

3:59PM
Law

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WAYNE L. SCHIEFFELBEIN

March 28, 1995

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

HAND DELIVERY

Re: Docket No. ⁵940003-GU
Purchased Gas Adjustment (PGA) True-up
Request for Specified Confidential Treatment

Dear Ms. Bayo:

Enclosed on behalf of Chesapeake Utilities Corporation, Florida Division, for filing in the above docket are an original and 10 copies of a Revised Exhibit A and revised workpapers pages 46P17, 46P18, 46P19, 46P20, 54P1, 54P1, 54P1, 54P1, and 54P1 of the
6 7-1 7-2 14 14-1
public copy of the attachments thereto. These documents revise those contained in Document No. 12583-94.

Please acknowledge receipt of the foregoing by stamping the enclosed extra copy of this letter and returning same to my attention. Thank you for your assistance.

Sincerely,

Wayne L. Schiefelbein
Wayne L. Schiefelbein

- ACK
- AFA
- APP _____
- CAF _____
- CMU _____
- CTR WLS/ldv
Enclosures
- EAS 3/Mahin
- LEG 1/Erstling
- LIR 3 cc:w/ercl.: Beth Culpepper, Esq.
All parties of record
- OPR _____
- RCR _____
- SEC 1
- WAS _____
- OTR _____

DOCUMENT NUMBER-DATE

03250 MAR 28 95

FPSC-RECORDS/REPORTING

FILE COPY

Docket No. 940003-GU

CHESAPEAKE UTILITIES CORPORATION
FLORIDA DIVISION
EXHIBIT "A"

Justification for Confidentiality of portions of audit workpapers resulting from a Commission audit of the period October 1, 1993 through September 1994:

<u>Month</u>	<u>Schedule/ Workpaper</u>	<u>Line(s)</u>	<u>Column(s)</u>	<u>Rationale</u>
12/93	<u>46P1</u> 3	1 - 8	Gross Nominated through Wacog	(1)
12/93	<u>46P1</u> 3	1 - 8	Producer	(2)
12/93	<u>46P1</u> 4	1	Gross Nominated through Wacog	(1)
12/93	<u>46P1</u> 4	1	Producer	(2)
12/93	46P5	1 - 9	Gross Amount/MMBtu per day through City Gate Price	(4)
12/93	46P5	1 - 9	Producer/Supplier	(2)
12/93	46P6	1 - 10	A - G	(4)
12/93	46P6	1 - 10	Producer/Supplier	(2)
12/93	<u>46P6</u> 1	1 - 12	Gross Amount, Net Amount, Invoice Amount	(1)
12/93	<u>46P6</u> 1	1 - 12	Supplier	(2)
12/93	<u>46P6</u> 1	1 - 8, 10, 11	Wellhead Price	(4)
12/93	46P9	1 - 9	System Supply and Total Therms Purchased Through Total Cents Per Therm	(1)
12/93	46P9	1 - 9	Purchased From	(2)

DOCUMENT NUMBER-DATE

03250 MAR 28 82

FPSC-RECORDS/REPORTING

12/93	46P17	Items 2, 2a	2
12/93	46P17	Items 3 through 3w	3
12/93	46P18	Items 2 through 2d	2
12/93	46P18	Item 3	3
12/93	46P19	Items 2 through 2c	2
12/93	46P19	Items 3 through 3f	3
12/93	46P20	Items 2 through 2c	2
12/93	46P20	Items 3 through 3f	3
7/94	<u>54P1</u> 6	Items 2 through 2d	2
7/94	<u>54P1</u> 6	Items 3 through 3v	3
7/94	<u>54P1</u> 7-1	Items 2 through 2b	2
7/94	<u>54P1</u> 7-1	Items 3 through 3j	3
7/94	<u>54P1</u> 7-2	Items 2 through 2d	2
7/94	<u>54P1</u> 7-2	Item 3	3
7/94	<u>54P1</u> 14	Item 2	2
7/94	<u>54P1</u> 14	Items 3 through 3bbb	3
7/94	<u>54P1</u> 14-1	Items 2 through 2g	2
7/94	<u>54P1</u> 14-1	Items 3 through 3g	3
7/94	54P4	1 - 4 System Supply, Total Purchased, Commodity Cost, Demand Cost, Total Cents Per Therm	(1)
7/94	54P4	1 - 4 Purchased From	(2)

7/94	54P5	1 - 8	Producer/Supplier	(2)
7/94	54P5	1 - 8	C - H	(4)

(1) Included in the audit workpapers are schedules which show the quantities of gas which the Florida Division purchased from FGT and other suppliers during the months of December 1993 and July, 1994, together with the cost of such purchases. However, rates for purchases of gas supplies from persons other than FGT are currently based primarily on negotiations between the Florida Division and third-party suppliers. Effective November 1, 1993, FGT is no longer a merchant of gas due to their restructuring in compliance with FERC Order No. 636. All gas supplies for the Florida Division will be obtained from these third-party suppliers. Purchases are made by the Florida Division at varying prices depending upon the quantities involved and whether the purchase is made on a firm or interruptible basis. Prices at which gas is available to the Florida Division can vary from supplier to supplier.

This information is contractual information which, if made public, "would impair the efforts of [the Florida Division] to contract for goods or services on favorable terms." Section 366.093(3)(d), Florida Statutes. The information shows the price or average prices which the Florida Division paid to suppliers for gas during the periods. Knowledge of the prices the Florida Division paid to its suppliers during these periods would give other competing suppliers information with which to potentially or actually control the pricing of gas either by all quoting a

particular price or by adhering to a price offered by a current supplier. Despite the fact that this information is the price or weighted average price paid by the Florida Division during the involved periods, a supplier of the Florida Division which might have been willing to sell gas at a price less than such weighted average cost would likely refuse to do so. Such a supplier would be less likely to make any price concessions which it might have previously made (or might otherwise have been willing to make), and could simply refuse to sell at a price less than such weighted average price. The end result is reasonably likely to be increased gas prices, and, therefore, an increased cost of gas which the Florida Division must recover from its ratepayers.

The information regarding the number of therms nominated, purchased, and delivered, as well as the invoice amount (commodity costs/third party) and transportation costs (commodity costs/pipeline and demand costs) for purchases by the Florida Division from its suppliers are algebraic functions of the price per therm paid to such suppliers in the column entitled, "Total Cents Per Therm" (WACOG). Thus, the publication of these columns together or independently on the various schedules could allow other suppliers to derive the purchase price of gas paid by the Florida Division to its suppliers. Thus, this information would permit other suppliers to determine contractual information which, if made public, "would impair the efforts of [the Florida Division] to contract for goods or services on favorable terms." Section 366.093(3)(d), Florida Statutes.

(2) The information showing the identity of the Florida Division's suppliers is contractual and proprietary business information which, if made public, "would impair the efforts of [the Florida Division] to contract for goods or services on favorable terms." Section 366.093(3)(d) Florida Statutes. Knowledge of the name of the Florida Division's suppliers would give other competing suppliers information with which, together with price and quantity information discussed in Rationale (1) above, to potentially or actually control the pricing of gas, thus impairing the competitive interests and/or ability of the Florida Division and its current suppliers to contract for gas supply on favorable terms.

(3) The information shown on invoices submitted to the Florida Division for gas purchases from third party suppliers is contractual and proprietary business information which, if made public, "would impair the efforts of the Florida Division to contract for goods or services on favorable terms" Section 366.093(3)(d), Florida Statutes. The invoices show the FGT assigned points of delivery, actual quantity of gas purchased, and the price per unit of gas purchased. Knowledge of this information would give other competing suppliers the information with which to potentially or actually control the pricing of gas by either all quoting a particular price, or adhering to a price offered by the Florida Division's current suppliers, thus impairing the competitive interests and/or ability of the Florida Division and its suppliers to contract for gas supply on favorable terms. The

end result is reasonably likely to be increased gas prices, and, therefore, an increased cost of gas which the Florida Division must recover from its ratepayers.

(4) The information regarding the number of MMBtu's per day and per month purchased by the Florida Division as well as the wellhead and city gate price per MMBtu paid by the Florida Division to its suppliers is contractual information which, if made public, "would impair the efforts of [the Florida Division] to contract for goods or services on favorable terms." Section 366.093(3)(d) Florida Statutes. Knowledge of the prices the Florida Division paid to its suppliers during these periods would give other competing suppliers information with which to potentially or actually control the pricing of gas either by all quoting a particular price or by adhering to a price offered by a current supplier. The end result is reasonably likely to be increased gas prices, and, therefore, an increased cost of gas which the Florida Division must recover from its ratepayers.

Chesapeake Utilities Corporation
Attn: T.J. Holt
E O Box 615
Dover, DE 19903-0615

Owner No.: 7407
Location-ID: CUC1
Invoice No.: 16333
Date: 01/06/1994
Days Due: 10
P.O Number:

Deliveries on: FLORIDA GAS TRANSMISSION
To invoice for 12/1993 gas purchases:

MMBTUs purchased
Purchase Price

Sub-Total

MMBTUs purchased
Purchase Price

Sub-Total

MMBTUs purchased
Purchase Price

Sub-Total

MMBTUs purchased
Purchase Price

Sub-Total

MMBTUs purchased
Purchase Price

Sub-Total

MMBTUs purchased
Purchase Price

Sub-Total

3	46P6	3a	3b	46P1 3
			3c	
3d	46P6	3e	3f	}
			3g	
3h	46P6	3i	3j	}
			3k	
3l	46P6	3m	3n	}
			3o	
3p	46P6	3q	3r	46P1 3
			3s	
3t	46P6	3u	3v	46P1 3
			3w	

2

Chesapeake Utilities Corporation
Atten: T.J. Holt
B O Box 615
Dover, DE 19903-0615

Owner No.: 7407
Location-ID: CUC1
Invoice No.: 16333
Date: 01/06/1994
Days Due: 10
P.O Number:

Deliveries on: FLORIDA GAS TRANSMISSION

Total

----- 3 ----- ^{46P1}
3

Please remit payment to:

2a

Or wire transfer:

2b
NATIONSEANK
Account # -----
DALLAS, TX
ABA # -----

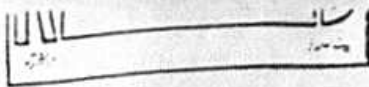
For invoicing questions, call 2c

2d

2d

46P18

2
2a



01/02/94

Ref.: 5331

TO: Chesapeake Utilities Corporation
ATTN: Philip Barefoot
Florida Division
P.O. Box 960
Winter Haven, FL 33882-0960

REMIT TO: 2b
IN C/O

Texas Commerce Bank
P.O. Box 200915
Houston, TX 77216-0915
Acct. No.: 00100893958

Wire Instructions:
Texas Commerce Bank, Houston
ABA No.:
Acct. No.

INVOICE NO.	00162*199312
PLANT SERVICED	

Payment due according to contract terms.
Interest will be charged on late payments.

PERIOD	PIPELINE	DELIVERY POINT	MMBTU	PRICE	TOTAL
*** CURRENT MONTH TRANSACTIONS ***					
[Commodity]					
DEC 1993	FGT	25306	3	3a	3b
DEC 1993	FGT	25412	3c	3d	3e

Amount Due: 3f

NOTES:

ok
SS

For questions regarding this account please contact: 2c

PLEASE RETURN COPY WITH YOUR REMITTANCE

46P10

INVOICE DATE
12/29/93

Ref.: 5331

2
2a

TO: Chesapeake Utilities Corporation
ATTN: Philip Barefoot
Florida Division
P.O. Box 960
Winter Haven, FL 33862-0960

REMIT TO: 2b
IN C/O

Texas Commerce Bank
P.O. Box 209915
Houston, TX 77218-0915
Acct. No.: 00100893958

Wire Instructions:
Texas Commerce Bank, Houston
ABA No.:
Acct. No.

INVOICE NO
PLANT SERVICED

Payment due according to contract terms.
Interest will be charged on late payments.

PERIOD	PIPELINE	DELIVERY POINT	MMETU	PRICE	TOTAL
*** PRICE PERIOD ADJUSTMENTS ***					
	Commodity		3	3a	3b
OCT 1993	FGT	16833	3c	3d	3e
OCT 1993	FGT	16812			

Amount Due: 3f

NOTES:

46P1
3

For questions regarding this account please contact: 2c

46P20

2
2a

Doc# No. 94003-6U
Chesapeake Utilities Corp.
ARW-1
Page 21 of 23

INVOICE
INVOICE DATE 08/02/94
Ref.: 5331

TO: Chesapeake Utilities Corporation
ATTN: Philip Barefoot
Florida Division
P.O. Box 960
Winter Haven, FL 33882-0960

REMIT TO: 2b
IN C/O Texas Commerce Bank
P.O. Box 200915
Houston, TX 77216-0915
Acct. No.: 00101435502

Wire Instructions:
Texas Commerce Bank, Houston
ABA No.:
Acct. No.

INVOICE NO. 00126*199407
PLANT SERVICED

Payment due on 08/13/94
Interest will be charged on late payments.

PERIOD	PIPELINE	DELIVERY POINT	MMBTU	PRICE	TOTAL
*** CURRENT MONTH TRANSACTIONS ***					
	Commodity				
JUL 1994	FGT	25306	3 3c 3f	54PS 3a 3d 3g	54PS 3b 3e 3h
JUL 1994	FGT	25412			
JUL 1994	FGT	25309			
		MMBTU			
		3i 3j 3k 3l 3m 3n			
		54PI 7-1			
		30	3p	3g 3r	54P2

NOTES:

Amount Due: 3S

54PI - 3f
7-2 - 3u
3v - 54PI
1 - 54P2

For questions regarding this account please contact: 2c

54PI
6

2

Docket No. 94003-6
Chesapeake Utilities Co
AVW-1
Page 19 of 23

Chesapeake Utilities Corporation
1015 6th Street N.W.
Attn: Sam Sessa
Winter Haven, FL 33881

Owner No.: 7407
Location-ID: CUC1
Invoice No.: 19926
Date: 08/08/1994
Days Due: 10
P.O Number:

Deliveries on: FLORIDA GAS TRANSMISSION
To invoices for 07/1994 gas purchases:

ZONE 3
MMBTUs purchased
Purchase Price

Sub-Total

ZONE 2
MMBTUs purchased
Purchase Price

Sub-Total

ZONE 1
MMBTUs purchased
Purchase Price

Sub-Total

3 — 54 PS

3a — 3b

3c

3d — 54 PS

3e — 3f

3g — 54 PS

3h — 3i

3j

Post-It™ brand fax transmittal memo 7671 # of pages > 2

To	Sam Sessa	From	
Co.	Chesapeake Util.	Co.	2a
Dept.		Phone #	
Fax #	(813) 294-3895	Fax #	

← 26 →

54 PS
7

2

DOCKET No 19603
Chesapeake Utilities
AVW-1
Page 20 of 23

Chesapeake Utilities Corporation
1015 6th Street N.W.
Attn: Sam Sessa
Winter Haven, FL 33881

Order No.: 7407
Location-ID: CUC1
Invoice No.: 19936
Date: 08/08/1994
Days Due: 10
P.O Number:

Deliveries on: FLORIDA GAS TRANSMISSION

Total

3 54P1
6

Please remit payment to:

2a

Or wire transfer:

2b

NATIONSBANK
Account #
DALLAS, TX
ABA #

For invoicing questions, call

2c

54P1
7-2

← 2d →

2

Gas Supply Invoice

Customer

CHESAPEAKE UTILITIES
P.O. Box 960
Winter Haven, Florida 33882-0960

Attention: Sam Sessa

Production month of: July, 1994

Statement Date:

August 12, 1994

Weighted avg cost

3	3d	3h	3l
3a	3e	3i	3m
3b	3f	3j	3n
<u>3c</u>	<u>3g</u>	3k	<u>3o</u>

54P5

Zone	Volume	Unit Price	FGT Usage	Demand	Total Price
1	3p	3u			3gg
2	3q	3v			3hh
3	3r	3w			3ii
	<u>3s</u> 3t				3jj
	3x	3dd	0.0719	0.4331	3kk
	3y	3ee			3ll
	3z	3ff			3mm
	3aa				3nn

54P1
14-1

54P1
14-1

PAYABLE UPON RECEIPT
FAST DUE AFTER: August 22, 1994

PLEASE REMIT TO:
PENINSULA ENERGY SERVICES CO.
DIVISION OF CHESAPEAKE UTILITIES
P. O. BOX 1769
DOVER, DELAWARE 19903-1769

Direct Billing Inquires To:
Chesapeake Utilities
P.O. Box 960
Winter Haven, Florida 33882-0960
(813)293-8612
Attn: Customer Accounting

3ww 3xx 3yy 3zz

322
3aaa
3bbb

54P1

2

INVOICE

2a

Central Florida Gas Company
 P.O. Box 960
 Winter Haven, Florida 33882-0960
 Attn: Sam Sessa

Special Instructions:
 Please Make Check Payable To:
 2b

Invoice No. FP100695
 Invoice Date 21 July 94
 Due Date 15 Aug 94

Fermit by Mail to:
 c/o
 2c

Delivery Date	Volume / Description	Contract Price	Amount Due
07 21	3 3a 54 P4	3c MMBtu (Dry) Plus: FTG - 1 Reservation .0550 FTG - 1 Usage .0255 TCR Reservation .0600 GFI Demand .0072 GFI Volumetric .0055 ACA .0025 TCR Usage .0350	3e 3f 3g 54 P1 / 14
	FLORIDA GAS TRANSMISSION		
	3b TOTAL 54 P1 / 14	Subtotal .505 Total 3d	
		Telephone Contact: 2d FAX #: 2e 2f	

2g

54 P1