



July 5, 2022

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**BY HAND DELIVERY**

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

RECEIVED-FPSC  
2022 JUL -5 PM 4:20  
COMMISSION  
CLERK

**Re: Docket No. 20220067-GU: Petition for rate increase by Florida Public Utilities Company, Florida Division of Chesapeake Utilities Corporation, Florida Public Utilities Company - Fort Meade, and Florida Public Utilities Company - Indiantown Division.**

Dear Mr. Teitzman:

Please accept for filing in the above-referenced docket, the original and 7 copies of Florida Public Utilities Company's Request for Confidential Classification and Motion for Protective Order as it pertains to certain documents provided in response today to the Office of Public Counsel's First Set of Interrogatories and First Request for Production of Documents to the Company. Highlighted and redacted pages of documents provided in response to Interrogatory 91 are also provided in accordance with the rule. In addition, certain documents were either not susceptible to redaction/highlighting due to the electronic nature of the file, or because redaction would otherwise produce a blank document. Those files have been provided on clearly marked flash drives (one for interrogatory attachments and the other for document production requests) and are submitted herewith in substantial compliance with the Rule.

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

Sincerely,

COM \_\_\_\_\_  
AFD 1  
APA 1  
ECO 3 + 1 redacted  
ENG 1  
GCI 1  
IDM \_\_\_\_\_  
CLK \_\_\_\_\_

Beth Keating  
Gunster, Yoakley & Stewart, P.A.  
215 South Monroe St., Suite 601  
Tallahassee, FL 32301  
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Cc: Certificate of Service

**BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION**

In re: Petition for rate increase by Florida Public Utilities Company, Florida Division of Chesapeake Utilities Corporation, Florida Public Utilities Company - Fort Meade, and Florida Public Utilities Company - Indiantown Division.

DOCKET NO. 20220067-GU

FILED: July 5, 2022

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

Florida Public Utilities Company (FPUC or the Company), by and through undersigned counsel 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 certain portions of FPUC's responses to Citizens' First Set of Interrogatories and First Requests for Production. In support of this request, the Company states:

1. On May 24, 2022, FPUC, including all of its natural gas division and the Florida Division of Chesapeake Utilities Corporation (herein, jointly, FPUC) filed its Petition for Rate Adjustment, Approval of Depreciation Study, Approval of Consolidated Rate Structure and Request for Interim Relief (hereafter, "Petition"), and *inter alia* the prefiled direct testimony and supporting exhibits of its witnesses and Minimum Filing Requirements.

2. On May 26, 2022, the Citizens of the State of Florida, through the Office of Public Counsel (OPC), filed its notice of intervention. Thereafter, on June 2, 2022, OPC served FPUC with its First Set of Interrogatories (Nos. 1-120) and First Requests for Production of Documents (PODs) (Nos. 1-59). Numerous documents responsive to both the interrogatories, as

well as document productions, contain material and information that FPUC and its affiliates, as well as the parent company, Chesapeake Utilities Corporation, treat as highly confidential, which has not otherwise been publicly disclosed. In certain instances, the Company considers entire documents to be confidential, the disclosure of which would cause harm to FPUC and its customers.

3. The information for which FPUC 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. Specifically, FPUC seeks confidential classification of information and documents that fall into the following categories: (1) Internal Audits; (3) Employee compensation policy and actual compensation information; (4) Tax information; (5) Competitively sensitive revenue projection information and cost information; and (6)

Competitively sensitive contract information<sup>1</sup>. The information for which the Company is seeking confidential classification is information provided in response to the following discovery requests in OPC's revised first set: (1 )certain documents provided as attachments to the Company's responses to Interrogatories 46, 76, 91 and 118; and (2) certain documents provided in response to Requests for Production, Nos. 20, 21, 26, 27, ~~40~~, 41, 42, and 55.<sup>2</sup>

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5. With regard to the attachments provided in response to Interrogatory 46, this document contains detailed information regarding employee compensation, which the Company considers to be proprietary confidential business information and strictly protects. This information should be classified as proprietary confidential business information because its disclosure would impair the FPUC's competitive interests, by providing information that would provide other companies with an unfair advantage in efforts to lure employees away, which would not only drive up salaries - and therefore rates, but create circumstances under which employee morale could be negatively affected. See, *Florida Power & Light Company et al. v. Public Service Commission*, 31 So. 3d 860 (Fla. 1st DCA 2010). The Commission has recognized that similar such employee information warrants confidential classification.<sup>3</sup> Because redaction of the confidential information would, for all intents, result in blank pages, the Company is requesting that these files be granted confidential classification in their entirety.

6. With regard to the documents provided for review in response to POD 40, these documents contain information regarding corporate financing plans, strategies, rating agency presentations, and business plans that the Company also strenuously protects, including information

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<sup>1</sup> Much of which, the Company notes, has been afforded confidential classification by the Commission in prior FPSC dockets.

<sup>2</sup> FPUC notes that it also considers responses to PODs 40 (Board Minutes), 41 and 42 (Income Tax Returns) to be highly confidential information consistent with the definition in Section 366.093(3), F.S. At this time, however, FPUC proposes to make these available at the offices of the Gunster Law Firm.

<sup>3</sup> See, for instance, Order No. PSC-13-0626-CFO-EI, issued November 26, 2013, in Docket No. 130140-EI.

and capitalization strategies that pertain to entities outside to the Commission's jurisdiction.<sup>4</sup> Such information should be deemed "proprietary confidential business information," consistent with Section 366.093 (d and e), F.S., in that public disclosure would reveal competitively-sensitive financial and strategic information of FPUC, its parent, Chesapeake Utilities Corporation, as well as that of other Southern Company affiliates. Disclosure of this information would impair FPUC's, and Chesapeake Utilities Corporation's, ability to effectively compete for goods and services, potentially driving up costs, and could impair the Companies' ability to obtain financing at favorable rates and terms. As with the documents referenced in paragraph 5 above, redaction of these documents would, for all purposes, render the documents blank pages. As such, FPUC is respectfully requesting that the documents be granted confidential classification in their entirety.

7. As for the documents provided in response to the Attachment for Interrogatory 76, and PODs 41 and 42, these documents constitute tax returns and tax audit documents, including documents consolidated with other Chesapeake corporate entities. As with the other referenced documents, these documents are all treated as highly confidential. The Commission has traditionally considered tax returns and tax information to be confidential, and disclosure of this information would impair FPUC's competitive interests by providing competitors with unfair insight into FPUC's finances.<sup>5</sup> Given their competitively sensitive nature and the fact that redaction would render these documents blank, FPUC respectfully requests that these documents be granted confidential classification in their entirety, as the material is consistent with the definition of "proprietary confidential business information" as set forth in Section 366.093(3)(d) and (e), F.S..

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<sup>4</sup> To the extent that information in certain documents, particularly documents responsive to POD 40, contain information that exceeds FPUC's discovery obligations, those documents are being submitted with partial redaction. This is not meant to indicate that the unredacted material is not confidential. To the contrary, the information is confidential, but nonetheless, responsive to OPC's discovery request.

<sup>5</sup> See, for instance, Order No. PSC-08-0394-CFO-SU, issued June 12, 2008, in Docket No. 20070293-SU.

8. As for the documents provided in response to Interrogatory 118, specifically Attachment ROG 118.2, this document contains information that pertains to injuries and damages charged to Acct No. FN00-RM800-2620-2282, Self-Insurance Expense. Disclosure of this information would negatively impact FPUC by revealing competitively sensitive information regarding projected liability, incidents and costs incurred, that could not only provide competitors with unfair advantage, but could also impair the Company's ability to obtain financing and insurance coverage on favorable terms, which would ultimately result in harm to the customers. As such, the information contained therein meets the definition of "proprietary confidential business information" and should not be publicly disclosed. In addition, redaction of this documents would, for all intents, result in a blank document; therefore, the Company respectfully requests that this document be afforded confidential classification in its entirety.

9. With regard to the documents responsive to OPC POD 20, numerous documents include substantial amounts of information considered by the Company to be proprietary confidential business information. Specifically, the following documents contain employee specific salary and benefits information, which, if disclosed, would put the Company at a competitive disadvantage in terms of hiring and retaining high caliber employees:

Confidential OPC POD 20 2022-2023 Non Corporate Payroll and Payroll Overhead\_(FPUC-Rate 0000136-0000194)

Confidential OPC POD 20 Union Employees Annual Increases\_(FPUC-Rate 0001513-0001526)

Confidential OPC POD 20 compliance backup 2021\_(FPUC-Rate 0000521-0000560)

Confidential OPC POD 20 2021 Corporate Payroll and Payroll Overhead\_(FPUC-Rate 0000040-0000057)

Confidential OPC POD 20 2022-2023 Corporate Non-payroll\_(FPUC-Rate 0000058-0000093)

Confidential OPC POD 20 Salaried and Hourly Increases\_(FPUC-Rate 0001453-0001479)

Confidential OPC POD 20 2022-2023 Corporate Payroll and Payroll Overhead\_(FPUC-Rate 0000094-0000135)

Confidential OPC POD 20 Total Increase Combined\_(FPUC-Rate 0001480-0001512)

Due to the nature of these documents and the amount of confidential information contained therein, the Company respectfully requests confidential classification of these files in their entirety.

As for the following documents that are also responsive to OPC POD 20, as well as one responsive to OPC POD 39 Confidential OPC POD 39 2022 ORIGINAL Flex Rates FN\_(FPUC-Rate 0025977-0025978)and certain files responsive to OPC POD 27, the documents contain customer specific and vendor specific information, as well as contractual information, which, if disclosed, would harm the Company's ability to compete for goods and services in the market place. Disclosure of a significant portion of the information in these documents would also likely be in breach of contractual provisions. As such, the Company requests that the following files be afforded confidential classification, and due to the nature of the documents, the Company asks that such treatment be afforded to these files in their entirety:

Confidential OPC POD 20 Elim flex plant adjustment\_(FPUC-Rate 0000002-0000009)

Confidential OPC POD 20 FN Affiliates Eight Flags\_(FPUC-Rate 0001313-0001322)

Confidential OPC POD 20 FN Affiliates PPC & Marlin\_(FPUC-Rate 0001323-0001375)

Confidential OPC POD 20 3 Flex plant adjustment\_(FPUC-Rate 0000010)

Confidential OPC POD 20 FL Special Contracts - Annual OM and Net Plantv8\_(FPUC-Rate 0001023-0001085)

Confidential OPC POD 20 G-1 4 FL Special Contracts - Annual OM and Net Plantv8  
(004)\_(FPUC-Rate 0001384-0001451)

Confidential OPC POD 20 FL Special Contracts Large Customers\_(FPUC-Rate 0001086-  
0001301)

Confidential OPC POD 20 Flex Related Revenues & Expenses\_(FPUC-Rate 0001302-  
0001310)

Confidential OPC POD 39 2022 ORIGINAL Flex Rates FN\_(FPUC-Rate 0025977-0025978)

Confidential OPC POD 27 Operating\_Budget\_GrossMargin\_112019\_(FPUC-Rate  
0027281-0027285);

Confidential OPC POD 27 Operating\_Budget\_GrossMargin\_102021\_(FPUC-Rate  
0025972-0025976);

Confidential OPC POD 27 Operating\_Budget\_GrossMargin\_102020\_(FPUC-Rate  
0025967-0025971);

Confidential OPC POD 27 Operating\_Budget\_GrossMargin\_102019\_(FPUC-Rate  
0025962-0025966);

Confidential OPC POD 27 Operating\_Budget\_GrossMargin\_102018\_(FPUC-Rate  
0025459-0025961);

Confidential OPC POD 27 Operating\_Budget\_GrossMargin\_092021\_(FPUC-Rate  
0025454-0025458);

Confidential OPC POD 27 Operating\_Budget\_GrossMargin\_092020\_(FPUC-Rate  
0025449-0025453);

Confidential OPC POD 27 Operating\_Budget\_GrossMargin\_092019\_(FPUC-Rate  
0025444-0025448);

Confidential OPC POD 27 Operating\_Budget\_GrossMargin\_082021\_(FPUC-Rate  
0025439-0025443);

Confidential OPC POD 27 Operating\_Budget\_GrossMargin\_082020\_(FPUC-Rate  
0026703-0027280);



Confidential OPC POD 27 Operating\_Budget\_GrossMargin\_082019\_(FPUC-Rate  
0025434-0025438);

Confidential OPC POD 27 Operating\_Budget\_GrossMargin\_072021\_(FPUC-Rate  
0025429-0025433);

Confidential OPC POD 27 Operating\_Budget\_GrossMargin\_072020\_(FPUC-Rate  
0025424-0025428);

Confidential OPC POD 27 Operating\_Budget\_GrossMargin\_072019\_(FPUC-Rate  
0025419-0025423);

Confidential OPC POD 27 Operating\_Budget\_GrossMargin\_062021\_(FPUC-Rate  
0025414-0025418);

Confidential OPC POD 27 Operating\_Budget\_GrossMargin\_062020\_(FPUC-Rate  
0025409-0025413);

Confidential OPC POD 27 Operating\_Budget\_GrossMargin\_062019\_(FPUC-Rate  
0025404-0025408);

Confidential OPC POD 27 Operating\_Budget\_GrossMargin\_062018\_(FPUC-Rate  
0024883-0025403);

Confidential OPC POD 27 Operating\_Budget\_GrossMargin\_052021\_(FPUC-Rate  
0024878-0024882);

Confidential OPC POD 27 Operating\_Budget\_GrossMargin\_052020\_(FPUC-Rate  
0024873-0024877);

Confidential OPC POD 27 Operating\_Budget\_GrossMargin\_052019\_(FPUC-Rate  
0024868-0024872);

Confidential OPC POD 27 Operating\_Budget\_GrossMargin\_052018\_(FPUC-Rate  
0024341-0024867);

Confidential OPC POD 27 Operating\_Budget\_GrossMargin\_042022\_(FPUC-Rate  
0024336-0024340);

Confidential OPC POD 27 Operating\_Budget\_GrossMargin\_042021\_(FPUC-Rate  
0024331-0024335);

Confidential OPC POD 27 Operating\_Budget\_GrossMargin\_042020\_(FPUC-Rate  
0024326-0024330);

Confidential OPC POD 27 Operating\_Budget\_GrossMargin\_042019\_(FPUC-Rate 0023839-0024325);

Confidential OPC POD 27 Operating\_Budget\_GrossMargin\_032022\_(FPUC-Rate 0023834-0023838);

Confidential OPC POD 27 Operating\_Budget\_GrossMargin\_032021\_(FPUC-Rate 0023829-0023833);

Confidential OPC POD 27 Operating\_Budget\_GrossMargin\_032020\_(FPUC-Rate 0023824-0023828);

Confidential OPC POD 27 Operating\_Budget\_GrossMargin\_032019\_(FPUC-Rate 0023382-0023823);

Confidential OPC POD 27 Operating\_Budget\_GrossMargin\_022022\_(FPUC-Rate 0023377-0023381);

Confidential OPC POD 27 Operating\_Budget\_GrossMargin\_022021\_(FPUC-Rate 0023372-0023376);

Confidential OPC POD 27 Operating\_Budget\_GrossMargin\_022020\_(FPUC-Rate 0023367-0023371);

Confidential OPC POD 27 Operating\_Budget\_GrossMargin\_022019\_(FPUC-Rate 0022926-0023366);

Confidential OPC POD 27 Operating\_Budget\_GrossMargin\_022018\_(FPUC-Rate 0022353-0022925);

Confidential OPC POD 27 Operating\_Budget\_GrossMargin\_012022\_(FPUC-Rate 0022348-0022352);

Confidential OPC POD 27 Operating\_Budget\_GrossMargin\_012021\_(FPUC-Rate 0022343-0022347);

Confidential OPC POD 27 Operating\_Budget\_GrossMargin\_012020\_(FPUC-Rate 0022338-0022342);

Confidential OPC POD 27 Operating\_Budget\_GrossMargin\_012019\_(FPUC-Rate 0022333-0022337); and

Confidential OPC POD 27 Operating\_Budget\_GrossMargin\_012018\_(FPUC-Rate 0021762-0022332).

The following documents also include competitively sensitive information as it relates to the Company's unregulated affiliates. Disclosure of this information would put these affiliates at a competitive disadvantage and otherwise harm the entire corporation, which would ultimately cause harm to the Company's Florida ratepayers. Given the nature of these electronic files, redaction is not possible; as such, the Company requests that these files provided in response to OPC POD 20 also be afforded confidential classification in their entirety:

Confidential OPC POD 20 2017 CAPEX\_(FPUC-Rate 0000001)

Confidential OPC POD 20 2020 CAPEX\_(FPUC-Rate 0000038)

Confidential OPC POD 20 2021 CAPEX\_(FPUC-Rate 0000039)

Confidential OPC POD 20 2018 CAPEX\_(FPUC-Rate 0000036)

Confidential OPC POD 20 2019 CAPEX\_(FPUC-Rate 0000037)

10. Similarly, as it relates to Confidential OPC POD 55 Flex Related Revenues & Expenses\_(FPUC-Rate 0026694-0026702), like the files described above, this file contains competitively sensitive contractual information that has otherwise not been disclosed publicly. The disclosure of this information could put the Company at a competitive disadvantage in the market and also result in a breach of contract. As such, the Company requests that this file be afforded confidential classification and that it be afforded such in its entirety as redaction would result in a nearly blank document and would otherwise be problematic give the electronic nature of the file.

11. With regard to the response to OPC POD 21, one of the documents provided, CONFIDENTIAL OPC POD 21 WP-JDT\_Customer Transition\_(FPUC-Rate 0001527-0021281), contains customer specific information throughout. Given the nature of the Excel file, redaction would be problematic if not impossible. As such, the Company respectfully requests that this file also be treated as confidential in its entirety.

12. With regard to documents produced in response to POD 26, this file is a list of all internal audits that are not otherwise publicly available, including audits type and status for Chesapeake’s entities, including unregulated business units. Public disclosure of this competitively sensitive information would impair the operations of FPUC and Chesapeake Utilities Corporation. Moreover, these documents specifically fit the definition of “proprietary confidential business information” contained in Section 366.093(3)(b), F.S. As such, the Company is requesting that this document also be treated as confidential in their entirety.

13. As for the documents provided as Attachments to ROG 91, these are all contracts for services between FPUC and its affiliates under the Chesapeake corporate umbrella. With regard to the following identified documents responsive to this Interrogatory, the Company asks that the Commission grant confidential classification of the information contained in those documents as specified below

Document/Discovery Production	Page/Lines – Document	Rationale
ROG 91 – Amdt. 1 PPC FPU	Exhibit A -Data in Column identified as “MDTQ, in Dekatherms, excluding Fuel Retention” -Data associated with line identified as: “Total MDTQ (Dekatherms)” -Data associated with and in the first line of section titled: “Monthly Reservation Charge”	Proprietary Confidential Business Information that is competitively sensitive and meets the definition in Section 366.093(3)(e), F.S.

Document/Discovery Production	Page/Lines – Document	Rationale
ROG 91 – Eight Flags FPU  FGS	Highlighted information in Section 2.2 and in  Exhibit A -Data associated with line identified as: “Total MDTQ (Dekatherms) -Data associated with and in the first line of section titled: “Monthly Reservation Charge” -Data on Interruptible volumes and charge	Proprietary Confidential Business Information that is competitively sensitive and meets the definition in Section 366.093(3)(e), F.S.
ROG 91 Marlin FPU	Page 1, Section 1(b) – highlighted reservation information  Exhibit A – Highlighted information in all columns both pages pertaining to rates and services	Proprietary Confidential Business Information that is competitively sensitive and meets the definition in Section 366.093(3)(e), F.S.
ROG 91 – New Smyrna	Exhibit A -Data in Column identified as “MDTQ, in Dekatherms, excluding Fuel Retention” -Data associated with line identified as: “Total MDTQ (Dekatherms) -Data associated with and in the first line of section titled: “Monthly Reservation Charge” -Unauthorized Use Charge	Proprietary Confidential Business Information that is competitively sensitive and meets the definition in Section 366.093(3)(e), F.S.

Document/Discovery Production	Page/Lines – Document	Rationale
ROG 91 – NW Pipeline	Exhibit A -Data in Column identified as “MDTQ, in Dekatherms, excluding Fuel Retention” -Data associated with line identified as: “Total MDTQ (Dekatherms)” -Data associated with and in the first line of section titled: “Monthly Reservation Charge”	Proprietary Confidential Business Information that is competitively sensitive and meets the definition in Section 366.093(3)(e), F.S.
ROG 91 – FPU PPC	Exhibit A -Data in Column identified as “MDTQ, in Dekatherms, excluding Fuel Retention” -Data associated with line identified as: “Total MDTQ (Dekatherms)” -Data associated with and in the first line of section titled: “Monthly Reservation Charge” -Unauthorized Use Charge	Proprietary Confidential Business Information that is competitively sensitive and meets the definition in Section 366.093(3)(e), F.S.
ROG 91 – Palm Beach County	Exhibit A -Data in Column identified as “MDTQ, in Dekatherms, excluding Fuel Retention” -Data associated with line identified as: “Total MDTQ (Dekatherms)” -Data associated with and in the first line of section titled: “Monthly Reservation Charge”	Proprietary Confidential Business Information that is competitively sensitive and meets the definition in Section 366.093(3)(e), F.S.

Document/Discovery Production	Page/Lines – Document	Rationale
ROG 91 – Polk County	Exhibit A -Data in Column identified as “MDTQ, in Dekatherms, excluding Fuel Retention” -Data associated with line identified as: “Total MDTQ (Dekatherms)” -Data associated with and in the first line of section titled: “Monthly Reservation Charge”	Proprietary Confidential Business Information that is competitively sensitive and meets the definition in Section 366.093(3)(e), F.S.
ROG 91 – Port of Palm Beach	Exhibit A -Data in Column identified as “MDTQ, in Dekatherms, excluding Fuel Retention” -Data associated with line identified as: “Total MDTQ (Dekatherms)” -Data associated with and in the first line of section titled: “Monthly Reservation Charge” -Unauthorized Use Charge	Proprietary Confidential Business Information that is competitively sensitive and meets the definition in Section 366.093(3)(e), F.S.
ROG 91 – PPC CFG	Exhibit A -Data in Column identified as “MDTQ, in Dekatherms, excluding Fuel Retention” -Data associated with line identified as: “Total MDTQ (Dekatherms)” -Data associated with and in the first line of section titled: “Monthly Reservation Charge” -Unauthorized Use Charge	Proprietary Confidential Business Information that is competitively sensitive and meets the definition in Section 366.093(3)(e), F.S.

Document/Discovery Production	Page/Lines – Document	Rationale
ROG 91 – PPC FPU Nassau	<p>Exhibit A</p> <ul style="list-style-type: none"> <li>-Data in Column identified as “MDTQ, in Dekatherms, excluding Fuel Retention”</li> <li>-Data associated with line identified as: “Total MDTQ (Dekatherms)</li> <li>-Data associated with and in the first line of section titled: “Monthly Reservation Charge”</li> <li>-Unauthorized Use Charge</li> </ul>	<p>Proprietary Confidential Business Information that is competitively sensitive and meets the definition in Section 366.093(3)(e), F.S.</p>
ROG 91 – Riviera Beach	<p>Exhibit A</p> <ul style="list-style-type: none"> <li>-Data in Column identified as “MDTQ, in Dekatherms, excluding Fuel Retention”</li> <li>-Data associated with line identified as: “Total MDTQ (Dekatherms)</li> <li>-Data associated with and in the first line of section titled: “Monthly Reservation Charge”</li> </ul>	<p>Proprietary Confidential Business Information that is competitively sensitive and meets the definition in Section 366.093(3)(e), F.S.</p>
ROG 91 – William Burgess	<p>Exhibit A</p> <ul style="list-style-type: none"> <li>-Data in Column identified as “MDTQ, in Dekatherms, excluding Fuel Retention”</li> <li>-Data associated with line identified as: “Total MDTQ (Dekatherms)</li> <li>-Data associated with and in the first line of section titled: “Monthly Reservation Charge”</li> <li>-Unauthorized Use Charge</li> </ul>	<p>Proprietary Confidential Business Information that is competitively sensitive and meets the definition in Section 366.093(3)(e), F.S.</p>



Document/Discovery Production	Page/Lines – Document	Rationale
ROG 91 – Winter Haven	Exhibit A -Data in Column identified as “MDTQ, in Dekatherms, excluding Fuel Retention” -Data associated with line identified as: “Total MDTQ (Dekatherms)” -Data associated with and in the first line of section titled: “Monthly Reservation Charge”	Proprietary Confidential Business Information that is competitively sensitive and meets the definition in Section 366.093(3)(e), F.S.

14. Release of any of this information would ultimately impair the Company’s ability to provide services and its ratepayers. As such, FPUC requests that the Commission afford this information confidential treatment and exempt from Section 119.07, Florida Statutes.

15. Submitted herewith, in substantial compliance with Rule 25-22.006, Florida Administrative Code, are two flash drives containing the confidential files clearly identified as confidential. With regard to the Interrogatory Attachments 46, 76, and 118.2 and PODs 20, 21, 26, 27, 39, 40, 41, 42, and 55, a redacted version is not feasible and would simply result in a blank file. Moreover, given the electronic nature of the documents, highlighting is, in most instances, not feasible. Also included with this filing are one highlighted copy and two redacted copies of the confidential pages of the attachments for ROG 91.

16. FPUC 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, FPUC respectfully requests that:

1. The Commission enter an order protecting the information in the following files, in their entirety, from public disclosure as proprietary confidential business information:

- a. Confidential POD 20 [21 documents with: (BATES FPUC-Rate 0000001-001526)];
- b. Confidential POD 21 - OPC POD 21\_CONFIDENTIAL\_WP-JDT\_Customer Transition (BATES 013523-013598);
- c. Confidential OPC POD 26 List of Internal Audit Reports\_(FPUC-Rate 0021758-0021761)
- d. Confidential POD 27 [ 40 documents with: (BATES 0021762- 0027285)]
- e. Confidential OPC POD 39 2022 ORIGINAL Flex Rates FN\_(FPUC-Rate 0025977-0025978)(15675444.1)
- f. Confidential OPC POD 55 Flex Related Revenues & Expenses\_(FPUC-Rate 0026694-0025702
- g. Confidential Attachment ROG 46 (Pages - 1 Worksheet);
- h. Confidential Attachment ROG 76 RAR 03012022 (Pages 1-64);
- i. Confidential Attachment ROG 118.2 FN 2620 2282 Self Insurance 2021 (Pages - 2 Worksheets).
- j. The Commission enter an order protecting the highlighted, confidential information provided in response to Interrogatory 91, as described herein and

listed below, from public disclosure as proprietary confidential business information. Confidential Attachments:

ROG 91 – Amdt. 1 PPC FPU

ROG 91 – Eight Flags FPU FGS

ROG 91 Marlin FPU

ROG 91 – New Smyrna

ROG 91 – NW Pipeline

ROG 91 – FPU PPC

ROG 91 – Palm Beach County

ROG 91 – Polk County

ROG 91 – Port of Palm Beach

ROG 91 – PPC CFG

ROG 91 – PPC FPU Nassau

ROG 91 – Riviera Beach

ROG 91 – William Burgess

ROG 91 – Winter Haven

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;

3. In addition, to the extent that the following files will be available for review by Commission Staff and the Office of Public Counsel and are also considered highly confidential, the Company would ask that the Commission also grant a protective order as contemplated by Rule 25-22.006(6), Florida Administrative Code, for these files:

Confidential POD 40 Board Minutes (BATES PENDING) ;

CONFIDENTIAL OPC POD 41 CHPK - Subcon - FL 1120 - 2019\_(FPUC-  
Rate 0025979-0026034)

CONFIDENTIAL OPC POD 41 CHPK - Subcon - FL 1120 - 2020\_(FPUC-  
Rate 0026035-0026088)

CONFIDENTIAL OPC POD 41 FPU - Subcon - FL 1120 - 2019\_(FPUC-  
Rate 0026089-0026136)

CONFIDENTIAL OPC POD 41 FPU - Subcon - FL 1120 - 2020\_(FPUC-  
Rate - 0026137-0026175)

CONFIDENTIAL OPC POD 42 CHPK - Top Consolidation - 2019 Federal  
1120\_(FPUC-0026176-0026444)

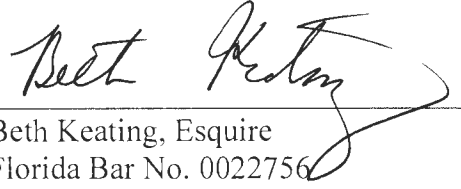
CONFIDENTIAL OPC POD 42 CHPK - Top Consolidation - 2020 Federal  
1120\_(FPUC-Rate 0026445-0026693)

The Company will submit a separate request for confidentiality for these files in the event the files or information is subsequently submitted into the Docket or delivered to the Office of Public Counsel.

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

Docket No. 20220067-GU  
*Florida Public Utilities Company*

Respectfully submitted this 5th day of July, 2022, by:

A handwritten signature in black ink, appearing to read "Beth Keating". The signature is written in a cursive style and is positioned above a horizontal line.

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

*Attorneys for Florida Public Utilities Company*

**CERTIFICATE OF SERVICE**

I hereby certify that a true and correct copy of the foregoing filing has been served by  
Hand Delivery this 5th day of July, 2022, upon the following:

Richard Gentry  
P. Christensen  
Office of Public Counsel  
c/o The Florida Legislature  
111 W. Madison Street, Room 812  
Tallahassee, FL 32399-1400  
[Gentry.Richard@leg.state.fl.us](mailto:Gentry.Richard@leg.state.fl.us)  
[Christensen.patty@leg.state.fl.us](mailto:Christensen.patty@leg.state.fl.us)

Jennifer Crawford  
Ryan Sandy  
2540 Shumard Oak Blvd.  
Tallahassee, FL 32399  
[jcrawfor@psc.state.fl.us](mailto:jcrawfor@psc.state.fl.us)  
[rsandy@psc.state.fl.us](mailto:rsandy@psc.state.fl.us)

Mike Cassel  
Florida Public Utilities Company  
208 Wildlight Ave.  
Yulee, FL 32097  
[mcassel@fpuc.com](mailto:mcassel@fpuc.com)

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

*Attorneys for Florida Public Utilities Company*

PENINSULA PIPELINE COMPANY, INC.  
FIRM TRANSPORTATION SERVICE AGREEMENT

EXHIBIT A

TO

FIRM TRANSPORTATION SERVICE AGREEMENT

BETWEEN

PENINSULA PIPELINE COMPANY, INC.

AND

FLORIDA PUBLIC UTILITIES COMPANY

DATED

May 17<sup>th</sup>, 2019

<u>Description of Delivery Point(s)</u>	<u>Description of Point(s) of Delivery</u>	<u>MDTQ, in Dekatherms, excluding Fuel Retention</u>
See Below	See Below	████████ Dt/Day

Total MDTQ (Dekatherms): ██████████ Day

MHTP: 6%

Monthly Reservation Charge: ██████████

The Company shall provide written notification to Shipper that the Palm Beach County Pipeline has been completed and establish an in-service date. The Parties recognize that the Palm Beach County Pipeline may be completed in segments with each segment placed into service as completed. In such event, the Company may provide written notification of the in-service date of each segment, whereupon the Company may begin to charge Shipper a pro rata portion of the Monthly Reservation Charge associated with the in-service segment.

PENINSULA PIPELINE COMPANY, INC.  
FIRM TRANSPORTATION SERVICE AGREEMENT

Description of Transporter Delivery Point(s)

1. Interconnection with Florida City Gas gate station in the vicinity of the intersection of Seminole Pratt Whitney Road and State Road 80 in Palm Beach County, Florida.
2. Interconnection with PPC gate station in the vicinity of the intersection of State Road 710 and North Lake Boulevard in Palm Beach County, Florida.
3. Interconnection with PPC gate station in the vicinity of the intersection of State Road 710 and State Road 706 in Palm Beach County, Florida.

Description of Point(s) of Delivery: Interconnection with Shipper and Company at one or more of the following points:

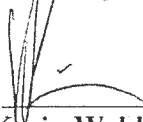
1. Arden residential housing development in Palm Beach County, Florida.
2. West Lake residential housing development in Palm Beach County, Florida.
3. Ancient Tree residential housing development in Palm Beach County, Florida.
4. Avenir residential housing development in Palm Beach County, Florida.
5. Florida Research Park commercial and Industrial development in Palm Beach County, Florida.



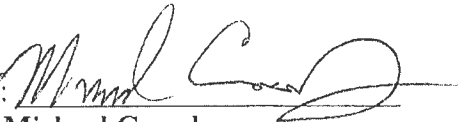
PENINSULA PIPELINE COMPANY, INC.  
FIRM TRANSPORTATION SERVICE AGREEMENT

IN WITNESS WHEREOF, the parties hereto have caused this Agreement to be executed by their duly authorized officers or representatives effective as of the date first written above.

COMPANY  
Peninsula Pipeline Company, Inc.

By:   
**Kevin Webber**  
Title: President

SHIPPER  
Florida Public Utilities Company

By:   
**Michael Cassel**  
Title: Assistant Vice President

(To be attested by the corporate secretary if not signed by an officer of the company)

Attested By: \_\_\_\_\_  
Title: \_\_\_\_\_  
Date: \_\_\_\_\_

Attested By: \_\_\_\_\_  
Title: \_\_\_\_\_  
Date: \_\_\_\_\_

PENINSULA PIPELINE COMPANY, INC.  
FIRM TRANSPORTATION SERVICE AGREEMENT

EXHIBIT A

TO

FIRM TRANSPORTATION SERVICE AGREEMENT

BETWEEN

PENINSULA PIPELINE COMPANY, INC.

AND

FLORIDA PUBLIC UTILITIES COMPANY

DATED

May 17<sup>th</sup>, 2019

<u>Description of Delivery Point(s)</u>	<u>Description of Point(s) of Delivery</u>	<u>MDTQ, in Dekatherms, excluding Fuel Retention</u>
See Below	See Below	████████ Dt/Day

Total MDTQ (Dekatherms): ██████████ Day

MHTP: 6%

Monthly Reservation Charge: ██████████

The Company shall provide written notification to Shipper that the Palm Beach County Pipeline has been completed and establish an in-service date. The Parties recognize that the Palm Beach County Pipeline may be completed in segments with each segment placed into service as completed. In such event, the Company may provide written notification of the in-service date of each segment, whereupon the Company may begin to charge Shipper a pro rata portion of the Monthly Reservation Charge associated with the in-service segment.

PENINSULA PIPELINE COMPANY, INC.  
FIRM TRANSPORTATION SERVICE AGREEMENT

Description of Transporter Delivery Point(s)

1. Interconnection with Florida City Gas gate station in the vicinity of the intersection of Seminole Pratt Whitney Road and State Road 80 in Palm Beach County, Florida.
2. Interconnection with PPC gate station in the vicinity of the intersection of State Road 710 and North Lake Boulevard in Palm Beach County, Florida.
3. Interconnection with PPC gate station in the vicinity of the intersection of State Road 710 and State Road 706 in Palm Beach County, Florida.


Description of Point(s) of Delivery: Interconnection with Shipper and Company at one or more of the following points:

1. Arden residential housing development in Palm Beach County, Florida.
2. West Lake residential housing development in Palm Beach County, Florida.
3. Ancient Tree residential housing development in Palm Beach County, Florida.
4. Avenir residential housing development in Palm Beach County, Florida.
5. Florida Research Park commercial and Industrial development in Palm Beach County, Florida.

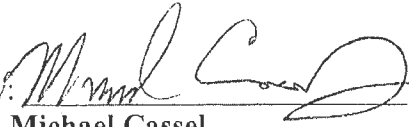
PENINSULA PIPELINE COMPANY, INC.  
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IN WITNESS WHEREOF, the parties hereto have caused this Agreement to be executed by their duly authorized officers or representatives effective as of the date first written above.

COMPANY  
Peninsula Pipeline Company, Inc.

By:   
\_\_\_\_\_  
**Kevin Webber**  
Title: President

SHIPPER  
Florida Public Utilities Company

By:   
\_\_\_\_\_  
**Michael Cassel**  
Title: Assistant Vice President

(To be attested by the corporate secretary if not signed by an officer of the company)

Attested By: \_\_\_\_\_  
Title: \_\_\_\_\_  
Date: \_\_\_\_\_

Attested By: \_\_\_\_\_  
Title: \_\_\_\_\_  
Date: \_\_\_\_\_

PENINSULA PIPELINE COMPANY, INC.  
FIRM TRANSPORTATION SERVICE AGREEMENT

EXHIBIT A

TO

FIRM TRANSPORTATION SERVICE AGREEMENT

BETWEEN

PENINSULA PIPELINE COMPANY, INC.

AND

FLORIDA PUBLIC UTILITIES COMPANY

DATED

September 26, 2014

Description of Delivery Point(s): Interconnection between Shipper and Company at one or more of the following points:

1. Southeast corner of Port property in the vicinity of Broadway Avenue and Middle Road adjacent to the FP&L property in Riviera Beach.
2. Midpoint of reactivated 12 inch steel pipeline on the Port property.

Total MDTQ (Dekatherms): [REDACTED] Day

MHTP: 6 %

Fuel Retention Percentage: 0.5%

Monthly Reservation Charge: [REDACTED]

Unauthorized Use Rate (In addition to Monthly Reservation Charge):  
[REDACTED] / Each Day of Unauthorized Use

PENINSULA PIPELINE COMPANY, INC.  
FIRM TRANSPORTATION SERVICE AGREEMENT

EXHIBIT A

TO

FIRM TRANSPORTATION SERVICE AGREEMENT

BETWEEN

PENINSULA PIPELINE COMPANY, INC.

AND

FLORIDA PUBLIC UTILITIES COMPANY

DATED

September 26, 2014

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1. Southeast corner of Port property in the vicinity of Broadway Avenue and Middle Road adjacent to the FP&L property in Riviera Beach.
2. Midpoint of reactivated 12 inch steel pipeline on the Port property.

Total MDTQ (Dekatherms): [REDACTED] Day

MHTP: 6 %

Fuel Retention Percentage: 0.5%

Monthly Reservation Charge: [REDACTED]

Unauthorized Use Rate (In addition to Monthly Reservation Charge):  
[REDACTED] / Each Day of Unauthorized Use

PENINSULA PIPELINE COMPANY, INC.  
FIRM TRANSPORTATION SERVICE AGREEMENT

EXHIBIT A

TO

FIRM TRANSPORTATION SERVICE AGREEMENT

BETWEEN

PENINSULA PIPELINE COMPANY, INC.

AND

FLORIDA PUBLIC UTILITIES COMPANY

DATED

FEBRUARY 1, 2012

<u>Description of Delivery Point(s)</u>	<u>Description of Point(s) of Delivery</u>	<u>MDTQ, in Dekatherms, excluding Fuel Retention</u>
---	--	--

Interconnection With Peoples Gas System Distribution system located at the Duval/Nassau County line.	See Below	██████ Dt/Day
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Total MDTQ (Dekatherms): ██████ Dt/Day

MHTP: 6 %

Fuel Retention Percentage: 0.5 %

Monthly Reservation Charge: ██████████. The Company shall provide written notification to Shipper that the Fernandina Beach Line has been completed and establish the in-service date.

Unauthorized Use Rate (In addition to Monthly Reservation Charge):  
\$ ██████ Each Day of Unauthorized Use

Description of Point(s) of Delivery: Up to six (6) Points of Delivery

- 1) One or more points – locations TBD – on SR 200, west of Amelia River
- 2) One or more points – locations TBD – on Amelia Island

PENINSULA PIPELINE COMPANY, INC.  
FIRM TRANSPORTATION SERVICE AGREEMENT

EXHIBIT A

TO

FIRM TRANSPORTATION SERVICE AGREEMENT

BETWEEN

PENINSULA PIPELINE COMPANY, INC.

AND

FLORIDA PUBLIC UTILITIES COMPANY

DATED

FEBRUARY 1, 2012

<u>Description of Delivery Point(s)</u>	<u>Description of Point(s) of Delivery</u>	<u>MDTQ, in Dekatherms, excluding Fuel Retention</u>
Interconnection With Peoples Gas System Distribution system located at the Duval/Nassau County line.	See Below	██████ Dt/Day

Total MDTQ (Dekatherms): ██████ Dt/Day

MHTP: 6 %

Fuel Retention Percentage: 0.5 %

Monthly Reservation Charge: ██████████ The Company shall provide written notification to Shipper that the Fernandina Beach Line has been completed and establish the in-service date.

Unauthorized Use Rate (In addition to Monthly Reservation Charge):  
\$ ██████ Each Day of Unauthorized Use

Description of Point(s) of Delivery: Up to six (6) Points of Delivery

- 1) One or more points – locations TBD – on SR 200, west of Amelia River
- 2) One or more points – locations TBD – on Amelia Island



## Master Supply & Services Agreement

This Master Supply & Services Agreement (the "Agreement") is entered into this 7<sup>th</sup> day of April (the "Effective Date") by and between Marlin Gas Services, LLC, a Delaware limited liability company ("Marlin") and FPU, a (state of inc) Delaware ("Customer") (hereinafter referred to individually at times as "Customer" and collectively as "the Parties").

### Recitals

- A. Marlin is engaged in the business of providing turn-key compressed natural gas ("CNG") solutions, which includes the utilization or acquisition of certain equipment and the production or procurement of CNG.
- B. Customer is interested in acquiring CNG solutions for its business.
- C. Marlin desires to sell and Customer desires to purchase CNG solutions subject to the terms and conditions set forth in this Agreement.

### Agreements

In consideration of the foregoing recitals and the mutual covenants set forth below, the Parties agree as follows:

#### **1. Services and Equipment**

(a) Services. Marlin's services will generally involve transporting CNG to locations mutually agreed by the parties, injecting CNG into pipelines owned or operated by Customer (each a "Pipeline"), and associated services. Marlin's services will be performed in accordance with the provisions, and at the rates, set forth in Exhibit A except to the extent the Parties have signed a SOW ("Statement of Work") which conflicts with Exhibit A, in which case, the provisions of the SOW shall govern with respect to services identified in, and governed by, such SOW. A SOE is attached hereto.

(b) Reservation Agreement. Reservation is [REDACTED]. Customer is provided the following equipment:

- 2 Steel CNG Trailers 160 Mcf
- 1 Composite CNG Trailer 505 Mcf
- 1 Regulation/Heater Unit
- 1 Tractor Cab
- 1 Service Truck.

The rates are set forth in Exhibit A. Customer retains unused Reservations till (14 months after start date). After the monthly reservation fee is used [REDACTED] rates in Exhibit A are applied.

Exhibit A

Standard Rates & Terms

	Reservation	[REDACTED]	[REDACTED]
CNG Equipment Charges (per day):	Planned	[REDACTED]	[REDACTED]
	(Monthly)	[REDACTED]	[REDACTED]

Trailer Costs:

CNG Jumbos (125 Dth)	[REDACTED]	[REDACTED]	[REDACTED]
CNG Composites (500 Dth)	[REDACTED]	[REDACTED]	[REDACTED]
Mini-Trailers (use for less than 3 mcf/hr – 20 Mcf)	[REDACTED]	[REDACTED]	[REDACTED]
Mini Quantum Composite 84 Dth	[REDACTED]	[REDACTED]	[REDACTED]

Portable Safety Regulation Unit:

In-Line Heater Regulation	[REDACTED]	[REDACTED]	[REDACTED]
Small Regulation (Hotdog)	[REDACTED]	[REDACTED]	[REDACTED]

Portable Compressor

Rated 1 MMcf/d @200 psi inlet (Bonnie)	[REDACTED]	[REDACTED]	[REDACTED]
Rated 2.5 MMcf/D @550 psi inlet	[REDACTED]	[REDACTED]	[REDACTED]

Vehicle Costs

Mechanical/Regulation Service Truck	[REDACTED]	[REDACTED]	[REDACTED]
Heavy Duty Tractor Cab	[REDACTED]	[REDACTED]	[REDACTED]

[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]

[REDACTED]



## Master Supply & Services Agreement

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### Recitals

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- B. Customer is interested in acquiring CNG solutions for its business.
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- 1 Regulation/Heater Unit
- 1 Tractor Cab
- 1 Service Truck.

The rates are set forth in Exhibit A. Customer retains unused Reservations till (14 months after start date). After the monthly reservation fee is used [REDACTED] rates in Exhibit A are applied.

Exhibit A

Standard Rates & Terms

	Reservation	[REDACTED]	[REDACTED]
CNG Equipment Charges (per day):	Planned (Monthly)	[REDACTED]	[REDACTED]

Trailer Costs:

CNG Jumbos (125 Dth)	[REDACTED]	[REDACTED]	[REDACTED]
CNG Composites (500 Dth)	[REDACTED]	[REDACTED]	[REDACTED]
Mini-Trailers (use for less than 3 mcf/hr – 20 Mcf)	[REDACTED]	[REDACTED]	[REDACTED]
Mini Quantum Composite 84 Dth	[REDACTED]	[REDACTED]	[REDACTED]

Portable Safety Regulation Unit:

In-Line Heater Regulation	[REDACTED]	[REDACTED]	[REDACTED]
Small Regulation (Hotdog)	[REDACTED]	[REDACTED]	[REDACTED]

Portable Compressor

Rated 1 MMcf/d @200 psi inlet (Bonnie)	[REDACTED]	[REDACTED]	[REDACTED]
Rated 2.5 MMcf/D @550 psi inlet	[REDACTED]	[REDACTED]	[REDACTED]

Vehicle Costs

Mechanical/Regulation Service Truck	[REDACTED]	[REDACTED]	[REDACTED]
Heavy Duty Tractor Cab	[REDACTED]	[REDACTED]	[REDACTED]

[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]

[REDACTED]

