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COMMISSION  
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**BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION**

In re: Petition for approval of a special contract )  
with RockTenn CP, LLC, by Peoples Gas System. )  
\_\_\_\_\_ )

Docket No.

Submitted for Filing:  
2-14-14

**PEOPLES GAS SYSTEM'S REQUEST  
FOR SPECIFIED CONFIDENTIAL CLASSIFICATION**

Pursuant to Section 366.093, *Florida Statutes*, Peoples Gas System ("Peoples" or the "Company"), submits the following Request for Specified Confidential Classification of portions of Exhibits A, B and C to the petition for approval of the Amended and Restated Gas Transportation Agreement between Peoples and RockTenn CP, LLC ("RockTenn") (the "Transport Agreement" or the "special contract"), which is submitted for filing in the above docket concurrently herewith:

1. Attached hereto as Exhibit A is a detailed justification for the requested confidential treatment of the highlighted portions of Exhibits A, B and C to Peoples' petition.

2. The material for which specified confidential classification is sought is intended to be and is treated as private by both Peoples and RockTenn, and has not been disclosed.

3. Peoples requests that the information for which it seeks confidential classification not be declassified until two months after the expiration of the term of the special contract. The detailed justification for non-disclosure of the highlighted portions of the special contract and the petition for its approval (see Exhibit A attached hereto) also establishes good cause for the Commission's finding that the protection from disclosure should extend for a period longer than 18 months (see Section 366.093(4), *Florida Statutes*). The time period requested is necessary to protect the competitive information (*i.e.*, the level of the rates at which service will be provided to RockTenn under the special contract, the calculation of certain of the rates, the quantities for which such rates will apply, and other information from which the rates or quantities to which the formula for calculation of the rates applies) from disclosure to Peoples' competitors and to other

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

customers in order to allow Peoples, should it become necessary, to negotiate future gas service arrangements with other customers on favorable terms based on the specific factual circumstances of such customers. The period of time requested will ultimately protect Peoples and its customers by any such future arrangements being entered into based only on the facts and circumstances then applicable. Should the Commission find that it no longer needs the highlighted confidential information, Peoples respectfully requests that such information be returned to the Company.

4. Included with this Request highlighted copies of Exhibits A, B and C to Peoples' petition for approval of the special contract. In addition, two redacted copies of the exhibits are enclosed.

WHEREFORE, Peoples submits the foregoing as its request for confidential treatment of the information identified in Exhibit A.

Respectfully submitted,



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Attorneys for Peoples Gas System

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true copy of the foregoing Request for Confidential Treatment, filed on behalf of Peoples Gas System, has been furnished by regular U.S. Mail to the Office of Public Counsel, 812 Claude Pepper Building, 111 W. Madison Street, Tallahassee, Florida 32399-1400, this 13th day of February, 2014.



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Ansley Watson, Jr.

**AMENDED AND RESTATED**  
**GAS TRANSPORTATION AGREEMENT (Exhibit A to the Petition)**

The information in the special contract for which Peoples seeks specified confidential treatment, and non-disclosure pursuant to Chapter 119, *Florida Statutes*, is highlighted on the following pages of the special contract (Exhibit A to Peoples' petition):

Page 2:

In the definition of "Excess Quantities," the information consists of annual quantities for each of the three RockTenn mills at which the rates for service to RockTenn will be provided by Peoples, and from which such rates could be algebraically determined or closely estimated.

In the definition of "Fernandina Beach Line," the information consists of hourly delivery capability of the line and the pressure at which such hourly capability exists, and is – in essence – Peoples' maximum delivery obligation to RockTenn.

Page 6:

In Section 4.6(b)(i), the information consists of the annual quantity and the rate for such annual quantity.

In Section 4.6(b)(ii), the information consists of the annual quantity stated in Section 4.6(b)(i).

In subparagraphs (iii) and (iv) of Section 4.6(b), the information consists of the rates at which Peoples will provide service to each of the Jacksonville Facility and the Panama City Facility (each as defined in the special contract).

Page 7:

In paragraphs (a) and (b) of Section 5.1, the information consists of the annual quantity thresholds above which incremental charges will apply.

Page 8:

In Section 5.2, the information consists of the formula for calculation of Usage Charges and examples of the calculation of Usage Charges based on certain assumed consumption by RockTenn.

Appendix A to Special Contract:

The information consists of the Maximum Transportation Quantity under the special contract – a part of Peoples' service obligation.

Appendix B to Special Contract:

The information consists of the Maximum Delivery Quantity under the special contract – a part of Peoples' service obligation.

Appendix D to Special Contract:

The information consists of the annual quantity threshold below which Peoples will provide service to RockTenn absent an election by RockTenn to commit to payment of incremental charges, and the incremental daily and annual incremental quantities (and associated incremental charges) which are available for RockTenn to elect to pay.

**EXHIBIT B TO THE PETITION**

Exhibit B to the petition for approval of the special contract is a narrative summary comparison of the annual revenues and cost of service for the provision of service by Peoples to RockTenn's Fernandina Beach mill. The highlighted information on this exhibit consists of the initial rate at which service will be provided, the annual quantity threshold below which such rate will apply, Peoples' cost of service for the provision of service at this rate, and the annual revenue to be derived by Peoples therefrom.

**EXHIBIT C TO THE PETITION**

Exhibit C to the petition is a cost of service study for service to RockTenn's Fernandina Beach mill.

**Rationale for Specified Confidential Classification**

The highlighted information identified above consists of the various rates at which Peoples will provide gas service to RockTenn under the special contract, the various thresholds below which such rates will apply, other information affecting the level of the rate to be charged, the formula pursuant to which certain of the rates are calculated, and Peoples' cost of service and other information from which the rates could be calculated or closely estimated algebraically. It also consists of information disclosing the service obligation to which Peoples has committed to RockTenn. All is information directly relating to Peoples' competitive interests which, if made public, "would impair the competitive business" of Peoples in the event it should become necessary to negotiate similar arrangements with other customers or potential customers in the future. Section 366.093(3)(d), *Florida Statutes*. Disclosure of the specific levels of the rates at which Peoples will provide gas service to RockTenn, or Peoples' cost to provide such service, would give other customers or potential customers a benchmark or target toward which to negotiate in dealing with Peoples, notwithstanding that their particular circumstances may not be the same as, or even similar to, those of RockTenn (which circumstances prompted Peoples to enter into the special contract for which the Commission's approval is sought in this docket).

Disclosure of this information, which consists of the rates (or information from which such rates could be algebraically determined or closely estimated) offered by Peoples to RockTenn to ensure that, during the term of the special contract, the customer will burn natural

gas at its paper products mills in Florida (as opposed to mills in other states), would damage Peoples in its ability to engage in possible future negotiations with this customer on rates and terms of service which are most favorable to Peoples and its ratepayers, and hamper the Company in its ability to negotiate in the future with other customers and potential customers who may be contemplating either the bypass of Peoples' distribution system or switching to a fuel other than natural gas, or never choosing to use the Peoples' distribution system at all. It is reasonably likely that the end result of disclosing this information would be a reduction in revenues to Peoples and/or a loss of future customers or potential customers to alternative suppliers, including those of an alternate fuel.