



Joel T. Baker
Principal Attorney
Florida Power & Light Company
700 Universe Boulevard
Juno Beach, FL 33408-0420
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October 3, 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 response to the Staff of the Florida Public Service Commission's ("Staff") Seventh Request for Production of Documents No. 14. The Request includes Exhibits A, B (two copies), C, and D.

Exhibit A consists of the confidential document that is 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 declaration 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

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

Enclosures

RECEIVED-FPSC
2022 OCT -3 PM 4:04
COMMISSION
CLERK

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Petition for rate increase by Florida City Gas

Docket No. 20220069-GU

Filed: October 3, 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 SEVENTH REQUEST FOR PRODUCTION OF DOCUMENTS (No. 14)

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 response to the Staff of the Florida Public Service Commission's ("Staff") Seventh Request for Production of Documents No. 14 (referred to herein as the "Confidential Information"). In support of its Request, FCG states as follows:

1. FCG served its responses to Staff's Seventh Request for Production of Documents on October 3, 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 Seventh Request for Production of Documents No. 14. The following exhibits are included with and made a part of this request:

a. Exhibit A consists of a copy of the confidential document 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 document.

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 declarant who supports the requested classification.

d. Exhibit D contains the declaration of Liz Fuentes 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, as well as information concerning contractual data, the disclosure of which would impair the efforts of FCG to contract for goods or services on favorable terms. Specifically, the Confidential Information that is the subject of this Request contains vendor invoices with pricing data. This information is protected by Sections 366.093(3)(d) and (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 3rd day of October 2022.

Joel T. Baker
Principal Attorney
Florida Power & Light Company
700 Universe Boulevard
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

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 3rd day of October 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

InfoSend, Inc.
 4240 E. La Palma Ave.
 Anaheim, CA 92807
 (714) 993-2690

Date: 7/18/2022

Account #	P.O. No.	Quote
ABN-000		7182

Name / Address	
ABN AMRO ACCOUNTS PAYABLE 9001 PAYSHPERE CIRCLE CHICAGO, IL 60674-0090	
Contact:	Katerina Sardi
Contact Phone:	
Contact Email:	Katerina.sardi@nexteraenergy.c
Artwork:	PDF

Ship To	
INFOSEND, INC 1041 S. PLACENTIA AVE FULLERTON, CA 92831	
Proof:	PDF
Title:	11x17 mailer
Target Mail Date:	8-10 business days
Description of Mailing:	Letter

A		B		
Item	Quantity	Description	Rate	Amount
1		Paper: 8.5x11 white 60# offset cover page		918.84
2		Data Processing/Print: CASS, std, presort, merge names and addresses to cover page		3,239.50
3		Inserts: 11x17 uncoated offset, printed 4/4		5,654.40
4		Outgoing Envelope: ENV-INF-#10		1,337.03
5		Mailing Services: Bindery, fold, insert, deliver to Post Office		1,178.00
6		Postage: Marketing Mail rates (2022 rates)		20,615.00
7		Set Up Fee		150.00
Standard turnaround time is 8-10 business days				

Estimate Only		Subtotal	\$33,092.77
Prepared By: Marla Callaghan <marla.c@infosend.com>		Sales Tax (7.75%)	\$0.00
Approved By: <u>Miguel Bustos</u>		Total	\$33,092.77

Terms & Conditions
 Prices subject to change upon receipt of artwork if not provided at time of estimate. Any changes in original copy after proofing may be charged at InfoSend's rate of \$95/hour in addition to the quoted price. Any quotes given without samples or actual specifications are subject to change upon receipt of actual order and specs. Overruns underruns will not exceed ten (10) percent of the quantity ordered, unless specified otherwise in the quotation. InfoSend will invoice for the actual quantity within this tolerance. If the Client requires a guaranteed quantity, the percentage of tolerance must be stated at the time of quotation. InfoSend will produce materials approved in this document. If changes are required before the order has been depleted, the client will be billed for any remaining unused materials. Any remaining unused materials is subject to material cost and will be billed.
 Materials which remain inactive or which have usage suspended will be billed a holding fee of \$40 per month during the inactive period and are subject to being invoiced for remaining material cost after 6 months of inactivity. Pricing listed on this quote is valid for 30 days from prepared date.

I have read and agreed to the Terms and Condition (Initial Here) _____



Pivotal Utility H. dba Florida City Gas
700 Universe Blvd
Juno Beach, FL 33408

NEWSPAPER INVOICE

Invoice Number : 016452
Date : 8/25/2022
Page : 1 of 1
Client PO: 565
Campaign: 70622 - FCG Q4 Quality of Service
Hearing Print Ads

AUGUST 2022 - PO#2000398926

	Net Amount
Vendor: LAKE OCKECHOBEE NEWS	
Order: 010091 - FCG Sep22 Quality Service Hearing Public	257.04
Vendor Total:	257.04
Total	257.04
	Total \$257.04

Invoice

P.O. 2000358411



Bi To:
Florida Power & Light Company Attn: Marketing & Communications 700 Universe Blvd MC/JB Juno Beach, FL 33408

	A	B
Date	Invoice No.	Terms
09/08/22	1855	Net 45

	Description	IO #	Qty	Rate	Amount
	September 1 - 30				
1	FCG Customer Emails opted in	6150024391	1	3,000.00	3,000.00
2	FCG Customer Emails not opted in	6150024391	1	3,000.00	3,000.00

We appreciate your business and look forward to future projects!

Total \$6,000.00



WELCOME TO THE *campaign*

Pivotal Utility H. dba Florida City Gas
700 Universe Blvd
Juno Beach, FL 33408

NEWSPAPER INVOICE

Invoice Number : 016453
Date : 8/25/2022
Page : 1 of 2
Client PO: 565
Campaign: 70622 - FCG Q4 Quality of Service
Hearing Print Ads

SEPTEMBER 2022 - PO#2000398926

	Net Amount
Vendor: EL NUEVO HERALD	
Order: 010086 - FCG Sep22 Quality Service Hearing Public	1,355.15
Vendor Total:	1,355.15
Vendor: FLORIDA TODAY	
Order: 010090 - FCG Sep22 Quality Service Hearing Public	648.20
Vendor Total:	648.20
Vendor: MIAMI HERALD	
Order: 010085 - FCG Sep22 Quality Service Hearing Public	3,154.03
Vendor Total:	3,154.03
Vendor: PALM BEACH POST	
Order: 010088 - FCG Sep22 Quality Service Hearing Public	679.80
Vendor Total:	679.80
Vendor: SUN SENTINEL	
Order: 010087 - FCG Sep22 Quality Service Hearing Public	2,869.00
Vendor Total:	2,869.00
Vendor: TC PALM	
Order: 010089 - FCG Sep22 Quality Service Hearing Public	451.44
Vendor Total:	451.44
Total	9,157.62



WELCOME TO THE *conversation*

Pivotal Utility H. dba Florida City Gas
700 Universe Blvd
Juno Beach, FL 33408

NEWSPAPER INVOICE

Invoice Number : 016453

Date : 8/25/2022

Page : 2 of 2

Client PO: 565

Campaign: 70622 - FCG Q4 Quality of Service
Hearing Print Ads

	Net Amount
Total	\$9,157.62

EXHIBIT C

JUSTIFICATION TABLE

EXHIBIT C

COMPANY: Florida City Gas
TITLE: Petition for rate increase by Florida City Gas
DOCKET NO.: 20220069-GU
DATE: October 3, 2022

Int/POD No.	Description	Bates No.	Line / Column	Florida Statute 366.093(3) Subsection	Declarants
Staff's 7 th POD, No. 14	Invoices Supporting Rate Case Expense	004888	Lines 1-7, Cols. A-B	(d)(e)	Liz Fuentes
		004890	Lines 1-2, Cols. A-B	(d)(e)	Liz Fuentes

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 LIZ FUENTES

1. My name is Liz Fuentes. I am currently employed by Florida Power & Light Company (“FPL”) 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 Staff of the Florida Public Service Commission’s (“Staff”) Seventh Request for Production of Documents, No. 14. 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. Additionally, the documents contain information concerning contractual data, the disclosure of which would impair the efforts of FCG to contract for goods or services on favorable terms. Specifically, the information contains vendor invoices and pricing 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.

Liz Fuentes
Liz Fuentes

Date: 9/27/2022