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July 11, 2022

VIA HAND DELIVERY

Mr. Adam Teitzman
Division of the Commission Clerk and Administrative Services
Florida Public Service Commission
2540 Shumard Oak Blvd.
Tallahassee, FL 32399-0850

REDACTED

**Re: Docket No. 20220069-GU
Florida City Gas's Request for Confidential Classification**

Dear Mr. Teitzman:

I enclose for filing in the above docket Florida City Gas's ("FCG") Request for Confidential Classification of Information contained in its responses to the Office of Public Counsel's ("OPC") First Request for Production of Documents Nos. 1, 16, 19, and 24 and OPC's First Set of Interrogatories Nos. 49, 56, and 84. The request includes Exhibits A, B (two copies), C and D.

Exhibit A consists of the confidential documents, wherein all the information that FCG asserts is entitled to confidential treatment has been highlighted, that is the subject of FPL's Request for Confidential Classification. Certain documents in Exhibit A are voluminous and confidential in their entirety, and they are being provided electronically on a disc. Exhibit B is an edited version of Exhibit A, in which the information FPL asserts is confidential has been redacted. For the documents that are confidential in their entirety, FPL has included only identifying cover pages in Exhibit B. Exhibit C is a justification table in support of FPL's Request for Confidential Classification. Exhibit D contains the declarations in support of FPL's Request. In accordance with Rule 25-22.006(3)(d), FPL requests confidential treatment of the information in Exhibit A pending disposition of FPL's Request for Confidential Classification.

Please contact me if you or your Staff has any questions regarding this filing.

- COM _____
- AFD _____
- APA _____
- ECO _____
- ENG** 1 exh "B"
- GCL _____
- IDM _____
- CLK _____

Enclosures

Sincerely,

/s/ Joel T. Baker
Joel T. Baker
Fla. Bar No. 0108202

RECEIVED-FPSC
2022 JUL 11 PM 3:20
COMMISSION CLERK

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Petition by Florida City Gas for Base
Rate Increase.

Docket No. 20220069-GU

Filed: July 11, 2022

**FLORIDA CITY GAS'S REQUEST FOR CONFIDENTIAL CLASSIFICATION
OF CERTAIN INFORMATION CONTAINED IN ITS RESPONSES TO THE
OFFICE OF PUBLIC COUNSEL'S FIRST REQUEST FOR PRODUCTION
OF DOCUMENTS AND FIRST SET OF INTERROGATORIES**

Pursuant to Section 366.093, Florida Statutes ("F.S."), and Rule 25-22.006, Florida Administrative Code, Florida City Gas ("FCG") hereby requests confidential classification of certain information provided in its responses to the Office of Public Counsel's ("OPC") First Request for Production of Documents and First Set of Interrogatories, filed contemporaneously in this proceeding (referred to herein as the "Confidential Information"). In support of its Request, FCG states as follows:

1. FCG served its responses to OPC's First Request for Production of Documents and OPC's First Set of Interrogatories on July 11, 2022. This request is being filed contemporaneously with service of those responses to request confidential classification of certain information contained in its response to OPC's First Request for Production of Documents Nos. 1, 16, 19, and 24, and OPC's First Set of Interrogatories Nos. 49, 56, and 84, consistent with Rule 25-22.006, Florida Administrative Code. The following exhibits are included with and made a part of this request:

a. Exhibit A consists of a copy of the confidential material on which all of the information that FCG asserts is entitled to confidential treatment has been highlighted. Documents that are voluminous and confidential in their entirety are provided in electronic format on a CD.

b. Exhibit B consists of a copy of the confidential documents, on which all the information that is entitled to confidential treatment under Florida law has been redacted. For documents that are confidential in their entirety, FCG has added an insert page so indicating.

c. Exhibit C is a table that identifies by column and line the information for which confidential treatment is being sought and references the specific statutory basis for the claim of confidentiality. Exhibit C also identifies the declarant who supports the requested classification.

d. Exhibit D contains the declarations of Liz Fuentes, Kathleen Slattery, Jennifer Nelson, Tara DuBose, and Kurt Howard in support of this Request.

2. The Confidential Information is intended to be and has been treated by FCG as private, its confidentiality has been maintained, and its disclosure would cause harm to FCG and its customers. Pursuant to Section 366.093, F.S., such materials are entitled to confidential treatment and are exempt from the disclosure provisions of the public records law. Thus, once the Commission determines that the information in question is proprietary confidential business information, the Commission is not required to engage in any further analysis or review such as weighing the harm of disclosure against the public interest in access to the information.

3. As described in the declarations included in Exhibit D, the Confidential Information that is the subject of this Request contains internal auditing controls and/or reports of internal auditors, as well as 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. Moreover, the Confidential Information contains information relating to competitive interests, the disclosure of which would cause harm to the provider of the information. This information is protected by Sections 366.093(3)(b)(d) and (e), F.S.

EXHIBIT B

REDACTED

The documents responsive to OPC's First Set of Interrogatories No. 49, Bates Nos. 001077-001104, are confidential in their entirety.

FPL Gas Operations
YTD 2019 Corporate Indicator Performance

A Indicator		B 2019 Year End				
		C Actual	Goal	On plan?	Weight	
Cust. Value	Gross Margin (\$000)	█ ██████	█ ██████	Worse	50%	10%
	O&M Base Costs (\$000)	█ ██████	█ ██████	Worse		10%
	Net Income (\$000)	█ ██████	█ ██████	Worse		10%
	Capital Expenditures (\$000)	█ ██████	█ ██████	Better		10%
	ROE - Regulatory (%) ⁽¹⁾	████████	████████	Worse		10%
Other Operational	Safety: Number of OSHA Recordables (per 200,000 Hrs)	████████	████████	Better	50%	8%
	Customer Growth (Count of Active Accounts)	████████	████████	Better		6%
	Customer Usage (Therms)	████████	████████	Better		6%
	Customer Experience:					
	Appointment Attainment (%)	████████	████████	Better		5%
	Average Leak Response (minutes)	████████	████████	Better		5%
	Call Center Data: ⁽²⁾					
	Call Volume (thousands of calls)	████████	████████	Worse		5%
	Speed of Answer (seconds)	████████	████████	Worse		5%
	Call Handle Time (seconds)	████████	████████	Worse		5%
	Collection:					
	Write-offs (\$000)	\$ ██████	\$ ██████	Worse		5%

⁽¹⁾ Regulatory ROE represents 100% equity financing from August 2018 through January 2019: FCG received an intercompany loan from FPL in February 2019 which rebalances the capital structure to the targeted equity ratio of 48%.

Actual Regulatory ROE based on 3/2019 Earnings Surveillance Report filed with the FPSC on 8/15/19.

⁽²⁾ Customer Service & Emergency Calls. Does not include Energy Connection.

FPL Gas Operations
YTD 2020 Corporate Indicator Performance

Indicator		2020 Year End				
		Actual	Goal	On plan?	Weight	
Cust. Value	Gross Margin (\$000)	█ ██████	█ ██████	Worse	50%	10%
	O&M Base Costs (\$000)	█ ██████	█ ██████	Worse		10%
	Net Income (\$000)	█ ██████	█ ██████	Worse		10%
	Capital Expenditures (\$000)	█ ██████	█ ██████	Better		10%
	ROE - Regulatory (%) ⁽¹⁾⁽²⁾	███████	███████%	Worse		10%
Other Operational	Safety: Number of OSHA Recordables (per 200,000 Hrs) ⁽³⁾	███████	███████	Worse	50%	8%
	Customer Growth (Count of Active Accounts) ⁽⁴⁾	███████	███████	Better		6%
	Customer Usage (Therms) ⁽⁵⁾	███████	███████	Better		6%
	Customer Experience: ⁽⁶⁾					
	Appointment Attainment (%)	███████	███████	N/A		5%
	Average Leak Response (minutes)	███████	███████	N/A		5%
	Call Center Data: ⁽⁷⁾					
	Call Volume (thousands of calls)	███████	███████	Worse		5%
	Speed of Answer (seconds)	███████	███████	Worse		5%
	Call Handle Time (seconds)	███████	███████	Worse		5%
	Collection:					
	Write-offs (\$000)	█ ██████	█ ██████	Better		5%

(1) Actual Regulatory ROE based on 3Q 2020 Earnings Surveillance Report filed with the FPSC on 11/13/20.

(2) Year-end ROE is not finalized until ESR filing for 4Q 2020.

(4) Current Month Actual and Goal reported as incremental active accounts added.

(5) Represents send out therms. May not move in sync with gross margin due to timing of billed therms.

(6) For all measures, Customer Experience information is currently unavailable from the Customer Information System (StarNik). The goal

(7) Customer Service & Emergency Calls. Does not include Energy Connection.

The documents responsive to OPC's First Set of Interrogatories No. 84, Bates Nos. 002152-002154, are confidential in their entirety.

The documents responsive to OPC's First Request for Production of Documents No. 1, Tara DuBose's Workpapers, Bates Nos. 004437-004493 are confidential in their entirety.

ESTIMATED COST AMI PILOT

	Capital	Ongoing Annual O&M	Notes
Additional Field network devices (Aps/Relays)	\$50,000		Estimate to augment field network. Assumes majority of the customers are covered by FPL network
SAAS - Itron software and managed services for UIQ and Temetra dashboard		\$15,000	Itron monthly SaaS fee includes Temetra, UIQ secondary stack, and managed services. \$.25/meter/month.
NAAS - Network as a services		\$2,150	FPL charge back for utilization of Smart grid network . Question out to regulatory to determine chargeback model. \$.43/meter/year.
Itron Initial set up cost	\$400,000		Includes standing up secondary UIQ stack and Temetra (one Production and one DR environment)
FPL IT Integration work	\$300,000		Device provisioning, Bill extract, device management, and network design for connectivity to compartment. This doesn't include any integration for events as it is assumed the Temetra dashboard will provide functionality needed. Also assumes meter programming is done by meter shop and is not included in this estimate
Professional Services Support from Itron	\$100,000		Depends on scope of deployment support needed by FCG such as project management, training, meter configuration, network optimization, system acceptance testing, travel, etc. Assuming \$100k for now.
Total	\$850,000	\$17,150	

Smart Meter Project Estimate

	A	B	C	D
Components for Depreciation Breakout	Unit Count	Cost	Dep Rate	Depreciation
1 Meter	5000		6.10%	
2 Revised MSA & Service Valves with bypass ports	5000		3.57%	
3 Meter & MSA Install	5000		3.57%	
4 Reg	5000		3.00%	
5 Reg Install	5000		3.10%	
6 ERT	5000		6.10%	
7 ERT Install	5000		3.10%	

Total	5,000	\$500.00	\$22.25	Composite Ra 4.45%
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*Annual Capex (including 3% inflation)		48 Month Plan	60 Months	120 Months
Year	1	\$625,000	\$500,000	\$250,000
	2	\$643,750	\$515,000	\$257,500
	3	\$663,063	\$530,450	\$265,225
	4	\$682,954	\$546,364	\$273,182
	5	<u>2,614,767</u>	<u>\$562,754</u>	\$281,377
	6		<u>\$2,654,568</u>	\$289,819
	7			\$298,513
	8			\$307,468
	9			\$316,693
	10			<u>\$326,193</u>
				\$2,865,970

Consolidated Components for Project Estimates	
8 Meter & ERT	
9 MSA, Regulator & Valves & misc mats	
10 Labor all components	
	\$500.00

The documents responsive to OPC's First Request for Production of Documents No. 1, Kurt Howard's Workpapers, Bates Nos. 004501-004541 are confidential in their entirety.

The documents responsive to OPC's First Request for Production of Documents No. 1, Jennifer Nelson's Workpapers, Bates Nos. 004542-004604 are confidential in their entirety.

The documents responsive to OPC's First Request for Production of Documents No. 1, Liz Fuentes's Workpapers, Bates Nos. 004605-004676 are confidential in their entirety.

The documents responsive to OPC's First Request for Production of Documents No. 16, Bates Nos. 000727-000750, are confidential in their entirety.

The documents responsive to OPC's First Request for Production of Documents No. 19, Bates Nos. 002186-002188, are confidential in their entirety.

The documents responsive to OPC's First Request for
Production of Documents No. 24, Bates Nos. 001111-001121,
are confidential in their entirety.

EXHIBIT C

JUSTIFICATION TABLE

EXHIBIT C

COMPANY: Florida City Gas
TITLE: Petition by Florida City Gas for Base Rate Increase.
DOCKET NO.: 20220069-GU
DATE: July 11, 2022

Int/POD No.	Description	Bates Nos.	Page No. Line / Column	Florida Statute 366.093(3) Subsection	Declarants
OPC 1 st INT, No. 49	Full Company Benefits Summary	001077-001104	All	(e)	Kathleen Slattery
OPC 1 st INT, No. 56	Internal Corporate Performance Indicators	002155-002157	Pages 1-3, Cols. A, B and C; Page 2, fn 3; Page 3, fn 1, 2	(e)	Kathleen Slattery
OPC 1 st INT, No. 84	2023 FCG Pension Allocation	002152-002154	All	(e)	Kathleen Slattery
OPC 1 st POD, No. 1	BCFF Report (April 2022)	004542-004560	All	(e)	Jennifer Nelson
OPC 1 st POD, No. 1	BCFF email	004561-004579	All	(e)	Jennifer Nelson
OPC 1 st POD, No. 1	BCFF Report (March 2022)	004580-004598	All	(e)	Jennifer Nelson
OPC 1 st POD, No. 1	Value Line Reports	004599-004604	All	(e)	Jennifer Nelson
OPC 1 st POD, No. 1	C-28 Miscellaneous Tax Information	004605-004614	All	(e)	Liz Fuentes

Int/POD No.	Description	Bates Nos.	Page No. Line / Column	Florida Statute 366.093(3) Subsection	Declarants
OPC 1 st POD, No. 1	Southern Co Data - 2016 and 2017	004615	All	(e)	Liz Fuentes
OPC 1 st POD, No. 1	MFR C-31 Support	004616-004622	All	(d)	Liz Fuentes
OPC 1 st POD, No. 1	MFR C-31 Support	004623-004626	All	(d)	Liz Fuentes
OPC 1 st POD, No. 1	MFR C-31 Support	004627-004629	All	(d)	Liz Fuentes
OPC 1 st POD, No. 1	MFR C-31 Support	004630-004632	All	(d)	Liz Fuentes
OPC 1 st POD, No. 1	MFR C-31 Support	004633-004635	All	(d)	Liz Fuentes
OPC 1 st POD, No. 1	DT 2021 Florida City Gas Engagement Letter - Executed	004636-004657	All	(d)	Liz Fuentes
OPC 1 st POD, No. 1	Executed CCO1 to Purchase Order Between FCG and BV for LNG Permit Assistance	004658-004660	All	(d)	Liz Fuentes
OPC 1 st POD, No. 1	Executed Purchase Order between FCG and BV (OCI) for LNG Permitting Asst Svcs	004661-004663	All	(d)	Liz Fuentes
OPC 1 st POD, No. 1	FCG LNG Plant Engagement Letter - Holland & Knight - Fully Executed	004664-004665	All	(d)	Liz Fuentes
OPC 1 st POD, No. 1	FCG LNG Plant Exhibit B - Holland & Knight	004666-004668	All	(d)	Liz Fuentes

Int/POD No.	Description	Bates Nos.	Page No. Line / Column	Florida Statute 366.093(3) Subsection	Declarants
OPC 1 st POD, No. 1	FCG LNG Plant Matter Rate Sheet - Holland & Knight - fully executed	004669	All	(d)	Liz Fuentes
OPC 1 st POD, No. 1	LNG Baer Engagement - Holland & Knight - Fully Executed	004670-004671	All	(d)	Liz Fuentes
OPC 1 st POD, No. 1	Purchase Order - Pond Signed	004672-004673	All	(d)	Liz Fuentes
OPC 1 st POD, No. 1	MFR C-31 - Invoices	004674-004676	All	(d)	Liz Fuentes
OPC 1 st POD, No. 1	Cost of Service-Rate Design MFR Workpaper (No RSAM)	004437-004467	All	(e)	Tara DuBose
OPC 1 st POD, No. 1	Cost of Service-Rate Design MFR Workpaper (RSAM)	004468-004493	All	(e)	Tara DuBose
OPC 1 st POD, No. 1	AMI Pilot - Estimate Cost	004499-004500	Page 2, Col A, Lines 8-10; Page 2 Cols. B-D, Lines 1-7	(e)	Kurt Howard
OPC 1 st POD, No. 1	Purchasing Goods and Services – Policies and Procedures	004501-004541	All	(d) (e)	Kurt Howard
OPC 1 st POD, No. 16	NEE/FPL Narratives (SOX Narrative 04.04.00 Fixed Assets)	000727-000750	All	(b)	Liz Fuentes
OPC 1 st POD, No. 19	FPL Performance Dollar Award Plan Document Revised	002186-002188	All	(e)	Kathleen Slattery
OPC 1 st POD, No. 24	FCG 2022 Rate Case - Concentric Consulting Agreement (Fully Executed)	001111-001117	All	(d)	Liz Fuentes

Int/POD No.	Description	Bates Nos.	Page No. Line / Column	Florida Statute 366.093(3) Subsection	Declarants
OPC 1 st POD, No. 24	Gannett Fleming – Signed Proposal	001118-001120	All	(d)	Liz Fuentes
OPC 1 st POD, No. 24	Gunster Engagement - FCG 2022 Rate Case - Fully Executed	001121	All	(d)	Liz Fuentes

EXHIBIT D

DECLARATIONS

EXHIBIT D

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Petition by Florida City Gas for Base Rate
Increase.

Docket No: 20220069-GU

DECLARATION OF LIZ FUENTES

1. My name is Liz Fuentes. I am currently employed by Florida Power & Light Company as Senior Director, Regulatory Accounting. I have personal knowledge of the matters stated in this written declaration.

2. I have reviewed the documents referenced and incorporated in Florida City Gas's ("FCG") Request for Confidential Classification, specifically the materials provided in response to the Office of Public Counsel's First Request for Production of Documents Nos. 1, 16, and 24. The documents or materials that I have reviewed and which are asserted by FCG to be proprietary confidential business information contain: internal auditing controls and reports of internal auditors (SOX narratives); contractual information concerning bids or other contractual data, the disclosure of which would impair the efforts of FCG to contract for goods or services on favorable terms; and information relating to competitive interests, the disclosure of which would impair the competitive business of the provider of the information (tax information). To the best of my knowledge, FCG has maintained the confidentiality of these documents and materials.

3. Consistent with the provisions of the Florida Administrative Code, such materials should remain confidential for a period of not less than 18 months. In addition, they should be returned to FCG as soon as the information is no longer necessary for the Commission to conduct its business so that FCG can continue to maintain the confidentiality of these documents.

4. Under penalties of perjury, I declare that I have read the foregoing declaration and that the facts stated in it are true to the best of my knowledge and belief.



Liz Fuentes

Date: 7/7/2022

EXHIBIT D

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Petition by Florida City Gas for Base Rate
Increase.

Docket No: 20220069-GU

DECLARATION OF KATHLEEN SLATTERY

1. My name is Kathleen Slattery. I am currently employed by Florida Power & Light Company ("FPL") as Senior Director, Executive Services and Compensation. I have personal knowledge of the matters stated in this written declaration.

2. I have reviewed the documents referenced and incorporated in Florida City Gas's ("FCG") Request for Confidential Classification, specifically the materials provided in response to the Office of Public Counsel's ("OPC") First Request for Production of Documents No. 19, and OPC's First Set of Interrogatories, Nos. 49, 56 and 84. The documents or materials that I have reviewed and which are asserted by FCG to be proprietary confidential business information contain information relating to competitive interests, the disclosure of which would impair the competitive business of the provider of the information. Specifically, the information contains proprietary FCG employee compensation and benefits data. To the best of my knowledge, FCG has maintained the confidentiality of these documents and materials.

3. Consistent with the provisions of the Florida Administrative Code, such materials should remain confidential for a period of not less than 18 months. In addition, they should be returned to FCG as soon as the information is no longer necessary for the Commission to conduct its business so that FCG can continue to maintain the confidentiality of these documents

4. Under penalties of perjury, I declare that I have read the foregoing declaration and that the facts stated in it are true to the best of my knowledge and belief


Kathleen Slattery

Date: 7-7-2022

EXHIBIT D

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Petition by Florida City Gas for Base Rate Increase.

Docket No: 20220069-GU

DECLARATION OF JENNIFER NELSON

1. My name is Jennifer Nelson. I am currently employed by Concentric Energy Advisors as Assistant Vice President. I have personal knowledge of the matters stated in this written declaration.

2. I have reviewed the documents referenced and incorporated in Florida City Gas's ("FCG") Request for Confidential Classification, specifically the materials provided in response to the Office of Public Counsel's First Request for Production of Documents No. 1. The documents or materials that I have reviewed and which are asserted by FCG to be proprietary confidential business information, contain information relating to competitive interests, the disclosure of which would impair the competitive business of the provider of the information. Specifically, the information contains financial reports obtained through a paid subscription service, and the information contained therein is proprietary to the vendor of the subscription. To the best of my knowledge, FCG has maintained the confidentiality of these documents and materials.

3. Consistent with the provisions of the Florida Administrative Code, such materials should remain confidential for a period of not less than 18 months. In addition, they should be returned to FCG as soon as the information is no longer necessary for the Commission to conduct its business so that FCG can continue to maintain the confidentiality of these documents.

4. Under penalties of perjury, I declare that I have read the foregoing declaration and that the facts stated in it are true to the best of my knowledge and belief.



Jennifer Nelson

Date: 7/8/2022

EXHIBIT D

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Petition by Florida City Gas for Base Rate
Increase.

Docket No: 20220069-GU

DECLARATION OF TARA DUBOSE

1. My name is Tara DuBose. I am currently employed by Florida Power & Light Company ("FPL") as Manager, Cost of Service and Load Research. I have personal knowledge of the matters stated in this written declaration.

2. I have reviewed the documents referenced and incorporated in Florida City Gas's ("FCG") Request for Confidential Classification, specifically the materials provided in response to the Office of Public Counsel's First Request for Production of Documents No. 1. The documents or materials that I have reviewed and which are asserted by FCG to be proprietary confidential business information contain information relating to competitive interests, the disclosure of which would impair the competitive business of the provider of the information. Specifically, the information contains non-public contract demand service pricing information. To the best of my knowledge, FCG has maintained the confidentiality of these documents and materials.

3. Consistent with the provisions of the Florida Administrative Code, such materials should remain confidential for a period of not less than 18 months. In addition, they should be returned to FCG as soon as the information is no longer necessary for the Commission to conduct its business so that FCG can continue to maintain the confidentiality of these documents.

4. Under penalties of perjury, I declare that I have read the foregoing declaration and that the facts stated in it are true to the best of my knowledge and belief.

Tara DuBose

Tara DuBose

Date: 07/07/2022

EXHIBIT D

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Petition by Florida City Gas for Base Rate Increase.

Docket No: 20220069-GU

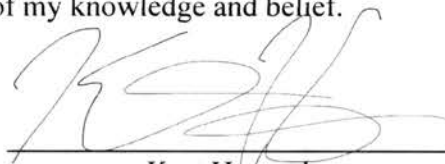
DECLARATION OF KURT HOWARD

1. My name is Kurt Howard. I am currently employed by Florida City Gas (“FCG”) as Senior Director and General Manager. I have personal knowledge of the matters stated in this written declaration.

2. I have reviewed the documents referenced and incorporated in FCG’S Request for Confidential Classification, specifically the materials provided in response to the Office of Public Counsel’s First Request for Production of Documents, No. 1. The documents or materials that I have reviewed and which are asserted by FCG to be proprietary confidential business information contain information concerning bids or other contractual data, the disclosure of which would impair the efforts of FCG to contract for goods or services on favorable terms, as well as information relating to competitive interests, the disclosure of which would impair the competitive business of the provider of the information. Specifically, the information contains vendor pricing information for FCG’s AMI Pilot and proprietary internal procurement guidelines and practices. To the best of my knowledge, FCG has maintained the confidentiality of these documents and materials.

3. Consistent with the provisions of the Florida Administrative Code, such materials should remain confidential for a period of not less than 18 months. In addition, they should be returned to FCG as soon as the information is no longer necessary for the Commission to conduct its business so that FCG can continue to maintain the confidentiality of these documents.

4. Under penalties of perjury, I declare that I have read the foregoing declaration and that the facts stated in it are true to the best of my knowledge and belief.



Kurt Howard

Date: 7/7/22