



FILED 9/13/2022
DOCUMENT NO. 06291-2022
FPSC - COMMISSION CLERK

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September 13, 2022

VIA ELECTRONIC FILING

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

Re: FPSC Docket No. 20220159
Joint Petition of Peoples Gas System and Florida Public Utilities Company for Approval of
a Special Contract

Dear Mr. Teitzman:

Attached for filing on behalf of Peoples Gas System and Florida Public Utilities Company is a Request for Confidential Classification of certain information contained in Bates Stamp pages 5 and 10 of Exhibit A to Joint Petition for Approval of Special Contract.

Thank you for your assistance in connection with this matter.

Sincerely,

A handwritten signature in blue ink that reads 'Virginia Ponder'.

Virginia Ponder

VLP/ne
Attachment

cc: Nora Bordine
Paula Brown
Beth Keating, Esq.

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Petition for approval of special contract)
with Florida Public Utilities Company, by Peoples)
Gas System.)

Docket No.: 20220159
Filed: September 13, 2022

**JOINT REQUEST
FOR CONFIDENTIAL CLASSIFICATION**

Peoples Gas System (“Peoples” or “the company”) and Florida Public Utilities Company (“FPUC”), (collectively, “the Parties”), pursuant to Section 366.093, Florida Statutes, and Rule 25-22.006, Florida Administrative Code, hereby requests confidential classification for information contained in Exhibit A, the proposed Gas Transportation Agreement (the “Special Contract”), to its Joint Petition for Approval of Special Contract which is submitted for filing concurrently herewith.

In support thereof, the Parties state:

1. Peoples and FPUC seek confidential classification of the highlighted rates and terms (“Confidential Information”) in the Special Contract, which represent contractual information that both Parties treat as proprietary confidential business information consistent with the definition of that term in Section 366.093, Florida Statutes.

2. Subsection 366.093(1), Florida Statutes, provides that any records "found by the Commission to be proprietary confidential business information shall be kept confidential and shall be exempt from s.119.07(1) [requiring disclosure under the Public Records Act]." The proprietary confidential business information includes, but is not limited to:

(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. (Section 366.093(3)(d), Florida Statutes)

3. Proprietary confidential business information also includes:

(e) Information relating to competitive interests, the disclosure of which would impair the competitive business of the

provider of the information. (Section 366.093(3)(e), Florida Statutes)

4. The Confidential Information falls within the above statutory categories and, thus, constitutes proprietary confidential business information entitled to protection under Section 366.093 and Rule 25-22.006. The Confidential Information within the Special Contract includes a monthly rate and usage charge associated with the reservation of firm capacity (at Bates Stamp page 5 of Exhibit A) and a daily volume rate (at Bates Stamp page 10 of Exhibit A). As such, the information in question is information concerning bids or other contractual data the disclosure of which would impair the efforts of Peoples and FPUC to contract for goods and services on favorable terms. It is also information relating to competitive interests the disclosure of which would impair the competitive business of Peoples and FPUC.

5. Peoples and FPUC treat the Confidential Information as such and have not disclosed it publicly.

WHEREFORE, Peoples and FPUC respectfully request that the highlighted Confidential Information contained in the Special Contract, at Bates Stamp pages 5 and 10 of Exhibit A, be afforded confidential classification for the reasons set forth above.

RESPECTFULLY SUBMITTED this 13th day of September 2022.



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