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Writer's E-Mail Address: bkeating@gunster.com

February 29, 2024

**BY HAND DELIVERY**

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

**REDACTED**

RECEIVED-FPSC  
2024 FEB 29 PM 4:55  
COMMISSION CLERK

**[New Filing] - Petition for Approval of Transportation Service Agreements for Alternative Gas Supply Project Expansions with Florida City Gas by Peninsula Pipeline Company, Inc.**

Dear Mr. Teitzman:

Attached for filing, please the original and seven (7) copies of Peninsula Pipeline Company's Request for Confidential Classification of portions of Exhibits A, B, and C to its Firm Transportation Service Agreement with Florida City Gas (Indian River), which is Attachment B to the Petition for Approval of Transportation Service Agreements for Alternative Gas Supply being filed under separate cover today. Also attached are one highlighted copy and two redacted copies of the subject exhibit submitted in accordance with Rule 25-22.006, F.A.C.

As always, thank you for your assistance in connection with this filing. If you have any questions whatsoever, please do not hesitate to let me know.

Sincerely,

  
Beth Keating  
Gunster, Yoakley & Stewart, P.A.  
215 South Monroe St., Suite 601  
Tallahassee, FL 32301  
(850) 521-1706

- COM \_\_\_\_\_
- AFD \_\_\_\_\_
- APA \_\_\_\_\_
- ECO 6
- ENG \_\_\_\_\_
- GCL 1
- IDM \_\_\_\_\_
- CLK \_\_\_\_\_

Cc: Certificate of Service

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Petition for Approval of Transportation	)	
Service Agreements for Alternative Gas Supply	)	Docket No.:
Project Expansions with the Florida City Gas	)	
by Peninsula Pipeline Company, Inc.	)	Filed: February 29, 2024
	)	

**PENINSULA PIPELINE COMPANY’S REQUEST FOR CONFIDENTIAL  
CLASSIFICATION FOR INFORMATION**

Peninsula Pipeline Company (“Peninsula” or “Company”) by and through its undersigned counsel, pursuant to Section 366.093, Florida Statutes, and consistent with Rule 25-22.006(3), Florida Administrative Code, hereby submits its Request for Confidential Classification for information contained in three exhibits, Exhibits A, B, and C, to its new, consolidated Firm Transportation Service Agreement with Florida City Gas (“FCG”) for its Indian River Project, which has been submitted under separate cover today. The information for which the Company seeks confidential treatment is information that is similar to that which the Commission has afforded confidential classification in prior cases, namely Order No. PSC-2018-0146-CFO-GU, issued March 19, 2018 in Docket No. 20180015-GU. In support thereof, Peninsula hereby states:

1. Peninsula seeks confidential classification of the highlighted information in Exhibit A to the Firm Transportation Service Agreement ("Contract") (page 10), in the line identifying the Total Maximum Daily Transportation Quantity (“Total MDTQ”), the line below identifying the MHTP. In addition, Peninsula seeks confidential classification of the information in the line that identifies the Monthly Reservation Charge for Segment I and the highlighted amount in the following line, as well as the unauthorized use rate in the second to the last line on page 10.

With regard to Exhibit B to the Firm Transportation Service Agreement (pages 11 and 12), the Company seeks confidential classification of the highlighted amounts listed for the MHTP and the MDTQ, as well as the highlighted amounts in the right-hand column in the lines pertaining to the years of the contract: Years 1-5, Years 6-10, Years 11-15, and on page 12 for Years 16-20, Years 21-25, and Years 26-30, as well as the Unauthorized Use Rate. With regard the Exhibit C, pages 13-14, the Company seeks confidential classification of the information on page 13 under the header Segment I for Total MDTQ, MHTP, Monthly Reservation Charge (Segment I) and the adjusted reservation charge two lines below. On page 14 of Exhibit C, the Company seeks confidential classification of the MDTQ and MHTP, the Monthly Reservations Charges reflected for each identified period of the contract for Segment II. On this same page, the Company seeks confidential classification of the MDTQ and MHTP, the Total Monthly Reservation Charge for Segment III, as well as the Unauthorized Use Rate. This information is directly related to the negotiated rates and terms of the Contract, which both Peninsula and FCG treat as proprietary confidential business information consistent with the definition of that term in Section 366.093, Florida Statutes.

2. The information for which Peninsula seeks confidential classification is information that the Company and FCG both treat as confidential, and that meets the definition of "proprietary confidential business information" as set forth in Section 366.093(3), Florida Statutes, which provides:

(3) Proprietary confidential business information means information, regardless of form or characteristics, which is owned or controlled by the person or company, is intended to be and is treated by the person or company as private in that the disclosure of the information would cause harm to the ratepayers or the person's or company's business operations, and has not been disclosed unless disclosed pursuant to a statutory provision, an order of a court or administrative body, or private agreement that provides that the information

will not be released to the public. Proprietary confidential business information includes, but is not limited to:

- (a) Trade secrets.
- (b) Internal auditing controls and reports of internal auditors.
- (c) Security measures, systems, or procedures.
- (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.
- (e) Information relating to competitive interests, the disclosure of which would impair the competitive business of the provider of the information.
- (f) Employee personnel information unrelated to compensation, duties, qualifications, or responsibilities.

3. Release of the referenced information as a public record would reveal the specific rate included in a competitive contract. Disclosure of this information would impair Peninsula's ability to compete for goods and services and provide its competitors with an unfair competitive advantage. As such, Peninsula requests that the Commission protect this information consistent with Rule 25-22.006, Florida Administrative Code. To the extent of Peninsula's knowledge, this information is not otherwise available in the public domain. Thus, the information meets the definition of "proprietary confidential business information" as set forth in Sections 366.093(3)(d) and (e), Florida Statutes. As such, Peninsula requests that the Commission protect this information consistent with Rule 25-22.006, Florida Administrative Code.

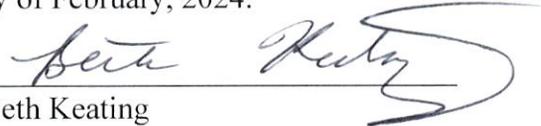
4. Included with this Request is a highlighted copy of Exhibits A, B and C. In addition, two redacted copies of the document are enclosed.

5. Peninsula asks that confidential classification be granted for a period of at least 18 months. Should the Commission no longer find that it needs to retain the information, Peninsula respectfully requests that the confidential information be returned to the Company.

WHEREFORE, Peninsula respectfully requests that the highlighted information contained in each of Exhibits A, B and C to the executed Firm Transportation Service Agreement

with FCG be classified as "proprietary confidential business information," and thus, exempt from Section 119.07, Florida Statutes.

RESPECTFULLY SUBMITTED this 29th day of February, 2024.

A handwritten signature in cursive script, appearing to read "Beth Keating", written over a horizontal line.

Beth Keating  
Gunster, Yoakley & Stewart, P.A.  
215 South Monroe St., Suite 601  
Tallahassee, FL 32301  
(850) 521-1706

**CERTIFICATE OF SERVICE**

I HEREBY ATTEST that a true and correct copy of the foregoing Request for Confidentiality has been served upon the following by Electronic Mail (redacted only) this 29th day of February, 2024:

Walt Trierweiler, Esquire  
c/o the Florida Legislature  
111 West Madison Street, Rm 812  
Tallahassee, FL 32399-1400  
Trierweiler.walt@leg.state.fl.us

Keith Hetrick, Esquire  
Florida Public Service Commission  
2540 Shumard Oak Blvd.  
Tallahassee, FL 32399  
khetrick@psc.state.fl.us

By:   
Beth Keating, Esq.  
Gunster, Yoakley & Stewart, P.A.  
215 S. Monroe St., Suite 601  
Tallahassee, FL 32301  
(850) 521-1706

*Attorneys for Peninsula Pipeline  
Company, Inc.*

**EXHIBIT A**

**FIRM TRANSPORTATION SERVICE AGREEMENT**

**BETWEEN**

**PENINSULA PIPELINE COMPANY, INC. AND**

**FLORIDA CITY GAS**

**DATED**

February 26, 2024

**Segment I**

Description of Transporter Delivery Point(s)

1. Interconnection between Florida Gas Transmission and the vicinity of I-95 and County Road 512

Description of Point(s) of Delivery

1. Interconnection between Shipper and Company in the area of Winter Beach, Florida,
2. Interconnection between Shipper and Company in the area of Fellsmere, Florida

Total MDTQ (Dekatherms): Dt/Day [REDACTED]

MHTP: [REDACTED]

Total Monthly Reservation Charge (Segment I): [REDACTED]

Monthly Reservation Charge if Agreement extends beyond initial thirty (30) year period:

[REDACTED]

Unauthorized Use Rate (In addition to Monthly Reservation Charge): [REDACTED] Each Day

Unauthorized Use

**EXHIBIT B**

**FIRM TRANSPORTATION SERVICE AGREEMENT**

**BETWEEN**

**PENINSULA PIPELINE COMPANY, INC. AND**

**FLORIDA CITY GAS**

**DATED**

February 26, 2024

**Segment II**

Description of Transporter Delivery Point(s)

1. A tap to the existing pipeline constructed in Segment I at or near 5900 85th Street, Vero Beach, Florida 32958

Description of Point(s) of Delivery

Interconnections between Company and Shipper's distribution lines at the following locations:

1. Highway 510 Wabasso Station
2. Beachside Orchid Station
3. Beach Turtle Trail Station
4. Beachside Indian River Shores Station
5. Beachside Greywig Station

From the Interconnection points identified herein, Company shall construct the Pipeline that shall consist of 10.93 miles of 4.50" x 0.188" API-5L X52 pipe. The design operating pressure is 625 psig, with an MAOP of 700 psig. At 700 psig the hoop stress in the 4" pipe is approximately 16.11% SMYS. The final design and construction of the Pipeline shall not materially deviate from these interconnection points or specifications absent a written and signed amendment of the Parties to this first revised amendment. The Pipeline consists of pipeline only and does not include any gate station, regulator station, branch valves, laterals, required property, etc.

MHTP: [REDACTED]

Total MDTQ (Dekatherms): [REDACTED] Dt/Day

Monthly Reservation Charge for thirty (30) year period (Segment II):

Years 1-5 [REDACTED]

Years 6-10 [REDACTED]

Years 11-15 [REDACTED]

Years 16-20 [REDACTED]

Years 21-25 [REDACTED]

Years 26-30 [REDACTED]

Where the Year 1 begins on the in-service 04/01/2023

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Unauthorized Use Rate (In addition to Monthly Reservation Charge): [REDACTED] Each Day

Unauthorized Use

**EXHIBIT C**

**FIRM TRANSPORTATION SERVICE AGREEMENT**

**BETWEEN**

**PENINSULA PIPELINE COMPANY, INC. AND**

**FLORIDA CITY GAS**

**DATED**

February 26, 2024

**Segment I**

Description of Transporter Delivery Point(s)

2. Interconnection between Florida Gas Transmission and the vicinity of I-95 and County Road 512

Description of Point(s) of Delivery

3. Interconnection between Shipper and Company in the area of Winter Beach, Florida,
4. Interconnection between Shipper and Company in the area of Fellsmere, Florida

Total MDTQ (Dekatherms): Dt/Day [REDACTED]  
MHTP: [REDACTED]

Total Monthly Reservation Charge (Segment I): [REDACTED]  
Monthly Reservation Charge if Agreement extends beyond initial thirty (30) year period:  
[REDACTED]

**Segment II**

Description of Transporter Delivery Point(s)

2. A tap to the existing pipeline constructed in Segment I at or near 5900 85th Street, Vero Beach, Florida 32958

Description of Point(s) of Delivery

Interconnections between Company and Shipper's distribution lines at the following locations:

6. Highway 510 Wabasso Station
7. Beachside Orchid Station
8. Beach Turtle Trail Station
9. Beachside Indian River Shores Station
10. Beachside Greywig Station

From the Interconnection points identified herein, Company shall construct the Pipeline

that shall consist of 10.93 miles of 4.50" x 0.188" API-5L X52 pipe. The design operating pressure is 625 psig, with an MAOP of 700 psig. At 700 psig the hoop stress in the 4" pipe is approximately 16.11% SMYS. The final design and construction of the Pipeline shall not materially deviate from these interconnection points or specifications absent a written and signed amendment of the Parties to this first revised amendment. The Pipeline consists of pipeline only and does not include any gate station, regulator station, branch valves, laterals, required property, etc.

MHTP: [REDACTED]

Total MDTQ (Dekatherms): [REDACTED] Dt/Day

Monthly Reservation Charge for thirty (30) year period (Segment II):

Years 1-5 [REDACTED]

Years 6-10 [REDACTED]

Years 11-15 [REDACTED]

Years 16-20 [REDACTED]

Years 21-25 [REDACTED]

Years 26-30 [REDACTED]

Where the Year 1 begins on the in-service 04/01/2023

**Segment III**

Description of Transporter Delivery Point(s)

1. At or near Oslo Road and 74<sup>th</sup> Avenue
2. 77<sup>th</sup> Street and Kings Highway

Description of Point(s) of Delivery

1. At or near Oslo Road and 74<sup>th</sup> Avenue
2. 77<sup>th</sup> Street and Kings Highway
3. At or near 74<sup>th</sup> Avenue and N Sandpiper Drive

Total MDTQ (Dekatherms): Dt/Day [REDACTED]

MHTP: [REDACTED]

Total Monthly Reservation Charge (Segment III): [REDACTED]

This charge is subject to adjustment pursuant to the terms of this Agreement.

Unauthorized Use Rate (In addition to Monthly Reservation Charge): [REDACTED] Each Day

Unauthorized Use

**EXHIBIT A**

**FIRM TRANSPORTATION SERVICE AGREEMENT**

**BETWEEN**

**PENINSULA PIPELINE COMPANY, INC. AND**

**FLORIDA CITY GAS**

**DATED**

February 26, 2024

**Segment I**

Description of Transporter Delivery Point(s)

1. Interconnection between Florida Gas Transmission and the vicinity of I-95 and County Road 512

Description of Point(s) of Delivery

1. Interconnection between Shipper and Company in the area of Winter Beach, Florida,
2. Interconnection between Shipper and Company in the area of Fellsmere, Florida

Total MDTQ (Dekatherms): Dt/Day [REDACTED]

MHTP: [REDACTED]

Total Monthly Reservation Charge (Segment I): [REDACTED]

Monthly Reservation Charge if Agreement extends beyond initial thirty (30) year period:

[REDACTED]

Unauthorized Use Rate (In addition to Monthly Reservation Charge): [REDACTED] Each Day

Unauthorized Use

**EXHIBIT B**

**FIRM TRANSPORTATION SERVICE AGREEMENT**

**BETWEEN**

**PENINSULA PIPELINE COMPANY, INC. AND**

**FLORIDA CITY GAS**

**DATED**

February 26, 2024

**Segment II**

Description of Transporter Delivery Point(s)

1. A tap to the existing pipeline constructed in Segment I at or near 5900 85th Street, Vero Beach, Florida 32958

Description of Point(s) of Delivery

Interconnections between Company and Shipper's distribution lines at the following locations:

1. Highway 510 Wabasso Station
2. Beachside Orchid Station
3. Beach Turtle Trail Station
4. Beachside Indian River Shores Station
5. Beachside Greywig Station

From the Interconnection points identified herein, Company shall construct the Pipeline that shall consist of 10.93 miles of 4.50" x 0.188" API-5L X52 pipe. The design operating pressure is 625 psig, with an MAOP of 700 psig. At 700 psig the hoop stress in the 4" pipe is approximately 16.11% SMYS. The final design and construction of the Pipeline shall not materially deviate from these interconnection points or specifications absent a written and signed amendment of the Parties to this first revised amendment. The Pipeline consists of pipeline only and does not include any gate station, regulator station, branch valves, laterals, required property, etc.

MHTP: [REDACTED]

Total MDTQ (Dekatherms): [REDACTED] Dt/Day

Monthly Reservation Charge for thirty (30) year period (Segment II):

Years 1-5 [REDACTED]

Years 6-10 [REDACTED]

Years 11-15 [REDACTED]

Years 16-20 [REDACTED]

Years 21-25 [REDACTED]

Years 26-30 [REDACTED]

Where the Year 1 begins on the in-service 04/01/2023

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Unauthorized Use Rate (In addition to Monthly Reservation Charge): [REDACTED] Each Day

Unauthorized Use

**EXHIBIT C**

**FIRM TRANSPORTATION SERVICE AGREEMENT**

**BETWEEN**

**PENINSULA PIPELINE COMPANY, INC. AND**

**FLORIDA CITY GAS**

**DATED**

February 26, 2024

**Segment I**

Description of Transporter Delivery Point(s)

2. Interconnection between Florida Gas Transmission and the vicinity of I-95 and County Road 512

Description of Point(s) of Delivery

3. Interconnection between Shipper and Company in the area of Winter Beach, Florida,
4. Interconnection between Shipper and Company in the area of Fellsmere, Florida

Total MDTQ (Dekatherms): Dt/Day [REDACTED]

MHTP: [REDACTED]

Total Monthly Reservation Charge (Segment I): [REDACTED]

Monthly Reservation Charge if Agreement extends beyond initial thirty (30) year period:

[REDACTED]

**Segment II**

Description of Transporter Delivery Point(s)

2. A tap to the existing pipeline constructed in Segment I at or near 5900 85th Street, Vero Beach, Florida 32958

Description of Point(s) of Delivery

Interconnections between Company and Shipper's distribution lines at the following locations:

6. Highway 510 Wabasso Station
7. Beachside Orchid Station
8. Beach Turtle Trail Station
9. Beachside Indian River Shores Station
10. Beachside Greywig Station

From the Interconnection points identified herein, Company shall construct the Pipeline

that shall consist of 10.93 miles of 4.50" x 0.188" API-5L X52 pipe. The design operating pressure is 625 psig, with an MAOP of 700 psig. At 700 psig the hoop stress in the 4" pipe is approximately 16.11% SMYS. The final design and construction of the Pipeline shall not materially deviate from these interconnection points or specifications absent a written and signed amendment of the Parties to this first revised amendment. The Pipeline consists of pipeline only and does not include any gate station, regulator station, branch valves, laterals, required property, etc.

MHTP: [REDACTED]

Total MDTQ (Dekatherms): [REDACTED] Dt/Day

Monthly Reservation Charge for thirty (30) year period (Segment II):

Years 1-5 [REDACTED]

Years 6-10 [REDACTED]

Years 11-15 [REDACTED]

Years 16-20 [REDACTED]

Years 21-25 [REDACTED]

Years 26-30 [REDACTED]

Where the Year 1 begins on the in-service 04/01/2023

**Segment III**

Description of Transporter Delivery Point(s)

1. At or near Oslo Road and 74<sup>th</sup> Avenue
2. 77<sup>th</sup> Street and Kings Highway

Description of Point(s) of Delivery

1. At or near Oslo Road and 74<sup>th</sup> Avenue
2. 77<sup>th</sup> Street and Kings Highway
3. At or near 74<sup>th</sup> Avenue and N Sandpiper Drive

Total MDTQ (Dekatherms): Dt/Day [REDACTED]

MHTP: [REDACTED]

Total Monthly Reservation Charge (Segment III): [REDACTED]

This charge is subject to adjustment pursuant to the terms of this Agreement.

Unauthorized Use Rate (In addition to Monthly Reservation Charge): [REDACTED] Each Day

Unauthorized Use