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IN REPLY REFER TO:

Ansley Watson, Jr.  
P.O. Box 1531  
Tampa, Florida 33601  
e-mail: [aw@macfar.com](mailto:aw@macfar.com)

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COMMISSION  
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April 14, 2014

Carlotta S. Stauffer, Director  
Office of Commission Clerk  
Florida Public Service Commission  
2540 Shumard Oak Boulevard  
Tallahassee, Florida 32399-0850

**Re: Docket No. 140034-GU -- Petition for approval of special gas transportation service agreement with RockTenn CP, LLC, by Peoples Gas System**

Dear Ms. Stauffer:

We enclose for filing with the Commission:

1. the original and five (5) copies of billing examples verbally requested by the Commission Staff in the above docket (confidential treatment being requested for portions of such examples);
2. the original and seven (7) copies of Peoples Gas System's Request for Specified Confidential Classification of portions of the requested billing examples; and
3. a single unredacted copy of the billing examples on which the sensitive information for which confidential treatment is sought has been highlighted.

In the original and all five (5) "public" copies of the billing examples the sensitive information has been redacted.

Please acknowledge your receipt and the date of filing of the enclosures on the enclosed duplicate copy of this letter, and return the same to me in the preaddressed envelope which is also enclosed.

Carlotta S. Stauffer, Director  
April 14, 2014  
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Thank you for your usual assistance.

Sincerely,

A handwritten signature in blue ink that reads "Ansley Watson, Jr." in a cursive style.

ANSLEY WATSON, JR.

AWjr/a

cc: Suzanne Brownless, Esquire (via e-mail attachment)

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Petition for approval of a special contract )  
with RockTenn CP, LLC, by Peoples Gas System. )

Docket No. 140034-GU

Submitted for Filing:  
4-15-14

**PEOPLES GAS SYSTEM'S REQUEST  
FOR SPECIFIED CONFIDENTIAL CLASSIFICATION**

Pursuant to Section 366.093, *Florida Statutes*, Peoples Gas System ("Peoples" or the "Company"), submits the following Request for Specified Confidential Classification of portions of billing examples provided by the Company in response to Staff's verbal request for additional information, which are submitted for filing in the above docket concurrently herewith:

1. Attached hereto as Exhibit A is a detailed justification for the requested confidential treatment of the highlighted portions of Peoples' billing examples.

2. The material for which specified confidential classification is sought is intended to be and is treated as private by Peoples, and has not been disclosed.

3. Peoples requests that the information for which it seeks confidential classification not be declassified for a period of 18 months after the issuance of the Commission's order granting specified confidential classification. The time period requested is necessary to protect the competitive information (*i.e.*, the rates provided in the special contract, the quantities for which such rates will apply, and other information from which the rates or quantities might be calculated) from disclosure to Peoples' competitors and to other customers in order to allow Peoples, should it become necessary, to negotiate future gas service arrangements with other customers on favorable terms based on the specific factual circumstances of such customers.

The period of time requested will ultimately protect Peoples and its customers by any such future arrangements being entered into based only on the facts and circumstances then applicable. Should the Commission find that it no longer needs the highlighted confidential information in the Company's responses, Peoples respectfully requests that such information be

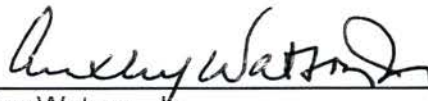
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IDM \_\_\_\_\_  
TEL \_\_\_\_\_  
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returned to the Company.

4. Included with this Request are highlighted copies of the billing examples provided by the Company in response to the Staff's verbal request for additional information. In addition, two redacted copies of those billing examples containing highlighted information are enclosed.

WHEREFORE, Peoples submits the foregoing as its request for confidential treatment of the information identified in Exhibit A.

Respectfully submitted,



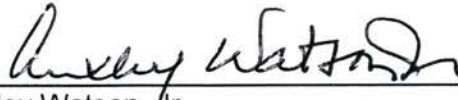
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Attorneys for Peoples Gas System

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true copy of the foregoing Request for Confidential Treatment, filed on behalf of Peoples Gas System, has been furnished by regular U.S. Mail to the Office of Public Counsel, 812 Claude Pepper Building, 111 W. Madison Street, Tallahassee, Florida 32399-1400, and to Suzanne Brownless, Esquire, Office of General Counsel, Florida Public Service Commission, 2540 Shumard Oak Blvd., Tallahassee, Florida 32399-0850, this 14th day of April, 2014.



\_\_\_\_\_  
Ansley Watson, Jr.

## PEOPLES' RESPONSES TO STAFF'S VERBAL REQUEST FOR ADDITIONAL INFORMATION

The information in the billing examples provided by the Company in response to Staff's request for additional information for which Peoples seeks specified confidential treatment, and non-disclosure pursuant to Chapter 119, *Florida Statutes*, is highlighted on the page of examples submitted:

### **Rationale for Specified Confidential Classification**

The highlighted information identified above consists of the various rates at which Peoples will provide gas service to RockTenn under the special contract, the various thresholds below which such rates will apply, other information affecting the level of the rate to be charged, the formula pursuant to which certain of the rates are calculated, and other information from which rates or annual quantities could be calculated or closely estimated algebraically. All is information directly relating to Peoples' competitive interests which, if made public, "would impair the competitive business" of Peoples in the event it should become necessary to negotiate similar arrangements with other customers or potential customers in the future. Section 366.093(3)(d), *Florida Statutes*.

Disclosure of this information, which consists of information from which the rates or annual quantities could be algebraically determined or closely estimated would damage Peoples in its ability to engage in possible future negotiations with this customer on rates and terms of service which are most favorable to Peoples and its ratepayers, and hamper the Company in its ability to negotiate in the future with other customers and potential customers who may be contemplating either the bypass of Peoples' distribution system or switching to a fuel other than natural gas, or never choosing to use the Peoples' distribution system at all. It is reasonably likely that the end result of disclosing this information would be a reduction in revenues to Peoples and/or a loss of future customers or potential customers to alternative suppliers, including those of an alternate fuel.

The Commission has already determined this same information to be entitled to confidential classification in this docket by its Orders Nos. PSC-14-0126-CFO-GU, issued March 14, 2014, and PSC-14-0151-CFO-GU, issued April 3, 2014, as well as the 18-month period of non-disclosure sought by Peoples.

Two redacted copies of the page referenced above are appended to this Exhibit A.

RockTenn Billing Examples

**Fernandina Beach Facility**

[REDACTED] election)	December	January	February	March	April	May	June	July	August	September	October	November
1 Fixed Monthly Charge / Distribution Charge	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
2 Usage Charge	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
3 Variable Rate/MMBtu	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
4 Monthly Consumption (MMBtu)	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
5 Year to Date Consumption (MMBtu)	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
Total Charge (Line 1 + 2)	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]

**Variable Rate Calculation:**

[REDACTED] for all quantities between [REDACTED]  
 [REDACTED] for all quantities over [REDACTED] delivered to the Fernandina Beach facility

**Fernandina Beach Facility**

[REDACTED] election)	December	January	February	March	April	May	June	July	August	September	October	November
6 Fixed Monthly Charge / Distribution Charge	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
7 Usage Charge	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
8 Variable Rate/MMBtu	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
9 Monthly Consumption (MMBtu)	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
10 Year to Date Consumption (MMBtu)	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
Total Charge (Line 6 + 7)	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]

**Fixed Monthly Charge Calculation:**

[REDACTED] (includes an incremental annual election increase of [REDACTED])

**Variable Rate Calculation:**

[REDACTED] for all quantities between [REDACTED] (quantity increases with election of increased Fixed Monthly Charge - See Appendix D)  
 [REDACTED] for all quantities over [REDACTED] delivered to the Fernandina Beach facility

Must elect quantities by July 1 to be effective December 1 - see Appendix D

**Jacksonville Facility**

[REDACTED] election)	December	January	February	March	April	May	June	July	August	September	October	November
11 Fixed Monthly Charge / Distribution Charge	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
12 Usage Charge	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
13 Variable Rate/MMBtu	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
14 Monthly Consumption (MMBtu)	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
15 Year to Date Consumption (MMBtu)	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
Total Charge (Line 11 + 12)	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]

**Variable Rate Calculation:**

[REDACTED] for all quantities between [REDACTED]  
 [REDACTED] for all quantities over [REDACTED] delivered to the Jacksonville (Seminole) facility

**Panama City Facility**

[REDACTED] election)	December	January	February	March	April	May	June	July	August	September	October	November
16 Fixed Monthly Charge / Distribution Charge	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
17 Usage Charge	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
18 Variable Rate/MMBtu	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
19 Monthly Consumption (MMBtu)	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
20 Year to Date Consumption (MMBtu)	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
Total Charge (Line 16 + 17)	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]

**Variable Rate Calculation:**

[REDACTED] for all quantities between [REDACTED]  
 [REDACTED] for all quantities over [REDACTED] delivered to the Panama City facility

RockTenn Billing Examples

**Fernandina Beach Facility**

(Election)	December	January	February	March	April	May	June	July	August	September	October	November
1 Fixed Monthly Charge / Distribution Charge												
2 Usage Charge												
3 Variable Rate/MMBtu												
4 Monthly Consumption (MMBtu)												
5 Year to Date Consumption (MMBtu)												
Total Charge (Line 1 + 2)												

**Variable Rate Calculation:**

for all quantities between [redacted]  
 for all quantities over [redacted] delivered to the Fernandina Beach facility

**Fernandina Beach Facility**

(Election)	December	January	February	March	April	May	June	July	August	September	October	November
6 Fixed Monthly Charge / Distribution Charge												
7 Usage Charge												
8 Variable Rate/MMBtu												
9 Monthly Consumption (MMBtu)												
10 Year to Date Consumption (MMBtu)												
Total Charge (Line 6 + 7)												

**Fixed Monthly Charge Calculation:**

[redacted] (includes an incremental annual election increase of [redacted])

**Variable Rate Calculation:**

for all quantities between [redacted] (quantity increases with election of increased Fixed Monthly Charge - See Appendix D)  
 for all quantities over [redacted] delivered to the Fernandina Beach facility

Must elect quantities by July 1 to be effective December 1 - see Appendix D

**Jacksonville Facility**

(Election)	December	January	February	March	April	May	June	July	August	September	October	November
11 Fixed Monthly Charge / Distribution Charge												
12 Usage Charge												
13 Variable Rate/MMBtu												
14 Monthly Consumption (MMBtu)												
15 Year to Date Consumption (MMBtu)												
Total Charge (Line 11 + 12)												

**Variable Rate Calculation:**

for all quantities between [redacted]  
 for all quantities over [redacted] delivered to the Jacksonville (Seminole) facility

**Panama City Facility**

(Election)	December	January	February	March	April	May	June	July	August	September	October	November
16 Fixed Monthly Charge / Distribution Charge												
17 Usage Charge												
18 Variable Rate/MMBtu												
19 Monthly Consumption (MMBtu)												
20 Year to Date Consumption (MMBtu)												
Total Charge (Line 16 + 17)												

**Variable Rate Calculation:**

for all quantities between [redacted]  
 for all quantities over [redacted] delivered to the Panama City facility