

Hopping Green & Sams

Attorneys and Counselors

Writer's Direct Dial Number
(850) 425-2313

July 17, 2003

BY HAND DELIVERY

Blanca Bayó
Director, Office of the Commission Clerk
Florida Public Service Commission
2540 Shumard Oak Boulevard
Tallahassee, FL 32399-0850

Re: **CONFIDENTIAL MATERIALS ATTACHED**
Docket No. 030003-GU

Dear Ms. Bayó:

Enclosed for filing on behalf of NUI/City Gas Company of Florida in the above docket are:

- (1) the original and seven copies of its Request for Confidential Classification of Staff's Audit Workpapers;
- (2) a confidential envelope containing one copy of the workpapers on which the confidential material has been highlighted; and
- (3) two redacted copies of the audit workpapers.

By copy of this letter, item (1) has been furnished to the parties on the attached certificate of service. Please stamp and return the enclosed extra copy of this filing. If you have any questions regarding this filing, please give me a call at 425-2313.

Very truly yours,



Richard D. Melson

RDM/mee
Enclosures
cc: Certificate of Service

DOCUMENT NUMBER 030003-GU

06354 JUL 17 2003

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

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

Docket No. 030003-GU

Filed: July 17, 2003

**CITY GAS COMPANY OF FLORIDA'S
REQUEST FOR CONFIDENTIAL CLASSIFICATION
OF STAFF'S AUDIT WORKPAPERS**

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 described below which were provided to Commission auditors as workpapers during NUI/City Gas' 2002 Purchased Gas Adjustment audit for the period ending December 31, 2002 (Audit Control #03-063-4-3). In support of this request for Confidential Classification, NUI/City Gas states as follows:

1. In connection with Staff's audit in this docket, NUI/City provided documents to the Commission auditors containing information that is "proprietary business information" under Section 366.093(3), Florida Statutes. All items for which the company is requesting confidentiality were included with the audit workpapers filed with the Commission, have been held temporarily confidential, and should not be released to the public.
2. A list of the audit workpapers containing confidential information that are part of the audit report for which NUI/City Gas requests confidential treatment is attached hereto as Exhibit A.
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. Exhibit A contains 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.

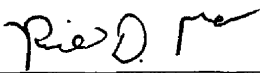
4. A version of above described documents on which the information for which confidentiality is requested has been highlighted and is being submitted to the Division of Records and Reporting under a separate cover. A redacted version of the documents on which the information asserted to be confidential had been blocked out is attached hereto 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.

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

RESPECTFULLY SUBMITTED this 17th day of July, 2003.

HOPPING GREEN & SAMS

By:  _____

Richard D. Melson
P.O. Box 6526
Tallahassee, FL 32314
(850) 222-7500

Attorneys for NUI/City Gas

EXHIBIT A

CITY GAS COMPANY OF FLORIDA

Docket No. 030003-GU

The justification for the Confidential Data provided by NUI/City Gas to staff and included as workpapers to the Staffs audit report in Docket No. 030003-GU is as follows:

Document/Description	No. of Pages	Justification
Customer Bills to be tested: WP No. 41-6 / 2 WP No. 41-6 / 3	5 5	A
Customer Bills tested: WP No. 41-6 / 2-1 thru 2-9 WP No. 41-6 / 3-1 thru 3-5	9 5	A

Justification "A": The information contained herein is customer specific data (name or location, gas usage, amount billed, etc.) the disclosure of which would cause harm to the Company's business operation and would impair the competitive business interests of the Company.

EXHIBIT B

CITY GAS COMPANY OF FLORIDA

Docket No. 030003-GU

Attached are redacted copies of the information subject
to the Company's Request for Confidential Classification
dated July 18, 2003.

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing has been furnished by hand-delivery (*) and/or regular U.S. mail to the following this 17th day of May, 2003:

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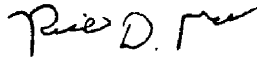
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