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August 9, 2011

HAND DELIVERY

Ms. Ann Cole
Commission Clerk
Florida Public Service Commission
2540 Shumard Oak Boulevard
Tallahassee, FL 32399-0850

claim of confidentiality
 notice of intent
 request for confidentiality
 filed by OPC

For DN 05592-11, which
is in locked storage. You must be
authorized to view this DN-CLK

Re: Docket No. 110003-GU - **Purchased gas adjustment (PGA) true-up.**

Dear Ms. Cole:

Attached for filing, please find the original and 7 copies of Florida City Gas Company's Request for Confidential Classification of information provided in responses to Staff's First Set of Data Requests. Also enclosed, in a separate envelope, is a copy of Florida City Gas's responses with the confidential information highlighted in accordance with the Rule 25-22.006, Florida Administrative Code.

Thank you for your assistance with this filing. If you have any questions, please do not hesitate to contact me.

Sincerely,

Beth Keating
Gunster, Yoakley & Stewart, P.A.
215 South Monroe St., Suite 601
Tallahassee, FL 32301
(850) 521-1706

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MEK
cc: Parties of Record

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

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

Docket No. 110003-GU
Filed: August 9, 2011

FLORIDA CITY GAS'S
REQUEST FOR CONFIDENTIAL
CLASSIFICATION

Florida City Gas ("FCG" or "Company") by and through its undersigned counsel, pursuant to Section 366.093, Florida Statutes, and Rule 25-22.006(4), Florida Administrative Code, hereby submits its Request for Confidential Classification for information contained in Florida City Gas's Responses to Staff's First Data Request (cross-referenced Document No. 05038-11). In thereof, FPUC hereby states that:

1. The Company requests confidential classification of information contained in its response to Data Request Question No. 1, parts B and D. Information included in the response to Data Request Question No. 1, parts B and D, includes confidential contractual information as well as information that would allow confidential contractual information to be easily derived. The Company and its asset manager treat this information as proprietary confidential business information consistent with the definition of that term in Section 366.093, Florida Statutes.

2. More specifically, release of the information in the response to Data Request Question No. 1, parts B and D, as a public record would harm the Company's business operations and ratepayers by impairing the Company's ability to effectively negotiate for goods and services. The information set forth in these responses includes specific data regarding volumes purchased and prices per decatherm that is competitively sensitive, and which both FCG and its asset manager protect as proprietary confidential business information. Public disclosure

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of this information would impair FCG's ability to obtain natural gas at favorable, competitive prices. Therefore, this information meets the definition of "proprietary confidential business information" as set forth in Section 366.093(3), Florida Statutes, which provides:

(3) Proprietary confidential business information means information, regardless of form or characteristics, which is owned or controlled by the person or company, is intended to be and is treated by the person or company as private in that the disclosure of the information would cause harm to the ratepayers or the person's or company's business operations, and has not been disclosed unless disclosed pursuant to a statutory provision, an order of a court or administrative body, or private agreement that provides that the information will not be released to the public. Proprietary confidential business information includes, but is not limited to:

- (a) Trade secrets.
- (b) Internal auditing controls and reports of internal auditors.
- (c) Security measures, systems, or procedures.
- (d) Information concerning bids or other contractual data, the disclosure of which would impair the efforts of the public utility or its affiliates to contract for goods or services on favorable terms.

As such, the Company requests that the Commission protect the highlighted information provided in Response to Data Requests 1(B) and 1(D) of Staff's First Data Requests.

3. With this filing, the Company has included a separate envelope labeled "Confidential" which contains a highlighted copy of the response to Data Request Question No. 1, parts B and D.¹ Also, included with this filing are two redacted copies of the information.

4. FCG asks that confidential classification be granted for a period of at least 18 months. Should the Commission no longer find that it needs to retain the document, FCG respectfully requests that the confidential information be returned to the Company.

WHEREFORE, FCG respectfully requests that the highlighted information contained in its responses to FPSC Staff's First Set of Data Requests, (Nos. 1(B) and 1(D)) be classified as

¹ Copies of FCG's Responses to Staff's First Data Requests with the confidential information redacted are being filed (and served on staff and parties of record) contemporaneous with this Request.

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“proprietary confidential business information,” exempt from Section 119.07, Florida Statutes.

RESPECTFULLY SUBMITTED this 9th day of August, 2011.

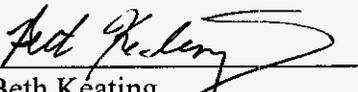


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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of Florida City Gas's Request for Confidentiality of its Responses to Staff's First Data Requests in Docket No. 110003-GU has been furnished by regular U.S. Mail to the following parties of record this 9th day of August 2011:

Thomas A. Geoffroy/Cheryl Martin Florida Public Utilities Company P.O. Box 3395 West Palm Beach, FL 33402-3395	Ansley Watson, Jr. MacFarlane Ferguson Law Firm P.O. Box 1531 Tampa, FL 33601-1531
Charles A. Costin Costin and Costin Law Firm P.O. Box 98 Port Saint Joe, FL 32457-1159	J.R. Kelly/Patricia Christensen Office of Public Counsel c/o The Florida Legislature 111 West Madison Street Room 812 Tallahassee, FL 32399-1400
Paula Brown Peoples Gas System P.O. Box 111 Tampa, FL 33601-0111	Mr. Stuart L. Shoaf St. Joe Natural Gas Company, Inc. P.O. Box 549 Port St. Joe, FL 32457-0549
TECO Energy, Inc. Javier Cuebas P.O. Box 111 Tampa, FL 33601-0111	Elizabeth Wade/David Weaver/Brian Sulmonetti AGL Resources Inc. Ten Peachtree Place Location 1470 Atlanta, GA 30309
Melvin Williams Florida City Gas 933 East 25 th Street Hialeah, FL 33013-3498	Jennifer Crawford Florida Public Service Commission 2540 Shumard Oak Boulevard Tallahassee, FL 32399


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