



BEN ALBRITTON
President of the Senate

**STATE OF FLORIDA
OFFICE OF PUBLIC COUNSEL**

c/o THE FLORIDA LEGISLATURE
111 WEST MADISON ST.
SUITE 812
TALLAHASSEE, FLORIDA 32399-1400
850-488-9330

EMAIL: OPC_WEBSITE@LEG.STATE.FL.US
WWW.FLORIDAOPC.GOV



DANIEL PEREZ
*Speaker of the House of
Representatives*

July 28, 2026

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

Re: Docket No. 20260026-GU - Application for rate increase by Florida City Gas

Dear Mr. Teitzman:

Enclosed for filing in the above docket is the Office of Public Counsel's ("OPC's") Request for Confidential Classification of Information contained in its response to Florida City Gas' ("FCG's") Second Request for Production of Documents (No. 3). This request includes Exhibits A, B, C, and D.

Exhibit A consists of confidential documents that are the subject of OPC's Request for Confidential Classification. Documents in Exhibit A are from OPC expert Christopher C. Walters. A portion of Mr. Walters' workpapers provided in the responses to Florida City Gas' ("FCG's") Second Request for Production of Documents (No. 3) are voluminous and confidential in their entirety, and they are being provided via a flash drive. The documents contained in Exhibit B are confidential in their entirety, and OPC has included only an identifying cover page. Exhibit C is a justification table in support of OPC's Request for Confidential Classification. Exhibit D contains the declaration in support of OPC's Request. In accordance with Rule 25-22.006(3)(d), OPC requests confidential treatment of the information in Exhibit A pending disposition of OPC's Request for Confidential Classification.

Please contact me if you have any questions. Thank you for your assistance with this filing.

Sincerely,

/s/ Charles J. Rehwinkel
Charles J. Rehwinkel
Deputy Public Counsel
Florida Bar No.: 527599
rehwinkel.charles@leg.state.fl.us

CERTIFICATE OF SERVICE
DOCKET NO. 20260026-GU

I HEREBY CERTIFY that a true and correct copy of the foregoing has been furnished by electronic mail on this 28th day of July, 2026, to the following:

Major Thompson
Alisha Hixon
Florida Public Service Commission
Office of General Counsel
2540 Shumard Oak Blvd.
Tallahassee, FL 32399-0850
major.thompson@psc.state.fl.us
ahixon@psc.state.fl.us
discovery-gcl@psc.state.fl.us

Beth Keating
Gunster, Yoakley & Stewart, P.A.
215 South Monroe Street, Suite 601
Tallahassee FL 32302
bkeating@gunster.com

Thomas A. Jernigan
Leslie R. Newton
Matthew R. Vondrasek
Ebony M. Payton
James B. Ely
Federal Executive Agencies
139 Barnes Drive, Suite 1
Tyndall Air Force Base, FL 32403
thomas.jernigan.3@us.af.mil
leslie.newton.1@us.af.mil
matthew.vondrasek.1@us.af.mil
ebony.payton.ctr@us.af.mil
james.ely@us.af.mil
ULFSC.Tyndall@us.af.mil

/s/ Charles J. Rehwinkel
Charles J. Rehwinkel
Deputy Public Counsel
rehwinkel.charles@leg.state.fl.us

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Application for rate increase by Florida
City Gas.

DOCKET NO.: 20260026-GU

FILED: July 28, 2026

**OFFICE OF PUBLIC COUNSEL'S REQUEST FOR CONFIDENTIAL
CLASSIFICATION OF CERTAIN INFORMATION CONTAINED IN ITS
RESPONSE TO FLORIDA CITY GAS' SECOND REQUEST
FOR PRODUCTION OF DOCUMENTS (No. 3)**

Pursuant to sections 366.093(3), Florida Statutes, and Rule 25-22.006(6)(c), Florida Administrative Code, the Office of Public Counsel ("OPC"), hereby request confidential classification of certain information provided in its response to Florida City Gas' ("FCG") Second Request for Production of Documents ("PODs") No. 3, (referred to here as the "Confidential Information"). In support of its Request, OPC states as follows:

1. OPC served its response to FCG's Second Request for PODs (No. 3) on July 28, 2026.

This request is being filed contemporaneously with service of that response to request confidential classification of certain information contained in its response consistent with Rule 25-22.006, Florida Administrative Code. The following exhibits are included with and made a part of this request:

- a. Exhibit A consists of a copy of the yellow highlighted confidential material, which are voluminous and confidential in their entirety and are provided in electronic format on a flash drive.
- b. Exhibit B is an edited version of Exhibit A, in which the information OPC asserts to be confidential has been redacted. The documents contained in Exhibit B are confidential in their entirety, and OPC has included only an identifying cover page.

- c. Exhibit C is a table that identifies by column and line the information for which confidential treatment is being sought and references the specific statutory basis for the claim of confidentiality. Exhibit C also identifies the declarant who supports the requested classification.
 - d. Exhibit D contains the declaration of Christopher C. Walters in support of this requested classification.
- 2. The Confidential Information is intended to be and has been treated by OPC, Christopher C. Walters, and his employer Brubaker and Associates, Inc., as private, its confidentiality has been maintained, and its disclosure would cause harm to OPC, Christopher C. Walters and his employer Brubaker Associates, Inc. Pursuant to Section 366.093, F.S., such materials are entitled to confidential treatment and are exempt from the disclosure provisions of the public records law. Thus, 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.
- 3. As described in the declaration included in Exhibit D, the Confidential Information that is attached contains information relating to competitive interest, the disclosure of which would impair the competitive business for the provider of the information. Specifically, the Confidential Information that is the subject of this Request involves financial reports that were obtained through paid subscription services. This information is protected by Section 366.093(3)(e), F.S.

4. After conferral with counsel for FCG regarding this request, counsel is authorized to reflect that FCG does not object to the motion but reserves the right to challenge confidentiality under Commission rules.
5. Upon a finding by the Commission that the Confidential Information is proprietary confidential business information, the information should not be declassified for a period of at least eighteen (18) months and should be returned to OPC as soon as the information is no longer necessary for the Commission to conduct its business. See Section 366.093(4), F.S.

This same type of information provided by Mr. Walters has previously been found by the Commission to be confidential in Docket No. 20220069-GU in Order No. PSC-2022-0370-GU, issued on October 28, 2022.

Wherefore, for the above and foregoing reasons, as more fully set forth in the supporting materials, OPC respectfully request that its Request for Confidential Classification be granted.

Respectfully submitted,

/s/ Savannah Jacobs

Savannah Jacobs

Associate Public Counsel

Florida Bar No.: 1015246

jacobs.savannah@leg.state.fl.us

Office of Public Counsel

c/o The Florida Legislature

111 West Madison Street, Suite 812

Tallahassee, FL 32399-1400

(850) 488-9330

*Attorneys for the Citizens
of the State of Florida*

CERTIFICATE OF SERVICE
DOCKET NO. 20260026-GU

I HEREBY CERTIFY that a true and correct copy of the foregoing has been furnished by electronic mail on this 28th day of July, 2026, to the following:

Major Thompson
Alisha Hixon
Florida Public Service Commission
Office of General Counsel
2540 Shumard Oak Blvd.
Tallahassee, FL 32399-0850
major.thompson@psc.state.fl.us
ahixon@psc.state.fl.us
discovery-gcl@psc.state.fl.us

Beth Keating
Gunster, Yoakley & Stewart, P.A.
215 South Monroe Street, Suite 601
Tallahassee FL 32301
bkeating@gunster.com

Thomas A. Jernigan
Leslie R. Newton
Matthew R. Vondrasek
Ebony M. Payton
James B. Ely
Federal Executive Agencies
139 Barnes Drive, Suite 1
Tyndall Air Force Base, FL 32403
thomas.jernigan.3@us.af.mil
leslie.newton.1@us.af.mil
matthew.vondrasek.1@us.af.mil
ebony.payton.ctr@us.af.mil
james.ely@us.af.mil
ULFSC.Tyndall@us.af.mil

/s/ Savannah Jacobs
Savannah Jacobs
Associate Public Counsel
jacobs.savannah@leg.state.fl.us

EXHIBIT A

Confidential Documents

Confidential documents are provided in
electronic format via flash drive.

EXHIBIT B

REDACTED

The documents responsive to FCG's Second Set of Production of Documents No. 3, Bates No. 000380 - 001104 are confidential in their entirety.

EXHIBIT C

JUSTIFICATION

TABLE

EXHIBIT C

PARTY: Office of Public Counsel
TITLE: Application for rate increase by Florida City Gas
DOCKET
NO.. 20260026-GU
DATE: July 28th, 2026

Int/POD No	Description	Bates Nos	Page No. Line / Column	Florida Statue 366.093(3) Subsection	Declarants
FCG's 2nd POD No.3	CCW Confidential Workpapers	000380 - 001104	All	(e)	Christopher C. Walters

EXHIBIT D

DECLARATION

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Application for rate increase by
Florida City Gas.

DOCKET NO.: 20260026-GU

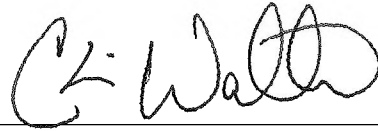
FILED: July 27, 2026

DECLARATION OF CHRISTOPHER C. WALTERS

1. My name is Christopher C. Walters. I am a consultant in the field of public utility regulations and a Principal at the firm of Brubaker and Associates, Inc. ("BAI"). I have personal knowledge of the matters stated in this written declaration.

2. I have reviewed the documents referenced and incorporated in the Office of Public Counsel's ("OPC") Request for Confidential Classification, specifically the materials provided in response to the Florida City Gas ("FCG") Second Request for Production of Documents, No. 3. BAI has subscriptions with numerous third-party subscription based services as well as permission of certain authors to reproduce, for limited purposes certain financial works. The information in these publications was and/or is developed by the third parties and contains descriptions and explanations; or uniquely by the third party. It is my understanding that these third parties consider the information contained in their materials to be proprietary in nature. Further, the third parties control access to the materials contained in the workpapers through the paid subscriptions, or other special arrangements, and that they are not made for use by the general public. In numerous jurisdictions in which I have appeared as a witness, parties on whose behalf I have testified on, have sought, and been granted, confidential treatment of these, and similar materials. To the best of my knowledge, I, BAI, and OPC have maintained the confidentiality of these documents and materials.

Under penalties of perjury, I declare that I have read the foregoing declaration and that the facts stated in it are true to the best of my knowledge and belief.

A handwritten signature in black ink, appearing to read "C. Walters", written over a horizontal line.

Christopher C. Walters

July 27, 2026

Date