

MESSER CAPARELLO & SELF, P.A.

Attorneys At Law

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July 8, 2010

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COMMISSION
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BY HAND DELIVERY

Ms. Ann Cole, Commission Clerk
Office of Commission Clerk
Room 110, Easley Building
Florida Public Service Commission
2540 Shumard Oak Blvd.
Tallahassee, Florida 32399-0850

Re: Docket No. 090539-GU

Dear Ms. Cole:

___ CLAIM OF CONFIDENTIALITY
___ NOTICE OF INTENT
 REQUEST FOR CONFIDENTIALITY
___ FILED BY OPC
FOR DN 05601-10, WHICH
IS IN LOCKED STORAGE. YOU MUST BE
AUTHORIZED TO VIEW THIS DN. - CLK

Enclosed for filing on behalf of Florida City Gas are the following documents:

1. An original and one copy of Florida City Gas' Notice of Serving Responses to FPSC Staff's First Set of Interrogatories (Nos. 1-17) and First Request for Production of Documents (No.1); and 05602-10
2. An original and ten copies of Florida City Gas' Request for Confidential Classification in the above referenced docket. 05600-10
3. An envelope containing the confidential version of Florida City Gas' Responses to FPSC Staff's First Set of Interrogatories (Nos. 1-17). 05601-10

Please acknowledge receipt of these documents by date stamping the enclosed extra copy of this letter.

Thank you for your assistance with this filing.

Sincerely yours,


Floyd R. Self

DOCUMENT NUMBER-DATE
05600 JUL-8 2010
FPSC-COMMISSION CLERK

COM ___
APA ___
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Enclosures

cc: Shannon O. Pierce, Esq.
Parties of Record

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Petition for approval of Special Gas) Docket No. 090539-GU
Transportation Service agreement)
with Florida City Gas by Miami-Dade) Date Filed: July 8, 2010
through Miami-Dade Water and Sewer)
Department)
_____)

**FLORIDA CITY GAS' REQUEST FOR
CONFIDENTIAL CLASSIFICATION**

Florida City Gas ("FCG" or "Company"), pursuant to section 366.093, Florida Statutes, and Rule 25-22.006(3) and (4), Florida Administrative Code, submits this Request for Confidential Classification of the documents described below which are part of the response to the Florida Public Service Commission Staff's First Set of Interrogatories (Nos. 1-17) issued to FCG on June 18, 2010. In support of this Request for Confidential Classification, FCG states as follows:

1. On June 18, 2010, FCG received the Commission Staff's First Set of Interrogatories (Nos. 1-17) to FCG in the above captioned docket.
2. On July 8, 2010, FCG has provided its non-confidential responses to Commission Staff and Miami-Dade County as requested by Staff. Excluded from these responses is certain confidential information which is more particularly discussed below and for which FCG now requests confidential treatment for the information itemized in Exhibit "A."
3. Each of the identified data request responses contains information which FCG considers to be proprietary and confidential and of value to other businesses. Specifically the documents include:

DOCUMENT NO. DATE
05600-10 7/8/10
FPSC - COMMISSION CLERK

- (a) Invoices reflecting customer specific information, usage, charges, and other details about customer accounts that are of value to competing businesses.
- (b) Usage reports and analyses which provide specific information about customers, charges, and revenue.
- (c) Contractual information reflecting charges for and amounts paid for supplies.
- (d) Detailed reports which, if disclosed, would reveal customer and/or consumption information which is of value to competitors.

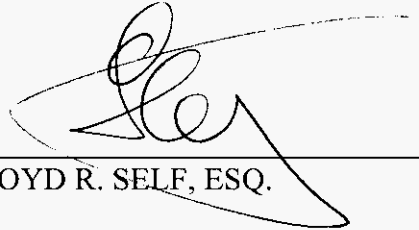
4. The disclosure of the information included in the data request responses would harm the ratepayers of the Company and the business operations of the Company by disclosing information which would be of value to competitors. Using the information in the data request responses, competitors would be able to discern information about FCG and its business which could be used to the disadvantage of FCG.

5. Accompanying this request as Attachment "B" are redacted copies of the identified documents. Under separate cover, FCG is providing a copy of the unedited documents with the confidential information highlighted pursuant to the requirements of the Commission.

6. FCG requests that the Commission grant this request for confidential treatment for the specified information and that the material be treated as *confidential* pursuant to section 366.093, Florida Statutes, and Rule 25-22.006, Florida Administrative Code.

Dated this 8th day of July, 2010.

MESSER, CAPARELLO & SELF, P.A.
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Post Office Box 1876
Tallahassee, FL 32302-1876
(850) 222-0720

A handwritten signature in black ink, appearing to read 'F. Self', is written over a horizontal line. The signature is stylized and cursive.

FLOYD R. SELF, ESQ.

Attorneys for Florida City Gas

EXHIBIT "A"

Document	No. of Pages	Column/Lines	Justification
Florida City Gas Company's Responses to Staff Data Request No. 1	8	Page 2, Response to Item 4, Lines 22, 24, and 25, Response to Item 5, Line 36; Page 3, Response to Item 6, Line 6; and Response to Item 8, Lines 42-44	Customer name and account numbers; and sales, consumption, and margin information
Confidential Attachment 2	2	Page 1, Lines 10-22 all columns; Lines 24 and 26, columns B-G; Page 2, 10-22, 24 and 26, columns H-N	Customer name and account information Sales figures
Confidential Attachment 4	2	Page 1, Lines 8, 10, 12, 20, 34, 36, 38, and 46 Columns C, E, G, H, Lines 14, 40 and 42, Columns C, E, G, H, I, and J; Lines 18, 22, 24, 26, 54, 48, 50, and 52, Column C; Page 2, Lines 9-44, Columns B-L	Cost of Service and Rate Design and FCG Average Rate of Return Income Statement, reflecting customer sales and costs.
Confidential Attachment 6	1	Lines 18, 36, 54 and 72, Columns A-I, Lines 73 and 74 Columns B-I	Customer-specific Margin Comparisons.
Confidential Attachment 16	9	Page 1, Lines 9-12, Columns A and C; Page 2, Lines 6, Column E, Line 15, Column F, Line 24, Column D, Line 28, Columns F and G, Lines 30-34, Columns D and F, Lines 35-37, Column F, Line 38, Column F, Line 44 Column B, Line 45, Column A; Page 3, Lines 6-36 Columns A, C, and D, Line 38 Columns B and D, Line 39, Column B; Page 4, Line 6, Column E, Line 14 Column F, Line 23, Column D, Line 27, Columns F and G, Lines 28-32, Columns C and F, Lines 33-35, Column F, Line 42, Column B, Line 43, Column A; Page 5, Lines 6-35, Columns A, C, and D, Line 36, Column A and D, Line 38, Columns B and D, Line 39, Column B; Page 6, Line 6, Column E, Line 15, Column F, Line 24, Column D, Line 29, Column F and G, Lines 30-34, Columns C and F, Lines 36-39, Column F, Line 46, Columns A and B;	Customer Invoices and Gas Volume Worksheets for those invoices

Document	No. of Pages	Column/Lines	Justification
Confidential Attachment 16	9	<p>Page 7, Lines 6-35 Columns A, C, and D, Line 36, Columns A and D, Line 38, Column B and D, Line 39, Column B;</p> <p>Page 8, Line 6, Column C, Line 16 Column D, Line 25, Column B, Lines 30-34, Columns A and D, Lines 35-37, Column D;</p> <p>Page 9, Lines 6-35, Columns A, C, and D, Line 36, Columns A and D, Line 38, Column B and D, Line 39 Column B</p>	Customer Invoices and Gas Volume Worksheets for those invoices

State of Florida



Public Service Commission

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TALLAHASSEE, FLORIDA 32399-0850

Floyd R. Self
P.O. Box 15579
Tallahassee FL 32317

Re: Acknowledgement of Confidential Filing in Docket No. 090539-EI

This will acknowledge receipt by the Florida Public Service Commission, Office of Commission Clerk, of a CONFIDENTIAL DOCUMENT filed on July 8, 2010, in the above-referenced docket.

Document Number 05601-10 has been assigned to this filing, which will be maintained in locked storage.

If you have any questions regarding this document, please contact Kim Peña, Records Management Assistant, at (850) 413-6393.