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April 4, 2024

BY E-PORTAL

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

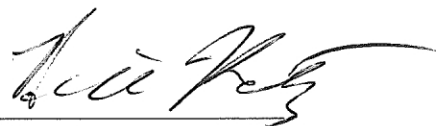
Docket No. 20220069-GU - Petition for rate increase by Florida City Gas.

Dear Mr. Teitzman:

Attached for electronic filing, please find Florida City Gas's Request for Extension of Confidential Classification.

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

Cc: Certificate of Service

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

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

Docket No. 20220069-GU
Filed: April 4, 2024

**FLORIDA CITY GAS’S REQUEST FOR
EXTENSION OF CONFIDENTIAL CLASSIFICATION**

Florida City Gas (“FCG” or “Company”) by and through its undersigned counsel, pursuant to Section 366.093, Florida Statutes, and Rule 25-22.006(4), Florida Administrative Code, hereby seeks an extension of the confidential classification previously granted for its responses to Office of Public Counsel's 2nd request for Production of Documents (No. 39). When originally filed, FCG represented that the highlighted information contained therein represents contractual information that FCG treats as proprietary confidential business information. These documents also include cost information that FCG considers proprietary confidential business information. (cross-referenced Document No. 04794-2022). This information was originally granted confidential classification by Order No. PSC-2022-0342-CFO-GU, issued October 10, 2022, and FCG continues to treat this information as confidential. In support of this Request for Extension, FCG hereby states that:

1. On July 18, 2022, FCG filed its Request for Confidential Classification of certain highlighted information contained in response to the Office of Public Counsel’s Second Request for Production (No. 39). FCG contended the information in the document included competitively sensitive information that, if disclosed, could harm FCG’s ability to compete. The information therein was reviewed by the Commission and determined to constitute proprietary confidential business information. Therefore, by Order No. 2022-0342-CFO-GU, the Commission ruled that

this information is entitled to continued and ongoing protection under Section 366.093, Florida Statutes, and Rule 25-22.006, Florida Administrative Code.

2. The information for which FCG seeks an extension of confidential classification is information that the Company still treats as confidential, and that the Commission has already determined 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:

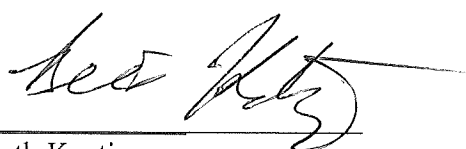
- (a) Trade secrets.
- (b) Internal auditing controls and reports of internal auditors.
- (c) Security measures, systems, or procedures.
- (d) Information concerning bids or other contractual data, the disclosure of which would impair the efforts of the public utility or its affiliates to contract for 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.

The Company continues to treat this information as confidential because it contains competitively sensitive budgeting information at least through the year 2026, which has not otherwise been publicly disclosed to the best of the Company’s knowledge.

3. As such, FCG asks that confidential classification be extended for an additional period of at least another 18 months. Should the Commission no longer find that it needs to retain the information, FCG respectfully requests that the confidential information be returned to the Company.

WHEREFORE, FCG respectfully requests that the highlighted information contained in responses to Office of Public Counsel's 2nd request for Production of Documents (No. 39), which were originally afforded confidential classification by Order No. PSC-2022-0342-CFO-GU, be allowed to retain classification as "proprietary confidential business information," and thus, exempt from Section 119.07, Florida Statutes, for an additional period of 18 months.

RESPECTFULLY SUBMITTED this 4th day of April, 2024.

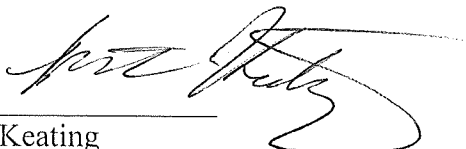


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CERTIFICATE OF SERVICE

I HEREBY ATTEST that a true and correct copy of the foregoing Request for Extension of Confidential Classification has been served upon the following by Electronic Mail this 4th Day of April, 2024:

<p>Adria Harper, Esquire Timothy Sparks, Esquire Florida Public Service Commission 2540 Shumard Oak Boulevard Tallahassee, FL 32399 aharper@psc.state.fl.us tsparks@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 Trierweiler.Walt@leg.state.fl.us wessling.mary@leg.state.fl.us <i>For Office of Public Counsel</i></p>
<p>Jon C. Moyle, Jr. Karen A. Putnal Moyle Law Firm, P.A. 118 North Gadsden Street Tallahassee, Florida 32301 Telephone: (850) 681-3828 Facsimile: (850) 681-8788 jmoyle@moylelaw.com kputnal@moylelaw.com mqualls@moylelaw.com <i>For Petitioner Florida Industrial Power Users Group</i></p>	<p>T. Jernigan/E. Payton 139 Barnes Drive, Suite 1 Tyndall AFB FL 32403 thomas.jernigan.3@us.af.mil ebony.payton.ctr@us.af.mil <i>For Federal Executive Agencies</i></p>

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