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In Reply Refer to:
Tampa
ab@macfar.com

July 22, 2019

VIA FEDEX

Adam J. Teitzman, Commission Clerk
Florida Public Service Commission
2540 Shumard Oak Boulevard
Tallahassee, Florida 32399-0850

REDACTED

COM _____
AFD _____
APA _____
ECO 6
ENG _____
GCL 1
IDM _____
CLK _____

Re: In re: Joint Petition for Approval of Restructured Nassau County Agreements to reflect Callahan Expansion by Florida Public Utilities Company, Peoples Gas System, Peninsula Pipeline Company Inc. and SeaCoast Gas Transmission, LLC; Docket No. 20190145

Dear Mr. Teitzman:

We enclose for filing with the Commission:

1. the original and seven (7) copies of SeaCoast Gas Transmission, LLC's Request for Specified Confidential Classification of portions of Exhibit C to the above joint petition; and

2. a single unredacted copy of the portions of Exhibit C to the petition in which the sensitive information for which confidential treatment is sought has been highlighted.

Redacted electronic versions of the enclosures will be e-mailed once Staff has been assigned.

In the original and all seven (7) "public" copies of the joint petition identified above, the sensitive information in Exhibits A and B to the Firm Service Agreement (Exhibit C to the joint petition) has been redacted.

Thank you for your usual assistance.

Sincerely,

Andrew M. Brown
Andrew M. Brown

AB/plb
Attachments
cc: J.R. Kelly (Kelly.jr@leg.state.fl.us)
Beth Keating, Esq. (bkeating@gunster.com)
Kandi Floyd
Ansley Watson, Jr., Esq.

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COMMISSION
CLERK

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Joint Petition for Approval of Restructured) DOCKET NO. 20190145
Nassau County Agreements to reflect Callahan)
Expansion by Florida Public Utilities Company,) FILED: July 22, 2019
Peoples Gas System, Peninsula Pipeline Company,)
Inc. and SeaCoast Gas Transmission, LLC)
_____)

**SEACOAST GAS TRANSMISSION, LLC's
REQUEST FOR CONFIDENTIAL TREATMENT**

Pursuant to Section 366.093, *Florida Statutes*, SeaCoast Gas Transmission, LLC. (“SeaCoast” or the “Company”) submits the following Request for Confidential Treatment of portions of Exhibit C to the captioned joint petition, which joint petition is submitted for filing concurrently herewith or has heretofore been filed:

1. Attached hereto as Exhibit A is a detailed justification for the requested confidential treatment of the highlighted portions of Exhibits A and B to the Firm Service Agreement (Exhibit C to the petition).
2. The material for which confidential classification is sought is intended to be and is treated as private by both SeaCoast and Peoples Gas System (“Peoples”) and has not been disclosed.
3. SeaCoast requests that the information for which it seeks confidential classification not be declassified until 18 months after the date of the Commission’s order granting this request (see Section 366.093(4), *Florida Statutes*). The time period requested is necessary to protect the competitive information (*i.e.*, the level of the rates at which service will be provided to Peoples under the Firm Service Agreement, the quantities for which such rates will apply, and other

information) from disclosure to SeaCoast's and Peoples' competitors and to other potential SeaCoast customers in order to allow SeaCoast, should it become necessary, to negotiate future gas service arrangements with other customers on favorable terms based on the specific factual circumstances of such customers. The period of time requested will ultimately protect SeaCoast and its customers by any such future arrangements being entered into based only on the facts and circumstances then applicable.

WHEREFORE, SeaCoast submits the foregoing as its request for confidential treatment of the information identified in Exhibit A to this request.

Respectfully submitted,



Andrew M. Brown

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Macfarlane Ferguson & McMullen

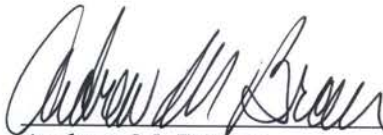
P. O. Box 1531

Tampa, FL 33601-1531

Attorneys for SeaCoast Gas Transmission, LLC

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true copy of the foregoing Request for Confidential Treatment, filed on behalf of SeaCoast Gas Transmission, LLC, has been furnished electronically to the Office of Public Counsel, 812 Claude Pepper Building, 111 W. Madison Street, Tallahassee, FL 32399-1400, this 22nd day of July, 2019.



Andrew M. Brown

**EXHIBITS A AND B TO FIRM SERVICE AGREEMENT (EXHIBIT C TO THE
PETITION)**

The only information in the Firm Service Agreement (Exhibit C to the petition) for which SeaCoast seeks specified confidential treatment, and non-disclosure pursuant to Chapter 119, *Florida Statutes*, is highlighted on Exhibits A and B thereto.

The information is the rate at which SeaCoast will provide transportation service to Peoples under the Firm Service Agreement, the quantities for which the rates apply, and other information from which the quantities could be arithmetically determined. All is information directly relating to SeaCoast's competitive interests which, if made public, "would impair the competitive business" of SeaCoast in negotiating rates in the future for similar arrangements with other customers or potential customers. Section 366.093(3)(d), *Florida Statutes*. Disclosure of the rate at which SeaCoast will provide transportation service to Peoples would give other customers or potential customers a benchmark or target toward which to negotiate in dealing with SeaCoast, notwithstanding that their particular circumstances may not be the same as, or even similar to, those of Peoples.

For Contract No. FT1-PGS-0003

BETWEEN SEACOAST GAS TRANSMISSION COMPANY, L.L.C. AND PEOPLES GAS SYSTEM, A DIVISION OF TAMPA ELECTRIC COMPANY

Primary Receipt Points:

Primary Receipt Point



SNG/Cypress-Callahan

Primary Receipt Point MDQ

█ Dth per Day

SEACOAST GAS TRANSMISSION, L.L.C.

PEOPLES GAS SYSTEM,
a division of Tampa Electric
Company

By: 
Title: Vice President
By: 
Title: VP Engineering Ops


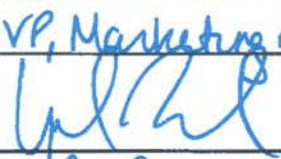
By: 
Title: VP, Marketing + Sales
By: 
Title: VP, Regulatory Affairs

EXHIBIT B

For Contract No. FT1-PGS-0003

BETWEEN SEACOAST GAS TRANSMISSION, L.L.C. AND PEOPLES GAS SYSTEM, A
DIVISION OF TAMPA ELECTRIC COMPANY

RATE:

Reservation: \$ [REDACTED] per Dth

Usage 1: \$ [REDACTED] per Dth

Retainage: TBD

Primary Delivery Points:

<u>Primary Delivery Point</u>	<u>Primary Delivery Point MDQ</u>	<u>Minimum Delivery Pressure</u>
PPC\PGS Westrock Interconnection Point	TBD	TBD
Callahan-FB Line South Interconnection Point	TBD	TBD

Maximum Daily Transport Quantity [REDACTED]

Maximum Hourly Flow Rate: TBD

Maximum Hourly Quantity: TBD

SEACOAST GAS TRANSMISSION, L.L.C.

PEOPLES GAS SYSTEM, a division of Tampa Electric Company

By: [Signature]

By: [Signature]

Title: Vice President

Title: VP, Marketing & Sales

By: [Signature]

By: [Signature]

Title: H.P. Engineering & Ops

Title: VP Regulatory Affairs