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FILE COPY

March 8, 1995

Ms. Blanca Bayo, Director
Division of Records and Reporting
Florida Public Service Commission
101 East Gaines Street
Tallahassee, Florida 32399-0850

HAND DELIVERY

Re: FPSC Docket No. 950003-GU

Dear Ms. Bayo:

Enclosed for filing are an original and fifteen copies of a second revised Exhibit "A" and a revised Page 43P4 to Florida Public Utilities Co.'s Request for Confidential Information Classification filed January 4, 1995 in the above-referenced docket. The purpose of this revision is to correct errors on the Exhibit "A" and add marks to Page 43P4 to correspond to the correction in Exhibit "A". These changes are shown in legislative format. This revision does not affect the remainder of the request. A confidential version of Page 43P4 is submitted in a sealed envelope and has been highlighted in yellow. The correct information for which confidential treatment is sought has been identified on the various workpapers.

Please indicate receipt of this document by stamping the enclosed extra copy of this letter.

RECEIVED & FILED

ms
FPSC-BUREAU OF RECORDS

DOCUMENT NUMBER-DATE

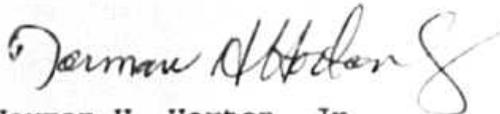
02574 MAR-8⁹⁵

FPSC-RECORDS/REPORTING

Blance Bayo, Director
March 8, 1995
Page 2

Thank you for your assistance with this filing.

Sincerely,

A handwritten signature in cursive script, appearing to read "Norman H. Horton, Jr.", written in dark ink.

Norman H. Horton, Jr.

NHH/amb

Enclosures

cc: Parties of Record
Mary Elizabeth Culpepper, Esq.
Mr. George Bachman

Exhibit "A"

PAGE 1 of 3

FLORIDA PUBLIC UTILITIES COMPANY

Justification for Confidentiality Data Obtained During a PSC Audit of Florida Public Utilities Company's PGA/True-up filings for the six (6) months ended 3/94 and 9/94 under Docket NO. 940003-GU / AFAD NO. 94-158-4-2:

<u>SCHEDULES</u>	<u>PAGES</u>	<u>LINES</u>	<u>COLUMNS</u>	<u>RATIONALE</u>
TRANSPORTATION PURCHASES SCHEDULE A-3	2-2 P 10	1-13	PURCHASED FROM, SYSTEM SUPPLY, TOTAL PURCHASED, COMMODITY COST THIRD PARTY, OTHER CHARGES, TOTAL CENTS PER THERM <u>END USE</u>	(1)
AUDITOR'S WORKPAPERS TITLE: GAS COST	43P4	AS INDICATED <u>No. 3a, 3b, 3c, 3d, 3e.</u>	AS-INDICATED	(3)
INFORMATION FOR ACCOUNTING	43-1/1	3-8, 10-13 19	D&E D	(3) (3)
	43-2/1	3	D&E	(3)
	43-3/1	3-17	D	(3)
FLORIDA GAS TRANSMISSION INVOICE	43-1/1-1 P 3	9	B&C	(3)
	43-3/1-1 P 3	-3- <u>8</u>	B&C	(3)
GAS INVOICES AND RELATED TRANSACTIONS & ALLOCATIONS	43-1/1-1 P 6-9 <u>6-10</u>	1-80	ALL	(2, 4)
	43-1/1-2	8-11, 30-33	C-K	(4)
	43-2/1- 1 <u>1-1</u> P 4-7	1-80	ALL	(2, 4)
	43-2/1-2	8-10, 30-32	C-K	(4)
	43-3/1-1 P6-12	1-80	ALL	(4)

DOCUMENT NUMBER DATE

02574 MAR-84

Exhibit "A" (Continued)

PAGE 2 of 3

FLORIDA PUBLIC UTILITIES COMPANY

Justification for Confidentiality Data Obtained During a PSC Audit of Florida Public Utilities Company's PGA/True-up filings for the six (6) months ended 3/94 and 9/94 under Docket NO. 940003-GU / AFAD NO. 94-158-4-2:

(1) The information contained within these columns represent negotiated gas supply packages purchased from suppliers other than Florida Gas Transmission Company. These prices vary based on the operational flexibility of each contract. These data contain the names of gas suppliers from whom FPU is purchasing gas supplies. Release of supplier names would be detrimental to the interests of FPU and its customers since it would provide a competitor with a list of FPU's suppliers. These data also contain information concerning volumes purchased and costs by gas supply source. Releasing such information could provide competing gas suppliers with an advantage over FPU. Suppliers may be less likely to make price concessions. Release of such information has the potential to lead to inflated price fixing by gas suppliers. Potentially, release of the aforementioned information may result in higher gas costs which would have to be passed along to FPU's customers. Additionally, these schedules contain summaries of data previously granted confidential treatment by the FPSC in Dockets 920003-GU and/or 930003-GU, as appropriate. This information is contractual information which, if made public, "would impair the efforts of [Florida Public Utilities Company] to contract for goods or services on favorable terms." Section 366.093(3)(d), Florida Statutes.

(2) It is necessary to keep all natural gas supply invoices and related transactions confidential with the exception of the Florida Gas Transmission Company invoices and transactions. The identity of the individual gas suppliers could be determined by any person familiar with the individual supplier's invoice numbering systems. Release of such data would be detrimental to the interests of FPU and its customers since it would provide a competitor with a list of FPU's suppliers. Releasing such information could provide competing gas suppliers with an advantage over FPU. Suppliers may be less likely to make price concessions. Release of such information has the potential to lead to inflated price fixing by gas suppliers. Potentially, release of the aforementioned information may result in higher gas costs which would have to be passed along to FPU's customers. This information is contractual information which, if made public, "would impair the efforts of [Florida Public Utilities Company] to contract for goods or services on favorable terms." Section 366.093(3)(d), Florida Statutes.

SECOND REVISED

Exhibit "A" (Continued)

PAGE 3 of 3

FLORIDA PUBLIC UTILITIES COMPANY

Justification for Confidentiality Data Obtained During a PSC Audit of Florida Public Utilities Company's PGA/True-up filings for the six (6) months ended 3/94 and 9/94 under Docket NO. 940003-GU / AFAD NO. 94-158-4-2:

(3) It is necessary to keep the identity of Off Systems Sales customers confidential due to the competitiveness of this market. All invoices and related transactions must also be confidential with including the Florida Gas Transmission Company invoices and transactions. This information is contractual information which, if made public, "would impair the efforts of [Florida Public Utilities Company] to contract for goods or services on favorable terms." Section 366.093(3)(d), Florida Statutes.

(4) Confidentiality was previously granted by the FPSC for these schedules and respective columns and line numbers under this same Docket.

SECOND REVISED

COMPANY: PPUC
TITLE: GAS COSTS
PERIOD: 10/93 TO 9/94
DATE: NOVEMBER 28, 1994
WP: 43
AUDITOR: RKY

3

	JAN 94 43-1	FEB 94 43-2	June MAR 94 43-3
INVOICE AMOUNT	1,383,493.03	1,232,667.44	615,412.71
COST INCLUDED IN WP 40 and A-2	1,364,924.00	1,232,667.00	552,861.00
DIFFERENCE	18,569.03	0.44	62,551.71

Included on the invoice, but not in the PGA charges are costs for [redacted] For Jan 94, and [redacted] acceptable for Mar 94.

should these costs be removed from the PGA?

(end use charge) b [redacted]

c Company pays that any revenues from end use customers [redacted] + [redacted] are credited back to expense account 401

Travel to J&S credit to acct. 401 for Jan 94
Travel to J&S credit to acct 401 for June 94
It appears that the expenses & revenues are not in the PGA A-2 Schedule for [redacted] + [redacted] d

e [redacted]
x OUC = [redacted]
FHLP = [redacted]
These are end use customers

4 It appears that the Company is including End Use or Cost. Per Min [redacted]