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October 27, 2015

BY HAND DELIVERY

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

REDACTED

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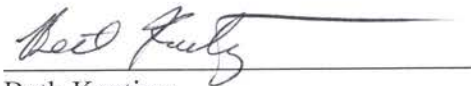
Re: New Filing - In re: Petition for Approval of Variance to Delay Area Extension Program True-Up and Extend Amortization Period by Florida City Gas.

Dear Ms. Stauffer:

Enclosed for filing, please find the original and seven copies of Florida City Gas Company's Request for Confidential Classification of certain information in its Petition for Approval of Variance to Delay Area Extension Program True-Up and Extend Amortization Period. Included with this Request are one highlighted and two redacted copies of the pages containing the referenced information in accordance with Rule 25-22.006, Florida Administrative Code.

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

Sincerely,



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

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BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Petition for Approval of Variance to
Delay Area Extension Program True-Up and
Extend Amortization Period by Florida City
Gas.

DOCKET NO.

DATED: October 27, 2015

REQUEST FOR CONFIDENTIAL CLASSIFICATION

Florida City Gas (“FCG” or “Company”), by and through its undersigned counsel, pursuant to Section 366.093, Florida Statutes, and consistent with Rule 25-22.006(4), Florida Administrative Code, hereby submits its Request for Confidential Classification to protect the information contained in its Petition for Approval of Variance to Delay Area Extension Program True-Up and Extend Amortization Period (“Petition”). In support of this Request, FCG states that:

1. The highlighted amounts reflected on page 5, paragraph 13, line 4 and page 6, paragraph 14, line 3 of the Petition reflect customer specific usage information, which both the Company and the customer treat as confidential, competitively sensitive information. The Company also seeks confidential classification of the highlighted dollar amount on page 6, paragraph 14, line 4, which, if disclosed, could be used to extrapolate the usage amount also set forth in paragraph 14. The highlighted numbers are information that, if disclosed in the manner presented in the Petition, could be used by others to gain an unfair competitive advantage in the market over the customer. Moreover, disclosure of this amount could impair the Company’s ability to do business not only with this particular customer, but with other similarly-situated

customers in the future. Ultimately, disclosure could harm both the Company and its ratepayers, as well as the customer.

2. The information at issue is considered proprietary confidential business information by FCG, and has not otherwise been disclosed publicly.

3. The information for which FCG seeks confidential classification 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. The information at issue falls squarely under Section 366.093(3)(e), Florida Statutes.

Release of the referenced information as a public record would harm FCG’s business operations and ratepayers by impairing the Company’s ability to attract and retain large customers, and it would also harm the competitive interests of the particular customer. As

such, FCG requests that the Commission afford this information confidential treatment and thus exempt from Section 119.07, Florida Statutes.

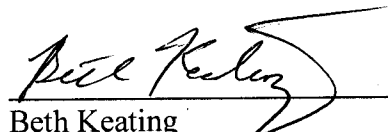
5. Included with this Request is a highlighted copy of the referenced documents. Also enclosed are two redacted copies of the information.

6. FCG 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, FCG respectfully requests that the confidential information be returned to the Company.

WHEREFORE, FCG respectfully requests that:

- 1) the highlighted in its Petition be classified as “proprietary confidential business information,” and thus, exempt from Section 119.07, Florida Statutes; and
- 2) confidential classification be granted for a period of at least 18 months from the issuance of the Commission’s Order.

RESPECTFULLY SUBMITTED this 27th day of October, 2015.


Beth Keating
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