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May 13, 2024

Hand Delivery

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

REDACTED

Re: Docket 20240039-GU – Petition for approval of transportation service agreements between Peninsula Pipeline Company, Inc. and Pivotal Utility Holdings, Inc. d/b/a Florida City Gas.

Dear Mr. Teitzman:

Enclosed for filing in the above-referenced docket, please find the original and seven (7) copies of Peninsula Pipeline's Request for Confidential Classification of its Responses to Staff's Third Set of Data Requests, which have been submitted (redacted) under separate cover today. Also included with this Request is one highlighted, and two redacted versions of the responses containing confidential information.

Thank you for your assistance with this filing.

Kind regards,

Beth Keating

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

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Enclosure

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: **Petition for approval of transportation service agreements between Peninsula Pipeline Company, Inc. and Pivotal Utility Holdings, Inc. d/b/a Florida City Gas.**)
Docket No.: 20240039-GU
Filed: May 13, 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 its Responses to Staff’s Third Set of Data Requests, which have 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 its Responses to Commission Staff’s Third Set of Data Requests. Specifically, the Company seeks confidential classification of the information set forth below:

Response to DR 4	Bottom of Page 3	Highlighted projects and corresponding amounts
Response to DR 5	Paragraphs 1, 2, and 3 of Response; page 4	Highlighted forecast amounts

Response to DR 10	Chart at top of page 9	All highlighted information and amounts reflected projections and contracted amounts
Response to DR 11	Charts on page 10	All highlighted information and amounts reflecting contracted amounts, projected amounts and associated increase
Response to DR 11	Chart on page 11	All highlighted information and amounts reflecting contracted amounts, projected amounts and associated increase

This information is directly related to the negotiated rates and terms of the parties' contract(s) with Florida Gas Transmission, as well as information regarding deliverable amounts contracted for with the subject RNG producers, which both Peninsula and FCG treat as proprietary confidential business information consistent with the definition of that term in Section 366.093, Florida Statutes. The information also includes projected customer growth information and capacity information that Peninsula treats as confidential due to the competitively sensitive nature of the information.

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 and quantity information included in competitive contracts, as well as growth information that is competitively sensitive to Peninsula. 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 the responses containing confidential information. 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 its Responses to Staff's Third Set of Data Requests be classified as "proprietary confidential business information," and thus, exempt from Section 119.07, Florida Statutes.

RESPECTFULLY SUBMITTED this 13th day of May, 2024.



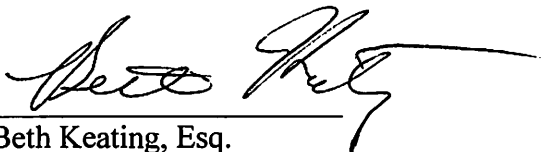
Beth Keating
Gunster, Yoakley & Stewart, P.A.
215 South Monroe St., Suite 601
Tallahassee, FL 32301
(850) 521-1706

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 13th day of May, 2024:

Shaw Stiller, Esquire
Florida Public Service Commission
2540 Shumard Oak Blvd.
Tallahassee, FL 32399
sstiller@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.*

Company Response

FCG expects that the projects will provide savings by allowing FCG the ability to potentially optimize its current capacity portfolio and realizing a savings to customers. Additionally, the projects are driven firstly by the need to diversify the gas supply and supply reliability of the Company's portfolio in the project areas due the constraints on FGT on the East Leg of its system. As previously stated, purchasing locally sourced gas is a benefit compared to the alternative of procuring long-haul capacity for incremental requirements. Currently max rate capacity on Florida Gas Transmission (FGT) is \$0.515Dth/day and a project providing additional capacity to FGT's East Leg, which is fully subscribed, may be north of \$2.00Dth/day. These projects provide supply to constrained locations without FCG having to procure the additional FGT capacity.

For the following questions, provide a response for each of the three projects (Brevard County, Indian River County, and Miami-Dade County).

4. Provide the estimated annual and peak day consumption of the local interconnected area, and the estimated annual and peak contribution of the associated production source. As part of your response, compare the consumption of the local interconnected area to the system as a whole.

Company Response

The total system demand based on the last Design Day study for the November to March winter season was 107,667Dth/d. This time frame is when FCG would most likely see a peak demand day. The demand in Brevard County would be around 31% of the total, Indian River would be 8% of the total, and Miami Dade would be 61% of the total. The design day study was done to address this issue, not an annual forecast.

The projected peak contribution of associated production source is the following,

[REDACTED]

[REDACTED]

[REDACTED]

While the Company acknowledges that these projects do not provide a total, long-term supply solution for FCG, each project does support system supply reliability by connecting an alternate local supply point for each area.

5. Provide the forecasted annual and peak consumption growth per year of the local interconnected area for the contracted period, and what percentage of that growth the associated production source would address. As part of your response, compare the growth of the local interconnected area to the system as a whole.

Company Response

Brevard – In addition to organic growth, FCG currently has large industrial users interested in gas service related to in the Space Launch and Cruise industries in Brevard County with demands that may exceed ██████████ which will exceed the available capacity in the area. Therefore, additional capacity is needed to meet the increasing demands in this highly constrained area.

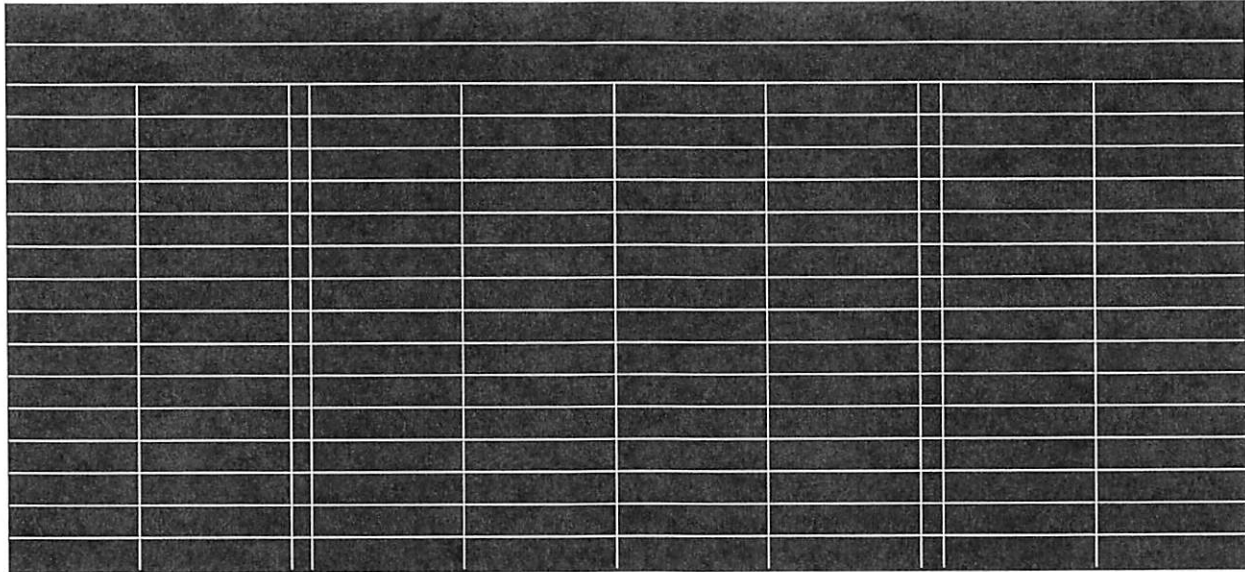
Indian-River – Additional capacity is needed in Indian River County to meet the demand associated with the Beachside Expansion project on the barrier island, forecasted to add approximately ██████ customers and ██████████ above our historical organic growth increases. Additionally, this supply point will tie all three Indian River County systems together, adding resiliency that is needed to address single points of failure on the distribution system. Eliminating the potential single points of failure will provide protection against wide-spread outages similar to the one experienced in St Lucie County in May 2015.

Miami-Dade – FCG currently has industrial users interested in gas service related to with a demand in excess of ██████████ That will strain an already constrained area in South Florida. Additional capacity is needed to meet the demands of those applicants while allowing for continued organic growth.

For how much the production source would provide to help serve the projected growth, please refer to question 4. Additional projects are expected to be developed to meet the future expected growth and associated demand.

Company Response

In the project areas, the only other supply source is the East Leg of FGT. In the table below, the projects are compared to contracted capacity on FGT for each month.



11. What percentage of renewable natural gas would the associated production source represent for the local interconnected area and out of the system as a whole?

Company Response

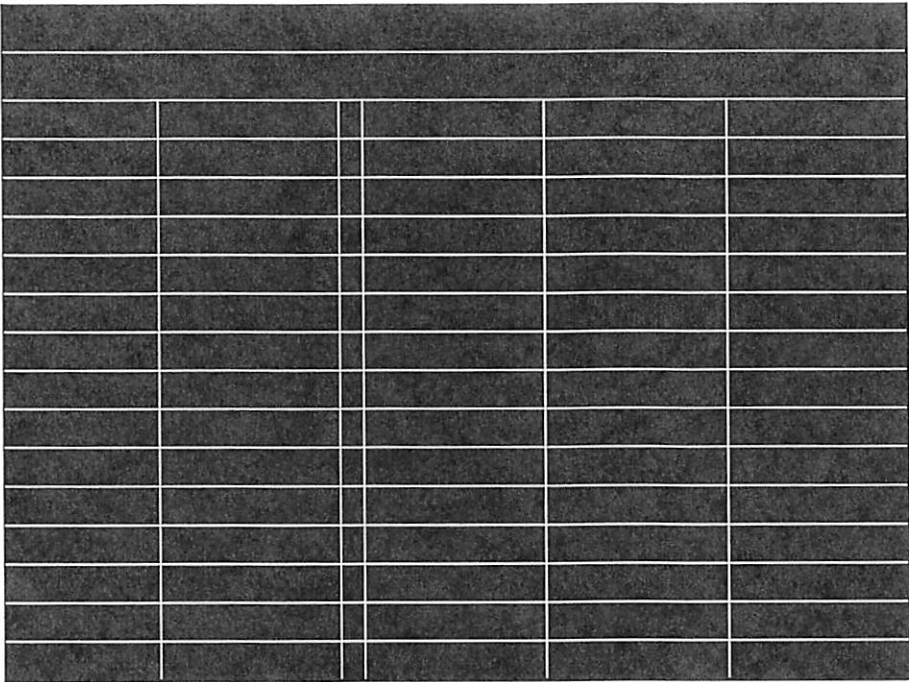
Based upon the time of the year, that percentage would change. Our current transportation position on FGT changes by season. Our capacity positions are based upon the following times frames:

- November to March
- April
- May to September
- October

The contracts with the RNG producers were structured to meet FCG’s estimated demand by season, with the November to March time frame being peak demand, the May to September time frame being the lowest demand, and April and October as being shoulder months adjusted for either the increase or decrease in demand based off of historical weather patterns. The new seasonal deliverability and percentage increases are as follows:

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A table with 5 columns and 15 rows. The entire table is covered by a solid black redaction box, obscuring all data.



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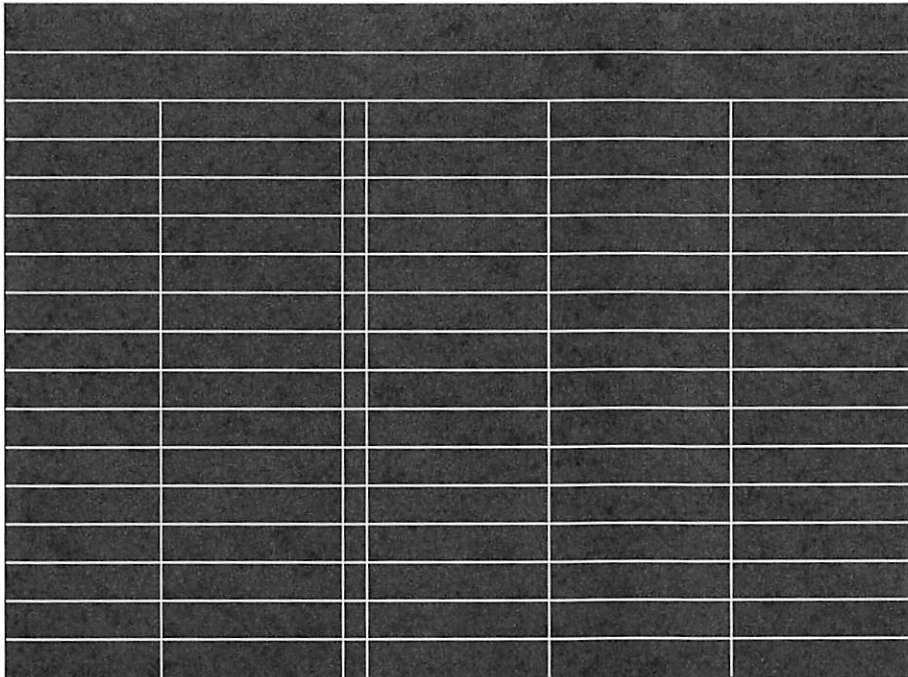
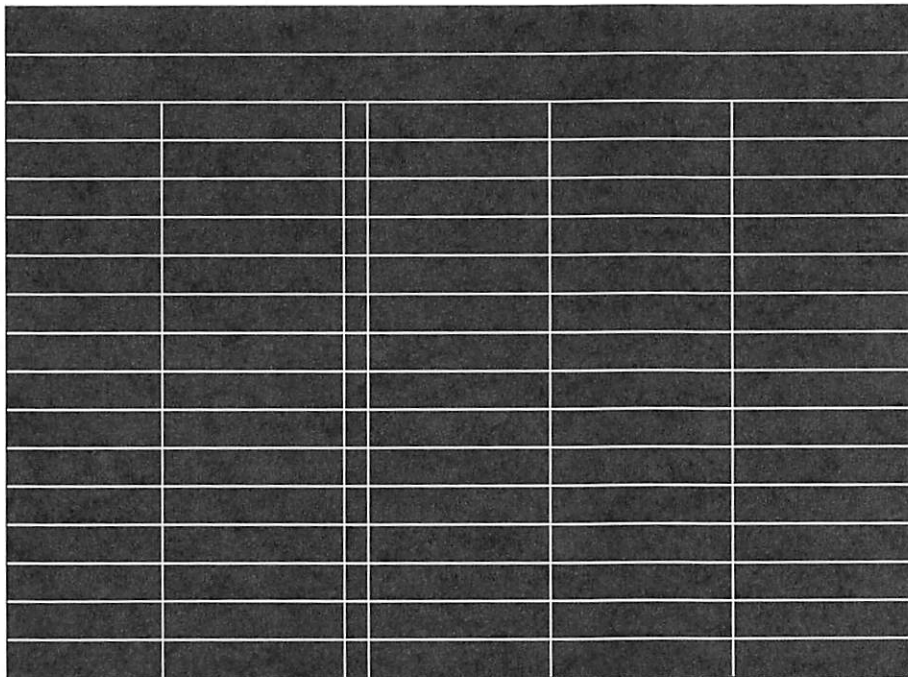
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