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March 6, 2018

E-PORTAL

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

Re: Docket No. 20110133-GU -**Petition for approval of acquisition adjustment and recovery of regulatory assets, and request for consolidation of regulatory filings and records of Florida Public Utilities Company and Florida Division of Chesapeake Utilities Corporation.**

Dear Ms. Stauffer:

Attached for filing, please find FPUC's Request for Extension of Confidential Classification of certain information contained in Staff Audit Workpapers associated with the audit conducted in this Docket (Audit Control No. 11-129-4-1).

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
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215 South Monroe St., Suite 601
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(850) 521-1706

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Petition for approval of acquisition)
adjustment and recovery of regulatory)
assets, and request for consolidation of)
regulatory filings and records of Florida)
Public Utilities Company and Florida)
Division of Chesapeake Utilities)
Corporation.)
_____)

Docket No. 20110133-GU

Filed: March 6, 2018

**FLORIDA PUBLIC UTILITIES COMPANY'S REQUEST FOR
EXTENSION OF CONFIDENTIAL CLASSIFICATION OF AUDIT WORKPAPERS**

Florida Public Utilities Company ("FPU" 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 second Request for Extension of Confidential Classification for information contained in the Staff Audit Workpapers associated with the audit conducted in this Docket (Audit Control No. 11-129-4-1) (cross-referenced Document No. 05685-11). This information was previously granted confidential classification by Order No. PSC-14-0234-CFO-GU., as well as a first extension by Order No. PSC-16-0340-CFO-GU. In support of this Request for Extension, FPU hereby states that:

1. In August 2011, the Company requested confidential classification of Staff Audit Workpapers associated with Staff Audit conducted in this Docket (Audit Control No. 11-129-4-1). Certain specified information included in those Staff's Audit Workpapers included financial information and corporate strategic information that had not otherwise been publicly disclosed. If disclosed, particularly out of context, the Company explained that this information could both harm the Company's ability to continue to obtain financing on favorable terms and impair the Company's ability to contract for goods and services on favorable terms, which would ultimately

have detrimental impacts on the Company's ratepayers, as well as the Company's business operations. The same holds true today. If this information is released, particularly out of context, it could impair the Company's ability to obtain financing on favorable terms, as well as its ability to contract for goods and services on favorable terms. The Company continues to treat this information as confidential, and it has not otherwise been disclosed.

2. The information for which FPU seeks confidential classification is information that the Company treats 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. In its initial August 29, 2011 Request regarding this information, the Company included an Exhibit A, which was a matrix identifying the specific portions of the Audit Workpapers for which FPU sought (and continues to seek) confidential treatment, along with the specific justification for each item specified in the request. Nothing has changed since the Company's

August 29, 2011, Request for Confidential Classification or its November 23, 2015, Request for Extension.

4. As such, FPU asks that confidential classification be extended for an additional period of at least 18 months. Should the Commission no longer find that it needs to retain the information, FPU respectfully requests that the confidential information be returned to the Company.

WHEREFORE, FPU respectfully requests that the highlighted information contained in Staff's Audit Workpapers associated with Audit Control No. 11-129-4-1, which was originally afforded confidential classification by Order No. PSC-14-0234-CFO-GU, be allowed to retain classification as "proprietary confidential business information," and thus, exempt from Section 119.07, Florida Statutes, for an additional period of 18 months.

RESPECTFULLY SUBMITTED this 6th day of March, 2018.



Beth Keating
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(850) 521-1706

CERTIFICATE OF SERVICE

I HEREBY ATTEST that a true and correct copy of the foregoing Request for Extension of Confidential Classification has been served upon the following by Electronic Mail this 6th Day of March, 2018:

Patricia Christensen Office of the Public Counsel c/o The Florida Legislature 111 West Madison St., Rm. 812 Tallahassee, FL 32399-1400	Jennifer Crawford Office of the General Counsel Florida Public Service Commission 2540 Shumard Oak Boulevard Tallahassee, FL 32399-0850
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