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November 1, 2016

BY E-FILE

Ms. Callotta Stauffer, Director
Office of the Commission Clerk
Florida Public Service Commission
2540 Shumard Oak Boulevard
Tallahassee, FL 32399-0850

Re: Docket No. 160175-GU

Dear Ms. Stauffer:

On behalf for Florida City Gas (“FCG”), enclosed is an updated Attachment 1 to FCG’s Request for Confidential Classification, Line by Line Justification. Please substitute the attached pages for the ones filed this morning with FCG’s Request for Confidential Classification (“Request”). The original Attachment 1 omitted the line by line justification for the data request response. Also attached is an updated copy of the complete redacted version of the confidential documents that should be substituted for the redacted copy filed this morning. The redacted copy omitted the redacted data request responses that reflected the line numbers. There are no changes to the Request for Confidential Classification pleading.

I apologize for any inconvenience this has caused. Thank you for your assistance. If you have any questions, please contact me directly.

Sincerely,

Berger Singerman LLP



Floyd R. Self

FRS:AM
Enclosures

UPDATED Attachment 1
 FCG Request for Confidential Classification, November 1, 2016
 Line-by-Line Justification
 Docket No. 160175

DOCUMENT	PAGE NO(S).	COLUMNS	LINE NO(S).	STATUTORY JUSTIFICATION
Response Exhibit 2A, FCG Revenue Requirement Study	Page 1 (entire document)	A-G	1-43	<p>This document contains FCG's compilation of actual, budgeted, and forecasted natural gas volumes transported or estimated to be transported by FCG for Florida Crystals. In addition it includes on a year-by-year basis FCG's Revenue Requirement, FCG's Actual or Forecasted Margin/Revenue, whether FCG's revenues exceed or fall below FCG's revenue requirement, and the actual revenue received from Florida Crystals for each year. This type of customer-specific volumes and revenues and customer-specific margin information is not released to the public, including the customer it is derived from. This information, if made public, would negatively impact the competitive interests of the company (and hence FCG's ratepayers) in the company's negotiations of other service agreements. Moreover, this would be an unfair and inappropriate disclosure of customer information. Finally, this information is based upon FCG trade secret information in terms of the method of calculation such revenue requirements and margins.</p>

<p>Response Exhibit 3A (2016), Revenue Requirement Analysis</p> <p>FCG's Confidential MDWASD Bypass Analysis</p>	<p>Page 1 Page 2 Page 3 Page 4 Page 5 Page 6 Page 7 Page 8 Page 9 (entire document)</p>	<p>A-B A-D A-G A-K L-Z AA-AH A-D A-F A-D</p>	<p>1-18 1-27 1-46 1-41 1-41 1-41 1-36 1-45 1-49</p>	<p>The proprietary information presented in this document includes the backup calculations for the information presented in Petition Confidential Exhibit 2 as well as the proposed interim service arrangement rates and how such rates were calculated. These analyzes are based upon the unique customer-specific volumes and revenues and customer-specific margin information presented in Confidential Petition Exhibit 2. This information is not released to the public, including the customer it is derived from. This information, if made public, would negatively impact the competitive interests of the company (and hence FCG's ratepayers) in the company's negotiations of other service agreements. Moreover, this would be an unfair and inappropriate disclosure of customer information. Finally, this information is based upon FCG trade secret information in terms of the method of calculation such revenue requirements and margins.</p>
<p>Response Exhibit 3A (2017), Revenue Requirement Analysis</p> <p>FCG's Confidential MDWASD Bypass Analysis</p>	<p>Page 1 Page 2 Page 3 Page 4 Page 5 Page 6 Page 7 Page 8 Page 9 (entire document)</p>	<p>A-D A-D A-G A-I J-V W-AH A-D A-F A-D</p>	<p>1-41 1-37 1-45 1-41 1-41 1-41 1-36 1-45 1-70</p>	<p>The proprietary information presented in this document includes the backup calculations for the information presented in Petition Confidential Exhibit 2 as well as the proposed interim service arrangement rates and how such rates were calculated. These analyzes are based upon the unique customer-specific volumes and revenues and customer-specific margin information presented in Confidential Petition Exhibit 2. This information is not released to the public, including the customer it is derived from. This information, if made public, would negatively impact the competitive interests of the company (and hence FCG's ratepayers) in the company's negotiations of other service agreements. Moreover, this would be an unfair and inappropriate disclosure of customer information. Finally, this information is based upon FCG trade secret information in terms of the method of calculation such revenue requirements and margins.</p>

<p>Response Exhibit 3A (2018), Revenue Requirement Analysis</p> <p>FCG's Confidential MDWASD Bypass Analysis</p>	<p>Page 1 Page 2 Page 3 Page 4 Page 5 Page 6 Page 7 Page 8 Page 9 (entire document)</p>	<p>A-D A-D A-G A-J K-V W-AH A-D A-F A-D</p>	<p>1-41 1-27 1-48 1-41 1-41 1-41 1-36 1-45 1-69</p>	<p>The proprietary information presented in this document includes the backup calculations for the information presented in Petition Confidential Exhibit 2 as well as the proposed interim service arrangement rates and how such rates were calculated. These analyzes are based upon the unique customer-specific volumes and revenues and customer-specific margin information presented in Confidential Petition Exhibit 2. This information is not released to the public, including the customer it is derived from. This information, if made public, would negatively impact the competitive interests of the company (and hence FCG's ratepayers) in the company's negotiations of other service agreements. Moreover, this would be an unfair and inappropriate disclosure of customer information. Finally, this information is based upon FCG trade secret information in terms of the method of calculation such revenue requirements and margins.</p>
<p>Response Exhibit 3A (2019), Revenue Requirement Analysis</p> <p>FCG's Confidential MDWASD Bypass Analysis</p>	<p>Page 1 Page 2 Page 3 Page 4 Page 5 Page 6 Page 7 Page 8 Page 9 (entire document)</p>	<p>A-D A-D A-G A-J K-V W-AH A-D A-F A-D</p>	<p>1-41 1-27 1-46 1-39 1-39 1-39 1-36 1-45 1-68</p>	<p>The proprietary information presented in this document includes the backup calculations for the information presented in Petition Confidential Exhibit 2 as well as the proposed interim service arrangement rates and how such rates were calculated. These analyzes are based upon the unique customer-specific volumes and revenues and customer-specific margin information presented in Confidential Petition Exhibit 2. This information is not released to the public, including the customer it is derived from. This information, if made public, would negatively impact the competitive interests of the company (and hence FCG's ratepayers) in the company's negotiations of other service agreements. Moreover, this would be an unfair and inappropriate disclosure of customer information. Finally, this information is based upon FCG trade secret information in terms of the method of calculation such revenue requirements and margins.</p>

<p>Response Exhibit 3A (2020), Revenue Requirement Analysis</p> <p>FCG's Confidential MDWASD Bypass Analysis</p>	<p>Page 1 Page 2 Page 3 Page 4 Page 5 Page 6 Page 7 Page 8 Page 9 (entire document)</p>	<p>A-D A-D A-G A-J K-W X-AH A-D A-F A-D</p>	<p>1-41 1-24 1-46 1-39 1-39 1-39 1-36 1-45 1-69</p>	<p>The proprietary information presented in this document includes the backup calculations for the information presented in Petition Confidential Exhibit 2 as well as the proposed interim service arrangement rates and how such rates were calculated. These analyzes are based upon the unique customer-specific volumes and revenues and customer-specific margin information presented in Confidential Petition Exhibit 2. This information is not released to the public, including the customer it is derived from. This information, if made public, would negatively impact the competitive interests of the company (and hence FCG's ratepayers) in the company's negotiations of other service agreements. Moreover, this would be an unfair and inappropriate disclosure of customer information. Finally, this information is based upon FCG trade secret information in terms of the method of calculation such revenue requirements and margins.</p>
<p>Response Exhibit 3A (2021), Revenue Requirement Analysis</p> <p>FCG's Confidential MDWASD Bypass Analysis</p>	<p>Page 1 Page 2 Page 3 Page 4 Page 5 Page 6 Page 7 Page 8 Page 9 (entire document)</p>	<p>A-D A-D A-G A-J K-W X-AH A-D A-F A-D</p>	<p>1-41 1-27 1-45 1-39 1-39 1-39 1-36 1-45 1-69</p>	<p>The proprietary information presented in this document includes the backup calculations for the information presented in Petition Confidential Exhibit 2 as well as the proposed interim service arrangement rates and how such rates were calculated. These analyzes are based upon the unique customer-specific volumes and revenues and customer-specific margin information presented in Confidential Petition Exhibit 2. This information is not released to the public, including the customer it is derived from. This information, if made public, would negatively impact the competitive interests of the company (and hence FCG's ratepayers) in the company's negotiations of other service agreements. Moreover, this would be an unfair and inappropriate disclosure of customer information. Finally, this information is based upon FCG trade secret information in terms of the method of calculation such revenue requirements and margins.</p>

<p>Response Exhibit 3A (2022), Revenue Requirement Analysis</p> <p>FCG's Confidential MDWASD Bypass Analysis</p>	<p>Page 1 Page 2 Page 3 Page 4 Page 5 Page 6 Page 7 Page 8 Page 9 (entire document)</p>	<p>A-D A-D A-G A-J K-X Y-AH A-D A-F A-D</p>	<p>1-41 1-27 1-45 1-41 1-41 1-41 1-36 1-44 1-70</p>	<p>The proprietary information presented in this document includes the backup calculations for the information presented in Petition Confidential Exhibit 2 as well as the proposed interim service arrangement rates and how such rates were calculated. These analyzes are based upon the unique customer-specific volumes and revenues and customer-specific margin information presented in Confidential Petition Exhibit 2. This information is not released to the public, including the customer it is derived from. This information, if made public, would negatively impact the competitive interests of the company (and hence FCG's ratepayers) in the company's negotiations of other service agreements. Moreover, this would be an unfair and inappropriate disclosure of customer information. Finally, this information is based upon FCG trade secret information in terms of the method of calculation such revenue requirements and margins.</p>
<p>Response Exhibit 3A (2023), Revenue Requirement Analysis</p> <p>FCG's Confidential MDWASD Bypass Analysis</p>	<p>Page 1 Page 2 Page 3 Page 4 Page 5 Page 6 Page 7 Page 8 Page 9 (entire document)</p>	<p>A-D A-D A-G A-I J-V W-AH A-D A-F A-D</p>	<p>1-41 1-27 1-46 1-41 1-41 1-41 1-36 1-45 1-70</p>	<p>The proprietary information presented in this document includes the backup calculations for the information presented in Petition Confidential Exhibit 2 as well as the proposed interim service arrangement rates and how such rates were calculated. These analyzes are based upon the unique customer-specific volumes and revenues and customer-specific margin information presented in Confidential Petition Exhibit 2. This information is not released to the public, including the customer it is derived from. This information, if made public, would negatively impact the competitive interests of the company (and hence FCG's ratepayers) in the company's negotiations of other service agreements. Moreover, this would be an unfair and inappropriate disclosure of customer information. Finally, this information is based upon FCG trade secret information in terms of the method of calculation such revenue requirements and margins.</p>

<p>Response Exhibit 3A (2024), Revenue Requirement Analysis</p> <p>FCG's Confidential MDWASD Bypass Analysis</p>	<p>Page 1 Page 2 Page 3 Page 4 Page 5 Page 6 Page 7 Page 8 Page 9 (entire document)</p>	<p>A-D A-D A-G A-J K-W X-AH A-D A-F A-D</p>	<p>1-40 1-25 1-51 1-40 1-40 1-40 1-35 1-45 1-69</p>	<p>The proprietary information presented in this document includes the backup calculations for the information presented in Petition Confidential Exhibit 2 as well as the proposed interim service arrangement rates and how such rates were calculated. These analyzes are based upon the unique customer-specific volumes and revenues and customer-specific margin information presented in Confidential Petition Exhibit 2. This information is not released to the public, including the customer it is derived from. This information, if made public, would negatively impact the competitive interests of the company (and hence FCG's ratepayers) in the company's negotiations of other service agreements. Moreover, this would be an unfair and inappropriate disclosure of customer information. Finally, this information is based upon FCG trade secret information in terms of the method of calculation such revenue requirements and margins.</p>
<p>Response Exhibit 3A (2025), Revenue Requirement Analysis</p> <p>FCG's Confidential MDWASD Bypass Analysis</p>	<p>Page 1 Page 2 Page 3 Page 4 Page 5 Page 6 Page 7 Page 8 Page 9 (entire document)</p>	<p>A-D A-D A-G A-J K-W X-AH A-D A-F A-D</p>	<p>1-40 1-25 1-49 1-40 1-40 1-40 1-35 1-45 1-70</p>	<p>The proprietary information presented in this document includes the backup calculations for the information presented in Petition Confidential Exhibit 2 as well as the proposed interim service arrangement rates and how such rates were calculated. These analyzes are based upon the unique customer-specific volumes and revenues and customer-specific margin information presented in Confidential Petition Exhibit 2. This information is not released to the public, including the customer it is derived from. This information, if made public, would negatively impact the competitive interests of the company (and hence FCG's ratepayers) in the company's negotiations of other service agreements. Moreover, this would be an unfair and inappropriate disclosure of customer information. Finally, this information is based upon FCG trade secret information in terms of the method of calculation such revenue requirements and margins.</p>

<p>Response Exhibit 3A (2026), Revenue Requirement Analysis</p> <p>FCG's Confidential MDWASD Bypass Analysis</p>	<p>Page 1 Page 2 Page 3 Page 4 Page 5 Page 6 Page 7 Page 8 Page 9 (entire document)</p>	<p>A-D A-D A-G A-J K-W X-AH A-D A-F A-D</p>	<p>1-40 1-27 1-48 1-40 1-40 1-40 1-36 1-45 1-70</p>	<p>The proprietary information presented in this document includes the backup calculations for the information presented in Petition Confidential Exhibit 2 as well as the proposed interim service arrangement rates and how such rates were calculated. These analyzes are based upon the unique customer-specific volumes and revenues and customer-specific margin information presented in Confidential Petition Exhibit 2. This information is not released to the public, including the customer it is derived from. This information, if made public, would negatively impact the competitive interests of the company (and hence FCG's ratepayers) in the company's negotiations of other service agreements. Moreover, this would be an unfair and inappropriate disclosure of customer information. Finally, this information is based upon FCG trade secret information in terms of the method of calculation such revenue requirements and margins.</p>
<p>Response Exhibit 3A (2027), Revenue Requirement Analysis</p> <p>FCG's Confidential MDWASD Bypass Analysis</p>	<p>Page 1 Page 2 Page 3 Page 4 Page 5 Page 6 Page 7 Page 8 Page 9 (entire document)</p>	<p>A-D A-D A-G A-J K-W X-AH A-D A-F A-D</p>	<p>1-40 1-27 1-47 1-39 1-39 1-39 1-35 1-45 1-70</p>	<p>The proprietary information presented in this document includes the backup calculations for the information presented in Petition Confidential Exhibit 2 as well as the proposed interim service arrangement rates and how such rates were calculated. These analyzes are based upon the unique customer-specific volumes and revenues and customer-specific margin information presented in Confidential Petition Exhibit 2. This information is not released to the public, including the customer it is derived from. This information, if made public, would negatively impact the competitive interests of the company (and hence FCG's ratepayers) in the company's negotiations of other service agreements. Moreover, this would be an unfair and inappropriate disclosure of customer information. Finally, this information is based upon FCG trade secret information in terms of the method of calculation such revenue requirements and margins.</p>

<p>Response Exhibit 3A (2028), Revenue Requirement Analysis</p> <p>FCG's Confidential MDWASD Bypass Analysis</p>	<p>Page 1 Page 2 Page 3 Page 4 Page 5 Page 6 Page 7 Page 8 Page 9 (entire document)</p>	<p>A-D A-D A-G A-J K-X Y-AH A-D A-F A-D</p>	<p>1-40 1-26 1-47 1-41 1-41 1-41 1-36 1-45 1-70</p>	<p>The proprietary information presented in this document includes the backup calculations for the information presented in Petition Confidential Exhibit 2 as well as the proposed interim service arrangement rates and how such rates were calculated. These analyzes are based upon the unique customer-specific volumes and revenues and customer-specific margin information presented in Confidential Petition Exhibit 2. This information is not released to the public, including the customer it is derived from. This information, if made public, would negatively impact the competitive interests of the company (and hence FCG's ratepayers) in the company's negotiations of other service agreements. Moreover, this would be an unfair and inappropriate disclosure of customer information. Finally, this information is based upon FCG trade secret information in terms of the method of calculation such revenue requirements and margins.</p>
<p>Response Exhibit 3A (2029), Revenue Requirement Analysis</p> <p>FCG's Confidential MDWASD Bypass Analysis</p>	<p>Page 1 Page 2 Page 3 Page 4 Page 5 Page 6 Page 7 Page 8 Page 9 (entire document)</p>	<p>A-D A-D A-G A-I J-V W-AH A-D A-F A-D</p>	<p>1-40 1-26 1-46 1-38 1-38 1-38 1-35 1-45 1-69</p>	<p>The proprietary information presented in this document includes the backup calculations for the information presented in Petition Confidential Exhibit 2 as well as the proposed interim service arrangement rates and how such rates were calculated. These analyzes are based upon the unique customer-specific volumes and revenues and customer-specific margin information presented in Confidential Petition Exhibit 2. This information is not released to the public, including the customer it is derived from. This information, if made public, would negatively impact the competitive interests of the company (and hence FCG's ratepayers) in the company's negotiations of other service agreements. Moreover, this would be an unfair and inappropriate disclosure of customer information. Finally, this information is based upon FCG trade secret information in terms of the method of calculation such revenue requirements and margins.</p>

<p>Response Exhibit 3A (2030), Revenue Requirement Analysis</p> <p>FCG's Confidential MDWASD Bypass Analysis</p>	<p>Page 1 Page 2 Page 3 Page 4 Page 5 Page 6 Page 7 Page 8 Page 9 (entire document)</p>	<p>A-D A-D A-G A-J K-W X-AH A-D A-F A-D</p>	<p>1-40 1-26 1-48 1-39 1-39 1-39 1-36 1-45 1-70</p>	<p>The proprietary information presented in this document includes the backup calculations for the information presented in Petition Confidential Exhibit 2 as well as the proposed interim service arrangement rates and how such rates were calculated. These analyzes are based upon the unique customer-specific volumes and revenues and customer-specific margin information presented in Confidential Petition Exhibit 2. This information is not released to the public, including the customer it is derived from. This information, if made public, would negatively impact the competitive interests of the company (and hence FCG's ratepayers) in the company's negotiations of other service agreements. Moreover, this would be an unfair and inappropriate disclosure of customer information. Finally, this information is based upon FCG trade secret information in terms of the method of calculation such revenue requirements and margins.</p>
<p>Response Exhibit 3A (2031), Revenue Requirement Analysis</p> <p>FCG's Confidential MDWASD Bypass Analysis</p>	<p>Page 1 Page 2 Page 3 Page 4 Page 5 Page 6 Page 7 Page 8 Page 9 (entire document)</p>	<p>A-D A-D A-G A-J K-X Y-AH A-D A-F A-D</p>	<p>1-40 1-25 1-46 1-41 1-41 1-41 1-36 1-45 1-70</p>	<p>The proprietary information presented in this document includes the backup calculations for the information presented in Petition Confidential Exhibit 2 as well as the proposed interim service arrangement rates and how such rates were calculated. These analyzes are based upon the unique customer-specific volumes and revenues and customer-specific margin information presented in Confidential Petition Exhibit 2. This information is not released to the public, including the customer it is derived from. This information, if made public, would negatively impact the competitive interests of the company (and hence FCG's ratepayers) in the company's negotiations of other service agreements. Moreover, this would be an unfair and inappropriate disclosure of customer information. Finally, this information is based upon FCG trade secret information in terms of the method of calculation such revenue requirements and margins.</p>

CD-ROM containing the native unlocked Excel spreadsheets for Petition Confidential Exhibits 2A and 3A(XXXX), where (XXXX) is the specific year of the analysis.				<p>Justification is the same as above.</p> <p>Response Confidential Exhibit 2A is: Revenue Requirement Study</p> <p>Response Confidential Exhibit 3A (2016 to 2031) is: Revenue Requirements Analysis</p>
Individual Pages of the Data Request Response containing confidential information.	1	N/A	19-25, 27, and 30	Response to Question 1(a) and 1(b): This response recites terms from Petition Confidential Exhibit No. 1, so the justification filed on for that document applies to the confidential portions of this response: This is the natural gas transportation service agreement between FCG and Florida Crystals. By its terms, it is to be held and treated as confidential. This document reflects trade secrets of FCG, including rates, terms, and conditions of service that are not available to any other customer. Such customer-specific information is not released to the public and if disclosed, would harm FCG and Florida Crystals. If the rates and other terms were made public, such disclosure would harm FCG's competitive interests by impairing the ability to negotiate future special contracts with other customers.
	2	N/A	14	
Individual Pages of the Data Request Response containing confidential information.	3	N/A	14-21, 24, 27-35	Response to Question 3: This response recites terms from Petition Confidential Exhibit No. 1, so the justification filed on for that document applies to the confidential portions of this response: This is the natural gas transportation service agreement between FCG and Florida Crystals. By its terms, it is to be held and treated as confidential. This document reflects trade secrets of FCG, including rates, terms, and conditions of service that are not available to any other customer. Such customer-specific information is not released to the public and if disclosed, would harm FCG and Florida Crystals. If the rates and other terms were made public, such disclosure would harm FCG's competitive interests by impairing the ability to negotiate future special contracts with other customers. In addition, this response provides historic transportation volumes derived from Confidential Exhibit No. 2 and Confidential Exhibit No. 2A, so that justification is applicable here as well: This document

				contains FCG's compilation of actual, budgeted, and forecasted natural gas volumes transported or estimated to be transported by FCG for Florida Crystals. In addition it includes on a year-by-year basis FCG's Revenue Requirement, FCG's Actual or Forecasted Margin/Revenue, whether FCG's revenues exceed or fall below FCG's revenue requirement, and the actual revenue received from Florida Crystals for each year. This type of customer-specific volumes and revenues and customer-specific margin information is not released to the public, including the customer it is derived from. This information, if made public, would negatively impact the competitive interests of the company (and hence FCG's ratepayers) in the company's negotiations of other service agreements. Moreover, this would be an unfair and inappropriate disclosure of customer information. Finally, this information is based upon FCG trade secret information in terms of the method of calculation such revenue requirements and margins.
Individual Pages of the Data Request Response containing confidential information.	5	N/A	2, 4, 5, 6, 8, 9-11	Response to Question 5: This response provides historic transportation volumes derived from Confidential Exhibit No. 2A, so that justification is applicable here as well: This document contains FCG's compilation of actual, budgeted, and forecasted natural gas volumes transported or estimated to be transported by FCG for Florida Crystals. In addition it includes on a year-by-year basis FCG's Revenue Requirement, FCG's Actual or Forecasted Margin/Revenue, whether FCG's revenues exceed or fall below FCG's revenue requirement, and the actual revenue received from Florida Crystals for each year. This type of customer-specific volumes and revenues and customer-specific margin information is not released to the public, including the customer it is derived from. This information, if made public, would negatively impact the competitive interests of the company (and hence FCG's ratepayers) in the company's negotiations of other service agreements. Moreover, this would be an unfair and inappropriate disclosure of customer information. Finally, this information is based upon FCG trade secret information in terms of the method of calculation such revenue

				requirements and margins.
Individual Pages of the Data Request Response containing confidential information.	5 6	N/A N/A	46 2, 3, 4, 5	Response to Question 8: This response provides pipeline capacity and percentages of capacity throughput derived from Confidential Exhibit No. 2A and other records of the Company, so that justification is applicable here as well: This document contains FCG's compilation of actual, budgeted, and forecasted natural gas volumes transported or estimated to be transported by FCG for Florida Crystals. In addition it includes on a year-by-year basis FCG's Revenue Requirement, FCG's Actual or Forecasted Margin/Revenue, whether FCG's revenues exceed or fall below FCG's revenue requirement, and the actual revenue received from Florida Crystals for each year. This type of customer-specific volumes and revenues and customer-specific margin information is not released to the public, including the customer it is derived from. This information, if made public, would negatively impact the competitive interests of the company (and hence FCG's ratepayers) in the company's negotiations of other service agreements. Moreover, this would be an unfair and inappropriate disclosure of customer information. Finally, this information is based upon FCG trade secret information in terms of the method of calculation such revenue requirements and margins.
Individual Pages of the Data Request Response containing confidential information.	7	N/A	6-11, 16-18	Response to Question 11: This response recites terms from Petition Confidential Exhibit No. 1, so the justification filed on for that document applies to the confidential portions of this response: This is the natural gas transportation service agreement between FCG and Florida Crystals. By its terms, it is to be held and treated as confidential. This document reflects trade secrets of FCG, including rates, terms, and conditions of service that are not available to any other customer. Such customer-specific information is not released to the public and if disclosed,

				would harm FCG and Florida Crystals. If the rates and other terms were made public, such disclosure would harm FCG's competitive interests by impairing the ability to negotiate future special contracts with other customers.
Individual Pages of the Data Request Response containing confidential information.	7	N/A	29-30, 30, 35-36, 39 (table with three numbers)	Response to Question 12: This response recites terms from Petition Confidential Exhibit No. 1, so the justification filed on for that document applies to the confidential portions of this response: This is the natural gas transportation service agreement between FCG and Florida Crystals. By its terms, it is to be held and treated as confidential. This document reflects trade secrets of FCG, including rates, terms, and conditions of service that are not available to any other customer. Such customer-specific information is not released to the public and if disclosed, would harm FCG and Florida Crystals. If the rates and other terms were made public, such disclosure would harm FCG's competitive interests by impairing the ability to negotiate future special contracts with other customers.

Responses to Staff's Data Requests
Nos. 1 through 13
October 28, 2016
Confidential Exhibit No. 2A:
Revenue Requirement Study

Redacted Version:
1 Page Spreadsheet
Redacted in its Entirety

Responses to Staff's Data Requests
Nos. 1 through 13
October 28, 2016
Confidential Exhibit No. 3A:
Revenue Requirement Analysis

Redacted Version:
144 Pages Spreadsheets
Redacted in its Entirety

Responses to Staff's Data Requests

Nos. 1 through 13

October 28, 2016

Confidential Attachment DR6:

Bypass Analysis

Redacted Version:

1 Page Spreadsheet

Redacted in its Entirety

1 **BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION**

2
3 In Re: Petition for Review and)
4 Determination on the Project Construction)
5 and Gas Transportation Agreement By and) Docket No.: 160175-GU
6 Between NUI Utilities, Inc. d/b/a City Gas)
7 Company of Florida and Florida Crystals)
8 Corporation dated April 24, 2001 and)
9 Approval of an Interim Service Arrangement)
10 _____)

11 **FLORIDA CITY GAS RESPONSES TO**
12 **STAFF'S FIRST SET OF DATA REQUESTS**

13 Florida City Gas ("FCG" or "Company"), hereby provides its Responses to the Staff's
14
15 First Set of Data Requests served on October 10, 2016.

16 1. *Please refer to the July 22 petition, page 6, paragraph 14, and to Confidential Exhibit*
17 *No. 2 filed concurrently with the petition, cells C3 through C32.*

18 (a) *Given consideration of the values in Cells 3 through C17 and, in particular,*
19 *Cells C14 through C17, please explain and provide support for why FCG*
20 *believes that the values shown in Cells C18 through C32 are likely to occur.*

21 **FCG Response:**

22 Cells C18 through C32 reflect the maximum volume of gas that Florida Crystals may transport
23 during the third phase or the "Extended Term" of the GTA. These numbers are based upon
24 Section 8 of the GTA (Confidential Exhibit No. 1 at 13 of 46), which provides

25
26
27 While Florida Crystals may not transport _____, under the GTA FCG
28 must reserve this level of capacity for Florida Crystals' use and therefore cannot make that
29 capacity available to provide firm service to other customers. Thus, from a forecast standpoint,
30 FCG must assume _____. Moreover, as is referenced in paragraph 14 of
31 the Petition, the 2015 discussions between the parties led FCG to conclude that Florida Crystals
32 intends to ramp up production at the Okeelanta mill and take the maximum permissible volumes,
33 especially if there was not going to be an expansion of service to the Osceola mill. Actual
34 transportation volumes for the last 12 months reflect multiple months where Florida Crystals
35 moved gas at or near the maximum monthly amount.

1 On Confidential Exhibit No. 2, Cells C3 through C16 reflect the actual volumes that the Florida
2 Crystals marketer delivered to the Florida City Gas distribution system from 2002 to 2015.
3 Note, all the data on Confidential Exhibit No. 2 reflects an October to September 12-month
4 period and not a calendar year basis. At the time that the Petition was filed, Cell C17 reflected
5 FCG's 2016 (October 2015 to September 2016) estimated transportation volume based on recent
6 consumption. In the updated Confidential Exhibit No. 2A discussed below, the volume in C17
7 reflects FCG's 2016 (October 2015-September 2016) actual transportation volume.

8
9 **(b) Given the value in Cell C16, please explain the first sentence in paragraph 14 of**
10 **the petition.**

11
12 **FCG Response:**

13 The first sentence in paragraph 14 of the Petition referenced the fact that in November 2015,
14 Florida Crystals exceeded [REDACTED] that applies during the Make-
15 Up Period.

16
17 2. ***Please refer to Confidential Exhibit No. 2 to the July 22 petition. Also, please refer to***
18 ***Exhibit A to Florida Crystals Corporation (Crystals') September 19 Response in***
19 ***Opposition to FCG's Motion for Approval of Temporary Interim Service Arrangement.***
20 ***Please explain each of the differences between the values shown in Exhibit A to***
21 ***Crystals' September 19 pleading as compared to the values shown in Cells G3 through***
22 ***G16 in FCG's Confidential Exhibit No. 2.***

23
24 **FCG Response:**

25 Overall, the differences may be due to the fact that the information provided by FCG on
26 Confidential Exhibit No. 2 reflects an October-September year whereas the Florida Crystals
27 Exhibit A appears to reflect information from a calendar year basis. FCG has confirmed the
28 actual revenues and transportation volumes billed to Florida Crystals for the period November
29 2001 through September 2016 in the updated Confidential Exhibit No. 2 and Confidential
30 Exhibit No. 3 provided in response to Staff's Data Request No. 3 below, identified as
31 Confidential Exhibit No. 2A and Confidential Exhibit No. 3A. Confidential Exhibit No. 2A
32 reflects slightly different revenues for 2002 and 2003 than are present in Confidential Exhibit
33 No. 2, but this does not account for the disparity in 2002 and 2003 data between the parties and
34 FCG does not have any records that would support the Florida Crystals information. Further,
35 since service began in 2002, and there was no pipeline in service to the Okeelanta mill prior to
36 2002, FCG is at a loss regarding the calendar year 2000 payment reported by Florida Crystals on
37 its Exhibit A.

38
39 3. ***Please refer to Confidential Exhibit No. 2 to the July 22 petition. Please provide an***
40 ***explanation of the values shown in Cells G5 through G9 and G12 in the context of***
41 ***their relationship with the values shown in Cells C5 through C9 and C12. Also, please***
42 ***provide an explanation of the values shown in Cells G14 and G16 in the context of***
43 ***their relationship with the values shown in Cells C14 and C16. Please include in each***
44 ***of the respective discussions the effects, if applicable, of sections 9B and 9C of the***
45 ***confidential GTA exhibit, pages 15 and 16 of 46.***

1 **FCG Response:**

2 In the process of responding to these Data Requests, FCG discovered that despite its best efforts
3 it used some incorrect data sources in preparing Confidential Exhibit No. 2 and Confidential
4 Exhibit No. 3. On the basis of that review, and in the course of responding to several of these
5 Data Requests, FCG has prepared updated versions of these exhibits which it is designating as
6 Confidential Exhibit No. 2A and Confidential Exhibit No. 3A(XXXX), where (XXXX) is the
7 specific year of the analysis, such as is requested in Data Requests Nos. 4(a) and 4(b). To the
8 extent these revised confidential exhibits impact the Petition, FCG shall separately file any
9 appropriate pages with the Commission Clerk's Office.

10
11 Although some of the numbers have changed in these revised exhibits, the explanation requested
12 in this Data Request is applicable to both Confidential Exhibit No. 2 and Confidential Exhibit
13 No. 2A.

14 The Primary Term of the GTA allows Florida Crystal to

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22 The values
23 in cells G5 through G9 and in G12 represent the revenues associated with the minimum terms
24 charged to Florida Crystals for each of the months in those periods, even though there may have
been some nominal flows in some of those months below

25 With respect to Cells C14 and C16, and the corresponding revenues in G14 and G16, as is
26 discussed in FCG's Response to Staff Data Request No. 1 above, the Primary Term allows
27 Florida Crystals to transport

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37 **4. Please refer to Confidential Exhibit No. 2 to the July 22 petition.**

38
39 **(a) For the entry shown in Cell A17, please provide an exhibit similar to**
40 **Confidential Exhibit No. 3 and explain the difference between the values in**
41 **Cells D17 and D18.**
42
43

1 **FCG Response:**

2 From 2002 through 2012 Florida Crystals usage represented about [REDACTED] of the FCG total system
3 sales and total margins, and Florida Crystals was not FCG's largest customer. Starting in 2013
4 Florida Crystals usage [REDACTED] FCG's total system sales, which [REDACTED] in
5 2014 and [REDACTED] in 2015, and at that time Florida Crystals [REDACTED]
6 [REDACTED]. However, the correlating margins for 2013 through 2015 remained at [REDACTED] of total
7 Florida City Gas margins. Based on the allowed usage and discount rates included the Extended
8 Term of the GTA, the usage percentage in 2017 will [REDACTED] of total FCG system sales,
9 which given the current customer profiles [REDACTED]

10 [REDACTED]
11 [REDACTED] Please see the various versions of Confidential Exhibit No. 3A(XXXX)
12 provided in response to Staff Data Request No. 4(b) to compare various years.
13

- 14 **6. *Please identify and discuss any potentially viable bypass opportunities of which FCG is***
15 ***aware that might be available to Crystals. If potentially viable bypass opportunities***
16 ***exist, please provide, to the extent that such information is readily available, estimated***
17 ***costs and associated cost support for each bypass option.***
18

19 **FCG Response:**

20 FCG has been unable to locate in its records any bypass analysis information for Florida
21 Crystals. In order to be responsive to this request, FCG had its engineering group identify and
22 evaluate any potential bypass opportunities that may be available to Florida Crystals through a
23 direct connect with Florida Gas Transmission ("FGT") using FCG's current cost structure for
24 large projects. This information is provided in Confidential Attachment DR-6 to this Data
25 Response. FCG notes that whether interconnection and bypass with FGT is feasible will depend
26 upon various variables outside FCG's analysis including the availability of capacity on FGT's
27 system.
28

- 29 **7. *Please refer to the GTA (Confidential Exhibit No. 1 to the July 22 petition), page 6 of***
30 ***46. Please confirm that the facility referred to under the fourth topic heading was not***
31 ***built.***
32

33 **FCG Response:**

34 The Osceola Facility was constructed but FCG does not provide natural gas transportation
35 service to this facility for Florida Crystals.
36

- 37 **8. *Does FCG serve any other customers via the infrastructure used to serve Crystals'***
38 ***Okeelanta site? If so, please provide the percentage of the total throughput transported***
39 ***via this infrastructure on behalf of other customers and the percentage of total capacity***
40 ***reserved on this infrastructure for other customers.***
41

42 **FCG Response:**

43 FCG does not serve other customers via the lateral off of the East-West Pipeline that is used to
44 serve the Florida Crystals Okeelanta site. With respect to the overall East-West Pipeline serving
45 Florida Crystals and other customers in the western Palm Beach County-Hendry County area, the
46 actual throughput for the other customers using the East-West Pipeline represents [REDACTED] of

1 the total throughput of the East-West Pipeline flowed in the last 12 months. However, based on
2 the total capacity of the East-West Pipeline and the [REDACTED] capacity reserved for Florida
3 Crystals as is required by the GTA, Florida Crystals represents [REDACTED] of the total capacity on
4 that line and [REDACTED] is currently committed to use by other customers, which presently leaves
5 [REDACTED] available for new customers.

6
7 **9. Please refer to the confidential redacted portion of paragraph 41 on pages 17 and 18 of**
8 **the July 22 petition. Also, please refer to the GTA (Confidential Exhibit No. 1), section**
9 **9A, page 13 of 46. The referenced GTA section and the redacted portion of the**
10 **referenced petition paragraph identify a specific rate schedule as being the source of**
11 **the rates negotiated for the GTA. The actual rate is stated on the first and third**
12 **redacted lines on page 18 of the July 22 petition and in section 9A of the GTA.**

13
14 *According to Commission records, the stated rate referred to above was associated with*
15 *an earlier canceled version of the relevant rate schedule and is not the rate associated*
16 *with the version of that rate schedule which was actually in effect as of the date of the*
17 *execution of the GTA. Please explain why the rate from the rate schedule in effect as of*
18 *the date of the execution of the GTA was not used given the statement in the un-*
19 *redacted portion of petition paragraph 43 that: "on their face the rates for the Primary*
20 *Term and the Make-Up Period have some colorable relationship to the tariff . . ."*

21
22 **FCG Response:**

23 At the time the Petition was prepared, counsel used tariff pages from the 2003 rate case which
24 appeared to be in effect at the time the GTA was executed. Based upon the tariff pages provided
25 by the Commission Staff in connection with this Data Request, FCG would agree that none of
26 the GTA rates have any relationship to the then applicable tariff. Based upon the correct tariff
27 pages provided by the Commission Staff, FCG would need to modify some of the confidential
28 language in paragraph 41. To the extent this tariff analysis impacts any confidential portions of
29 the Petition, FCG shall separately file any appropriate pages with the Commission Clerk's
30 Office. In addition, we would revise the first sentence of paragraph 43 to read as follows (edits
31 shown in track changes):

32
33 While ~~on their face~~ the rates for the Primary Term and the Make-Up Period are materially below
34 the rates in the then applicable ~~have some colorable relationship to the tariff, for the even-lower~~
35 Extended Term rates do not have any connection to the tariff, and FCG has not located any
36 original economic analysis or justification for these rates.

37
38 **10. Please refer to section 10 of the confidential GTA exhibit, page 23 of 46. To date, has**
39 **FCG paid any costs pursuant to section 10 of the GTA? If so, please provide a**
40 **breakdown by year of the costs paid and discuss the project circumstances associated**
41 **with why the costs were paid.**

42
43 **FCG Response:**

44 FCG has not paid any costs pursuant to Section 10 of the GTA.
45

1 **11. Please refer to Confidential Exhibit No. 3 to the July 22 petition, page 1 of 7, Cells A26**
2 **and B26. Please provide documentation to support the value shown in Cell B26.**

3
4 **FCG Response:**

5 With respect to the proposed interim rates contained in original Confidential Exhibit No. 3, they
6 were designed to be somewhat similar to those contained in the GTA. Specifically, [REDACTED]

7 [REDACTED]
8 [REDACTED]
9 [REDACTED]
10 [REDACTED]
11 [REDACTED]
12
13 Based upon the updates to original Confidential Exhibit No. 2 and original Confidential Exhibit
14 No. 3 discussed above, FCG has had to further revise the proposed interim rates to reflect the
15 updated cost study analysis. The new proposed interim rates are shown on Confidential Exhibit
16 3A(2017), at Cells A-B24, A-B25, and A-B26. [REDACTED]

17 [REDACTED]
18 See Confidential Exhibit 3A(2017), at Cells A-B34, A-
19 B35, and A-B36 and the associated information in Cells C37-43 and D37-43.

20
21 **12. Please refer to Confidential Exhibit No. 3 to the July 22 petition, page 2 of 7. Please**
22 **provide an explanation and support to show how the formula used to calculate the**
23 **value in Cell C21 was derived.**

24
25 **FCG Response:**

26 Cell C21 of Exhibit No. 3, Page 2 of 7, is the sum of the capacity provided to Florida Crystals
27 during its peak month and the capacity provided to Florida Crystals during an average month.
28 As is further discussed in response to Staff Data Request No. 1 above, under the GTA FCG is
29 required to provide Florida Crystals the ability to transport [REDACTED]

30 [REDACTED] While today Florida Crystals may not transport [REDACTED] during
31 every month of the year, FCG must still reserve this level of capacity for Florida Crystals' use
32 and therefore cannot use the capacity to provide firm service to other customers. If Florida
33 Crystals increases its operations at the mill to year round, then Florida Crystals may be in a
34 position to take the maximum volume of therms permitted by the GTA for the Extended Term
35 each and every month. As a result, the capacity devoted to Florida Crystals is the [REDACTED]
36 [REDACTED] This did not change in the
37 revised exhibit, Confidential Exhibit No. 3A (2017) or any of the years analyzed. The
38 calculation of the peak plus average is:

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CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing has been furnished by E-

Mail on this 1st day of November, 2016, to the following:

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