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**REDACTED**

May 8, 2015

**Hand Delivery**

Ms. Carlotta Stauffer, Clerk  
Florida Public Service Commission  
2540 Shumard Oak Boulevard  
Tallahassee, FL 32399-0850

RECEIVED FPSC  
15 MAY - 8 PM 3:35  
COMMISSION  
CLERK

**Re: Docket No. 150117-GU- Joint Petition of Florida Public Utilities Company, Florida Public Utilities Company-Indiantown Division, Florida Public Utilities Company-Fort Meade, and the Florida Division of Chesapeake Utilities Corporation for Approval of Modified Cost Allocation Methodology and Revised Purchased Gas Adjustment Calculation.**

Dear Ms. Stauffer:

Enclosed, please find the original and seven (7) copies of the Joint Request for Confidential Classification and Protective Order of Florida Public Utilities Company, Florida Public Utilities Company-Fort Meade, Florida Public Utilities Company-Indiantown Division, and the Florida Division of Chesapeake Utilities Corporation for certain information contained in the Companies' Responses to Commission Staff's First Data Requests to the Companies in the referenced docket. Also enclosed is one highlighted version of the pages containing the subject confidential information, as well as two redacted copies of these pages, as required by Commission Rule.

As always, please do not hesitate to contact me if you have any questions whatsoever regarding this filing.

Sincerely,

Beth Keating  
Gunster, Yoakley & Stewart, P.A.  
215 South Monroe St., Suite 601  
Tallahassee, FL 32301  
(850) 521-1706

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Cc://Kysha Mapp, Staff Counsel

**BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION**

In re: Joint Petition of Florida Public Utilities ) Docket No. 150117-GU  
Company, Florida Public Utilities Company- )  
Indiantown Division, Florida Public Utilities ) Filed: May 8, 2015  
Company-Fort Meade, and the Florida Division of )  
Chesapeake Utilities Corporation for Approval of )  
Modified Cost Allocation Methodology and )  
Revised Purchased Gas Adjustment Calculation. )

**JOINT REQUEST OF THE FLORIDA DIVISION OF CHESAPEAKE UTILITIES CORPORATION AND FLORIDA PUBLIC UTILITIES COMPANY FOR CONFIDENTIAL CLASSIFICATION AND TEMPORARY PROTECTIVE ORDER**

The Florida Division of Chesapeake Utilities Corporation and Florida Public Utilities Company (“Companies”) by and through their undersigned counsel, pursuant to Section 366.093, Florida Statutes, and consistent with Rule 25-22.006(4), Florida Administrative Code, hereby submit this Joint Request for Confidential Classification for information contained in the Companies’ Responses to Commission Staff’s First Data Requests. In accordance with Rule 25-22.006(6), Florida Administrative Code, the Companies further request that a Temporary Protective Order be issued protecting this information when such is provided to the Office of Public Counsel (“OPC”). In support thereof, the Companies hereby state:

1. The Companies seek confidential classification of the highlighted amounts provided in response to Data Request No. 6. The subject information may be found at page 6, in Chart 3, in the Columns titled “Annualized Cost Un-released Capacity” and “Annualized Therms Un-released Capacity,” as well as in Chart 4, in the Columns titled “Annualized PGA Cost Un-released Capacity” and “Annualized PGA Therms Un-released Capacity.” The highlighted information represents information that the Companies treat as proprietary confidential business information consistent with the definition of that term in Section 366.093, Florida Statutes. This information has not otherwise been publicly disclosed, to the best of the Companies’ knowledge.

2. The information for which the Companies seek confidential classification is information that both treat 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.

3. Specifically, the highlighted information at page 6 of the Companies’ Data Responses includes specific system function and capacity information, as well as information regarding the costs associated therewith. If this information were disclosed publicly, the Companies’ respective abilities to contract for services could be significantly impaired, which ultimately would have an adverse impact on the Companies’ ratepayers as well. Likewise, release of certain amounts may pose financial and safety concerns for the Companies’ system(s). The information at issue, therefore, falls within Section 366.093(3)(c) and (e), Florida Statutes.

4. Included with this Request are highlighted copies of page 6 of the Companies’ Data Responses containing the confidential information. Also enclosed are two redacted copies of the referenced page.

5. The Companies ask that confidential classification be granted for a period of at least 18 months. Should the Commission determine that it no longer needs to retain the information, the Companies respectfully request that the confidential information be returned to the Companies.

WHEREFORE, Florida Public Utilities Company and the Florida Division of Chesapeake Utilities Corporation respectfully request that: (1) the highlighted information contained on page 6 of their Responses to Commission Staff's First Data Requests be classified as "proprietary confidential business information," and thus, exempt from Section 119.07, Florida Statutes; and (2) that a Temporary Protective Order also be issued protecting this information while in the possession of the Office of Public Counsel.

RESPECTFULLY SUBMITTED this 8th day of May, 2015.



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Beth Keating  
Gunster, Yoakley & Stewart, P.A.  
215 South Monroe St., Suite 601  
Tallahassee, FL 32301  
(850) 521-1706

CERTIFICATE OF SERVICE

I HEREBY ATTEST that a true and correct copy of the foregoing Request has been served upon the following by U.S. Mail this 8th day of May, 2015:

Honorable J.R. Kelly  
Office of Public Counsel  
c/o the Florida Legislature  
111 West Madison Street, Rm 812  
Tallahassee, FL 32399-1400



Beth Keating, Esq.  
Gunster, Yoakley & Stewart, P.A.  
215 S. Monroe St., Ste 601  
(850) 521-1706

Florida Public Utilities Company (Gas Divisions) and Florida Division of Chesapeake Utilities  
 Responses to Staff's First Data Requests  
 FPSC Docket No. 150117-GU  
 (CONFIDENTIAL VERSION)

Subtract the current estimated annual PGA cost per therm from the estimated annual cost per therm after the consolidation to arrive at the estimated increase to cost per therm of approximately \$0.025 – see Chart 4 and 5.

**Chart 3**

Consolidated Estimate Annual Cost Un-released Capacity	Consolidated Estimate Annual Therms Un-released Capacity	Consolidated Estimate Cost per Therm Un-released Capacity
██████████	██████████	\$0.108

**Chart 4**

Estimated Annual PGA Cost Un-released Capacity	Estimated Annual PGA Therms Un-released Capacity	Estimated PGA Cost per Therm Un-released Capacity
██████████	██████████	\$0.083

**Chart 5**

Consolidated Estimate Cost Per Therm Un-released Capacity	Estimated PGA Cost Per Therm Un-released Capacity	Estimated Increase PGA Cost Per Therm
\$0.108	\$0.083	\$0.025

7. **Do the Companies anticipate that consolidating the cost allocation methodology across the entire Chesapeake Florida system will result in any administrative cost savings in comparison with the current practice of performing separate cost allocations for each of the four divisions? If the answer is affirmative and it is possible to estimate potential cost savings, please provide an estimate of the annual cost savings that would be realized by each division.**

Response:

No, at this time the Companies do not anticipate any administrative cost savings in comparison with the current practice of performing separate cost allocations for each of the four divisions. It is anticipated that it will simply be a change in methodology of allocation, without any material change to the administration time necessary to allocate the costs.