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April 4, 2025

BY HAND DELIVERY

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

Docket No. 20250035-GU – Petition for approval of 2025 depreciation study and for approval to amortize reserve imbalance, by Florida City Gas.

Dear Mr. Teitzman:

Enclosed for filing, please find the original and seven (7) copies of Florida City Gas's Request for Confidential Classification and Motion for Protective Order for information contained in its responses to OPC's First Requests for Production of Documents. A highlighted/confidential copy of the file, which is in Excel format, is included on the enclosed flash drive. Given the nature of the document, it is not feasible or practical to produce a redacted copy in a format that could be placed in the docket file.

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

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BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Petition for Approval of Florida City Gas's 2025 Depreciation Study and for Approval to Amortize Reserve Imbalance.) Docket No.: 20250035-GU
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) Filed: April 4, 2025
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FLORIDA CITY GAS'S REQUEST FOR CONFIDENTIAL CLASSIFICATION AND MOTION FOR PROTECTIVE ORDER FOR INFORMATION IN DISCOVERY RESPONSES

Florida City Gas ("FCG" or "Company") by and through its undersigned counsel, pursuant to Section 366.093, Florida Statutes, and consistent with Rule 25-22.006(4) and (6), Florida Administrative Code, hereby submits its Request for Confidential Classification and Motion for Protective Order for information contained in its response to the Office of Public Counsel's ("OPC") First Request for Production of Documents. The information for which the Company seeks confidential treatment is contained in Schedule B, provided in response to OPC's Request for Production No. 1, which contains variance reports. Information contained within those reports includes customer-specific account information, sensitive employee departmental and benefits information; expense information arising from contracts with various vendors, including law firms, as well as other contractual outside services information. Public disclosure of the information could be considered a violation of contractual obligations with certain vendors, as well as certain large customers, which could impair the Company's ability to contract for goods and services with these, or other, vendors. Disclosure of the sensitive employee information could impair the Company's ability to compete for and retain qualified personnel. Thus, disclosure of any of the information for which confidential classification is requested herein could have an adverse impact on the Company and, ultimately, its customers. In support thereof, FCG hereby states:

1. FCG seeks confidential classification of the highlighted amounts and explanations in the following files included in Schedule B:

Worksheet Name	Location
02-2024	Highlighted information in Column D, Line 10
03-2024	Highlighted information in Column D, Line 12
MTD 06-24	Highlighted information in Column G, Lines 40, 41, and 48
YTD 06-24	Highlighted information in Column G, Lines 41, 47 and 50
QTD 06-24	Highlighted information in Column G, Lines 41, 47, and 50
MTD 7-24	Highlighted information in Column G, Lines 46 and 47
YTD 7-24	Highlighted information in Column G, Lines 25 and 26, 43 and 49
MTD 8-24	Highlighted information in Column G, Lines 24, 44, 45, 51, 54, 55, and 56
YTD 8-24	Highlighted information in Column G, Lines 26, 46, 53 and 55
MTD 9-24	Highlighted information in Column F, Lines 24, 44, 45, 48 and 51
YTD 9-24	Highlighted information in Column F, Lines 26, 46, 47, 53 and 57
QTD 9-24	Highlighted information in Column F, Lines 25, 45, 46, and 52
MTD 10-24	Highlighted information in Column G, Lines 24, 44, 45, 51 and 55
YTD 10-24	Highlighted information in Column G, Lines 26, 47, and 53

Worksheet Name	Location
MTD 11-24	Highlighted information in Column G, Lines 24, 45, 46, 52 and 56
YTD 11-24	Highlighted information in Column G, Lines 26, 46, 47, 54, and 58
MTD 12-24	Highlighted information in Column F, Lines 24, 45, 46, 52, and 58

2. FCG treats the information described herein as proprietary confidential business information consistent with the definition of that term in Section 366.093, Florida Statutes. The information meets the definition of "proprietary confidential business information" as set forth in Section 366.093(3)(d-f), 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. Disclosure of this information would impair FCG's competitive interests in that public disclosure of the information could adversely impact the Company's ability to compete for goods

and services, as well as qualified employees, and would reveal confidential contractual information. As such, FCG requests that the Commission protect this information consistent with Rule 25-22.006, Florida Administrative Code. To the extent of FCG'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, FCG requests that the Commission protect this information consistent with Rule 25-22.006, Florida Administrative Code.

4. Because this information is being provided to the OPC through discovery in response to OPC's First Request for Documents in this proceeding, FCG also asks that the Commission issue a Protective Order protecting this information while in the possession of the OPC.

4. Included with this Request is a highlighted copy of Schedule B on a flash/jump drive. Given that Schedule B is an Excel file that is not otherwise conducive to being printed and redacted, or printed such that it remains readable, FCG respectfully asks that the Commission accept this Request for Confidential Classification and Motion for Protective Order without the required redacted copies.

5. FCG 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, FCG respectfully requests that the confidential information be returned to the Company by the Commission and OPC.

WHEREFORE, Florida City Gas respectfully requests that the highlighted information contained in Schedule B, provided in response to the Office of Public Counsel's First Requests

for Production of Documents, be classified as "proprietary confidential business information,"
and thus, exempt from Section 119.07, Florida Statutes.

RESPECTFULLY SUBMITTED this 4th day of April, 2025.

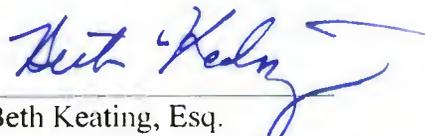


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CERTIFICATE OF SERVICE

I HEREBY ATTEST that a true and correct copy of the foregoing Request for Confidentiality has been served upon the following by Electronic Mail (w/o attachments) this 4th day of April, 2025:

Walter Trierweiler Mary Wessling Charles Rehwinkel Office of Public Counsel c/o The Florida Legislature 111 W. Madison Street, Room 812 Tallahassee, FL 32399-1400 Trierweiler.walt@leg.state.fl.us Wessling.mary@leg.state.fl.us Rehwinkel.charles@leg.state.fl.us	Adria Harper Timothy Sparks Florida Public Service Commission 2540 Shumard Oak Boulevard Tallahassee, FL 32399-0850 aharper@psc.state.fl.us tsparks@psc.state.fl.us
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By: 
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