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February 9, 1996

Ms. Blanca S. Bayo, Director  
Division of Records and Reporting  
Florida Public Service Commission  
2540 Shumard Oak Boulevard, Rm. 110  
Tallahassee, FL 32399-0850

Re: Amendment to Docket No. 950003-GU, Purchased Gas Adjustment Cost  
Recovery, Document No. 06984-95, filed October 1995

Dear Ms. Bayo:

At the suggestion of Mr. M. Fulford and Mr. W. Makin, enclosed please find original and sixteen (16) copies of amendments to City Gas Company of Florida's October 1995 Purchase Gas Adjustment filing. The Company revised Schedules A-1, A-1R and A-2 which are attached to this letter. The Company requests specified confidential treatment of portions of this document as explained in attachment "A." The confidential document is filed under separate cover (copy enclosed).

Please acknowledge receipt and filing of the above by stamping the duplicate copy of this letter and returning same to me.

Thank you for your assistance in connection with this matter.

Sincerely,

*Michael A. Palecki*

Michael A. Palecki  
Vice President of Regulatory Affairs

Enclosures

RECEIVED & FILED

*MR. RN*  
FPSC-BUREAU OF RECORDS

DOCUMENT NUMBER-DATE  
01575 FEB-96  
FPSC-RECORDS/REPORTING

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Purchased Gas     )  
Adjustment Cost Recovery )  
\_\_\_\_\_ )

Docket No. 950003-GU  
Filed: February 9, 1996

CITY GAS COMPANY OF FLORIDA REQUEST  
FOR SPECIFIED CONFIDENTIAL TREATMENT

City Gas Company of Florida ("City Gas" or "the Company"), pursuant to section 366.093, Florida Statutes, submits the following Request for Specified Confidential Treatment of portions of its Purchased Gas Adjustment (PGA) filing for the month of October 1995. In support thereof, City Gas states:

1. City Gas' PGA filing for the month of October 1995 consists of Schedule A-1, A-1R and A-2 for the month of October 1995. The confidential version of City Gas' filing for the month is submitted in a sealed envelope concurrently with this request.
2. Attached hereto as Exhibit "A" is a detailed justification for the requested confidential treatment of the highlighted portions of City Gas' filing referenced above.
3. The material for which confidential classification is sought is intended to be and is treated by City Gas as proprietary and has not been publicly disclosed.
4. City Gas requests that the information for which it seeks confidential classification not be declassified for a period of eighteen months as provided in section 366.093 (4), Florida Statutes. The time period requested is necessary to allow City Gas to negotiate future gas purchase contracts with suppliers/competitors (and other

DOCUMENT NUMBER-DATE

01575 FEB-96

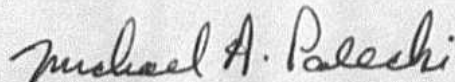
FPSC-RECORDS/REPORTING

customers having access to information which would adversely affect the ability of the Company to negotiate such future contracts) on favorable terms.

Wherefore, City Gas Company of Florida respectfully requests the Commission grant its petition for Specified Confidential Treatment of the information identified in Exhibit "A."

Dated this February 9, 1996

City Gas Company of Florida  
A Division of NUI Corporation  
955 East 25th Street  
Hialeah, FL 33013



Michael A. Palecki  
Vice President of Regulatory Affairs

**EXHIBIT "A"**  
**CITY GAS COMPANY OF FLORIDA**

**Data Elements for the October 1995 PGA for which Confidential Treatment is Requested**

Schedule Number, or Other Identifier	Page	Lines	Columns	Justification (See "Notes" Below)
A-1	1	1-6	A, C, E, G	(2, 3)
		7-8	A, C, E, G	(3)
		15-20	A, C, E, G	(2, 3)
		21-22	A, C, E, G	(3)
		28	A, C, E, G	(1)
		31	A, C, E, G	(1)
A-1R	2	1-6	A, B, C, E, F, G	(2, 3)
		7-8	A, B, C, E, F, G	(3)
		15-20	A, B, C, E, F, G	(2, 3)
		21-22	A, B, C, E, F, G	(3)
		28	A, B, C, E, F, G	(1)
		31	A, B, C, E, F, G	(1)

Notes To Exhibit "A" Regarding Justification:

(1) Line 28 and 31 of Schedule A-1 and A-1R contain City Gas' Weighted Average Cost of Gas (WACOG) for the current month. Dissemination of this information could adversely influence the Company's ability to effectively negotiate for low-cost gas supplies. If gas suppliers know the Company's WACOG, they may tend to quote future gas prices at or above the weighted level. Likewise, vendors who previously supplied gas to the Company at prices below the average cost could tend to resist making future price concessions. As a consequence, ratepayers may pay higher gas costs. Public knowledge of City Gas' WACOG "would impair the efforts of the Company to contract for goods or services on favorable terms," Section 366.093(3)(d), Florida Statutes.

(2) Disclosure of lines 4 and 18, Schedules A-1 and A-1R, will allow suppliers to derive the price that the Company pays third-party suppliers. Dividing line 4, Cost of Gas Purchased, by line 18, Therms Purchased, yields the WACOG that appears on line 31. As explained above, publication of the information on line 31 could diminish the Company's ability to constructively negotiate for gas supplies. Therefore, any information that could provide competitors with the contents of line 31 should be also granted confidentiality. Public knowledge of this information "would impair the efforts of City Gas to contract for goods or services on favorable terms," Section 366.093(3)(d), Florida Statutes.

(3) Lines 1-6, 7-8, 15-22, Schedules A-1 and A-1R, contain components of arithmetical calculations used to derive the per therm price of gas. Disclosure of these numbers is "reasonably likely" to impair the Company's efforts to contract for goods and services on favorable terms. Similarly, the Company further requests confidentiality for Schedule A-1, Supporting Details, with respect to the columns named Therms, Invoice Amount and Cost per Therm. This schedule shows the derivation and arithmetic manipulation of information on Schedule A-1 and A-1R. Publication of the supporting details for these Schedules "would also impair the efforts of City Gas to contract for goods or services on favorable terms," Section 366.093(3)(d), Florida Statutes.