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April 9, 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 five copies of FPU's Request for Confidential Classification; and
2. An envelope containing a copy of the material considered "Confidential."

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

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RECEIVED & FILED

FPSC-BUREAU OF RECORDS

DOCUMENT NUMBER-DATE

03668 APR-95

FPSC-RECORDS/REPORTING

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BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

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

Docket No. 970003-GU
Filed: April 9, 1997

FPU'S REQUEST FOR CONFIDENTIAL CLASSIFICATION

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 the Commission Staff's audit work papers pertaining to the Commission Staff's purchased gas adjustment ("PGA") Audit for the twelve-month period ending September 1996. In support thereof, FPU states as follows:

1. The Commission Staff's audit work papers at issue identify the names of the gas suppliers from which FPU has purchased gas and the price and invoice number of each purchase. With the exception of the purchases from the Florida Gas Transmission Company, these purchases were made pursuant to negotiated gas supply contracts.

2. FPU requests that certain information¹ in the Commission Staff's audit work papers be classified as "proprietary confidential business information" within the meaning of Section 366.093, Florida Statutes. The 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 Nos. PSC-96-0532-CFO-GU, issued April 15, 1996, and PSC-96-0343-CFO-GU, issued March 11, 1996. Attached hereto as exhibit "A" is a detailed explanation of the information and material for which confidential treatment is requested and justification for the requested confidential treatment

¹ The vendor's name, invoice number and price paid for purchases from suppliers other than the Florida Gas Transmission Company.

DOCUMENT NUMBER-DATE

03668 APR-96

FPSC-RECORDS/REPORTING

Exhibit "A"
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 twelve (12) months ended September 1996 under Docket NO. 960003-GU / AFAD NO. 96-151-4-2:

<u>SCHEDULES</u>	<u>PAGE(S)</u>	<u>LINES</u>	<u>COLUMNS</u>	<u>RATIONALE</u>
AUDITOR'S WORK PAPERS (COST OF GAS BY SUPPLIER AND PERIOD)	43-1/1 P1:	30-37	A,C&D	see below
		56-63	A,C&D	see below
	43-1/1 P2:	31-36	A,C&D	see below
		52-61	A,C&D	see below
	43-1/1 P3:	30-36	A,C&D	see below
		52-59	A,C&D	see below
	43-1/2 P1:	29-32	A,C&D	see below
		49-57	A,C&D	see below
	43-1/2 P2:	30-36	A,C&D	see below
		52-61	A,C&D	see below
	43-1/2 P3:	30-36	A,C&D	see below
		52-54	A,C&D	see below

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 the totals paid to gas 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. The item also represents transaction by Florida Public Utilities Company and affects it's PGA for imbalances traded and as an alternative to Florida Gas Transmission Company's cash out program. Transactions of these types are with other pipeline customers. For competitive purposes only, FPU must be assured that no other pipeline customer will be able to ascertain the parties involved in this transaction with FPU nor the prices of the components of such transactions nor the quantities involved in this transaction. Otherwise future transactions of this type may be put at undue risk. 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.

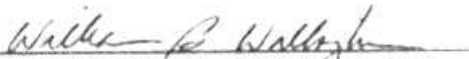
of the highlighted portions of the Commission Staff's audit work papers.

3. An unedited version of the Commission Staff's audit work papers 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 documents on which the information asserted to be confidential has been blocked out is enclosed herewith.

4. 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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& HOFFMAN, P.A.
P. O. Box 551
Tallahassee, Florida 32302-0551
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Attorneys for Florida Public
Utilities Company

CERTIFICATE OF SERVICE

I HEREBY certify that a copy of the foregoing was furnished by United States Mail this 24
day of April, 1997 to:

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Florida Public Service
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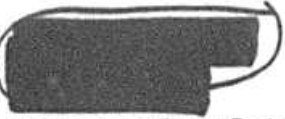



By: William B. Willingham
WILLIAM B. WILLINGHAM, ESQ.

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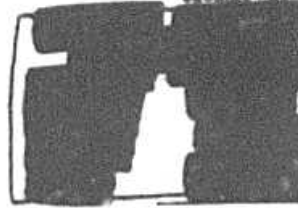
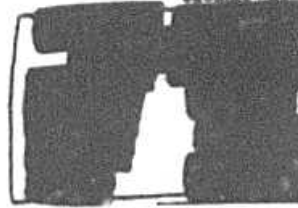
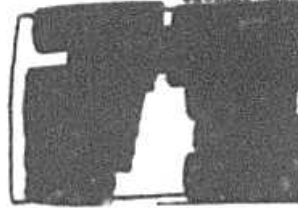
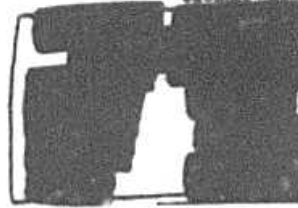
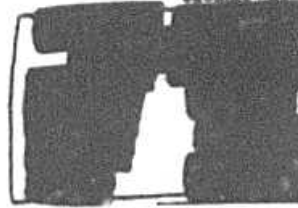
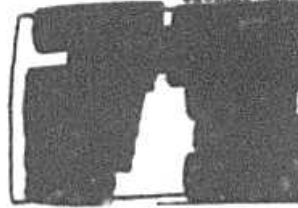


A	B	C	D
Company:	FPUC		
Title:	Purchased Gas Cost		
Auditor:	Raymond Grant		
Worksheet:			
Date:	11-14-96		

	Invoice Date	Invoice No Check No	Amount
APR 96			
FGT	4-30-96	11047	\$326,202.12
FGT	4-30-96	10898	\$240,003.52
FGT	5-10-96	11144	\$11,539.00
FGT	5-10-96	11133	\$12,944.71
			<u>\$590,689.35</u>
	5-6-96		\$1,811,212
	5-9-96		\$1,811,212
	5-3-96		\$1,811,212
Total Purchased Gas cost Per Invoice			\$1,811,212
Purchased Gas Cost Per Schedule A-2			\$1,811,212
Difference			(\$0)

CONFIDENTIAL

13-1

	Invoice Date	Invoice No Check No	Amount
MAY 96			
FGT	5-31-96	11511	\$126,421.45
FGT	5-31-96	11499	\$105,126.87
FGT	6-10-96	11707	\$19,861.02
FGT	6-10-96	11698	\$6,858.90
FGT	5-31-96	11639	\$10,817.24
FGT	5-31-96	11640	(\$6,801.20)
			<u>\$267,284.28</u>
	6-4-96		\$972,509
	6-11-96		\$972,508
	6-8-96		\$972,508
	6-12-96		\$972,508
	5-14-96		\$1
	5-6-96		\$1
Total Purchased Gas cost Per Invoice			\$972,509
Purchased Gas Cost Per Schedule A-2			\$972,508
Difference			\$1

CONFIDENTIAL

15-1

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A	B	C	D
Company:	FPUC		
Title:	Purchased Gas Cost		
Auditor:	Raymond Grant		
Workpaper			
Date:	11-14-96		

Invoice Date	Invoice No Check No	Amount
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JUNE 96

	Invoice Date	Invoice No	Amount
FGT	6-30-96	11957	\$123,589.75
FGT	6-30-96	11945	\$101,021.17
FGT	7-10-96	12224	\$13,429.45
FGT	7-10-96	12213	\$5,633.41
			<u>\$243,673.78</u>



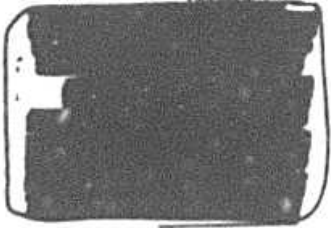
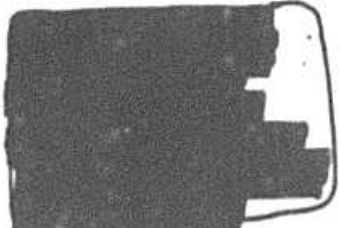
CONFIDENTIAL

Total Purchased Gas Cost Per Invoice	\$930,782
Purchased Gas Cost Per Schedule A-2	\$930,782
Difference	(\$0)

43-1

JULY 96

	Invoice Date	Invoice No	Amount
FGT	7-31-96	12466	\$128,082.19
FGT	7-31-96	12474	\$104,946.09
FGT	6-10-96	12659	\$15,763.02
FGT	6-10-96	12648	\$4,193.50
			<u>\$252,984.80</u>



CONFIDENTIAL

Total Purchased Gas Cost Per Invoice	\$969,766
Purchased Gas Cost Per Schedule A-2	\$969,766
Difference	(Immaterial Price on NG)

43-1

81	82	83	84	85	86	87	88	89	90

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A B C D

Company: FPUC
Title: Purchased Gas Cost
Auditor: Raymond Grant
Worksheet
Date: 11-14-96

Invoice Date Invoice No Amount

AUG 96

	Invoice Date	Invoice No	Amount
FGT	8-31-96	12920	\$122,722.06
FGT	8-31-96	12908	\$105,126.67
FGT	9-10-96	13138	\$16,091.08
FGT	9-10-96	13127	\$5,249.44
FGT	9-10-96	13088	\$9,029.65

\$258,218.90

[Redacted]

9-5-96
9-11-96
9-8-96
9-10-96
7-22-96

[Redacted]

CONFIDENTIAL

Total Purchased Gas Cost Per Invoice
Purchased Gas Cost Per Schedule A-2

\$936,186.34
\$936,187.00

42-1

Difference

(\$1)

SEPTEMBER 1996

	Invoice Date	Invoice No	Amount
FGT	9-30-96	13332	\$119,157.71
FGT	9-30-96	13320	\$100,895.60
FGT	10-10-96	13531	\$16,435.48
FGT	10-10-96	13520	\$5,726.56

\$242,215.35

[Redacted]

10-4-96
10-10-96
10-3-96

[Redacted]

CONFIDENTIAL

Total Purchased Gas Cost Per Invoice
Purchased Gas Cost Per Schedule A-2

\$763,114.07
\$763,114.00

42-1

Difference

\$0

[Grid of numbers and text, mostly obscured by noise]