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February 3, 1997

HAND DELIVERY

Ms. Blanca S. Bayo, Director
Division of Records and Reporting
Florida Public Service Commission
2540 Shumard Oak Boulevard
Betty Easley Conference Center
Room 110
Tallahassee, Florida 32399-0850

Re: Docket No. 970003-GU

Dear Ms. Bayo:

Enclosed herewith for filing in the above-referenced docket on behalf of Florida Public Utilities Company ("FPU") are the following documents:

1. Original and fifteen copies of FPU's Request for Confidential Classification of Revised Exhibit GMB-3, Mid-Course Correction;
2. Original and fifteen copies of Revised Exhibit GMB-3, which has been revised to reflect the projected total therm sales based upon the Purchased Gas Adjustment Factor Requested in FPU's Petition for a Mid-Course Correction that was filed in this docket on January 8, 1997; and
3. An envelope marked "confidential" containing a copy of the confidential information.

Please acknowledge receipt of these documents by stamping the extra copy of this letter "filed" and returning the same to me.

Thank you for your assistance with this filing.

Sincerely,

William B. Willingham

William B. Willingham

WBW/rl

cc: All Parties of Record
Trib. 3
cc: Mr. Wayne Makin

request
DOCUMENT NUMBER-DATE

01210 FEB-35

FPSC-RECORDS/REPORTING

revised copy of letter
DOCUMENT NUMBER-DATE

01209 FEB-35

FPSC-RECORDS/REPORTING

DOCUMENT NUMBER-DATE
filed
01212 FEB-36

FPSC-RECORDS/REPORTING

confidential
DOCUMENT NUMBER-DATE
01211 FEB-36

FPSC-RECORDS/REPORTING

ORIGINAL
FILE COPY

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Purchased Gas Adjustment)
(PGA) True-up)
_____)

Docket No. 970003-GU
Filed: February 3, 1997

**FPU'S REQUEST FOR CONFIDENTIAL
CLASSIFICATION OF REVISED EXHIBIT
GMB-3, MID-COURSE CORRECTION**

Florida Public Utilities Company ("FPU"), pursuant to Section 366.093, Florida Statutes, and Rule 25-22.006(4), Florida Administrative Code, submits this its Request for Confidential Classification of portions of Revised Composite Exhibit GMB-3 filed in support of FPU's Petition for a Mid-Course Correction to the Approved Purchased Gas Adjustment Factor for the period February 1, 1997 through March 31, 1997. In support thereof, FPU states as follows:

1. Schedule E-3 Revised Mid-Course Correction (page 3 of 3 of Revised Exhibit GMB-3) identifies the actual price, quantity and supplier for each of FPU's purchases of gas during the period of April 1996 through November 1996. This information is contractual information which, if made public, would impair the efforts of FPU to contract for similar goods and services on favorable terms.

2. FPU requests that certain information in Schedule E-3 Revised Mid-Course Correction (page 3 of 3 of Revised Exhibit GMB-3) be classified as "proprietary confidential business information" within the meaning of Section 366.093, Florida Statutes. The

FPU requests confidential treatment for the following information: the identity of the vendor that the gas was purchased from; whether the gas was system supply or end use; the total amount purchased; third party commodity cost; other charges; and total cents per therm.

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APP _____
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EAG _____
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OPC _____
RCH _____
SEC _____
WAS _____
OTH _____

DOCUMENT NUMBER DATE

01210 FEB-35

FPSC-RECORDS/REPORTING

information and material at issue is intended to be and is treated by FPU as proprietary and confidential. The Commission previously has determined that this information is entitled to the protection of Section 366.093(3), Florida Statutes. See, e.g., Order No. PSC-96-0532-CFO-GU, issued April 15, 1996.

3. Release of the information at issue would be detrimental to the interests of FPU and its customers. Release of the cost, which information is a function of the price of gas paid by FPU to each of its suppliers² pursuant to an individually negotiated gas supply package, and quantity of gas purchased by FPU would reveal the negotiated purchasing arrangement between FPU and each of its suppliers. In addition, revealing the identification of FPU's existing suppliers would provide competitors with a list of those suppliers. The release of any of this information would provide FPU's suppliers and potential suppliers with an advantage when negotiating contracts with FPU, potentially resulting in higher gas costs for FPU and its customers. Furthermore, the release of such information to competing suppliers has the potential to lead to the fixing of gas prices by suppliers, which would result in higher gas costs for FPU and its customers.

4. An unedited version of Revised Exhibit GMB-3 has been submitted to the Division of Records and Reporting on this date under a separate cover with the information asserted to be confidential highlighted in yellow. An edited version of the

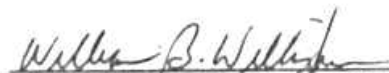
²With the exception of FPU's purchases from the Florida Gas Transmission Company.

document on which the information asserted to be confidential has been blocked out is enclosed herewith.

5. FPU requests that the information for which it seeks confidential classification remain confidential for a period of at least 18 months as provided in Section 366.093(4), Florida Statutes. The time period requested is necessary to allow FPU to negotiate future gas purchase contracts on favorable terms.

WHEREFORE, for the foregoing reasons, FPU respectfully requests that its Request for Confidential Classification be granted.

Respectfully submitted,



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CERTIFICATE OF SERVICE

I HEREBY certify that a copy of the foregoing was furnished by United States Mail this 3rd day of February, 1997 to:

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