ability to effectively compete for goods and services, potential driving up costs, and could impair the companies’ ability to obtain financing at favorable rates and terms.

Staff reviewed FCG’s request and in staff’s opinion, the information subject to the requests meets the criteria for confidential classification pursuant to Section 366.093, F.S., and Rule 25-22.006, F.A.C. Therefore, staff recommends that FCG’s request for confidential classification be approved.

cc: Office of Commission Clerk

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TALLAHASSEE, FLORIDA 32399-0850

-M-E-M-O-R-A-N-D-U-M-

DATE: December 29, 2017

TO: Division of Economics, Office of Primary Responsibility

FROM: OFFICE OF COMMISSION CLERK

RE: CONFIDENTIALITY OF CERTAIN INFORMATION

DOCKET NO: 20170179-GU DOCUMENT NO: 10598-2017

DESCRIPTION: FCG (Keating) - (CONFIDENTIAL) Certain portions of responses to Citizens' 3rd POD 52.

SOURCE: Florida City Gas

The above confidential material was filed along with a request for confidential classification and motion for protective order. Please complete the following form by checking all applicable information and forward it to the attorney assigned to the docket, along with a brief memorandum supporting your recommendation.

- The document(s) is (are), in fact, what the utility asserts it (them) to be.
- The utility has provided enough details to perform a reasoned analysis of its request.
- The material has been received incident to an inquiry.
- The material is confidential business information because it includes:
 - (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 information;
 - (f) Employee personnel information unrelated to compensation, duties, qualifications, or responsibilities;
- The material appears to be confidential in nature and harm to the company or its ratepayers will result from public disclosure.
- The material appears not to be confidential in nature.
- The material is a periodic or recurring filing and each filing contains confidential information.

This response was prepared by Christopher Richards on February 23, 2018, a copy of which has been sent to the Office of Commission Clerk and the Office of General Counsel.