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February 13, 2018

HAND DELIVERY

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

RECEIVED-FPSC
2018 FEB 13 PM 4:00
COMMISSION
CLERK

Re: DOCKET NO. 20170179-GU - Petition for rate increase and approval of depreciation study by Florida City Gas.

Dear Ms. Stauffer:

Attached, please find the original and 7 copies of Florida City Gas's Request for Confidential Classification of certain information in its Responses to Citizens' 9th Set of Interrogatories and 10th Requests for Production of Documents ("PODs") to the Company. Included with this filing are the confidential documents provided on a DVD clearly marked "Confidential."

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

cc:/ (Service List)

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BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Petition for rate increase by Florida City
Gas.

DOCKET NO. 20170179-GU

DATED: February 13, 2018

**REQUEST FOR CONFIDENTIAL CLASSIFICATION
AND MOTION FOR PROTECTIVE ORDER**

FLORIDA CITY GAS (FCG or the Company), by and through undersigned counsel, and pursuant to Rule 25-22.006, Fla. Admin. Code, requests that the Florida Public Service Commission (the Commission) enter an order protecting from public disclosure information contained in the Company's response to the 9th Set of Interrogatories and 10th Requests for Production of Documents from the Office of Public Counsel ("OPC"), namely documents provided in response to Interrogatory No. 184 and Production Request No. 147. In support of this request, the Company states:

1. On October 23, 2017, FCG filed its Petition for Rate Increase, and *inter alia*, the prefiled direct testimony and supporting exhibits of its witnesses and Minimum Filing Requirements.

2. On January 19, 2018, the OPC served FCG with its 9th Set of Interrogatories (Nos. 182-184) and 10th Requests for Production of Documents ("POD") (Nos. 147-149). With regard to the additional document provided as an Attachment to Interrogatory No. 184, the information contained therein is competitively sensitive information regarding third party suppliers/marketers on FCG's system and capacity identified for them on a given day. Documents in response to POD 147 contain competitively sensitive, internal Company strategy and planning information that FCG treats as highly confidential, which has not otherwise been publicly disclosed. Given

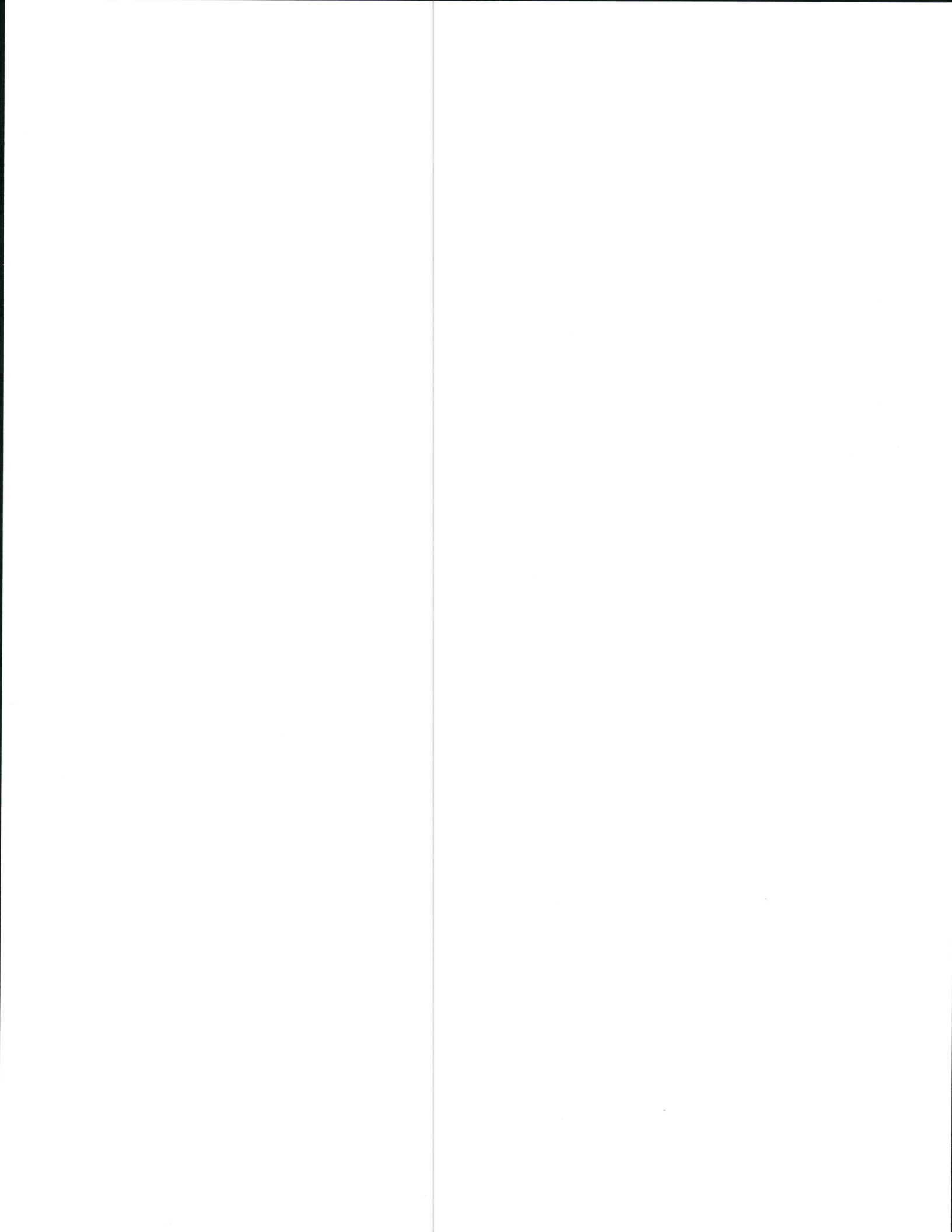
the nature of the documents provided, the Company believes that disclosure of any of this information would cause harm to FCG and its customers.

3. The information for which FCG seeks confidential classification is information 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.



4. With regard to the documents produced in response to OPC's Interrogatory No. 184 and POD 147, the Company considers these documents to be confidential in their entirety. Disclosure of this information would impair FCG's competitive interests, as well as FCG's business relationship with potential contractors, by disclosing information that has, to date, been maintained as confidential. As such, disclosure of this information as a public document would cause harm to both the Company and its ratepayers.

5. Specifically, FCG seeks confidential classification of the documentation provided in response to OPC's Interrogatory No. 184, which is correspondence from FGT to Witness Becker. The Company also seeks confidential classification of the following documents provided in response to OPC's POD No. 147:

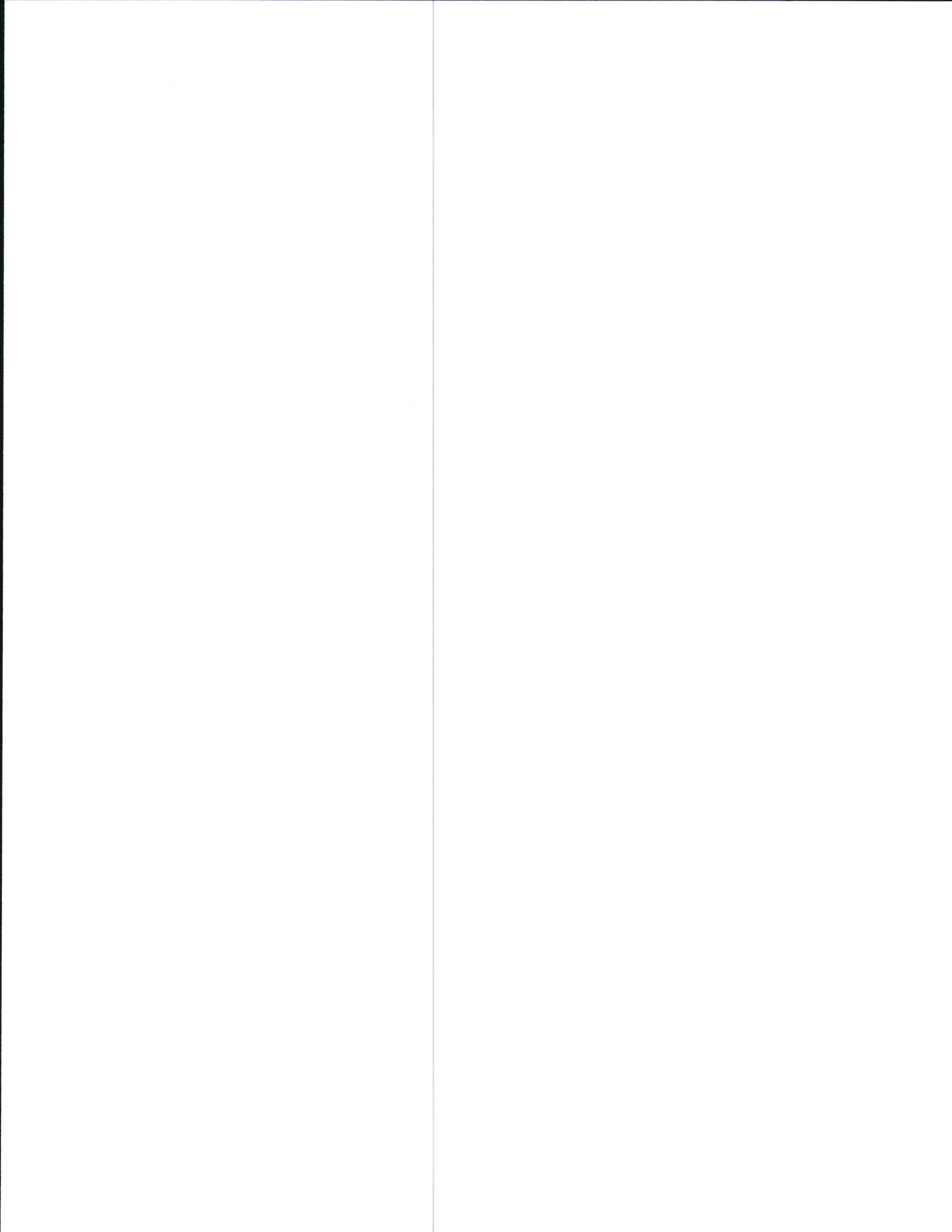
Confidential OPC POD 10-147.1 - *Estimate Vap Only by Joe.xlsx*: Early estimate based on different configurations that was based on prior estimates for other LNG plants.

Confidential OPC POD 10-147.2 - *Summary – Homestead LNG.docx*: Early summary comparing the costs of a portable vaporization plant and a LNG plant without liquefaction.

Confidential OPC POD 10-147.3 - *Basis of Design.pdf*: Initial design provided by FCG's engineering design contractor.

Confidential OPC POD 10-147.4 - *Homestead LNG End of SG3 Presentation.ppt*: Project management presentation.

The information provided by all five documents constitutes proprietary, confidential business information consistent with the definition set forth in Section 366.093(3)(d) and (e), Florida Statutes.



6. Release of any of this information would ultimately impair the Company's ability to contract for services on reasonable terms, which would ultimately be to the detriment of FCG's ratepayers.

7. Submitted herewith, in substantial compliance with Rule 25-22.006, Florida Administrative Code, are the confidential documents on a DVD clearly identified as "Confidential." Given that the documents are considered by the Company to be confidential, in their entirety, the Company has not provided redacted versions, as these would merely constitute blank pages.

8. FCG further requests that the Commission issue a protective order, in accordance with Rule 25-22.006(6), Florida Administrative Code, to protect this information when provided to the Office of Public Counsel, which is a party to this proceeding.

WHEREFORE, FCG respectfully requests that:

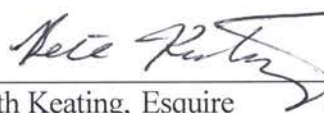
1. The Commission enter an order protecting the identified information in Florida City Gas's Responses to OPC's 9th Set of Interrogatories, No. 184, and 10th Request for Production of Documents, No. 147, from public disclosure as proprietary confidential business information, as described herein;

2. The Commission issue a protective order, in accordance with Rule 25-22.006(6), Florida Administrative Code, to protect this information when provided to the Office of Public Counsel; and

2. The Commission grant confidential classification for this information for a

period of at least 18 months.

Respectfully submitted this 13th day of February, 2018, by:



Beth Keating, Esquire
Florida Bar No. 0022756
Gunster Law Firm
215 South Monroe Street Suite 601
Tallahassee, FL 32301
Attorneys for Florida City Gas

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing filing has been served by Hand Delivery or Electronic Mail (public versions only) this 13th day of February, 2018, upon the following:

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