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May 20, 2026

VIA HAND DELIVERY

REDACTED

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

FILED MED-1 PSC
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COMMISSION
CLERK

Re: Docket No. 20260026-GU – Application for Rate Increase by Florida City Gas.

Dear Mr. Teitzman:

Enclosed for filing, please find the original and six (6) copies of Florida City Gas's Request for Confidential Classification and Motion for Protective Order pertaining to certain Excel documents provided in response to OPC's Second Requests for Production, No. 26. The referenced documents with confidential information highlighted are submitted herewith on a flash drive. The flash drive is encrypted for safety and the password is: GUNSTER .

Thank you for your assistance with this filing. As always, please don't hesitate to let me know if you have any questions whatsoever.

COM _____
AFD _____
APA _____
ECO _____
ENG 5
GCL 1
IDM _____
CLK _____

Sincerely,



Beth Keating
Gunster, Yoakley & Stewart, P.A.
215 South Monroe St., Suite 601
Tallahassee, FL 32301

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Enclosures
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BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Application for Rate Increase by
Florida City Gas.

Docket No. 20260026-GU

Filed: May 20, 2026

**FLORIDA CITY GAS'S REQUEST FOR CONFIDENTIAL CLASSIFICATION AND
MOTION FOR PROTECTIVE ORDER**

Florida City Gas ("FCG" or the "Company"), by and through undersigned counsel pursuant to Rule 25-22.006, Fla. Admin. Code, requests that the Florida Public Service Commission (the Commission) enter an order protecting from public disclosure certain portions of FCG's responses to Citizens' First Requests for Production. In support of this request, the Company states:

1. On April 20, 2026, FCG filed its Petition for Approval of Rate Increase and Request for Interim Rate Relief (herein, "Petition") with the Commission, along with supporting testimony, exhibits, and Minimum Filing Requirement ("MFR") schedules.

2. On April 23, 2026, the Citizens of the State of Florida, through the Office of Public Counsel ("OPC") served FCG with its Second Requests for Production of Documents (PODs) (Nos. 13-27). Three documents responsive to OPC's Request for Production of Documents No. 26, contain material and information that FCG, as well as the parent company, Chesapeake Utilities Corporation, treat as highly confidential. This information has not otherwise been publicly disclosed. In certain instances, the Company considers entire documents to be confidential, the disclosure of which would cause harm to FCG and its customers.

3. The information for which FCG seeks confidential classification is information 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.

4. Specifically, FCG seeks confidential classification of information and documents that fall into the following categories: (1) Competitively sensitive employee salary information; and (2) sensitive customer account information.

5. With regard to the documents responsive to OPC's Request for Production of Documents, No. 26, three responsive documents are Excel files that contain information that the Company considers competitively sensitive and/or customer sensitive information, which FCG treats as confidential. This information has not otherwise been disclosed publicly.

6. As it pertains to the file labeled "Confidential OPC POD 26 C-2b FCG ROR - Executive Incentive Comp_Q4_2025 FCG DISC 000473," this file contains executive compensation information specific to existing employees of Chesapeake. Disclosure of this information publicly would enable other corporations to identify the current compensation for Chesapeake's executive personnel, which would give them a competitive edge in any efforts to lure these highly competent, experienced employees away from Chesapeake. Retaining high level, competent executives is challenging in this competitive

environment and providing Chesapeake's competitors with the enhanced ability to attract these executives away from Chesapeake would potentially impair Chesapeake's ability, and that of its subsidiary FCG, to compete effectively and efficiently in Florida's natural gas utility market.

7. With regard to the file labeled "Confidential OPC POD 26 Salary Changes for FCG 2025 FCG DISC 000474," this file contains detailed compensation information for a range of employees that do not specifically fall under executive compensation. Given that the information contained in this file includes employees' names, their specific compensation, promotions or other salary changes in the date range specified, their status as a union or non-union employees, and reasons for job changes, disclosure of this information could be competitively harmful in two ways. First, disclosure of this information publicly could, as it would with executive compensation noted in the previous paragraph, enable Chesapeake's competitors to lure employees away with targeted offers. Employees in many of these categories have unique skill sets and utility industry experience; as such, loss of these employees would be harmful to Chesapeake and its subsidiaries' operations. Furthermore, disclosure of this information publicly, if accessed by Chesapeake employees, could cause internal discontent among Chesapeake employees. Either way, disclosure of this information has the very real potential of harming the Company's ability to compete for employees and could impact its ability to operate.

8. Finally, as it pertains to the file labeled "Confidential OPC POD 26 Uncollectible Accounts FCG DISC 000475," this file contains customer-specific account information, including amounts owed and amounts sent to collections. Disclosure of this information would not only be offensive to the identified customers but could impair FCG's ability to compete in the market by causing some customers to leave the system or, potentially, serve as the basis for

lawsuits regarding this disclosure. To be clear, while some information is disclosed to collections agencies for purposes of collecting past due amounts, the information is not disclosed in this format with this level of detail and is not allowed to be disclosed for other purposes. Otherwise, this information has not been disclosed publicly and is protected by the Company.

9. The chart below reflects the location of the information the Company deems confidential, as well as a summary of the justification associated with the information.

File	Sheet	Lines/Columns	Justification
Confidential OPC POD 26 C-2b FCG ROR - Executive Incentive Comp_Q4_2025 FCG DISC 000473	YTD 2025 Projected Expense	All Columns, lines 5-41	Section 366.093(3)(e), F.S. Disclosure would give competitors a competitive edge in obtaining qualified executives and impair FCG/CUC's ability to retain the same.
Confidential OPC POD 26 Salary Changes for FCG 2025 FCG DISC 000474	2025 Summary	Columns C & D, lines 2-194	Section 366.093(3)(e), F.S. Disclosure would give competitors a competitive edge in obtaining qualified employees and impair FCG/CUC's ability to retain the same. In the

File	Sheet	Lines/Columns	Justification
			context of this file, disclosure in conjunction with the Employee Number would reveal each employees' salary, which could also lead to internal issues.
“	Pivot of Salary Changes 2023-2024	Columns B & C, lines 4-169	Section 366.093(3)(e), F.S. Disclosure would give competitors a competitive edge in obtaining qualified employees and impair FCG/CUC's ability to retain the same. In the context of this file, disclosure in conjunction with the Employee Number would reveal each employees' salary, which could also lead to internal issues.
“	Union Increases	Columns B-H, lines 5-80	Section 366.093(3)(e), F.S. Disclosure would give competitors a

File	Sheet	Lines/Columns	Justification
			<p>competitive edge in obtaining qualified employees and impair FCG/CUC's ability to retain the same. In the context of this file, disclosure in conjunction with the Employee Number would reveal each employees' salary, which could also lead to internal issues.</p>
“	Non-union Increases	Columns B-M, lines 5-98	<p>Section 366.093(3)(e), F.S. Disclosure would give competitors a competitive edge in obtaining qualified employees and impair FCG/CUC's ability to retain the same. In the context of this file, disclosure in conjunction with the Employee Number would reveal each employees' salary, which could also lead to</p>

File	Sheet	Lines/Columns	Justification
			internal issues.
“	2023-2024 Data	Columns G-U, lines 2-267	Section 366.093(3)(e), F.S. Disclosure would give competitors a competitive edge in obtaining qualified employees and impair FCG/CUC’s ability to retain the same. In the context of this file, disclosure in conjunction with the Employee Number would reveal each employees’ salary, which could also lead to internal issues.
‘	Pivot of Salary Changes 2025	Column B, lines 4-170	Section 366.093(3)(e), F.S. Disclosure would give competitors a competitive edge in obtaining qualified employees and impair FCG/CUC’s ability to retain the same. In the context of this file, disclosure in

File	Sheet	Lines/Columns	Justification
			<p>conjunction with the Employee Number would reveal each employees' salary, which could also lead to internal issues.</p>
‘	2025 Increases	Columns B-S, lines 5-171	<p>Section 366.093(3)(e), F.S. Disclosure would give competitors a competitive edge in obtaining qualified employees and impair FCG/CUC's ability to retain the same. In the context of this file, disclosure in conjunction with the Employee Number would reveal each employees' salary, which could also lead to internal issues.</p>
‘	2025 Data	Columns J, P, Q, and S, lines 187-210	<p>Section 366.093(3)(e), F.S. Disclosure would give competitors a competitive edge in obtaining qualified</p>

File	Sheet	Lines/Columns	Justification
			<p>employees and impair FCG/CUC's ability to retain the same. In the context of this file, disclosure in conjunction with the Employee Number would reveal each employees' salary, which could also lead to internal issues.</p>
<p>Confidential OPC POD 26 Uncollectible Accounts FCG DISC 000475</p>	<p>July24 WO Rpt</p>	<p>Columns E-O, lines 7-1771</p>	<p>Section 366.093(3)(e), F.S. Disclosure in this context would reveal the account status of customers, which could not only impair FCG's ability to compete and retain customers, but could also be deemed a breach of the Florida Digital Bill of Rights, which pertains to the collection, maintenance, disclosure, sale, communication, or use of any personal data bearing on a</p>

File	Sheet	Lines/Columns	Justification
			consumer's creditworthiness, credit standing, credit capacity, character, general reputation, personal characteristics, or mode of living by a consumer reporting agency or furnisher that provides information for use in a consumer report, or by a user of a consumer report, but only to the extent that the activity is not regulated by and authorized under the Fair Credit Reporting Act, 15 U.S.C. ss. 1681 et seq.
“	Aug24 WO Rpt	Columns E-O, lines 6-1332	[same as above]
“	Sept24 WO Rpt	Columns E-O, lines 7-38	[same as above]
“	Oct24 WO Rpt	Columns E-O, lines 7-20	[same as above]
“	Nov24 WO Rpt	Columns E-O, lines	

File	Sheet	Lines/Columns	Justification
		8-11	[same as above]
“	Dec24 WO Rpt	Columns E-O, lines 7-1673	[same as above]
“	Jan25 WO Rpt	Columns E-O, lines 7-8	[same as above]
“	Feb25 WO Rpt	Columns E-O, lines 4-4969	[same as above]
“	Mar25 WO Rpt	Columns E-O, lines 7-68	[same as above]
“	Apr25 WO Rpt	Columns E-O, lines 8-17	[same as above]

Release of any of this information would ultimately impair the Company’s ability to provide service to its ratepayers at fair and reasonable rates. As such, FCG requests that the Commission afford this information confidential treatment and exempt from Section 119.07, Florida Statutes.

10. Submitted herewith, in substantial compliance with Rule 25-22.006, Florida Administrative Code, is a flash drive containing the confidential files clearly identified as confidential and with the pertinent sections highlighted. Given that the files are electronic Excel files, redaction of the pertinent information would be impractical and ineffective.

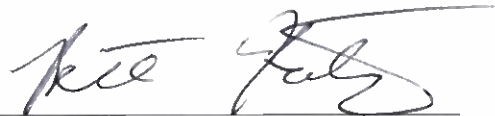
11. FCG further requests that the Commission issue a protective order, in accordance with Rule 25-22.006(6), Florida Administrative Code, to protect this information when provided to the Office of Public Counsel, which is a party to this proceeding. Upon conferral with the

OPC regarding this Request and Motion, counsel is authorized to reflect that the OPC does not object to the motion but reserves the right to challenge confidentiality under Commission rules.

WHEREFORE, FCG respectfully requests that:

1. The Commission enter an order protecting the information in the referenced files responsive to OPC's Request for Production, No. 26 and consistent with the chart set forth in Paragraph 9 of this request, from public disclosure as proprietary confidential business information and issue a protective order, in accordance with Rule 25-22.006(6), Florida Administrative Code, to protect this information when provided to the Office of Public Counsel;
2. The Commission grant confidential classification for this information for a period of at least 18 months.

Respectfully submitted this 20th day of May, 2026, by:



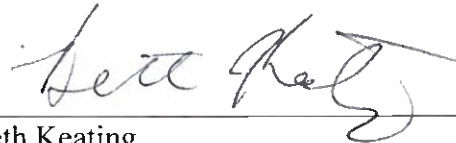
Beth Keating, Esquire
Florida Bar No. 0022756
Gunster Law Firm
215 South Monroe Street
Suite 601
Tallahassee, FL 32301

Attorneys for Florida City Gas

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing Request for Confidential Classification and Motion for Protective Order has been furnished by Electronic Mail to the following parties of record this 20th day of May, 2026:

Major Thompson Alisha Hixon Florida Public Service Commission 2540 Shumard Oak Boulevard Tallahassee, FL 32399 mthompso@psc.state.fl.us ahixon@leg.state.fl.us	Office of Public Counsel Walter Trierweiler/Charles Rehwinkel/Patricia Christensen/Austin Watrous c/o The Florida Legislature 111 West Madison Street, Room 812 Tallahassee, FL 32399-1400 Trierweiler.walt@leg.state.fl.us Rehwinkel.Charles@leg.state.fl.us Christensen.Patty@leg.state.fl.us Watrous.Austin@leg.state.fl.us
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