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October 2, 2017

HAND DELIVERY

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

REDACTED

RECEIVED-FPSC
2017 OCT -2 PM 4:47
COMMISSION
CLERK

Re: **Docket No. 20170193-GU- Petition for approval of transportation service agreement with Florida Public Utilities Company, by Peninsula Pipeline Company, Inc.**

Dear Ms. Stauffer:

Attached for filing, please find the original and 7 copies of a Request for Confidential Classification of certain information contained in Peninsula Pipeline's responses to Staff's First Data Requests in the referenced docket. In accordance with the Commission's Rules, also enclosed are one highlighted and two redacted copies of the confidential Attachment 1 for which this Request is submitted.

As always, please don't hesitate to let me know if you have any questions. Thank you for your assistance with this filing.

Kind regards,



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

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BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

**In re: Petition for approval of
transportation service agreement with
Florida Public Utilities Company, by
Peninsula Pipeline Company, Inc.**

Docket No. 20170193-GU

Filed: October 2, 2017

PENINSULA PIPELINE COMPANY, INC.
REQUEST FOR CONFIDENTIAL CLASSIFICATION

Peninsula Pipeline Company, Inc. (“Peninsula” or “Company”), by and through its undersigned counsel, pursuant to Section 366.093, Florida Statutes, and consistent with Rule 25-22.006(4), Florida Administrative Code, hereby submits its Request for Confidential Classification for information contained in Attachment 1 to its Responses to Staff’s First Data Requests. In support of this request, Peninsula hereby states:

1. Peninsula seeks confidential classification of the highlighted information in Attachment 1 to its Responses to Staff’s First Data Requests in the columns identifying the Maximum Daily Transportation Quantity (MDTQ), Capital Investment, Annual Rate, and Cost p/ Mile. The information is directly related to the negotiated rates and terms of the Contract at issue in this proceeding, as well as other contracts for which Peninsula has also sought confidential classification in the past in Dockets No. 20140189-GU, 20140190 and 20150031-GU, consistent with Section 366.093, Florida Statutes.

2. The information for which Peninsula seeks confidential classification is information that meets the definition of “proprietary confidential business information” as set forth in Section 366.093(3)(d), 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

Request for Confidential Classification

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. Release of the referenced information as a public record would reveal the specific rates included in competitive contracts. Disclosure of this information would impair Peninsula's ability to compete for goods and services and provide its competitors with an unfair competitive advantage. As such, Peninsula requests that the Commission protect this information consistent with Rule 25-22.006, Florida Administrative Code. To the extent of Peninsula's knowledge, this information is not otherwise available in the public domain.

4. Included with this Request is a highlighted copy of Attachment 1 to its Responses to Staff's First Data Request. In addition, two redacted copies of the document are enclosed.

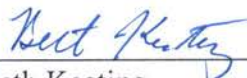
5. Peninsula asks that confidential classification be granted for a period of at least 18 months. Should the Commission no longer find that it needs to retain the information, Peninsula respectfully requests that the confidential information be returned to the Company.

WHEREFORE, Peninsula respectfully requests that the highlighted information contained in Attachment 1 to its Responses to Staff's First Data Requests be classified as

Request for Confidential Classification

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

RESPECTFULLY SUBMITTED this 2nd day of October, 2017.



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

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing has been served upon the following by Electronic Mail this 2nd day of October, 2017.

Kyesha Mapp Florida Public Service Commission 2540 Shumard Oak Boulevard Tallahassee, FL 32399-0850 kmapp@psc.state.fl.us	
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By: 
Beth Keating
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FLORIDA PUBLIC UTILITIES COMPANY
 NEW SMYRNA EXPANSION PROJECT
 EVALUATION OF PROPOSALS

Status	Company	Description of Project	Upstream Pipeline	Term	MDTQ	Capital Investment	Annual Rate	Cost p/Mile
Proposed	From FGT Daytona West Gate Station to New Smyrna and Turnbull Bay	14.7 miles 8" steel	FGT	20				
Estimate FGT	From FGT Daytona West Gate Station to New Smyrna and Turnbull Bay	14.7 miles 8" steel	FGT	20				
Completed	PPC to FPU via Wm Burgess (Docket No. 20140189-GU)	4.6 miles 6" steel via Wm Burgess Custody transfer point with Peninsula at Broadway Ave. & Middle Rd. in Riviera Beach - at the Port of Palm Beach.	FGT	20				
Completed	Peninsula Pipeline Company Affiliate (Docket No. 20140190-GU)		FGT	20				
Completed	Peninsula Pipeline Company Affiliate (Docket No. 20150031-GU)	14.2 miles of 6" Pipeline in Polk County via Hwy 27	FGT	20				

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