

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

September 20, 2024

**Hand Delivery**

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

RECEIVED-PPSC  
2024 SEP 20 AM 4:57  
COMMISSION  
CLERK

**REDACTED**

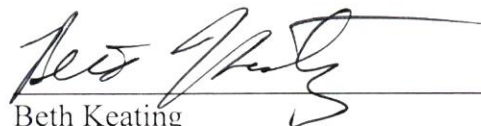
**Re: [New Filing] - Petition for Approval of a Transportation Service Agreement with Florida City Gas by Peninsula Pipeline Company, Inc.**

Dear Mr. Teitzman:

Enclosed for filing in the above-referenced docket, please find the original and seven (7) copies of Peninsula Pipeline's Request for Confidential Classification of Exhibit A to the referenced Transportation Service Agreement. Also included with this Request is one highlighted, and two redacted versions of the exhibit containing confidential information.

Thank you for your assistance with this filing.

Kind regards,



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

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Enclosure



Charge:”, Peninsula seeks confidential classification of the information in the two charts on the page of the highlighted amounts in the columns titled “Monthly Reservation Charge.” Beneath each chart, the Company also seeks confidential classification of the highlighted amounts for the Unauthorized Use Rate. This information is directly related to the negotiated rates and terms of the ML Contracts, 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 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 with Florida City Gas (Miami Loop). 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 Florida City Gas be classified as "proprietary confidential business information," and thus, exempt from Section 119.07, Florida Statutes.

RESPECTFULLY SUBMITTED this 20th day of September, 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 20th day of September, 2024:

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

Keith Hetrick, General Counsel  
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**

**FIRM TRANSPORTATION SERVICE AGREEMENT BETWEEN**

**PENINSULA PIPELINE COMPANY, INC.**

**AND**

**PIVOTAL UTILITY HOLDINGS, INC. d/b/a FLORIDA CITY GAS**

**DATED**

**SEPTEMBER 18, 2024**

Description of Transporter Delivery Point(s)

<b>Description</b>
At or near SW 78 <sup>th</sup> Place and SW 21 <sup>st</sup> Terrace (West Miami)
At or near NW 93 <sup>rd</sup> Street and NW 89 <sup>th</sup> Avenue (Medley-ML North)
At or near 10200 NW 77th Ave (Hialeah)
At or near NW 12 Street and Dolphin Express (Miami Airport)
New Interconnect(s) to be determined in Miami-Dade County

Description of Point(s) of Delivery

<b>Description</b>	<b>Segment</b>
At or near the corner of NW 58 <sup>th</sup> Street and NW 87 <sup>th</sup> Avenue	<u>ML North</u>
At or near the intersection of NW 74 <sup>th</sup> Street and NW 97 <sup>th</sup> Avenue	<u>ML North</u>
At or near NW South River Drive and NW 104 <sup>th</sup> Way	<u>ML North</u>
At or near NW 70 <sup>th</sup> Street	<u>ML North</u>
At or near W 12 <sup>th</sup> Street and SR825	<u>ML West</u>
At or near SW 8 <sup>th</sup> and Krome Avenue	<u>ML West</u>
At or near At or near Datran Drive and Old Highway 60	<u>ML South</u>
At or near Federal Highway and Old Dixie Highway	<u>ML South</u>
At or near SW 55th St & SW 93rd Ct	<u>ML South</u>
TBD New Point(s) of Delivery in Miami-Dade County	<u>TBD</u>

**ML North MDTQ ( ) Dt/Day**

**ML West MDTQ ( ) Dt/Day**

**ML South MDTQ ( ) Dt/Day**

**Total MDTQ (Dekatherms) ( ) Dt/Day**

**MHTP: ( )**

**Total Monthly Reservation Charge:**

**Monthly Reservation including new construction and acquisition of assets before being removed from the Shipper's rate base**

Segment	Monthly Reservation Charge
ML North	██████████
ML West	██████████
ML South	██████████
<b>TOTAL</b>	██████████

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

██████████/Decatherm

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

**Monthly Reservation including new construction and acquisition of assets after removal from the Shipper's rate base**

Segment	Monthly Reservation Charge
ML North	██████████
ML West	██████████
ML South	██████████
<b>TOTAL</b>	██████████

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

Unauthorized Use Rate (In addition to Monthly Reservation Charge): ██████████/Decatherm

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**PENINSULA PIPELINE COMPANY, INC.**

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At or near Federal Highway and Old Dixie Highway	<u>ML South</u>
At or near SW 55 <sup>th</sup> St & SW 93 <sup>rd</sup> Ct	<u>ML South</u>
TBD New Point(s) of Delivery in Miami-Dade County	<u>TBD</u>

ML North MDTQ [REDACTED] Dt/Day

ML West MDTQ [REDACTED] Dt/Day

ML South MDTQ [REDACTED] Dt/Day

Total MDTQ (Dekatherms) [REDACTED] Dt/Day

MHTP: [REDACTED]



**Total Monthly Reservation Charge:**

**Monthly Reservation including new construction and acquisition of assets before being removed from the Shipper's rate base**

Segment	Monthly Reservation Charge
ML North	████████
ML West	████████
ML South	████████
<b>TOTAL</b>	████████

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

████████/DeKatherm

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

**Monthly Reservation including new construction and acquisition of assets after removal from the Shipper's rate base**

Segment	Monthly Reservation Charge
ML North	████████
ML West	████████
ML South	████████
<b>TOTAL</b>	████████

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

Unauthorized Use Rate (In addition to Monthly Reservation Charge): ██████████/DeKatherm