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April 1, 2021

**VIA E-PORTAL FILING**

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

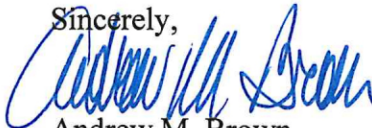
**Re: Docket No. 20210042-GU** – In re: Petition for approval of Firm Service Agreement with Peoples Gas System, by SeaCoast Gas Transmission, L.L.C.

Dear Mr. Teitzman:

Enclosed for filing on behalf of SeaCoast Gas Transmission, L.L.C. (“Seacoast”) is a Request for Confidential Treatment of portions of response to 1(a) in SeaCoast Gas Transmission, L.L.C.’s Response to Staff’s First Data Request (Nos. 1-5).

Exhibit 1 is being provided under separate cover and consists of the confidential document, and all information that Seacoast and Peoples asserts is entitled to confidential treatment has been highlighted.

Your assistance in this matter is greatly appreciated.

Sincerely,  
  
Andrew M. Brown

AB/plb  
Attachment

cc: Oakley Ward (via email: [oward@psc.state.fl.us](mailto:oward@psc.state.fl.us))  
Richard Gentry, Esq. (via email: [gentry.richard@leg.state.fl.us](mailto:gentry.richard@leg.state.fl.us))  
Ms. Kandi M. Floyd  
Ms. Paula K. Brown  
Ms. Karen Bramley  
Mr. Luke Buzard

**BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION**

In re: Petition for approval of Firm Service :  
Agreement with Peoples Gas System, by : Docket No.:20210042-GU  
SeaCoast Gas Transmission, L.L.C. : Submitted for Filing: April 1, 2021

**SEACOAST GAS TRANSMISSION, L.L.C.'S  
REQUEST FOR CONFIDENTIAL TREATMENT**

Pursuant to Section 366.093, *Florida Statutes*, SeaCoast Gas Transmission, L.L.C. ("Seacoast" or the "Company") submits the following Request for Confidential Treatment of SeaCoast Gas Transmission, L.L.C.'s Response to Paragraph 1a. of the Staff's First Data Request (Nos. 1-5), which response is submitted for filing concurrently herewith:

1. The following exhibits are included with and made a part of this request:
  - a. Exhibit 1 consists of a copy of SeaCoast Gas Transmission, L.L.C.'s response to Paragraph 1a on which all information that Seacoast and Peoples asserts is entitled to confidential treatment has been highlighted.
  - b. Exhibit 2 consists of a copy of Exhibit A on which all information that Seacoast and Peoples asserts is entitled to confidential treatment has been redacted.
  - c. Exhibit 3 is a table containing an identification of the information highlighted in Exhibit 1, together with references to the specific statutory basis or bases for the claim of confidentiality.
2. Seacoast submits that the highlighted information in Exhibit 1 is proprietary confidential business information within the meaning of Section 366.093(3), *Florida Statutes*.

3. Section 366.093(3), *Florida Statutes*, defines confidential information as information that is intended to be and is treated by the company as private in that disclosure of the information would cause harm to the company's business operations or its customers, and has not been disclosed publicly.

4. The confidential information is intended to be and has been treated by Seacoast and Peoples as private, its confidentiality has been maintained, and its disclosure would cause harm to Peoples and its customers.

5. Pursuant to Section 366.093(3)(2), such information is entitled to confidential treatment and it is exempt from the disclosure provisions of the public records law.

6. Once the Commission determines that the information in question is proprietary confidential business information, the Commission is not required to engage in any further analysis or review such as weighing the harm of disclosure against the public interest in access to the information.

7. 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 ensuring any such future arrangements are being entered into based only on the facts and circumstances then applicable.

**WHEREFORE**, Seacoast respectfully requests confidential classification of the material described herein.

Respectfully submitted,



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Attorneys for SeaCoast Gas Transmission, L.L.C.

### CERTIFICATE OF SERVICE

I HEREBY CERTIFY that true and correct copies of the foregoing has been furnished via electronic mail, this 1st day of April, 2021, to the following:

Bianca Lherisson  
Office of General Counsel  
Florida Public Service Commission  
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Tallahassee, FL 32399-0850  
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Kandi Floyd / Paula K. Brown  
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Office of Public Counsel  
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c/o The Florida Legislature  
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Andrew M. Brown, Esq.

**EXHIBIT 1**

**CONFIDENTIAL**

**FILED UNDER SEPARATE COVER**

# **EXHIBIT 2**

## **REDACTED COPIES**

PEOPLES GAS SYSTEM  
SEACOAST GAS TRANSMISSION  
DOCKET NO. 20210042-GU  
STAFF'S FIRST DATA REQUEST  
REQUEST NO. 1  
BATE PAGE: 1  
FILED: APRIL 1, 2021

1. Regarding the proposed pipeline extensions discussed in paragraph 9 of the petition, please respond to the following:
  - a. What is the cost to Seacoast to construct/install the new 2.5 mile 6-inch steel extension (including any necessary appurtenances) from the tap-in to the 4-inch FGT pipeline lateral to the new interconnection with Peoples' new high pressure main pipeline at the Polk-Hillsborough County Line? Please include a general description of the types of costs that will be incurred (e.g., materials, labor, permitting, secure right-of-way, etc.). Also, please confirm that the pipeline material will not consist of "bare steel" construction.
  - b. Are the pipeline extensions sized to meet the current capacity needs of Peoples or is it built to allow for potential future capacity requests by other customers?
  - c. Has Seacoast engaged in discussions with FGT regarding the tap-in to the 4-inch pipeline lateral and the recommission of the gate station? Please explain.
- A.
  - a. The cost to construct/install the new 2.5 mile 6-inch steel extension (including necessary appurtenances) from the FGT tap to the new interconnection with Peoples new high pressure main is [REDACTED], broken down as follows:

Description	Cost
Materials	[REDACTED]
Labor	[REDACTED]
Interconnect Facilities	[REDACTED]
Right of Way	[REDACTED]
Miscellaneous	[REDACTED]

The new pipeline material will not consist of bare steel construction.

- b. The pipeline extensions are sized to meet both existing needs, as well as the needs of unserved and underserved customers.
- c. Yes, Seacoast has engaged in discussions with FGT with regards to the tap-in to their 4-inch pipeline lateral and the Company will be working with FGT to refurbish the gate station and the associated lateral in connection with this project.

# **EXHIBIT 3**

## **JUSTIFICATION TABLE**



**EXHIBIT 3**

**Company:** SeaCoast Gas Transmission, L.L.C.

**Title:** List of Confidential Documents Included in Seacoast's Request for Confidential Treatment

**Docket No.:** 20210042-GU

<b>Document</b>	<b>Description</b>	<b>No. of Pages</b>	<b>Conf. Y/N</b>	<b>Line No./Col. No.</b>	<b>Florida Statute 366.093(3) Subsection</b>
1	SeaCoast Gas Transmission, L.L.C's Response to Paragraph 1a of Staff's First Data Request (Nos. 1-5)	1	Y	Middle of page, under 1a (end of 3 <sup>rd</sup> line last two two items, along with a portion of the chart below with the items in the column marked "Cost" redacted).	(a), (d), (e)