

**Diamond Williams**

**From:** Keating, Beth [BKeating@gunster.com]  
**Sent:** Monday, August 01, 2011 1:25 PM  
**To:** Filings@psc.state.fl.us  
**Cc:** 'Ansley Watson, JR.'; 'Geoffroy, Tom'; Martin Cheryl; christensen.patty@leg.state.fl.us; 'sshof@stjoenaturalgas.com'; 'Paula K. Brown'; 'jcuebas@tecoenergy.com'; 'Elizabeth Wade'; David Weaver; Brian Sulmonetti; 'Christina Robinson'; Jennifer Crawford; 'mwilliam@agresources.com'  
**Subject:** Docket No. 110003-GU  
**Attachments:** 20110801130452274.pdf

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

Beth Keating

***Gunster, Yoakley & Stewart, P.A.***

215 S. Monroe St., Suite 618

Tallahassee, FL 32301

[bkeating@gunster.com](mailto:bkeating@gunster.com)

Direct Line: (850) 521-1706

a. Person responsible for this electronic filing:

Beth Keating

***Gunster, Yoakley & Stewart, P.A.***

215 S. Monroe St., Suite 618

Tallahassee, FL 32301

[bkeating@gunster.com](mailto:bkeating@gunster.com)

Direct Line: (850) 521-1706

b. Docket No. 110003-GU - In re: Purchased Gas Adjustment (PGA) True-Up.

c. On behalf of: Florida City Gas

d. There are a total of 14 pages.

e. Description: Request for Extension of Confidential Classification



**GUNSTER**

FLORIDA'S LAW FIRM FOR BUSINESS

Beth Keating | Attorney

Governmental Affairs

215 S. Monroe Street, Suite 601

Tallahassee, FL 32301

P 850-521-1706 C 850-591-9228

[gunster.com](http://gunster.com) | [View my bio](#)

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05367 AUG-1 =

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8/1/2011

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Writer's Direct Dial Number: (850) 521-1706  
Writer's E-Mail Address: bkeating@gunster.com

August 1, 2011

**ELECTRONIC FILING – FILINGS@PSC.STATE.FL.US**

Ms. Ann Cole  
Commission Clerk  
Florida Public Service Commission  
2540 Shumard Oak Boulevard  
Tallahassee, FL 32399-0850

claim of confidentiality  
 notice of intent  
 request for confidentiality *text.*  
 filed by OPC  
For DN 08291; 11100-07, which  
is in locked storage. You must be  
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Re: Docket No. 110003-GU - **Purchased gas adjustment (PGA) true-up.**

Dear Ms. Cole:

Attached for electronic filing, please find Florida City Gas Company's Request for Extension of Confidential Classification previously granted by Orders Nos. PSC-08-0150-CFO-GU and PSC-10-0096-CFO-GU for material provided in connection with PGA Audit No. 07-067-4-1 (referenced Document Nos. 08291-07 and 11100-07).

Thank you for your assistance with this filing. If you have any questions, please do not hesitate to contact me.

Sincerely,

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

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MEK  
cc: Parties of Record

DOCUMENT NUMBER-DATE  
**05367 AUG -1 =**  
FPSC-COMMISSION CLERK

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In Re: Purchased Gas Adjustment (PGA) ) Docket No: 110003-GU  
True-Up )  
\_\_\_\_\_ ) Filed: August 1, 2011

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

Florida City Gas ("FCG" or "the Company"), pursuant to Section 366.093, Florida Statutes, and Rule 25-22.006, Florida Administrative Code, hereby submits this Request for Extension of Confidential Classification previously granted to certain material (Document Nos. 08291-07 and 11100-07) that was provided to the Florida Public Service Commission ("Commission," "PSC," or "Staff") in connection with FCG's Purchased Gas Adjustment ("PGA") Audit for the year ended December 31, 2006 (Audit No. 07-067-4-1). In support of this Request, FCG states as follows:

1. By Order No. PSC-08-0150-CFO-GU, issued March 12, 2008, in Docket No. 080003-GU, the Commission granted FCG's request for confidential treatment of the information included in the referenced documents for a period of 18 months. By the terms of the Commission's Order, the confidential treatment afforded this information was to expire on September 12, 2009, unless an extension was granted.

2. By Order No. 10-0096-CFO-GU, issued February 22, 2010, in Docket No. 100003-GU, the Commission granted FCG's first Request for Extension of the confidential classification originally afforded these documents by Order No. PSC-08-0150-CFO-GU. By the terms of this Order, the confidential classification is set to expire on August 22, 2011, unless another extension of the confidential classification is granted.

Docket No. 110003-GU  
FCG Request for Extension of Confidential Treatment

3. Subsection 366.093(1), Florida Statutes, provides that upon request, records received by the Commission which are "found by the commission to be proprietary confidential business information shall be kept confidential and shall be exempt from s. 119.07(1)."

4. "Proprietary confidential business information" is defined as meaning "information, regardless of form or characteristics, which is owned or controlled by the ... company, is intended to be and is treated by the ... company as private in that the disclosure of the information would cause harm to the ratepayers or the 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." Section 366.093(3), Florida Statutes.

5. Proprietary confidential business information includes, but is not limited to, information concerning:

- (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.

Section 366.093(3), Florida Statutes.

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FCG Request for Extension of Confidential Treatment

6. The confidential portions of the information provided to, and retained by, the Commission fall within these statutory definitions, and therefore constitute proprietary confidential business information entitled to protection under Section 366.093, Florida Statutes, and Rule 25-22.006, Florida Administrative Code. The audit workpapers contain information, including specific contractual information, prices, and pricing data, which has been treated by FCG as private and has not been publicly disclosed. These terms and data, if disclosed, would impair the efforts of FCG to contract for goods and services on favorable terms in the future. The contractual terms and pricing data therein is therefore proprietary confidential business information and is entitled to continued and ongoing protection under Section 366.093, Florida Statutes, and Rule 25-22.006, Florida Administrative Code.

7. Specifically, FCG seeks continued confidential treatment of specific information as set forth in Attachment A, which is a duplicate of the original justification matrix provided to the Commission with FCG's original request for confidential treatment of this information on December 20, 2007. FCG further incorporates by reference the highlighted and redacted exhibits attached to its December 20, 2007, Request for Confidentiality.

8. Pursuant to Section 366.093(4), Florida Statutes, and Rule 25-22.006(9), Florida Administrative Code, FCG requests that the information described above as proprietary confidential business information be protected from disclosure for a period of at least 18 months and asks that all information be returned to the Company as soon as the information is no longer necessary for the Commission to conduct its business.

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FCG Request for Extension of Confidential Treatment

Respectfully submitted this 1st day of August, 2011.

By:




Beth Keating  
Gunster, Yoakley & Stewart, P.A.  
215 South Monroe St., Suite 618  
Tallahassee, FL 32301  
(850) 521-1706

*Attorneys for Florida City Gas Company*

Certificate of Service

I HEREBY CERTIFY that a true and correct copy of the foregoing in Docket No. 110003-GU has been furnished by Electronic Mail to the following parties of record this 1st day of August 2011:

Florida Public Utilities Company Thomas A. Geoffroy P.O. Box 3395 West Palm Beach, FL 33402-3395	MacFarlane Ferguson Law Firm Ansley Watson, Jr. P.O. Box 1531 Tampa, FL 33601-1531
Charles A. Costin Costin and Costin Law Firm P.O. Box 98 Port Saint Joe, FL 32457-1159	Office of Public Counsel J.R. Kelly/Patricia Christensen c/o The Florida Legislature 111 West Madison Street Room 812 Tallahassee, FL 32399-1400
People Gas System Paula Brown P.O. Box 111 Tampa, FL 33601-0111	St. Joe Natural Gas Company, Inc. Mr. Stuart L. Shoaf P.O. Box 549 Port St. Joe, FL 32457-0549
TECO Energy, Inc. Javier Cuebas P.O. Box 111 Tampa, FL 33601-0111	AGL Resources Inc. Elizabeth Wade/David Weaver Ten Peachtree Place Location 1470 Atlanta, GA 30309
Florida City Gas Melvin Williams 933 East 25 <sup>th</sup> Street Hialeah, FL 33013-3498	Jennifer Crawford Florida Public Service Commission 2540 Shumard Oak Boulevard Tallahassee, FL 32399

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



Attachment A

Confidentiality Justification

DOCUMENT	line/column	RATIONALE
<p>Sequent Physical Purchases Compared to Index Pricing – January 2006</p>	<p>All information in Sequent Purchase Price Column</p> <p>All information in FOM price column</p> <p>All information in difference column</p> <p>All information in column composed of auditor notes</p> <p>Specific highlighted information in pertaining to Weighted Average Price for Sequent purchases at Destin, FGT Zone 1, and Mobile Bay</p> <p>Specific highlighted information and amounts in auditor notes at the bottom of the page</p>	<p>See paragraph 5 of the Request</p>
<p>Sequent Physical Purchases Compared to Index Pricing – February 2006</p>	<p>All information in Sequent Purchase Price Column</p> <p>All information in FOM price column</p> <p>All information in difference column</p> <p>All information in column composed of auditor notes</p> <p>Specific highlighted information in pertaining to Weighted Average Price for Sequent purchases at Destin, FGT Zone 1, High Island</p>	<p>See paragraph 5 of the Request</p>

DOCUMENT	line/column	RATIONALE
	Operating System, and Mobile Bay	
Sequent Physical Purchases Compared to Index Pricing – March 2006	<p>All information in Sequent Purchase Price Column</p> <p>All information in FOM price column</p> <p>All information in difference column</p> <p>All information in column composed of auditor notes</p> <p>Specific highlighted information in pertaining to Weighted Average Price for Sequent purchases at Destin, FGT Zone 1, High Island Operating System, and Mobile Bay</p>	See paragraph 5 of the Request
Sequent Physical Purchases Compared to Index Pricing – April 2006	<p>All information in Sequent Purchase Price Column</p> <p>All information in FOM price column</p> <p>All information in difference column</p> <p>All information in column composed of auditor notes</p> <p>Specific highlighted information in pertaining to Weighted Average Price for Sequent purchases at Destin, FGT Zone 1 and 2, Houston Pipeline, Northern Natural Gas/MOPS, Southern Natural Gas/MOPS, and</p>	See paragraph 5 of the Request

DOCUMENT	line/column	RATIONALE
	Mobile Bay	
Sequent Physical Purchases Compared to Index Pricing – May 2006	<p>All information in Sequent Purchase Price Column</p> <p>All information in FOM price column</p> <p>All information in difference column</p> <p>All information in column composed of auditor notes</p> <p>Specific highlighted information in pertaining to Weighted Average Price for Sequent purchases at Destin, FGT Zones 1 and 2, Northern Natural Gas/MOPS, Southern Natural Gas/MOPS, and Mobile Bay</p>	See paragraph 5 of the Request
Sequent Physical Purchases Compared to Index Pricing – June 2006	<p>All information in Sequent Purchase Price Column</p> <p>All information in FOM price column</p> <p>All information in difference column</p> <p>All information in column composed of auditor notes</p> <p>Specific highlighted information in pertaining to Weighted Average Price for Sequent purchases at Destin, FGT Zones 1 and 2, Northern Natural Gas/MOPS, Southern Natural</p>	See paragraph 5 of the Request

DOCUMENT	line/column	RATIONALE
	Gas/MOPS, and Mobile Bay	
Sequent Physical Purchases Compared to Index Pricing – July 2006	<p>All information in Sequent Purchase Price Column</p> <p>All information in FOM price column</p> <p>All information in difference column</p> <p>All information in column composed of auditor notes</p> <p>Specific highlighted information in pertaining to Weighted Average Price for Sequent purchases at Destin, FGT Zones 1 and 2, Northern Natural Gas/MOPS, Southern Natural Gas/MOPS, and Mobile Bay</p>	See paragraph 5 of the Request
Sequent Physical Purchases Compared to Index Pricing – August 2006	<p>All information in Sequent Purchase Price Column</p> <p>All information in FOM price column</p> <p>All information in difference column</p> <p>All information in column composed of auditor notes</p> <p>Specific highlighted information in pertaining to Weighted Average Price for Sequent purchases at Destin, FGT Zones 1 and 2, Northern Natural Gas/MOPS, Southern Natural</p>	See paragraph 5 of the Request

DOCUMENT	line/column	RATIONALE
	Gas/MOPS, and Mobile Bay	
Sequent Physical Purchases Compared to Index Pricing – September 2006	<p>All information in Sequent Purchase Price Column</p> <p>All information in FOM price column</p> <p>All information in difference column</p> <p>All information in column composed of auditor notes</p> <p>Specific highlighted information in pertaining to Weighted Average Price for Sequent purchases at Destin, FGT Zones 1 and 2, Northern Natural Gas/MOPS, Southern Natural Gas/MOPS, and Mobile Bay</p>	See paragraph 5 of the Request
Sequent Physical Purchases Compared to Index Pricing – October 2006	<p>All information in Sequent Purchase Price Column</p> <p>All information in FOM price column</p> <p>All information in difference column</p> <p>All information in column composed of auditor notes</p> <p>Specific highlighted information in pertaining to Weighted Average Price for Sequent purchases at Destin, FGT Zones 1 and 2, and Mobile Bay</p>	See paragraph 5 of the Request
Sequent Physical Purchases Compared to Index Pricing –	All information in Sequent Purchase Price Column	See paragraph 5 of the Request

DOCUMENT	line/column	RATIONALE
November 2006	<p>All information in FOM price column</p> <p>All information in difference column</p> <p>All information in column composed of auditor notes</p> <p>Specific highlighted information in pertaining to Weighted Average Price for Sequent purchases at Destin, FGT Zones 1 and 2, and Mobile Bay</p>	
Sequent Physical Purchases Compared to Index Pricing – December 2006	<p>All information in Sequent Purchase Price Column</p> <p>All information in FOM price column</p> <p>All information in difference column</p> <p>All information in column composed of auditor notes</p> <p>Specific highlighted information in pertaining to Weighted Average Price for Sequent purchases at Destin, FGT Zones 1 and 2, Northern Natural Gas Company/MOPS, and Mobile Bay</p>	See paragraph 5 of the Request
Audit Workpaper 43-1/1 -1 p. 2	<p>All information in "Counterparty" column</p> <p>Highlighted numbers in +/- spread column</p>	See paragraph 5 of the Request
Audit Workpaper 43-1/2	Highlighted information in line 44 of auditor notes	See paragraph 5 of the Request

DOCUMENT	line/column	RATIONALE
Audit Source: Request 1/p. 1 (8/17/07)	Highlighted information in first paragraph of Response	See paragraph 5 of the Request
Audit Source: Request (43-1/2-1; 43-1/3; 43-1/4) p. 2, 3, and 4 (9/16/07)	Highlighted information in second, third, and fourth paragraphs of Response under subject line "Market Price and Cost of Gas"	See paragraph 5 of the Request
Attachment III – Comparison of Sequent Daily Purchase Cost to FCG Daily Purchase Cost	<p>Total Sequent Daily Purchase – All information in the Price and Amount columns</p> <p>FCG Daily Ordered – All information in the Price and Amount columns</p> <p>All information in the Difference and Value columns</p> <p>Highlighted information in the auditor notes below chart</p>	See paragraph 5 of the Request
Attachment IV – Sequent Energy Management FCG Allocated Cost Year-ended 2006	<p>All amounts identified for Florida City Gas 2006</p> <p>All amounts identified for Sequent 2006 Earnings Summary</p> <p>Percentage Gross Margin</p> <p>Estimated expense calculation</p> <p>Amount associated with Percentage Gross Margin in last line</p> <p>Highlighted information and amounts in auditor handwritten notes</p>	See paragraph 5 of the Request
PGA Audit Supplement Page –	All information in Sequent	See paragraph 5 of the Request

DOCUMENT	line/column	RATIONALE
<p>May Comparison - Sequent Physical Purchases Compared to Index Pricing - May 2006</p>	<p>Purchase Price Column</p> <p>All information in FOM price column</p> <p>All information in difference column</p> <p>Specific highlighted information in pertaining to Weighted Average Price for Sequent purchases at Destin, FGT Zones 1 and 2, Northern Natural Gas/MOPS, Southern Natural Gas/MOPS, and Mobile Bay</p>	
<p>2006 PGA Audit Supplement - Sequent Cost Including Gas Daily Purchases -- Workpaper 43 - 4</p>	<p>All information in the Total Cost Column; all information in the Z1 cost column; all information in the Z2 cost column; all information in the Z3 cost column; all information in the Average Cost line; all information in the Market line; all information in the Difference line; all information in the City Therm Purchases line; all information in the Difference Between Avg. Cost and Cost to City line; and all information in the Allocation of Sequent Expenses Net Difference for May line.</p>	<p>See paragraph 5 of the Request</p>