

Writer's E-Mail Address: bkeating@gunster.com

April 7, 2015

REDACTED

HAND DELIVERY

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

Re: Joint Petition of Florida Public Utilities Company, Florida Public Utilities Company-Indiantown Division, Florida Public Utilities Company-Fort Meade, and the Florida Division of Chesapeake Utilities Corporation for Approval of Modified Cost Allocation Methodology and Revised Purchased Gas Adjustment Calculation.

Dear Ms. Stauffer:

Enclosed for filing, please find the original and seven copies of the Request for Confidential Classification of portions of the Joint Petition of Florida Public Utilities Company-Indiantown Division, Florida Public Utilities Company-Fort Meade, and the Florida Division of Chesapeake Utilities Corporation for Approval of Modified Cost Allocation Methodology and Revised Purchased Gas Adjustment Calculation, which has been submitted under separate cover today. Also included with this Request are the required highlighted and redacted copies of the referenced pages containing confidential information.

As always, please do not hesitate to contact me if you have any questions whatsoever regarding this filing.

Sincerely,

COM	_____
AFD	1
APA	1
ECO	2
ENG	1
GCL	2
IDM	_____
TEL	_____
CLK	_____


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

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CLERK

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Joint Petition of Florida Public Utilities) Docket No.
Company, Florida Public Utilities Company-)
Indiantown Division, Florida Public Utilities) Filed: April 7, 2015
Company-Fort Meade, and the Florida Division of)
Chesapeake Utilities Corporation for Approval of)
Modified Cost Allocation Methodology and)
Revised Purchased Gas Adjustment Calculation.)

**JOINT REQUEST OF THE FLORIDA DIVISION OF CHESAPEAKE UTILITIES
CORPORATION AND FLORIDA PUBLIC UTILITIES COMPANY FOR
CONFIDENTIAL CLASSIFICATION**

The Florida Division of Chesapeake Utilities Corporation and Florida Public Utilities Company (“Companies”) by and through their undersigned counsel, pursuant to Section 366.093, Florida Statutes, and consistent with Rule 25-22.006(4), Florida Administrative Code, hereby submit this Joint Request for Confidential Classification for information contained in the Companies’ Joint Petition for Approval of Modified Cost Allocation Methodology and Revised Purchased Gas Adjustment Calculation (“the Petition”). In support thereof, the Companies hereby state:

1. The Companies seek confidential classification of the highlighted amounts in paragraph 21, lines 4 and 5, at page 9 of the Petition, which represents information that the Companies treat as proprietary confidential business information consistent with the definition of that term in Section 366.093, Florida Statutes.

2. The information for which the Companies seek confidential classification is information that both treat as confidential, and that 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.
- (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.

3. The highlighted information in paragraph 21 of the Petition includes costs and allocation information that could be used by competitors to extrapolate the contractual terms, as well as system requirements information.¹ If this information were disclosed publicly, the Companies' respective abilities to contract for services, or with other large customers, could be significantly impaired, which ultimately would have an adverse impact on the Companies' ratepayers as well. The information at issue, therefore, falls within Section 366.093(3)(d) and (e), Florida Statutes.


4. Included with this Request are highlighted copies of page 9 of the Petition containing the confidential information. Also enclosed are two redacted copies of the referenced page.

5. The Companies ask that confidential classification be granted for a period of at least 18 months. Should the Commission determine that it no longer needs to retain the information, the Companies respectfully request that the confidential information be returned to the Companies.

¹ The Companies note that this request is consistent with the Companies' request for confidential classification of the same information submitted on March 31, 2015, in Docket No. 150031-GU.

WHEREFORE, Florida Public Utilities Company and the Florida Division of Chesapeake Utilities Corporation respectfully request that the highlighted information contained on page 9 of their Joint Petition, in paragraph 21, be classified as “proprietary confidential business information,” and thus, exempt from Section 119.07, Florida Statutes.

RESPECTFULLY SUBMITTED this 7th day of April, 2015.



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

CERTIFICATE OF SERVICE

I HEREBY ATTEST that a true and correct copy of the foregoing Request has been served upon the following by U.S. Mail this 7th day of April, 2015:

Honorable J.R. Kelly
Office of Public Counsel
c/o the Florida Legislature
111 West Madison Street, Rm 812
Tallahassee, FL 32399-1400



Beth Keating, Esq.
Gunster, Yoakley & Stewart, P.A.
215 S. Monroe St., Ste 601
(850) 521-1706

allocation would simply be an accounting change reflected in the allocations across the Companies' respective books.

20) The benefits of this revised approach are many for both Companies and will be further enhanced if Phase II is ultimately approved. For instance, the intrastate capacity costs associated with the recent proposed Haines City project on CFG's system (Docket No. 150031-GU) will be allocated across a larger body of customers, thereby reducing the impact on CFG's TTS Pool Shippers and customers. Likewise, capacity costs associated with recent large projects on FPUC's system, such as the Nassau County expansion (Docket No. 140189-GU) and the project in Palm Beach County (Docket No. 140190-GU) will also be allocated across a broader base of customers.

21) The end result will be a more equitable allocation of costs and the ability to better balance the costs of individual projects across the entire CHPK Florida system, instead of on a system-by-system basis. For example, the impact to aggregate the unreleased capacity and LDC interconnection related costs across the entire CHPK Florida system would be \$■■■■ per therm, or an approximate increase of \$■■■■ per therm to the PGA.

22) In Phase II, the Companies contemplate that the allocation of these costs would be expanded to include transportation service customers on FPUC's system, as well as Shippers on CFG's system that are not part of the TTS Pool. While the Companies believe that equity demands that these customers ultimately bear their fair portion of these intrastate capacity costs, the Companies also recognize that Shippers for these larger classes of customers provide service under contracts which will likely need to be amended to adjust for revised cost allocations. Subsequent implementation of Phase II will, therefore, allow the Companies time to conduct

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