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July 20, 2001

BY HAND DELIVERY

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

RECEIVED-FPSC
01 JUL 20 PM 4:13
COMMISSION
CLERK

Re: Docket No. 010003-GU
PGA Audit Report
Audit Control No. 01-064-4-1
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 fifteen copies of its Request for Confidential Classification with regard to certain audit workpapers.
2. An envelope containing one highlighted copy of the audit workpapers for which confidential treatment is requested.
3. Two redacted copies of the audit workpapers for which confidential treatment is requested.

APP _____
CAF _____
CMP _____
COM _____
CTR _____
ECR _____
LEG _____
OPC _____
PAI _____
RGO _____
SEC _____
SER _____
OTH _____

DOCUMENT NUMBER-DATE

08902 JUL 20 01

FPSC-COMMISSION CLERK

Blanca Bayo
July 20, 2001
Page 2

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

Very truly yours,

A handwritten signature in cursive script, appearing to read "Richard D. Melson".

Richard D. Melson

RDM/mee
Enclosures

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In Re: Purchased Gas Adjustment) (PGA) True-up. PGA Audit Report;) Audit Control No. 01-064-4-1) _____)	DOCKET NO. 001003-GU Submitted for Filing July 20, 2001
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**CITY GAS COMPANY OF FLORIDA'S
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 Request For Confidential Classification of the documents and information described below to the Florida Public Commission Staff in connection with the staff audit of NUI/City Gas' purchased gas adjustment 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>
41-3/1	Rate Schedule	3
41-3/2	Rate Schedle	3
41-5/2	Billing Register	13
41-5/2-1	Bills to Customer	1
41-5/2-2	Bills to Customer	1
41-5/2-3	Bills to Customer	1
41-5/2-4	Bills to Customer	1
41-5/2-5	Bills to Customer	1
41-5/2-6	Bills to Customer	1
41-5/2-7	Bills to Customer	1
41-5/2-8	Bills to Customer	1
41-5/2-9	Bills to Customer	1
41-5/2-10	Bills to Customer	1
41-5/2-11	Bills to Customer	1
41-5/2-12	Bills to Customer	1


<u>Workpaper No.</u>	<u>Description</u>	<u>Pages</u>
41-5/2-13	Bills to Customer	1
41-5/2-14	Bills to Customer	1
41-5/2-15	Bills to Customer	1
41-5/2-16	Bills to Customer	1
41-5/2-17	Bills to Customer	1
41-5/2-18	Bills to Customer	1
41-5/2-19	Bills to Customer	1
41-5/2-20	Bills to Customer	1
41-5/2-21	Bills to Customer	1
41-5/2-22	Bills to Customer	1
41-5/2-23	Bills to Customer	1
41-5/3	Rate Schedules	18
43-2	Invoice Reconciliation	1
43-2/1-2	Deal Sheet	1
43-2/1-3	Deal Sheet	1
43-2/1-6	Deal Sheet	1
43-3	Invoice Reconciliation	1
43-3/1	Payment Journal Entry	4
43-3/1-3	Deal Sheet	1
43-4/1-4	Deal Sheet	3
43-3/2	Purchases	1
43-3/2-1	Payment Journal Entry	3
43-3/2-1/1-1	Deal Sheets	3
43-3/2-1/1-2	Deal Sheets	4
43-3/2-1/1-3	Deal Sheets	1
43-3/2-2	Payment Journal Entry	1
43-3/3	Payment Journal Entry	1
43-4	Invoice Reconciliation	1
43-4/1	Payment Journal Entry	3
43-4/1-2	Deal Sheets	5
43-4/2	General Ledger	1
43-5	Invoice Reconciliation	2
43-5/1	Purchases	1
43-5/2	Payment Journal Entry	3
43-5/3	General Ledger	1
43-6/2-2/3	Deal Sheets	1
43-6/1	Billing Summary	1
43-6/3-2/4	Deals Sheets	5
43-6/3-3	Billing Summary	1
43-6/4-2/1	Billing Summary	1
43-6/4-2/2	Deal Sheet	3
43-6/4-2/3	Deal Sheet	3

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 Exhibit A is a detailed explanation of the information and documents for which confidential treatment are 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 has been blocked out is enclosed herewith as 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 the 20th day of July, 2001

HOPPING GREEN SAMS & SMITH, P .A.

By: 

Richard D. Melson
P.O. Box 6526
Tallahassee, Florida 32314
(850) 425-2313

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. 01003-GU, Audit Control No. 01-064-4-1.

Document	Pages	Line Nos.	Column/Field	Just.
41-3/1	1-3	All Page 2, lines 2-4	Cols: Rate Code; Volumetric Energy Charge (Margin/ECCR Factor/CRA Factor); Cost of Gas (PGA True-Up, WACOG, Taxes) Col: Customer Class; Service Charge	C
41-3/2	1-3	All Page 2, lines 2-4	Col: Rate Code; Volumetric Energy Charge (Margin/ECCR Factor/CRA Factor); Cost of Gas (PGA True-Up, WACOG, Taxes) Col: Customer Class; Service Charge	C
41-5/2	1-13	--	Fields: Customer Name, Address, Account Number	A
41-5/2-1	1	--	Fields: Customer Name, Address, Account Number	A
41-5/2-2	1	--	Fields: Customer Name, Address, Account Number	A
41-5/2-3	1	--	Fields: Customer Name, Address, Account Number	A
41-5/2-4	1	--	Fields: Customer Name, Address, Account Number	A
41-5/2-5	1	--	Fields: Customer Name, Address, Account Number	A
41-5/2-6	1	--	Fields: Customer Name, Address, Account Number	A
41-5/2-7	1	--	Fields: Customer Name, Address, Account Number	A
41-5/2-8	1	--	Fields: Customer Name, Address, Account Number	A
41-5/2-9	1	--	Fields: Customer Name, Address, Account Number	A
41-5/2-10	1	--	Fields: Customer Name, Address, Account Number	A

Document	Pages	Line Nos.	Column/Field	Just.
41-5/2-11	1	--	Fields: Customer Name, Address, Account Number	A
41-5/2-12	1	--	Fields: Customer Name, Address, Account Number	A
41-5/2-13	1	--	Fields: Customer Name, Address, Account Number	A
41-5/2-14	1	--	Fields: Customer Name, Address, Account Number	A
41-5/2-15	1	--	Fields: Customer Name, Address, Account Number	A
41-5/2-16	1	--	Fields: Customer Name, Address, Account Number	A
41-5/2-17	1	--	Fields: Customer Name, Address, Account Number	A
41-5/2-18	1	--	Fields: Customer Name, Address, Account Number	A
41-5/2-19	1	--	Fields: Customer Name, Address, Account Number	A
41-5/2-20	1	--	Fields: Customer Name, Address, Account Number	A
41-5/2-21	1	--	Fields: Customer Name, Address, Account Number	A
41-5/2-22	1	--	Fields: Customer Name, Address, Account Number	A
41-5/2-23	1	--	Fields: Customer Name, Address, Account Number	A
41-5/3	1-18	All Pages 2, 4, 6, 8, 10, 12, 14, 16, 18, lines 2-4	Col: Rate Code; Volumetric Energy Charge (Margin/ECCR Factor/CRA Factor); Cost of Gas (PGA True-Up, WACOG, Taxes) Col: Customer Class; Service Charge	C
43-2	1	--	Cols: 02, 24, 25, 23, 07, 08, 02	B
43-2/1-2	1	--	Fields: Base Amount, Adjust (+/-), Price Type	D
43-2/1-3	1	--	Fields: Base Amount, Adjust (+/-), Price Type	D
43-2/1-6	1	--	Fields: Base Amount, Adjust (+/-), Price Type	D
43-3	1	--	Cols: 23, 02, 24, 07, 08, 02, 25	B
43-3/1	1-4	--	Cols: All columns except CGF and Total	B
43-3/1-3	1	--	Fields: Base Amount, Adjust (+/-), Price Type	D
43-3/1-4	1-2	--	Fields: Base Amount, Adjust (+/-), Price Type, Price Point	D

Document	Pages	Line Nos.	Column/Field	Just.
43-1/1-4	3	--	Fields: Price	
43-3/2	1	--	Cols: All columns except CGFCO and Total	B
43-3/2-1	1-3	--	Cols: All columns except CGF	B
43-3/2-1/1-1	1-3	--	Fields: Base Amount, Adjust (+/-), Price Type, Price Point	D
43-3/2-1/1-2	1-3	--	Fields: Base Amount, Adjust (+/-), Price Type, Price Point	D
43-3/2-1/1-2	4	--	Fields: Price	
43-3/2-1/1-3	1	--	Fields: Base Amount, Adjust (+/-), Price Type, Price Point	D
43-3/2-2	1	--	Cols: All columns except CGF	B
43-3/3	1	--	Cols: All columns except CGF	B
43-4	1	--	Cols: All columns except CGF and Total	B
43-4/1	1-2	---	--	B
43-4/1	3	All lines except Total City Gas of Florida	--	
43-4/1-2	1-5	Pages 2, 4 Pages 3, 5	Fields: Base Amount, Adjust (+/-), Price Type, Price Point Field: Price	D
43-4/2	1	--	Cols: All columns except Balance	B
43-5	1-2	--	Cols: All columns except City Gas and total	B
43-5/1	1	--	Cols: All columns except CGFCO and Total	B
43-5/2	1-2	--	--	B
53-5/2	3	All lines after Total City Gas of Florida	--	
43-5/3	1	--	Cols: Dept., Curr., Journal Date, Journal ID, Seq. Line, Debit, Balance	B
43-6/2-2/3	1	--	Fields: Base Amount, Adjust (+/-), Price Type, Price Point	D
43-6/1	1	All lines except City Gas of Florida	--	B
43-6/3-2/4	1-5	Pages 1, 2 Pages 3, 4, 5	Cols: Price Type, Price Point Fields: Base Amount, Adjust (+/-), Price Type, Price Point	D
43-6/3-3	1	All lines	--	B

Document	Pages	Line Nos.	Column/Field	Just.
		except City Gas of Florida		
43-6/4-2/1	1	All lines except City Gas of Florida	--	B
43-6/4-2/2	1-3	Page 1	Fields: Base Amount, Adjust (+/-), Price Type, Price Point	D
		Pages 2-3	Cols: Price Type, Price Point	
43-6/4-2/3	1-3	Page 1	Fields: Base Amount, Adjust (+/-), Price Type, Price Point	D
		Pages 2-3	Cols: Price Type, Price Point	

"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 unpublished confidential rate information.

"D" Contains confidential information regarding 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.

In Re: Purchased Gas Adjustment
(PGA) True-up. PGA Audit Report;
Audit control No. 01-064-4-1

Docket No. 01003-GU

EXHIBIT B

Certificate of Service

I HEREBY CERTIFY that a true and correct copy of the foregoing has been furnished by regular U.S. mail to all known parties of record in Docket No. 010003-GU this 20th day of July, 2001.

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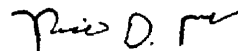
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