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September 19, 2022

REDACTED

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

RECEIVED-FPSC
2022 SEP 19 PM 4:19
COMMISSION CLERK

**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 response to the Staff of the Florida Public Service Commission's ("Staff") Fourth Set of Interrogatories No. 43 and Fourth Request for Production of Documents No. 10. The Request includes Exhibits A, B (two copies), C, and D.

Exhibit A consists of the confidential documents that are the subject of FCG's Request for Confidential Classification, wherein all the information that FCG asserts is entitled to confidential treatment has been highlighted. Exhibit B is an edited version of Exhibit A, in which the information FCG asserts to be confidential has been redacted. Exhibit C is a justification table in support of FCG's Request for Confidential Classification. Exhibit D contains the declarations in support of FCG's Request. In accordance with Rule 25-22.006(3)(d), Florida Administrative Code, FCG requests confidential treatment of the information in Exhibit A pending disposition of FCG'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 Eth "B" _____
- GCL _____
- IDM _____
- CLK _____

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Petition for rate increase by Florida City
Gas

Docket No. 20220069-GU

Filed: September 19, 2022

**FLORIDA CITY GAS’S REQUEST FOR CONFIDENTIAL CLASSIFICATION OF
CERTAIN INFORMATION CONTAINED IN ITS RESPONSE TO THE STAFF OF
THE FLORIDA PUBLIC SERVICE COMMISSION’S FOURTH SET OF
INTERROGATORIES (No. 43) AND FOURTH REQUEST FOR
PRODUCTION OF DOCUMENTS (No. 10)**

Pursuant to Section 366.093, Florida Statutes (“F.S.”), and Rule 25-22.006, Florida Administrative Code (“F.A.C.”), Florida City Gas (“FCG”) hereby requests confidential classification of certain information provided in its responses to the Staff of the Florida Public Service Commission’s (“Staff”) Fourth Set of Interrogatories No. 43 and Fourth Request for Production of Documents No. 10 (referred to herein as the “Confidential Information”). In support of its Request, FCG states as follows:

1. FCG served its responses to Staff’s Fourth Set of Interrogatories and Fourth Request for Production of Documents on September 19, 2022. Consistent with Rule 25-22.006, F.A.C., this request is being filed contemporaneously with service of those responses to request confidential classification of information contained in FCG’s response to Staff’s Fourth Set of Interrogatories No. 43 and Fourth Request for Production of Documents No. 10. The following exhibits are included with and made a part of this request:

- a. Exhibit A consists of a copy of the confidential documents on which all the information that FCG asserts is entitled to confidential treatment has been highlighted.
- b. Exhibit B consists of a redacted copy of the confidential documents.

c. Exhibit C is a table that identifies the document for which confidential treatment is being sought and references the specific statutory basis for the claim of confidentiality. Exhibit C also identifies the declarants who support the requested classifications.

d. Exhibit D contains the declarations of Tara DuBose and 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 declaration 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 the provider of the information. Specifically, the Confidential Information that is the subject of this Request contains the names of special contract (KDS) customers, as well as the forward LIBOR curve and short-term debt cost rate projections. 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 19th day of September 2022.

Joel T. Baker
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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

Attorney for Florida City Gas

CERTIFICATE OF SERVICE

20220069-GU

I HEREBY CERTIFY that a true and correct copy of the foregoing has been furnished by electronic mail this 19th day of September 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/M.Duffy 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

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QUESTION:

Referring to Witness DuBose's Testimony, Page 16, Lines 9-23, please state which customers are in the Contract Demand Service (KDS).

RESPONSE:

The current customers included in the Contract Demand Service (KDS) class are [REDACTED]

EXHIBIT C

JUSTIFICATION TABLE

EXHIBIT C

COMPANY: Florida City Gas
TITLE: Petition for rate increase by Florida City Gas
DOCKET NO.: 20220069-GU
DATE: September 19, 2022

Int/POD No.	Description	Bates/Page No.	Line / Column	Florida Statute 366.093(3) Subsection	Declarants
Staff's 4 th INT., No. 43	Contract Demand Service Customers	FCG 004864	Lines 13-14	(e)	Tara DuBose
Staff's 4 th PODs, No. 10	Forward LIBOR Curve and Short-Term Debt Cost Rate Projections	FCG 004875	Lines 5 and 8, Cols. B-Y	(e)	Mark Campbell

EXHIBIT D

DECLARATIONS

EXHIBIT D

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Petition for rate increase by Florida
City Gas.

Docket No: 20220069-GU

DECLARATION OF MARK CABELL

1. My name is Mark Cambell. I am currently employed by Florida Power & Light Company (“FPL”) 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 Staff of the Florida Public Service Commission’s (“Staff”) Fourth Request for Production of Documents No. 10. 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 the forward LIBOR curve and the short-term debt cost rate projections. 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 Cambell

Date: 9/16/2022

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 Senior Manager, Cost of Service and Wholesale Rates. 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 Florida Public Service Commission Staff's ("Staff") Fourth Set of Interrogatories, No. 43. 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 the names of customers who take service under certain special (KDS) contracts. 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: 09/15/2022