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February 29, 2024

BY HAND DELIVERY

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

REDACTED

RECEIVED-FPSC
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COMMISSION CLERK

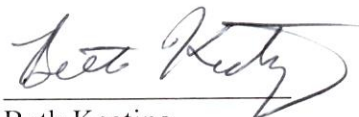
[New Filing] - Petition for Approval of Transportation Service Agreements for Alternative Gas Supply Project Expansions with Florida City Gas by Peninsula Pipeline Company, Inc.

Dear Mr. Teitzman:

Attached for filing, please the original and seven (7) copies of Peninsula Pipeline Company's Request for Confidential Classification of portions of Exhibit A to its Firm Transportation Service Agreement with Florida City Gas (Brevard), which is included in Attachment A to the Petition for Approval of Transportation Service Agreements for Alternative Gas Supply being filed under separate cover today. Also attached are one highlighted copy and two redacted copies of the subject exhibit submitted in accordance with Rule 25-22.006, F.A.C.

As always, thank you for your assistance in connection with this filing. If you have any questions whatsoever, please do not hesitate to let me know.

Sincerely,



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

COM _____
AFD _____
APA _____
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CLK _____

Cc: Certificate of Service

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

| | | |
|--|---|--------------------------|
| In re: Petition for Approval of Transportation |) | |
| Service Agreements for Alternative Gas Supply |) | Docket No.: |
| Project Expansions with the Florida City Gas |) | |
| by Peninsula Pipeline Company, Inc. |) | Filed: February 29, 2024 |
| |) | |

**PENINSULA PIPELINE COMPANY’S REQUEST FOR CONFIDENTIAL
CLASSIFICATION FOR INFORMATION**

Peninsula Pipeline Company (“Peninsula” or “Company”) by and through its undersigned counsel, pursuant to Section 366.093, Florida Statutes, and consistent with Rule 25-22.006(3), Florida Administrative Code, hereby submits its Request for Confidential Classification for information contained in Exhibits A to its Firm Transportation Service Agreement with Florida City Gas (“FCG”) for a Brevard County project, which has been submitted under separate cover today. The information for which the Company seeks confidential treatment is information that is similar to that which the Commission has afforded confidential classification in prior cases, namely Order No. PSC-2018-0146-CFO-GU, issued March 19, 2018 in Docket No. 20180015-GU. In support thereof, Peninsula hereby states:

1. Peninsula seeks confidential classification of the highlighted information in Exhibit A to the Firm Transportation Service Agreement ("Contract") (page 10), in the line identifying the Total Maximum Daily Transportation Quantity (“Total MDTQ”), as well as the amount next to MHTP in the following line. In addition, Peninsula seeks confidential classification of the information in the line that identifies the Monthly Reservation Charge, as well as the Unauthorized Use Rate in the second to the last line. This information is directly related to the negotiated rates and terms of the Contract, which both Peninsula and FCG treat as proprietary

confidential business information consistent with the definition of that term in Section 366.093, Florida Statutes.

2. The information for which Peninsula seeks confidential classification is information that the Company and FCG 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. Release of the referenced information as a public record would reveal the specific rate included in a competitive contract. Disclosure of this information would impair Peninsula's ability to compete for goods and services and provide its competitors with an unfair competitive advantage. As such, Peninsula requests that the Commission protect this information consistent with Rule 25-22.006, Florida Administrative Code. To the extent of Peninsula's knowledge, this information is not otherwise available in the public domain. Thus, the information meets the

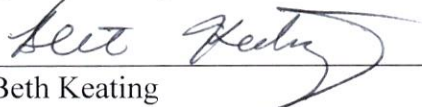
definition of "proprietary confidential business information" as set forth in Sections 366.093(3)(d) and (e), Florida Statutes. As such, Peninsula requests that the Commission protect this information consistent with Rule 25-22.006, Florida Administrative Code.

4. Included with this Request is a highlighted copy of Exhibit A to the Firm Transportation Service Agreement (Brevard). In addition, two redacted copies of the document are enclosed.

5. Peninsula asks that confidential classification be granted for a period of at least 18 months. Should the Commission no longer find that it needs to retain the information, Peninsula respectfully requests that the confidential information be returned to the Company.

WHEREFORE, Peninsula respectfully requests that the highlighted information contained in Exhibit A to the executed Firm Transportation Service Agreement with FCG for the project in Brevard County be classified as "proprietary confidential business information," and thus, exempt from Section 119.07, Florida Statutes.

RESPECTFULLY SUBMITTED this 29th day of February, 2024.



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 for Confidentiality has been served upon the following by Electronic Mail (redacted only) this 29th day of February, 2024:

Walt Trierweiler, Esquire
c/o the Florida Legislature
111 West Madison Street, Rm 812
Tallahassee, FL 32399-1400
Trierweiler.walt@leg.state.fl.us

Keith Hetrick, Esquire
Florida Public Service Commission
2540 Shumard Oak Blvd.
Tallahassee, FL 32399
khetrick@psc.state.fl.us

By:



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

*Attorneys for Peninsula Pipeline
Company, Inc.*

EXHIBIT A TO
FIRM TRANSPORTATION SERVICE
AGREEMENT BETWEEN
PENINSULA PIPELINE COMPANY, INC. AND
PIVOTAL UTILITY HOLDINGS, INC. d/b/a FLORIDA CITY GAS

DATED

February 26, 2024

Description of Transporter Delivery Point(s)

1. At or near Adamson Road and Sorrel Drive

Description of Point(s) of Delivery

1. At or near Route 524 and Cox Road

Total MDTQ (Dekatherms): Dt/Day [REDACTED]

MHTP: [REDACTED]

Total Monthly Reservation Charge: [REDACTED]

This charge is subject to adjustment pursuant to the terms of this Agreement.

Unauthorized Use Rate (In addition to Monthly Reservation Charge): [REDACTED]

Each Day Unauthorized Use

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Each Day Unauthorized Use