

GONZALEZ  
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July 22, 2013

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**BY HAND DELIVERY**

Ms. Ann Cole, Commission Clerk  
Office of Commission Clerk  
Room 110, Easley Building  
Florida Public Service Commission  
2540 Shumard Oak Blvd.  
Tallahassee, Florida 32399-0850

REDACTED

Re: Docket No. 130089-GU, FCG Request for Confidential Classification, FCG'S Responses, Staff's Third Second Set of Data Requests

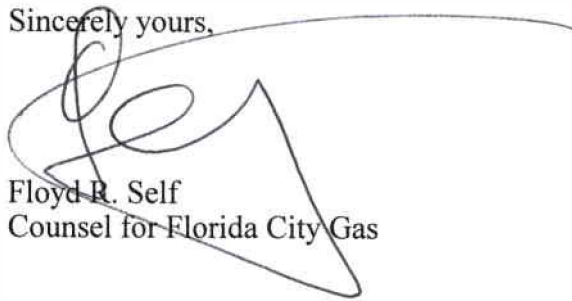
Dear Ms. Cole:

Enclosed for filing on behalf of Florida City Gas are an original and five copies of the Florida City Gas Request for Confidential Classification for Responses to Staff's Third Set of Data Requests.

Please acknowledge receipt of these documents by stamping the extra copy of this letter "filed" and returning the same to me.

Thank you for your assistance with this filing.

Sincerely yours,



Floyd R. Self  
Counsel for Florida City Gas

FRS/bhs  
Enclosures

cc: Elizabeth Wade, Esq.  
Henry Gillman, Esq.  
Suzanne Brownless, Esq.

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West Des Moines, IA

**BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION**

In re: Joint Petition for Approval of the )  
2014 Natural Gas Transportation Service )  
Agreement Between Florida City Gas and ) Docket No.: 130089-GU  
Miami-Dade County, Through the Miami- ) Filed: July 22, 2013  
Dade Water and Sewer Department )  
\_\_\_\_\_ )

**FLORIDA CITY GAS  
REQUEST FOR CONFIDENTIAL CLASSIFICATION,  
RESPONSES TO STAFF'S THIRD SET OF DATA REQUESTS**

Florida City Gas ("FCG" or "Company"), pursuant to Section 366.093, Florida Statutes, and Rule 25-22.006(4), Florida Administrative Code, hereby submits its Request for Confidential Classification ("Request") to the Florida Public Service Commission ("PSC" or "Commission") for certain FCG confidential information more particularly described below that is a part of FCG's Responses to Staff's Third Set of Data Requests. In support of this Request, FCG hereby states:

1. On July 9, 2013, the Commission Staff served on FCG its Third Set of Data Requests. One of the data requests seek additional information regarding the Confidential FCG Cost Support Documentation that was filed as Exhibit D to the Joint Petition in this matter. Confidential Exhibit D to the Joint Petition was granted Confidential Classification by Order No. PSC-13-0246-CFO-GU, on June 4, 2013.

2. In answering the Staff Data Requests regarding Joint Petition Confidential Exhibit D, FCG has prepared a spreadsheet that addresses the subject matter Staff's Third Set of Data Requests, No. 3-2(f), which is identified by FCG as "Exhibit 3-2f, FCG Confidential DR 3-2f Response" and consists of a two page Microsoft Excel ® spreadsheet. Because the information in this spreadsheet provides back up detailed information regarding the O&M expenses

contained in Joint Petition Exhibit D, the same rationale and analysis justifying the confidential treatment for Joint Petition Exhibit D applies with equal force to FCG's Responses to Staff's Third Set of Data Requests to FCG, Exhibit 3-2f, FCG Confidential DR 3-2f Response.

3. The information in FCG's Responses to Staff's Third Set of Data Requests to FCG, Exhibit 3-2f, FCG Confidential DR 3-2f Response, for which FCG seeks confidential classification is information that the Company treats 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. Attachment 1 to this Request contains a chart reflecting the line-by-line or field-by-field specific location and corresponding justification for the referenced confidential information. Release of the referenced confidential information as a public record would harm FCG's business operations and its ratepayers by impairing the Company's ability to effectively negotiate contracts. In particular, because the information contained in FCG's Responses to

Staff's Third Set of Data Requests to FCG, Exhibit 3-2f, FCG Confidential DR 3-2f Response, provides back up, detail, and analysis regarding FCG's cost study filed as Joint Petition Exhibit D, public disclosure of this information would undermine the proprietary and confidential business information in Joint Petition Exhibit D and thus provide FCG's customers with an advantage in any future negotiations with FCG for a contract rate under the LES tariff. As is required by Rule 25-22.006(4)(d), Florida Administrative Code, all of the material, or the arrangement and methodology contained therein, for which confidential classification is sought is intended to be and is treated by FCG as private, it has not been publically disclosed, and it relates to, explains, and backs up the confidential information granted by Order No. PSC-13-0246-CFO-GU and Order No. PSC-13-0297-CFO-GU, issued June 26, 2013 with respect to certain FCG confidential responses to Staff's Third Set of Data Requests. As such, FCG requests that the Commission not make this information publically available and that it protect this information consistent the terms of Section 366.093, Rule 25-22.006, Order No. PSC-13-0246-CFO-GU, and Order No. PSC-13-0297-CFO-GU.

5. Included with this Request in a sealed envelope is a copy of the two pages of FCG's Responses to Staff's Third Set of Data Requests to FCG, Exhibit 3-2f, FCG Confidential DR 3-2f Response, with the confidential information appropriately highlighted in yellow. Also attached to this Request are two redacted copies of these confidential pages.

6. FCG requests that confidential classification be granted for a period of at least 18 months, consistent with the terms of Order No. PSC-13-0246-CFO-GU and Order No. PSC-13-0297-CFO-GU. Should the Commission no longer find that it needs to retain the information, FCG respectfully requests that the confidential information be returned to the Company.

WHEREFORE, FCG respectfully requests that the highlighted information contained in

FCG's Responses to Staff's Third Set of Data Requests to FCG, Exhibit 3-2f, FCG Confidential DR 3-2f Response, be classified as "proprietary confidential business information," and thus, exempt from Section 119.07, Florida Statutes, for at least 18 months.

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By: \_\_\_\_\_



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Attorneys For  
Florida City Gas

	A	B	C	D	E	F
1	Task	Responsible Dept.	Hours / Qty	Rate	Total Cost	Comments
2	Locate Tickets and Emergency Locate requests	Operations Support - Damage Pevention				Number of MDWASD Orr tickets (245) divided by total number of Miami Region tickets (5517) = 4.44% times total locating expense for 2010
3	Sunshine One Call cost per ticket	Operations Support - Damage Pevention				MDWASD tickets 245 times \$0.94
4	Cathodic protection testing	Corrosion-Southern				Estimated Per Manager of Pipeline Integrity
5	Atmospheric corrosion inspection	Corrosion-Southern				Estimated Per Manager of Pipeline Integrity
6	Leak survey of ROW	Operations Support				Quote from Southern Cross contractor
7	Internal inspection & rebuild of pressure regulators and relief valves	Gas Measurement				Estimate per Director Measurement and Control
8	Visual inspection of above ground facilities	Gas Measurement				Estimate per Managing Director of Construction Operations
9	Maintain check measurement equipment/ perfrom witness testing of CTMeters	Gas Measurement				Estimate per Managing Director of Construction Operations
10	Ordorant Expense\per them	Gas Measurement				Estimate per Managing Director of Construction Operations
11	Investigate Leaks	Operations				Estimated Per Miami Operations Supervisor
12	Repair and Maintain Services	Operations				Estimated Per Miami Operations Supervisor
13	Repair and Maintain Mains	Operations				Estimated Per Miami Operations Supervisor
14	Repair and Maintain Meter and Reg Stations - Meter 1	Operations				Estimated Per Miami Operations Supervisor
15	Repair and Maintain Meter and Reg Stations - Meter 2	Operations				Estimated Per Miami Operations Supervisor
16	Customer Billing and Customer Accounting - Acct 1	Accounting				Three hours per month
17	Customer Billing and Customer Accounting - Acct 2	Accounting				Three hours per month
18						
19						

	A	B	C	D	E	F
1	Task	Responsible Dept.	Hours / Qty	Rate	Total Cost	Comments
2	Locate Tickets and Emergency Locate requests	Operations Support - Damage Pevention				Number of MDWASD Hialeah tickets (180) divided by total number of Miami Region tickets (5517) = 3.26% times total locating expense for 2010
3	Sunshine One Call cost per ticket	Operations Support - Damage Pevention				MDWASD tickets 180 times \$0.94
4	Cathodic protection testing	Corrosion-Southern				Estimated Per Manager of Pipeline Integrity
5	Atmospheric corrosion inspection	Corrosion-Southern				Estimated Per Manager of Pipeline Integrity
6	Leak survey of ROW	Operations Support				Quote from Southern Cross contractor
7	Internal inspection & rebuild of pressure regulators and relief valves	Gas Measurement				Estimate per Director Measurement and Control
8	Visual inspection of above ground facilities	Gas Measurement				Estimate per Managing Director of Construction Operations
9	Maintain check measurement equipment/ perfrom witness testing of CTMeters	Gas Measurement				Estimate per Managing Director of Construction Operations
10	Odorant Expense\per them	Gas Measurement				Estimate per Managing Director of Construction Operations
11	Investigate Leaks	Operations				Estimated Per Miami Operations Supervisor
12	Repair and Maintain Services	Operations				Estimated Per Miami Operations Supervisor
13	Repair and Maintain Mains	Operations				Estimated Per Miami Operations Supervisor
14	Repair and Maintain Meter and Reg Stations	Operations				Estimated Per Miami Operations Supervisor
15	Customer Billing and Customer Accounting	Accounting				Three hours per month
16						
17						
18						

FCG Confidential Request, Responses to Staff Third Data Requests

Attachment 1

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Document	Page Nos.	Columns	Line Nos.	Statutory Justification
<p>FCG's Responses to Staff's Third Set of Data Requests, Exhibit 3-2f, FCG Confidential DR 3-2f Response, consisting of a 2 page Microsoft Excel ® spreadsheet</p>	<p>1</p>	<p>C-E</p>	<p>2-19</p>	<p>These proprietary numbers provide in Column C the Hours or Quantity of work associated with the Operations and Maintenance (O&amp;M) Tasks detailed in Column A; the FCG rate for such tasks in Column D; and the total cost for such work in Column E (Column C multiplied by Column D), with the total O&amp;M cost for Orr in Column E, Line 19. The total O&amp;M cost for Orr in Column E, Line 19 has been previously granted confidential treatment in Order No. PSC-13-0246-CFO-GU, on June 4, 2013. Such customer-specific, detailed back up information to information already granted confidential treatment would, if made public, reveal the number already granted confidential treatment and otherwise negatively impact the competitive interests of the company (and hence ratepayers) in the company's negotiations of other agreements for it would provide those customers with information regarding the minimum take or pay requirements of the company. Such customer-specific information is maintained by FCG as confidential and proprietary information and is not released to the public.</p>
<p>FCG's Responses to Staff's Third Set of Data Requests, Exhibit 3-2f, FCG Confidential DR 3-2f Response, consisting of a two page Microsoft Excel ® spreadsheet</p>	<p>2</p>	<p>C-E</p>	<p>2-18</p>	<p>These proprietary numbers provide in Column C the Hours or Quantity of work associated with the Operations and Maintenance (O&amp;M) Tasks detailed in Column A; the FCG rate for such tasks in Column D; and the total cost for such work in Column E (Column C multiplied by Column D), with the total O&amp;M cost for Hialeah in Column E, Line 18. The total O&amp;M cost for Hialeah in Column E, Line 19 has been previously granted confidential treatment in Order No. PSC-13-0246-CFO-GU, on June 4, 2013. Such customer-specific, detailed back up information to information already granted confidential treatment would, if made public, reveal the number already granted confidential</p>



FCG Confidential Request, Responses to Staff Third Data Requests

Attachment 1

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				<p>treatment and otherwise negatively impact the competitive interests of the company (and hence ratepayers) in the company's negotiations of other agreements for it would provide those customers with information regarding the minimum take or pay requirements of the company. Such customer-specific information is maintained by FCG as confidential and proprietary information and is not released to the public.</p>
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