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July 20, 2026

VIA HAND DELIVERYMr. Adam Teitzman
Commission Clerk
Florida Public Service Commission
2540 Shumard Oak Boulevard
Tallahassee, FL 32399-0850RECEIVED-HPSC
2026 JUL 20 PM 4:56
COMMISSION
CLERK**Re: Docket No. 20260026-GU – Application for Rate Increase by Florida City Gas.**

Dear Mr. Teitzman:

Enclosed for filing, please find the original and six (6) copies of Florida City Gas's Request for Confidential Classification and Motion for Protective Order pertaining to a document provided in response to OPC's Request for a Late-Filed Deposition Exhibit No. 4 to the Deposition of Michael Galtman. Including with this filing is the document on a USB/flash drive. The drive is encrypted and the password is: GUNSTER.

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

Sincerely,

Beth Keating
Gunster, Yoakley & Stewart, P.A.
215 South Monroe St., Suite 601
Tallahassee, FL 32301MEK
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BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Application for Rate Increase by
Florida City Gas.

Docket No. 20260026-GU

Filed: July 20, 2026

**FLORIDA CITY GAS'S REQUEST FOR CONFIDENTIAL CLASSIFICATION AND
MOTION FOR PROTECTIVE ORDER**

Florida City Gas ("FCG" 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 Late-Filed Deposition Exhibit No. 4 to the Deposition of Michael Galtman. In support of this request, the Company states:

1. On April 20, 2026, FCG filed its Petition for Approval of Rate Increase and Request for Interim Rate Relief (herein, "Petition") with the Commission, along with supporting testimony, exhibits, and Minimum Filing Requirement ("MFR") schedules.

2. On June 29, 2026, the Citizens of the State of Florida, through the Office of Public Counsel ("OPC") conducted a deposition of FCG witness Michael Galtman. During that deposition, FCG was asked to produce Late-Filed Deposition Exhibit No. 4, consisting of the analysis of its parent company, Chesapeake Utilities Corporation's ("Chesapeake") acquisition of Florida City Gas, which was provided by one of Chesapeake's outside advisors. This information has not otherwise been publicly disclosed. In this instance, the Company considers the entire document to be confidential, competitively-sensitive, and proprietary, the disclosure of which would cause harm to FCG and its customers.

3. The information for which FCG 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, FCG seeks confidential classification of the responsive document in its entirety. The document is an analysis provided by Barclays to Chesapeake’s board and consisting of an assessment of management, financial, and valuation considerations for the acquisition by Chesapeake of FCG.

5. Disclosure of the information contained in this document publicly would reveal sensitive corporate valuation, financial and deal structure information. Release of any of this information would harm FCG and its ratepayers by revealing sensitive information that could be used unfairly to impair FCG and its parent company’s competitive interests. As such, FCG requests that the Commission afford this information confidential treatment and exempt from Section 119.07, Florida Statutes.

6. Submitted herewith, in substantial compliance with Rule 25-22.006, Florida Administrative Code, is a copy of the confidential document on a flash drive clearly identified as confidential. Given that the file is deemed confidential, in its entirety, FCG respectfully suggests that providing redacted copies would result in the provision of blank pages and thus asks that it not be required to submit the blank pages as doing so is not meaningful in terms of providing a publicly available version.

7. FCG 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. Upon conferral with the OPC and FEA regarding this Request and Motion, counsel is authorized to reflect that neither OPC nor FEA objects to the motion but both reserve the right to challenge confidentiality under Commission rules.

WHEREFORE, FCG respectfully requests that:

1. The Commission enter an order protecting Late-Filed Deposition Exhibit No. 4 to Michael Galtman's deposition from public disclosure as proprietary confidential business information and 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;
2. The Commission grant confidential classification for this information for a period

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Florida City Gas

of at least 18 months.

Respectfully submitted this 20th day of July, 2026, by:

A handwritten signature in black ink, appearing to read "Beth Keating", written over 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 City Gas

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing Request for Confidential Classification and Motion for Protective Order has been furnished by Electronic Mail to the following parties of record this 20th day of July, 2026:

Major Thompson Alisha Hixon Florida Public Service Commission 2540 Shumard Oak Boulevard Tallahassee, FL 32399 mthompso@psc.state.fl.us ahixon@leg.state.fl.us discovery-gcl@psc.state.fl.us	Office of Public Counsel Walter Trierweiler/Charles Rehwinkel/Patricia Christensen/Austin Watrous c/o The Florida Legislature 111 West Madison Street, Room 812 Tallahassee, FL 32399-1400 Trierweiler.walt@leg.state.fl.us Rehwinkel.Charles@leg.state.fl.us Watrous.Austin@leg.state.fl.us Ponce.Octavio@leg.state.fl.us opc-discovery@leg.state.fl.us
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