

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: September 25, 2025

TO: Daniel Dose, Senior Attorney, Office of the General Counsel

FROM: Christopher Nguyen, Public Utility Analyst I, Division of Economics *CQN*

RE: Docket No. 20250099-GU: Joint petition for approval of amendments to transportation service agreements between Peninsula Pipeline Company, Inc. and Florida City Gas.
Request for Confidential Classification for Document No. 13854-2025.

On September 23, 2025, Florida City Gas (FCG) and Peninsula Pipeline Company (Peninsula), collectively the Parties, filed a joint request for confidential treatment of Document No. 13854-2025. This document contains certain highlighted confidential information within Attachment A to the Parties' Supplemental Responses, identifying contractually negotiated amounts reflected in the transportation service agreements and the interconnection agreements. Furthermore, the Parties explained in their request for confidential classification that FCG, Peninsula, and the renewable gas producers treat the information as proprietary confidential business information that is not otherwise available in the public domain.

Staff reviewed the document and concurs with the Parties that the nature of the information meets the requirements set forth in Sections 366.093(3)(d) and (e), Florida Statutes, whereby disclosure of the information would harm the competitive business operations of the Parties. Therefore, staff recommends that the request by Peninsula and FCG for confidential classification of Document No. 13854-2025 be approved.

cc: Office of Commission Clerk



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

DATE: September 24, 2025

TO: Division of Economics, Office of Primary Responsibility

FROM: OFFICE OF COMMISSION CLERK

RE: CONFIDENTIALITY OF CERTAIN INFORMATION

DOCKET NO: 20250099-GU DOCUMENT NO: 13854-2025

DESCRIPTION: FCG; Peninsula (Keating) - (CONFIDENTIAL) Highlighted information contained in Attachment A to joint responses to staff's second set of data requests.

SOURCE: **Florida City Gas and Peninsula Pipeline Company, Inc.**

The above confidential material was filed along with a request for confidential classification. 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.
- ☒ Portions of the material appear to be confidential in nature and are identified in the memorandum supporting this recommendation.
- ☐ The material is a periodic or recurring filing and each filing contains confidential information.

This response was prepared by Chris Nguyen on 9/25/2025, a copy of which has been sent to the Office of Commission Clerk and the Office of General Counsel.