

**Eric Fryson**

**From:** Keating, Beth [BKeating@gunster.com]  
**Sent:** Wednesday, April 25, 2012 11:33 AM  
**To:** Filings@psc.state.fl.us  
**Cc:** 'Martin Cheryl'; 'Ansley Watson, JR.'; Jennifer Crawford; 'christensen.patty@leg.state.fl.us'; 'J.R. Kelly'; 'Paula K. Brown'; 'sshoaf@stjoenaturalgas.com'; 'jcuebas@tecoenergy.com'; 'Elizabeth Wade'; 'Brian Sulmonetti'; 'Christina Robinson'; Carolyn Bermudez  
**Subject:** Docket No. 120003  
**Attachments:** 20120425112709872.pdf

Attached for electronic filing, please find the Florida City Gas Company's Request for Extension of Confidential Classification. Please don't hesitate to contact me if you have any questions.

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a. Person responsible for this electronic filing:

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b. Docket No. 120003-GU - In re: Purchased Gas Adjustment (PGA) True-Up.

c. On behalf of: Florida City Gas

d. There are a total of pages: 9

e. Description: Request for Extension of Confidential Classification



**GUNSTER**

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02604 APR 25 2012

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FPSC-COMMISSION CLERK



Writer's Direct Dial Number: (850) 521-1706  
Writer's E-Mail Address: bkeating@gunster.com

April 25, 2011

**ELECTRONIC FILING – FILINGS@PSC.STATE.FL.US**

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 OFC  
**06867-10**  
For DN **06132-10**, which  
is in locked storage. You must be  
authorized to view this DN.-CLK

Re: Docket No. 120003-GU - Purchased gas adjustment (PGA) true-up.

Dear Ms. Cole:

Attached for electronic filing, please find Florida City Gas Company's Request for Extension of Confidential Classification previously granted by Order No. PSC-10-0676-CFO-GU to material provided in connection with PGA Audit No. 10-007-4-1 (referenced Document Nos. 06132-10 and 06867-10).

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

Sincerely,

Beth Keating  
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(850) 521-1706

- COM \_\_\_\_\_
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MEK  
cc: Parties of Record

DOCUMENT NUMBER DATE  
**02604 APR 25 11**

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In Re: Purchased Gas Adjustment (PGA) ) Docket No: 120003-GU  
True-Up )  
\_\_\_\_\_ ) Filed: April 25, 2012

**FLORIDA CITY GAS'S REQUEST FOR  
EXTENSION OF CONFIDENTIAL CLASSIFICATION**

Florida City Gas ("FCG" or "the Company"), pursuant to Section 366.093, Florida Statutes, and Rule 25-22.006, Florida Administrative Code, hereby submits this Request for Extension of Confidential Classification previously granted to certain material (Document Nos. 06132-10 and 06867-10) that was provided to the Florida Public Service Commission ("Commission," "PSC," or "Staff") in connection with FCG's Purchased Gas Adjustment ("PGA") Audit for the year ended December 31, 2009 (Audit No. 10-007-4-1). In support of this Request, FCG states as follows:

1. By Order No. PSC-10-0676-CFO-GU, issued November 12, 2010, in Docket No. 100003-GU, the Commission granted FCG's request for confidential treatment of the information included in the referenced documents for a period of 18 months. By the terms of the Commission's Order, the confidential treatment afforded this information is set to expire on May 12, 2012, unless an extension is granted.

2. Subsection 366.093(1), Florida Statutes, provides that upon request, records received by the Commission which are "found by the commission to be proprietary confidential business information shall be kept confidential and shall be exempt from s. 119.07(1)."

3. "Proprietary confidential business information" is defined as meaning "information, regardless of form or characteristics, which is owned or controlled by the ...

Docket No. 120003-GU  
FCG Request for Extension of Confidential Treatment

company, is intended to be and is treated by the ... company as private in that the disclosure of the information would cause harm to the ratepayers or the 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." Section 366.093(3), Florida Statutes.

4. Proprietary confidential business information includes, but is not limited to, information concerning:

- (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.
- (e) Information relating to competitive interests, the disclosure of which would impair the competitive business of the provider of the information.
- (f) Employee personnel information unrelated to compensation, duties, qualifications, or responsibilities.

Section 366.093(3), Florida Statutes.

5. The confidential portions of the information provided to, and retained by, the Commission fall within these statutory definitions, and therefore constitute proprietary confidential business information entitled to protection under Section 366.093, Florida Statutes, and Rule 25-22.006, Florida Administrative Code. The audit workpapers contain information, including specific contractual information, prices, and pricing data, which has been treated by FCG as private and has not been publicly disclosed. These terms and data, if disclosed, would impair the efforts of FCG to contract for goods and services on favorable terms in the future.

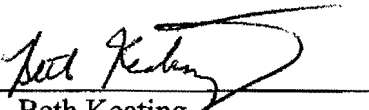
Docket No. 120003-GU  
FCG Request for Extension of Confidential Treatment

The contractual terms and pricing data therein is therefore proprietary confidential business information and is entitled to continued and ongoing protection under Section 366.093, Florida Statutes, and Rule 25-22.006, Florida Administrative Code.

6. Specifically, FCG seeks continued confidential treatment of specific information as set forth in Attachment A, which is a duplicate of the original justification matrix provided to the Commission with FCG's original request for confidential treatment of this information on August 18, 2010. FCG further incorporates by reference the highlighted and redacted exhibits attached to its August 18, 2010, Request for Confidentiality.

7. Pursuant to Section 366.093(4), Florida Statutes, and Rule 25-22.006(9), Florida Administrative Code, FCG requests that the information described above as proprietary confidential business information be protected from disclosure for an additional period of at least 18 months and asks that all information be returned to the Company as soon as the information is no longer necessary for the Commission to conduct its business.

Respectfully submitted this 25th day of April, 2012.

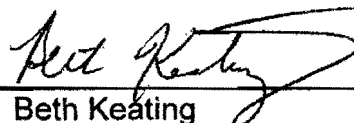
By:   
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(850) 521-1706

*Attorneys for Florida City Gas Company*

Certificate of Service

I HEREBY CERTIFY that a true and correct copy of the foregoing in Docket No. 120003-GU has been furnished by Electronic Mail to the following parties of record this 25th day of April 2012:

Florida Public Utilities Company Cheryl Martin 1641 Worthington Road, Suite 2 West Palm Beach, FL 33409-6703	MacFarlane Ferguson Law Firm Ansley Watson, Jr. P.O. Box 1531 Tampa, FL 33601-1531
Jennifer Crawford Florida Public Service Commission 2540 Shumard Oak Boulevard Tallahassee, FL 32399	Office of Public Counsel J.R. Kelly/Patricia Christensen c/o The Florida Legislature 111 West Madison Street Room 812 Tallahassee, FL 32399-1400
Peoples Gas System Paula Brown/Kandi Floyd P.O. Box 111 Tampa, FL 33601-0111	St. Joe Natural Gas Company, Inc. Mr. Stuart L. Shoaf P.O. Box 549 Port St. Joe, FL 32457-0549
TECO Energy, Inc. Javier Cuebas P.O. Box 111 Tampa, FL 33601-0111	AGL Resources Inc. Elizabeth Wade/Brian Sulmonetti Ten Peachtree Place Location 1470 Atlanta, GA 30309
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## Attachment A

### Confidentiality Justification

DOCUMENT <sup>2</sup>	Line/Column <sup>3</sup>	RATIONALE
5-3 , pp 1-5, Gas Purchase Procedures (pp 3-7).	Highlighted numbers on page 1, first paragraph, line 12; page 2, second paragraph, lines 2, 3, 7, 9, 11; page 3, first paragraph, lines 3 – 9; page 3, second paragraph, lines 1 - 10.	See paragraph 5 of the Request
44-1/1 Volume Recalculation (pp 8).	All numbers in all columns, including totals.	See paragraph 5 of the Request
44-1/1-1 Volume Reconciliation (pp 9).	All numbers chart with heading "FGT alloc delivery," and all numbers in "Baseload," "Swing/Fixed" and the far right tabulation columns.	See paragraph 5 of the Request
44-1/1-1/1 Delivery Quantity (pp 10).	All numbers in all rows and columns for daily scheduled deliveries.	See paragraph 5 of the Request
44-1/2 Storage Price Recalculation (pp 11).	All info in "Price/Gas Daily" and "WAC" columns	See paragraph 5 of the Request
44-1/3 Swing Gas Supply Price Recalculation (pp 12).	In second table, all numbers in "Negotiated \$" and "WAC" columns.	See paragraph 5 of the Request
44-1/3-1 Comparison of Delivery Quantity to Deal Tickets (pp 13).	All numbers in "Swing Delivered" and "Swing + Fuel @3.56%" columns.	See paragraph 5 of the Request
44-1/3-1/1 Deal Volume Reconciliation (pp 14).	All numbers in "Total Volume" column.	See paragraph 5 of the Request
44-1/3-2 May 23-26 Negotiated Price (pp 15).	N/A	N/A

<sup>2</sup> The first reference in each column is to an audit workpaper number, as hand written by the auditor. Sequential page numbers were added to the workpapers for this Request for ease in reference.

<sup>3</sup> Page references in this column are to the page numbers hand-written by the auditor on the subject pages.

<b>DOCUMENT<sup>2</sup></b>	<b>Line/Column<sup>3</sup></b>	<b>RATIONALE</b>
44-1/4 Transportation Demand (pp 16).	All info in "Rate" and "Amount" columns; auditor's hand-written tabulation of A, B and total values shown.	See paragraph 5 of the Request
44-1/5 Invoice Back-Up (pp 17).	Paragraph 1, line 2, highlighted item; paragraph 3, last two lines, highlighted item.	See paragraph 5 of the Request
44-1/6 Bay Gas Transportation Rates (pp 18).	Invoice total amount, invoice identifier and account number information.	See paragraphs 2, 5 and 6 of the Request
44-2 May 2009 Gas Market Report Index Price (pp 19).	N/A	N/A
44-2/1 Sequent Purchase Compared to Index Pricing (pp 20).	All info in "Sequent Purchase Price," "FOM price" and "Difference" columns; words below table indicating above/below and FOM index and delta.	See paragraph 5 of the Request
44-2/1-1 Purchase Invoice (pp 21-22).	"Premium" information in antecedent table; pipeline identifying information; handwritten auditor tabulations at above chart; all numbers in "GDA Plus Premium," "GDA v. Index," "Amount," "Total due," columns.	See paragraph 5 of the Request
44-3 Transportation Rates (pp 23).	N/A	N/A
44-4 Extraction Program (pp 24).	N/A	N/A
44-4/1 Extraction Program (pp 25-33).	Pages 2 – 9, all rows and lines.	See paragraphs 2, 5 and 6 of the Request. This data is also a trade secret, under Section 366.093(3)(a), F.S., as it includes proprietary methodology and code information of Sequent.



DOCUMENT <sup>2</sup>	Line/Column <sup>3</sup>	RATIONALE
44-4/1-1 Sequent Purchase Compared to Index Pricing (pp 34-45).	For all pages, all numbers in the "Sequent Purchase Price," "FOM price" and "Difference" columns, the above/below information and delta for the "FOM Index" and the auditor's handwritten tabulations at the far right of the tables. Also, on the first page, the auditor's hand written tabulations.	See paragraph 5 of the Request
44-5 Actual Compared to Market (pp 46).	All numbers in "Price," "Actual Cost," Market WAC," and "Difference" columns	See paragraph 5 of the Request
44-5/1 Actual Gas Cost Schedule (pp 47-48).	Page 1, all numbers in "Net Notnl Value/Actual Cost" column.  Page 2, all numbers in "Deal wtd Price," MTM Wtd Price," "Volume," and Net Notnl Value/Actual Cost" columns; all auditor handwritten tabulations.	See paragraph 5 of the Request
44-6 Sequent to Florida City Gas Swing Gas Comparison (pp 49-50).	All numbers in "Price" and "Amount" columns and auditor's handwritten tabulations.	See paragraph 5 of the Request
44-6/1 Revised Sequent to Florida City Gas Swing Gas Comparison (pp 51-52).	All numbers in all "Price" and "Amount" columns.	See paragraph 5 of the Request
44-6/2 Swing Gas Detail Schedule (pp 53).	All numbers in all "Price" and "Amount" columns, auditor's handwritten value for B.	See paragraph 5 of the Request
45p2 Off System Sales Reporting (pp 54).	N/A	N/A
45-1 Off System Sales Revenue Calculation Schedule (pp 55).	All numbers in all columns, other than dates.	See paragraph 5 of the Request
45-1/1 Apr 08 to Mar 09 Net Margin Schedule (pp 56-67).	All amounts in all "Dollars" columns.	See paragraph 5 of the Request
45-2 Off System Sales Revenue Calculation Schedule (pp 68).	All numbers in all columns, other than dates.	See paragraph 5 of the Request

<b>DOCUMENT<sup>2</sup></b>	<b>Line/Column<sup>3</sup></b>	<b>RATIONALE</b>
45-2/1 May 09 Net Margin Schedule (pp 69).	All amounts in all "Dollars" columns.	See paragraph 5 of the Request