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ORIGINAL

December 8, 2000

BY HAND DELIVERY

Blanca Bayó
Director, Records and Reporting
Florida Public Service Commission
2540 Shumard Oak Boulevard
Tallahassee, FL 32399-0850

Re: Docket No. 000003-GU
PGA Audit Report
Audit Control No. 00-03-4-4
CONFIDENTIAL DOCUMENTS ATTACHED

Dear Ms. Bayó:

Enclosed for filing on behalf of City Gas Company of Florida, a division of NUI Corporation ("NUI City Gas) are:

1. The original and ten copies of its Revised Request for Confidential Classification with regard to certain audit workpapers.

This revised filing is made in response to a letter dated November 29, 2000 from Mr. Robert Freeman of the Division of Regulatory Oversight which pointed out some perceived technical deficiencies with the original Request for Confidential Classification dated September 26, 2000.

2. An envelope containing one highlighted copy of the audit workpapers for which confidential treatment is

Redacted
DOCUMENT NUMBER-DATE

15813 DEC-88

FPSC-RECORDS/REPORTING

RECEIVED & FILED

FPSC-BUREAU OF RECORDS

DOCUMENT NUMBER-DATE

15812 DEC-88

FPSC-RECORDS/REPORTING

REVISED CONFIDENTIAL

DOCUMENT NUMBER-DATE

15811 DEC-88

FPSC-RECORDS/REPORTING

REVISED REQUEST

RECEIVED-FPSC
00 DEC -8 PM 4:33
RECORDS AND REPORTING

Blanca Bayó
December 8, 2000
Page 2

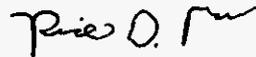
requested. These workpapers have previously been submitted to the Commission and assigned Document No. 12533-00. They were released to the company on November 21, 2000 to enable it to prepare a revised confidentiality request.

3. Two redacted copies of the audit workpapers for which confidential treatment is requested.

By copy of this letter, a copy of the Revised Request for Confidential Classification and two additional redacted copies of the audit workpapers are being furnished directly to Mr. Freeman, and a copy of the request is being furnished to Ms. Katrina Walker.

If you have any questions regarding this filing, please contact the undersigned.

Very truly yours,



Richard D. Melson

RDM/mee
Enclosures
cc: Mr. Freeman
Ms. Walker
Mr. Palecki

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

ORIGINAL

In re: Purchased Gas Adjustment) Docket No. 000003-GU
(PGA) True-up. PGA Audit Report;)
Audit Control No. 00-003-4-3) Filed: December 8, 2000
_____)

**CITY GAS COMPANY OF FLORIDA'S
REVISED REQUEST FOR CONFIDENTIAL CLASSIFICATION**

City Gas Company of Florida, a division of NUI Corporation ("NUI/City Gas") pursuant to Section 366.093, Florida Statutes and Rule 25-22.006(3)(a)2 and (4), Florida Administrative Code, submits this Revised Request for Confidential Classification of the documents and information described below which was provided to the Florida Public Service Commission Staff in connection with the staff audit of NUI/City Gas' purchased gas true-up filing. In support of this request for Confidential Classification, NUI/City Gas states as follows:

1. In connection with the staff audit of NUI/City Gas' purchased gas adjustment true-up filing, NUI/City Gas provided workpapers and documents to the staff containing information that is "proprietary business information" under Section 366/093(3), Florida Statutes.
2. The confidential information at issue provided to the Commission staff in connection with the PGA audit consists of the following:

<u>Workpaper No.</u>	<u>Description</u>	<u>Pages</u>
41-5/1-1	Billing Register	4
41-5/1-1/1	Bills to Customers	10
41-5/1-2	Billing Register	4
41-5/1-2/1	Bills T Customers	10
43-2/1	Journal Entry Detail	3
43-2/2	Invoice Log	6
43-2/2-1	Deal Sheets	2
43-2/2-2	Deal Sheets	3
43-2/3	Journal Entry Detail	1
43-2/4	Invoice Log	1
43-2/5-1	Deal Sheets	3
43-2/6	Journal Entry Detail	1
43-2/7	Invoice Reconciliation	1

43-2/7-1	Invoice Reconciliation	1
43-2/8-1	Deal Sheets	2
43-2/9	Journal Entry Detail	1
43-2/10	Invoice Reconciliation	1
43-2/11-2	Deal Sheets	8
43-2/11-3	Deal Sheets	6
43-3/1	Journal Entry Detail	4
43-3/2	Journal Entry Detail	2
43-4/1	Corporate Allocation	16
43-5/2-3	OSS Summary	1
43-5/2-2	OSS Summary	1
43-5/2-4	Link Margin Report	3
43-5/2-4/1	Cust. Bill, Deal Sheet	4
43-5/2-4/2-1	Cust. Bill, Deal Sheet	12
43-5/2-4/3	Customer Bill	1
43-5/2-5	OSS Summary	2
43-5/2-5/1	Margin Detail Report	1
43-5/2-5/1-1	Cust. Bill, Deal Sheet	3
43-5/2-5/1-3	Deal Sheet	1
43-5/2-5/2	Margin Detail Report	1
43-5/2-5/2-1	Deal Sheet	2
43-5/2-5/2-2	Deal Sheet	2
43-5/2-5/2-3	Cust. Bill, Deal Sheet	3
43-5/2-6	OSS Summary	2
45-5/2-6/1	Cust. Bill, Deal Sheet	3
43-5/2-6/2	Cust. Bill, Deal Sheet	7
43-5/3-4	Link Margin Report	4
43-5/3-2	OSS Summary	1
43-5/3-3	OSS Summary	1
43-5/3-4/2	Cust. Bill, Deal Sheet	3
43-5/3-4/3	Cust. Bill, Deal Sheet	4
43-5/3-5	True-Up Detail Report	1
43-5/3-5/2	True-Up Summary	1
43-5/4-1	Journal Entry Detail	1
43-5/4-2	Futures Gain/Loss	1
43-5/4-4	Storage Allocation	1
43-5/4-5	OSS Summary	3
43-5/4-5/1	Cust. Bill, Deal Sheet	3
43-5/4-5/2	Margin Detail Report	1
43-5/4-5/3	Cust. Bill, Deal Sheet	9
43-5/4-6/1	OSS Division Summary	2
43-6/3-2	Deal Sheets	2
43-6/3-5	Margin Detail Report	1

43-7/2	Journal Entry Detail	2
43-7/3	WSS Allocation	1

3. NUI/City Gas requests that the above-described information be classified as "proprietary business information" within the meaning of Section 366.093(3), Florida Statutes. The information and documents at issue are intended to be, and are, treated by NUI/City Gas as proprietary and confidential. Attached hereto as Revised Exhibit A is a detailed explanation of the information and documents for which confidential treatment is requested, and justification for the requested confidential treatment of the highlighted portions of the enclosed documents.
4. An unedited version of the above described documents is being submitted to the Division of Records and Reporting under a separate cover with the information asserted to be confidential highlighted. An edited version of the documents on which the information asserted to be confidential had been blocked out is enclosed herewith as Revised Exhibit B.
5. NUI/City Gas 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 NUI to negotiate future gas purchase contracts on favorable terms.

WHEREFORE, for the foregoing reasons, NUI/City Gas respectfully requests that its Request for Confidential Classification be granted.

RESPECTFULLY SUBMITTED this 8th day of December, 2000.

HOPPING GREEN SAMS & SMITH, P.A.

By: 

Richard D. Melson
P.O. Box 6526
Tallahassee, FL 32314
(850) 452-2313

Attorneys for NUI/City Gas

EXHIBIT "A"

City Gas Company of Florida

Justification for confidential data obtained by Florida Public Service Commission Auditors during an audit of NUI City Gas' Purchased Gas Adjustment Docket No. 000003-GU, Audit Control No. 00-003-4-3.

Document	Page	Line Nos.	Column/Field	Justification
41-5/1-1	1-4	--	Fields: Name, address, account number	A
41-5/1-1/1	1-10	--	Fields: Account number, name, address	A
41-5/1-2	1-4	--	Fields: Name, address, account number	A
41-5/1-2/1	1-10	--	Fields: Account number, name, address	A
43-2/1	1	10, 12-16	Cols: Reference	B
43-2/1	2	2, 4-8, 10-11, 18, 20, 22	Cols: Journal Line Description, Description	B
43-2/1	3	--	Fields: 1, 2, 3	B
43-2/2	1-6	--	Fields: Column headings for cols. 1-5	B
43-2/2-1	2-3	--	Fields: Commodity Price, Quantity	C
43-2/2-2	2-3	--	Fields: Commodity Price, Quantity	C
43-2/2-2	4	--	Fields: Volume	C
43-2/3	1	11.13-17	Cols: Reference	B
43-2/4	1	--	Fields: 1, 2, 3	B
43-2/5-1	3-5	--	Fields: Commodity Price, Quantity, Quantity Calculation	C
43-2/6	1	25,27-31	Cols: Reference	B
43-2/7	1	--	Fields: 1, 2, 3	B
43-2/7-1	1	--	Fields: 1, 2, 3	B
43-2/8-1	2	--	Fields: Commodity Price, Quantity, Quantity Calculation	C
43-2/8-1	3	--	Fields: Volume	C
43-2/9	1	18-23	Cols: Description	B

Document	Page	Line Nos.	Column/Field	Justification
43-2/10	1	--	Fields: 1, 2, 3	B
43-2/11-2	1-8	--	Fields: Base Amount, Adjust (+/-), Quantity, Commodity Price, Volume	C
43-2/11-3	2-7	--	Fields: Base Amount, Adjust (+/-), Quantity	C
43-3/1	1	28-33	Col: Reference	B
43-3/1	2	5, 9-11, 14-20, 24, 28, 33, 37	Col: Journal Line Description, Description	B
43-3/1	3	3-20, 24-25	Col: Description	B
43-3/1	4	--	Fields: 1, 2	B
43-3/2	1	8, 11	Col: Description	B
43-3/2	2	3-5, 7-8	Col: Description	B
43-4/1	1, 8	1-2	Col: Division	B
43-4/1	2-7, 9-16	--	Field: Division Name	B
43-5/2-3	1	--	Col: 1	B
43-5/2-2	1	--	Col: 1	B
43-5/2-4	1-3	1-11	Fields: Company Name, Market, Price Est. Supplier, Price Est.	A, C
43-5/2-4/1	2	--	Fields: Name, Address, Phone #, Fax #, Price	A, C
43-5/2-4/1	3-4	--	Fields: Counter-party, Commodity Price, Quantity	A, C
43-5/2-4/2-1	1-2	--	Fields: Name, Address, Phone #, Fax #, Price	A, C
43-5/2-4/2-1	3-12	--	Fields: Counter-party, Commodity Price, Quantity, Quantity Calculation, Volume	A, C
43-5/2-4/3	1	--	Fields: Name, Address, Phone #, Fax #, Price	A, C
43-5/2-5	5	2-7	Col: Division Sub Totals	B
43-5/2-5	6	--	Col: 1, 2, 3	A
43-5/2-5/1	1	--	Fields: Company Name, Counter-party	A

Document	Page	Line Nos.	Column/Field	Justification
43-5/2-5/1-1	1-3	--	Fields: Name, Address, Phone #, Fax #, Price, Counter-party, Commodity Price, Quantity	A, C
43-5/2-5/1-3	2	--	Fields: Counter-Party, Demand Price, Quantity	C
43-5/2-5/2	1	--	Fields: Name, Counter-Party	A
43-5/2-5/2-1	2-3	--	Fields: Commodity Price, Quantity, Volume	C
43-5/2-5/2-2	3-4	--	Fields: Commodity Price, Quantity, Activity #	C
43-5/2-5/2-3	1-3	--	Fields: Name, Address, Phone #, Fax #, Price, Commodity Price, Quantity	A, C
43-5/2-6	3-4	--	Cols: Division Sub Totals, Market	B
43-5/2-6/1	1-2	--	Fields: Name, Address, Phone #, Fax #, Price, Counter-Party, Pricing, Quantity, Rec/Del Pt.	A
43-5/2-6/1	3	1	--	A, B
43-5/2-6/2	1-7	--	Fields: Name, Address, Phone #, Fax #, Price, Counter-party, Commodity Price, Quantity, Rec/Del Pt.	A, C
43-5/3-4	1-4	--	Fields: Company Name, Market	A, B
43-5/3-2	1	--	Col: 1	B
43-5/3-3	1	--	Col: 1	B
43-5/3-4/2	1-3	--	Fields: Name, Address, Phone #, Fax #, Pricing, Counter-party, Commodity Price, Quantity	A, C
43-5/3-4/3	2-5	--	Fields: Name, Address, Phone #, Fax #, Pricing, Counter-party, Commodity Price, Quantity	A, C
43-5/3-5	3	--	Col: Market	A
43-5/3-5/2	3	1, 3-8	Col: Off System Sales & Trading	B
43-5/4-1	1	1, 2, 7, 32, 34-36	Col: Reference	B
43-5/4-2	1	3-14, 18-19	Col: Description	B
43-5/4-4	1	--	Col: Division	B
43-5/4-5	3-5	--	Col: Division, Market	A, B

Document	Page	Line Nos.	Column/Field	Justification
43-5/4-5/1	1-3	--	Fields: Name, Address, Phone #, Fax #, Price, Counter-party, Commodity Price, Quantity, Volume	A, C
43-5/4-5/2	2	--	Fields: Company Name, Counter-party	A
43-5/4-5/3	1-9	--	Fields: Name, Address, Phone #, Fax #, Price, Counter-party, Commodity Price, Quantity, Volume	A, C
43-5/4-6/1	1-2	--	Fields: Division Names	B
43-6/3-2	1-2	--	Fields: Counter-party, Commodity Price, Quantity, Quantity Calculation, Comments	A, C
43-6/3-5	1	--	Fields: Name, Counter-party	A
43-7/2	1	14-16	Col: Description	B
43-7/2	2	2-6, 12-14, 16	Col: Line Descr., Descr.	B
43-7/3	1	--	Col: Company	B

"A" Contains confidential customer information including name, address, phone number or fax number.

"B" Contains information regarding divisions of NUI other than City Gas.

"C" Contains confidential information regarding purchase or sales volumes, pricing and price structure.

The above data represents negotiated gas supplies purchased from suppliers other than Florida Gas Transmission Company and deliveries by gate station. Prices vary based on the operational flexibility of each contract. Release of price and volume negotiations would be detrimental to the interests of NUI and City Gas Company of Florida and its customers, since competitors would have access to operational information. This is contractual information which, if made public, "would impair the efforts of (NUI/City Gas) to contract for goods or services on favorable terms." Section 366.093(3)(d), Florida Statutes.