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July 18, 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 Second Request for Production of Documents No. 39. 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 are the subject of FPL's Request for Confidential Classification. Exhibit B is an edited version of Exhibit A, in which the information FPL asserts is confidential has been redacted. Exhibit C is a justification table in support of FPL's Request for Confidential Classification. Exhibit D contains the declaration 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.

Sincerely,

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

Enclosures

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

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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 18, 2022

**FLORIDA CITY GAS'S REQUEST FOR CONFIDENTIAL CLASSIFICATION
OF CERTAIN INFORMATION CONTAINED IN ITS RESPONSE TO
THE OFFICE OF PUBLIC COUNSEL'S SECOND REQUEST
FOR PRODUCTION OF DOCUMENTS NO. 39**

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 response to the Office of Public Counsel's ("OPC") Second Request for Production of Documents No. 39, 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 Second Request for Production of Documents on July 18, 2022. This request is being filed contemporaneously with the service of those responses to request confidential classification of certain information contained in its response to OPC's Second Request for Production of Documents No. 39, 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.

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.

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 declaration of Mark Campbell 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 information relating to competitive interests, the disclosure of which would impair the competitive business of the provider of the information. This information is protected by Sections 366.093(3)(e), F.S.

4. Upon a finding by the Commission that the Confidential Information is proprietary confidential business information, the information should not be declassified for a period of at least eighteen (18) months and should be returned to FCG as soon as the information is no longer necessary for the Commission to conduct its business. *See* Section 366.093(4), F.S.

WHEREFORE, for the above and foregoing reasons, as more fully set forth in the supporting materials, Florida City Gas respectfully requests that its Request for Confidential Classification be granted.

Respectfully submitted this 18th day of July 2022.

Joel T. Baker
Principal Attorney
Florida Power & Light Company
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Juno Beach, FL 33408-0420
Phone: 561-691-7255
Fax: 561-691-7135
Email: joel.baker@fpl.com

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

CERTIFICATE OF SERVICE

20220069-GU

I HEREBY CERTIFY that a true and correct copy of the foregoing has been furnished by electronic mail this 18th day of July 2022 to the following parties:

<p>Walter Trierweiler, Esquire Matthew Jones, Esquire Florida Public Service Commission 2540 Shumard Oak Boulevard Tallahassee, FL 32399 wtrierwe@psc.state.fl.us majones@psc.state.fl.us <i>For Commission Staff</i></p>	<p>Office of Public Counsel c/o The Florida Legislature 111 West Madison Street, Room 812 Tallahassee, FL 32399-1400 Gentry.richard@leg.state.fl.us wessling.mary@leg.state.fl.us <i>For Office of Public Counsel</i></p>
<p>Beth Keating Gunster, Yoakley & Stewart, P.A. 215 South Monroe St., Suite 601 Tallahassee, FL 32301 BKeating@gunster.com <i>For Florida City Gas</i></p>	<p>T. Jernigan/H. Buchanan/E. Payton/R. Franjul 139 Barnes Drive, Suite 1 Tyndall AFB FL 32403 thomas.jernigan.3@us.af.mil holly.buchanan.1@us.af.mil ebony.payton.ctr@us.af.mil rafael.franjul@us.af.mil ULFSC.Tyndall@us.af.mil marcus.duffy.3@us.af.mil <i>For Federal Executive Agencies</i></p>

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

EXHIBIT B

REDACTED



2022 Budget Presentation Florida City Gas

October 25, 2021

Florida City Gas

2020 – 2026 Base O&M Cost Summary

Base O&M
Business Unit: Florida City Gas
 (\$Millions)

Project / Activity	2020 Actual	2021 Forecast	2022 Funds Request	2023 Forecast	A	B	C
					2024 Forecast	2025 Forecast	2026 Forecast
1 Support Services	1.4	3.7	3.4	3.4			
2 Distribution Operations	8.7	8.3	8.8	9.1			
3 Engineering & Construction	1.5	1.7	2.2	2.3			
4 FCG-Corporate Overheads	(0.5)	0.0	0.1	0.2			
5 FCG-Information Technology	1.0	1.8	1.3	1.3			
6 Measurement & Systems Operations	0.9	1.1	1.1	1.1			
7 Marketing	0.6	0.3	0.5	0.5			
8 Business Operations	14.4	8.5	7.9	7.7			
9 Total Base O&M Florida City Gas	\$28.1	\$25.4	\$25.3	\$25.5			



2021 Base O&M Walk

Base O&M		
Business Unit: Florida City Gas		
(\$millions)		
2021 Year End Forecast		
		\$25.4
	Support Services	(\$0.3)
	Distribution Operations	\$0.6
	Engineering & Construction	\$0.5
	Corporate Overheads	\$0.1
	Information Technology	(\$0.5)
	Measurement & Systems Operations	(\$0.0)
	Business Development	\$0.1
	Business Operations	(\$0.5)
2022 Funds Request		
		\$25.3
	Merit Changes - Increase / (Decrease)	0.2
2023 Forecast		
1	[REDACTED]	[REDACTED]
2	[REDACTED]	[REDACTED]
3	[REDACTED]	[REDACTED]
4	[REDACTED]	[REDACTED]
5	[REDACTED]	[REDACTED]
6	[REDACTED]	[REDACTED]

1
2
3
4
5
6

Florida City Gas

2019 – 2025 Capex Cost Summary

Capital Expenditures
Business Unit: Florida City Gas
(\$millions)

					A	B	C
	2020	2021	2022	2023	2024	2025	2026
Project / Activity	Actual	Forecast	Funds Request	Forecast	Forecast	Forecast	Forecast
1 Support Services	0.1	1.4	0.2	0.2			
2 Transmission Operations	0.8	0.8	1.4	1.4			
3 Distribution Operations	3.3	2.8	2.9	3.0			
4 Engineering & Construction	44.7	42.8	73.2	47.4			
5 Information Technology	2.9	2.4	2.0	0.1			
6 Measurement & Systems Operations	0.0	0.1	0.3	0.3			
7 Business Operations	0.1	0.8	0.0	0.0			
8 Total Capex Florida City Gas	\$51.9	\$51.1	\$80.0	\$52.3			

Florida City Gas

A

B

2021 Capex Walk

Capital Expenditures	
Business Unit: Florida City Gas	
(\$millions)	
2021 Year End Forecast	\$51.1
Support Services	(\$1.2)
Transmission Operations	\$0.6
Distribution Operations	\$0.2
Engineering & Construction	\$30.4
Information Technology	(\$0.5)
Measurement & Systems Operations	\$0.2
Business Operations	(\$0.8)
2022 Funds Request	\$80.0
Engineering & Construction project LNG in service	(27.6)
2023 Forecast	\$52.3
1 [REDACTED]	[REDACTED]
2 [REDACTED]	[REDACTED]
3 [REDACTED]	[REDACTED]
4 [REDACTED]	[REDACTED]
5 [REDACTED]	[REDACTED]
6 [REDACTED]	[REDACTED]



Florida City Gas

2019 – 2025 Headcount Summary

FCG Employees

					A	B	C
	2020	2021	2022	2023	2024	2025	2026
FCG Employees	Actual	Year-End	Request	Forecast	Forecast	Forecast	Forecast
1 Support Services	16	18	18	18			
2 Distribution Operations	85	92	96	96			
3 Engineering & Construction	27	30	30	30			
4 Information Technology	3	4	4	4			
5 Measurement & Systems Operations	12	12	12	12			
6 Business Development	11	14	14	14			
7 Business Operations	7	11	11	11			
Total FCG Full Time Employees	161	181	185	185			

Increased headcount driven by Accelerate 5 initiatives to decrease contractor costs.

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 18, 2022

Int/POD No.	Description	Bates Nos.	Page No. Line / Column	Florida Statute 366.093(3) Subsection	Declarants
OPC 2ND POD, No. 39	2022 Budget Presentation	FCG 001106	Page 2, Lines 1-9, Cols. A-C	(e)	Mark Campbell
OPC 2ND POD, No. 39	2022 Budget Presentation	FCG 001107	Page 3, Lines 1-6, Cols. A-C	(e)	Mark Campbell
OPC 2ND POD, No. 39	2022 Budget Presentation	FCG 001108	Page 4, Lines 1-8, Cols. A-C	(e)	Mark Campbell
OPC 2ND POD, No. 39	2022 Budget Presentation	FCG 001109	Page 5, Lines 1-6, Cols. A-B	(e)	Mark Campbell
OPC 2ND POD, No. 39	2022 Budget Presentation	FCG 001110	Page 6, Lines 1-7, Cols. A-C	(e)	Mark Campbell

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 MARK CAMPBELL

1. My name is Mark Campbell. I am currently employed by Florida Power & Light Company as Senior Director, Financial Forecasting. 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 Second Request for Production of Documents, No. 39. 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 information related to internal budget forecasts. 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.

Mark Campbell

Mark Campbell

Date: 7/15/2022