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September 23, 2025

**BY HAND DELIVERY**Mr. Adam Teitzman, Clerk  
Florida Public Service Commission  
2540 Shumard Oak Boulevard  
Tallahassee, FL 32399-0850**REDACTED**2025 SEP 23 PM 1:40  
CLERK**Docket No. 20250099-GU – Joint petition for approval of transportation service agreements between Peninsula Pipeline Company, Inc. and Florida City Gas.**

Dear Mr. Teitzman:

Attached for filing, please find the original and seven (7) copies of Peninsula Pipeline Company's and Florida City Gas's Joint Request for Confidential Classification of information in Attachment A to their Joint Responses to Staff's 2<sup>nd</sup> Set of Data Requests. With this Request, the Companies' have included one highlighted copy of Attachment A, along with two redacted versions, per Rule 25-22.006, F.A.C.

As always, thank you for your assistance in connection with this filing. If you have any questions whatsoever, please do not hesitate to let me know.

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AFD \_\_\_  
APA \_\_\_  
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ENG \_\_\_  
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IDM \_\_\_  
CLK \_\_\_

Sincerely,

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

ENCL

CC:// (Dose - GCL)

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Joint Petition for Approval of )  
Amendments to Transportation Service ) Docket No.: 20250099-GU  
Agreements with Florida City Gas by Peninsula )  
Pipeline Company, Inc. ) Filed: September 23, 2025  
)

**FLORIDA CITY GAS'S AND PENINSULA PIPELINE COMPANY'S JOINT REQUEST FOR  
CONFIDENTIAL CLASSIFICATION**

Florida City Gas ("FCG") and Peninsula Pipeline Company ("Peninsula")(jointly herein, "Companies") by and through undersigned counsel, pursuant to Section 366.093, Florida Statutes, and consistent with Rule 25-22.006(3), Florida Administrative Code, hereby submit this Joint Request for Confidential Classification for information contained in their responses to staff's second set of data requests, which has been submitted under separate cover today. The information for which the Companies seek confidential treatment is information that is essentially the same information for which the Companies requested confidential treatment in Docket No. 20240039-GU, in which the original Transportation Service Agreements ("TSAs") were approved, as well as the Companies' request for confidentiality filed earlier in this proceeding. It is also similar to that which the Commission has afforded confidential classification in prior cases, namely Order No. PSC-2018-0146-CFO-GU, issued March 19, 2018 in Docket No. 20180015-GU. The Companies are submitting this request jointly as these projects are a coordinated effort. To be clear, both Companies, as well as the counter parties to the ICAs, treat the information addressed herein as confidential and have not otherwise disclosed the information publicly. In support thereof, the Companies hereby state:

1. The Companies seek confidential classification of amounts reflected in a chart included in its response to Data Request No. 1, which is included as Attachment A to the responses. These amounts are contractually negotiated amounts reflected in the TSAs, the Amendments to the TSAs, or the Interconnection Agreements. Specifically, in the chart under the header "Current," the Companies seek confidential classification of the highlighted amounts in the columns "FCG-PPC FTSA Monthly Revenue," "FCG-RNG Producer ICA Monthly Revenue," and "Total" and in the lines "Brevard," "Indian River," and

“Miami Dade.” Likewise, in the chart titled “Amended,” the Companies seek confidentiality of the amounts in the columns “FCG-PPC FTSA Monthly Revenue,” “FCG-RNG Producer ICA Monthly Revenue,” “FCG-RNG Producer ICA Revenue Credit to PGA/Swing,” and “Total” in each of the lines “Brevard,” “Indian River,” and “Miami Dade.” The Companies also seek confidential classification of the specific amounts responsive to Data Request No. 8, which are also included on Attachment A, in the lines identified for Indian River and Miami Dade. These lines also reflect contractual amounts identical to those in the referenced chart.

2. Again, the amounts are directly related to the negotiated rates and terms of the Amendments, which Peninsula and FCG, as well as the RNG Producers, treat as proprietary confidential business information consistent with the definition of that term in Section 366.093, Florida Statutes.

3. The information for which the Companies seek confidential classification is information that Peninsula and FCG both treat as confidential, and 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. To the best of Peninsula and FCG’s respective knowledge, the information has not otherwise been disclosed publicly. Release of any of the referenced information as a public record would reveal the specific rate included in a competitive contract. Disclosure of this information would impair both Peninsula’s ability

## Joint Request for Confidential Classification

to compete for goods and services and provide its competitors with an unfair competitive advantage and would likewise impair FCG's ability to obtain services at competitive rates, as well as placing FCG in the posture of breaching the ICAs. Thus, the information meets the definition of "proprietary confidential business information" as set forth in Sections 366.093(3)(d) and (e), Florida Statutes. As such, the Companies request that the Commission protect this information consistent with Rule 25-22.006, Florida Administrative Code.

5. The Companies ask that confidential classification be granted for a period of at least 18 months. Should the Commission no longer find that it needs to retain the information, the Companies respectfully request that the confidential information be returned to the Companies.

WHEREFORE, Peninsula and Florida City Gas respectfully request that the highlighted information contained in Attachment A to the Companies' Joint Responses to Staff's Data Requests, in this proceeding be classified as "proprietary confidential business information," and thus, exempt from Section 119.07, Florida Statutes.

RESPECTFULLY SUBMITTED this 23<sup>rd</sup> day of September, 2025.



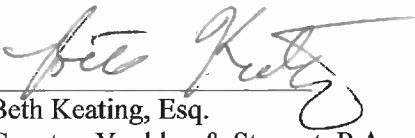
Beth Keating  
Gunster, Yoakley & Stewart, P.A.  
215 South Monroe St., Suite 601  
Tallahassee, FL 32301  
(850) 521-1706

**CERTIFICATE OF SERVICE**

I HEREBY ATTEST that a true and correct copy of the foregoing Joint Request for Confidentiality has been served upon the following by Electronic Mail (redacted only) this 23<sup>rd</sup> day of September, 2025:

Walt Trierweiler, Public Counsel Office of Public Counsel c/o The Florida Legislature 111 W. Madison Street, Room 812 Tallahassee, FL 32399-1400 Trierweiler.walt@leg.state.fl.us	Daniel Dose, General Counsel Florida Public Service Commission 2540 Shumard Oak Boulevard Tallahassee, FL 32399-0850 ddose@psc.state.fl.us
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By:

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

*Attorneys for Florida City Gas and  
Peninsula Pipeline Company*

# ATTACHMENT A

1.

<b>Current</b>			
	FCG-PPC FTSA Monthly Revenue	FCG-RNG Producer ICA Monthly Revenue	Total
Brevard			
Indian River			
Miami			
Dade			

<b>Amended</b>				
	FCG-PPC FTSA Monthly Revenue	FCG-RNG Producer ICA Monthly Revenue	FCG-RNG Producer ICA Revenue Credit to PGA/Swing	Total
Brevard				
Indian River				
Miami				
Dade				

8. Indian River -

Miami-Dade - annual shown in contract as but monthly is

# ATTACHMENT A

1.

Current			
	FCG-PPC FTSA Monthly Revenue	FCG-RNG Producer ICA Monthly Revenue	Total
Brevard			
Indian River			
Miami			
Dade			

Amended				
	FCG-PPC FTSA Monthly Revenue	FCG-RNG Producer ICA Monthly Revenue	FCG-RNG Producer ICA Revenue Credit to PGA/Swing	Total
Brevard				
Indian River				
Miami				
Dade				

8. Indian River -

Miami-Dade - annual shown in contract as but monthly is