

Writer's Direct Dial Number: (850) 521-1706  
Writer's E-Mail Address: bkeating@gunster.com

March 28, 2024

**BY HAND DELIVERY**

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

**REDACTED**

RECEIVED-PPSC  
2024 MAR 27 PM 4:34  
COMMISSION  
CLERK

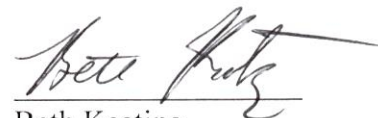
**[New Filing] - In re: Petition by Peninsula Pipeline, Inc. for Approval of a Transportation Service Agreement with Florida City Gas.**

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 (Pioneer), which is included in Attachment A to the Petition for Approval of Transportation Service Agreement with Florida City Gas 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 \_\_\_\_\_
- ECO \_\_\_\_\_
- ENG 6
- GCL 1
- IDM \_\_\_\_\_
- CLK \_\_\_\_\_

Cc: Certificate of Service

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Petition by Peninsula Pipeline, Inc. for )  
Approval of a Transportation Service ) Docket No.:  
Agreement with Florida City Gas. )  
)  
) Filed: March 28, 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 Exhibit A to its Firm Transportation Service Agreement with Florida City Gas (“FCG”) for its Pioneer project in Miami-Dade County (“Contract”), 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 highlighted amount next to MHTP. In addition, Peninsula seeks confidential classification of the information in the line that identifies the Monthly Reservation Charge in the second to the last line on page 10. 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 FPUC 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. 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 each, attached Exhibit A to the executed Firm Transportation Service Agreement with Florida City Gas be classified as "proprietary confidential business information," and thus, exempt from Section 119.07, Florida Statutes.

RESPECTFULLY SUBMITTED this 28th day of March, 2024.

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

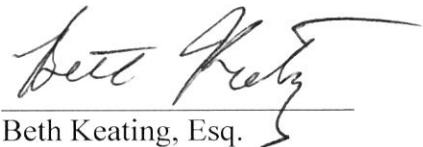
**CERTIFICATE OF SERVICE**

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 28th day of March, 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**

March 18, 2024

Description of Transporter Delivery Point(s)

1. Interconnect with Florida Gas Transmission at or near Pioneer Road

Description of Point(s) of Delivery

1. Meters until the terminus at or near the intersection of W Palm Road and US Highway 27 S

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

**MHTP: [REDACTED]**

**Total Monthly Reservation Charge: \$ [REDACTED] (Dekatherm)**

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

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

**Total Monthly Reservation Charge: \$ [REDACTED] (Dekatherm)**

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