

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

April 17, 2019

VIA E-PORTAL

Mr. Adam Teitzman
Commission Clerk
Florida Public Service Commission
2540 Shumard Oak Boulevard
Tallahassee, FL 32399-0850

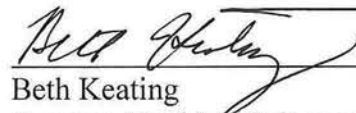
Re: Docket No. 20190004-GU – Natural Gas Conservation Cost Recovery

Dear Mr. Teitzman:

Enclosed for electronic filing, please find Florida City Gas' Request for Extension of Confidential Classification in the above-referenced docket.

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

Sincerely,



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: Natural Gas Conservation)
Cost Recovery Clause.)
_____)

Docket No. 20190004-GU

Filed: April 17, 2019

**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 for certain material that was provided to the Florida Public Service Commission (“Commission,” “PSC,” or “Staff”) in connection with FCG’s Natural Gas Conservation Clause (“CCR”) Audit for the year ended December 31, 2012 (Audit No. 13-004-4-2), which was previously granted confidential classification by Order No. PSC-2013-0399-CFO-GU, issued August 29, 2013, and for which subsequent extensions have been granted by Order No. PSC-2015-0289-CFO-GU, issued July 5, 2015, and Order No. PSC-2017-0388-CFO-GU, issued October 11, 2017 (Referenced Document Nos. 04292-13 and 04237-13). In support of this Request, FCG states as follows:

1. The highlighted information in the referenced audit workpapers includes contract terms and related invoices, which FCG is still required to maintain as confidential in accordance with the subject contracts. More specifically, the contracts are with the Georgia Tech Research Corporation and with Resource Solutions. The Georgia Tech contract pertains to development of a new natural gas application with the context of FCG’s approved Research and Development conservation program. FCG contracts with Resource Solutions for management of its conservation programs. As asserted in the Company’s original Request, filed July 25, 2013, the public disclosure of the specific terms and invoices associated with these contracts would not

only breach the terms of the referenced agreements, but would impair FCG's ability to contract for similar services in the future at reasonable terms and rates. Therefore, this information continues to meet 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.

The audit workpapers contain information, which continues to be treated by FCG as private and has not been publicly disclosed. As such, the Company requests that the Commission continue to protect the highlighted information included in the referenced Staff Audit workpapers.

2. FCG therefore seeks continuing confidential treatment of the identical specific information afforded confidential classification by Orders Nos. PSC-2013-0399-CFO-GU, PSC-2015-0289-CFO-GU, and PSC-2017-0388-CFO-GU.

3. 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 17th day of April, 2019.



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

Attorneys for Florida City Gas

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of FCG's Request for Extension Confidential Classification has been furnished by Electronic Mail to the following parties of record this 17th day of April, 2019:

<p>Florida Public Utilities Company/Florida Division of Chesapeake Utilities/Indiantow Mike Cassel Florida Public Utilities Company 1750 S 14th Street, Suite 200 Fernandina Beach FL 32034 mcassel@fpuc.com</p>	<p>MacFarlane Ferguson Law Firm Ansley Watson, Jr. /Andrew Brown P.O. Box 1531 Tampa, FL 33601-1531 aw@macfar.com AB@macfar.com</p>
<p>Florida Power & Light Company Christopher T. Wright 700 Universe Boulevard Juno Beach, FL 33408 Christopher.Wright@fpl.com</p>	<p>Office of Public Counsel J.R. Kelly/Charles Rehwinkel/Patty Christensen c/o The Florida Legislature 111 West Madison Street, Room 812 Tallahassee, FL 32399-1400 Kelly.JR@leg.state.fl.us Rehwinkel.charles@leg.state.fl.us Christensen.Patty@leg.state.fl.us</p>
<p>Peoples Gas System Paula Brown Mark R. Roche P.O. Box 111 Tampa, FL 33601-0111 regdept@tecoenergy.com MRRoche@tecoenergy.com</p>	<p>St. Joe Natural Gas Company, Inc. Mr. Andy Shoaf P.O. Box 549 Port St. Joe, FL 32457-0549 andy@stjoegas.com</p>
<p>Sebring Gas System, Inc. Jerry H. Melendy, Jr. 3515 U.S. Highway 27 South Sebring, FL 33870 jmelendy@floridasbestgas.com</p>	<p>Florida Public Service Commission Rachael Dziechciarz 2540 Shumard Oak Boulevard Tallahassee, FL 32399 rdziehc@psc.state.fl.us</p>

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