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October 23, 2017

VIA HAND DELIVERY

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

RECEIVED-FPSC
2017 OCT 23 PM 12: 27
COMMISSION
CLERK

RE: Docket No. 20170179-GU

Dear Ms. Stauffer:

Enclosed is Florida City Gas' (FCG's) Request for Confidential Classification pertaining to certain portions of Exhibit DJN-14 to the Direct Testimony of Daniel J. Nikolich and certain portions of the Direct Testimony and Exhibit 2 to the Direct Testimony of Gregory Becker, filed in connection with FCG's Petition for Rate Increase.

Please contact me if you have any questions.

Sincerely,

Gregory M. Munson

cc: B. O'Farrow, FCG

COM _____
AFD |_____
APA |_____
ECO 4+CD |_____
ENG |_____
GCL |_____
IDM _____
CLK _____

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Petition for rate increase by Florida City
Gas.

DOCKET NO. 20170179-GU

DATED: October 23, 2017

REQUEST FOR CONFIDENTIAL CLASSIFICATION

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 Exhibit DJN-14 to the Direct Testimony¹ of Daniel J. Nikolich (the Nikolich Exhibit) and certain portions of the Direct Testimony and Exhibit GB-2 to the Direct Testimony of Gregory Becker (the Becker Testimony, and the Becker Exhibit, respectively). In support of this request, the Company states:

1. On October 23, 2017, FCG filed its Petition for Rate Increase, and *inter alia* the prefiled direct testimony and supporting exhibits of its witnesses.

2. The Nikolich Exhibit contains confidential information. The confidential information contained in the Nikolich Exhibit includes the rates of natural gas charged to a contractual customer of FCG. FCG and the customer entered into a negotiated settlement that established the rate, and the settlement expressly provided for confidentiality of the rate. It also provided that disclosure of the rate could cause the Company to suffer damages and/or irreparable harm and could interfere with the Company's relationships with other customers or prospective customers. The Commission, after having reviewed the settlement agreement and

¹ An identical copy of Exhibit DJN-14 to the Direct Testimony of Daniel J. Nikolich is also contained in FCG's Minimum Filing Requirements, Schedule H-1, p. 1.

noting that the “proposed rates ... are confidential,” approved the settlement and did not disturb the express confidentiality provision in the settlement. *See In re: Petition for review and determination on the project construction and gas transportation agreement between NUI Utilities, Inc., d/b/a City Gas Company of Florida and Florida Crystals Corporation*, Docket No. 20160175-GU, Order No. PSC-2017-0296-FOF-GU (August 2, 2017). Consequently, the Commission accepted the confidentiality of the rates and presumably accepted the underlying harm to the Company that would occur if the rates were disclosed. Indeed, it is still true that, if publicly disclosed, such information could harm FCG by interfering with the Company’s relationships with other customers or prospective customers. This information is entitled to confidential classification pursuant to sec. 366.093(3)(d), Fla. Stat. This information is intended to be and is treated as confidential by FCG and to the best of FCG’s knowledge has not been publicly disclosed.

3. The Becker Testimony contains confidential information. The confidential information contained in the Becker Testimony contains the cost to FCG of obtaining future quantities of gas from the Florida Gas Transmission Company (FGT), which owns a pipeline supplying natural gas to portions of Florida. Public disclosure of this information would be harmful to the provider of this information because it would impact the willingness of other current and future customers of FGT to pay similar or higher rates. Public disclosure would also harm FCG, because it would allow other potential purchasers of natural gas to effectively outbid FCG and thereby increase the price of this limited supply of natural gas capacity available from FGT. This information is entitled to confidential classification pursuant to sec. 366.093(d)-(e), Fla. Stat. This information is intended to be and is treated as confidential by FCG and to the best of FCG’s knowledge has not been publicly disclosed.

4. The Becker Exhibit contains confidential information. The confidential information in the Becker Exhibit contains the price per Dth and annual cost to FCG of purchasing of 10,000 Dth/d from FGT. Public disclosure of this information would be harmful to the provider of this information because it would impact the willingness of other current and future customers of FGT to pay similar or higher rates. Public disclosure would also harm FCG, because it would allow other potential purchasers of natural gas to effectively outbid FCG and thereby increase the price of this limited supply of natural gas capacity available from FGT. This information is entitled to confidential classification pursuant to sec. 366.093(d)-(e), Fla. Stat. This information is intended to be and is treated as confidential by FCG and to the best of FCG's knowledge has not been publicly disclosed.

5. Submitted as Exhibit A are copies of the subject documents, highlighted, consistent with Commission practice, to reflect the information for which confidential classification is requested. Exhibit A should be treated as confidential pending a ruling on this request. Attached as Exhibit B are two edited copies of the subject documents, which may be made available for public review and inspection. Attached as Exhibit C to this request is a line-by-line/field-by-field justification for the request for confidential classification.

WHEREFORE, FCG respectfully requests that the Commission enter an order protecting the information highlighted on Exhibit A from public disclosure as proprietary confidential information.

Respectfully submitted this 23rd day of October, 2017, by:



Gregory Munson

Docket No. 20170179-GU
Florida City Gas

Florida Bar No. 188344
Gunster Law Firm
215 South Monroe Street
Suite 601
Tallahassee, FL 32301
Attorney for Florida City Gas

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing filing has been served by Hand Delivery this 23rd day of October, 2017, upon the following:

Keith Hetrick
Florida Public Service Commission
General Counsel's Office
2540 Shumard Oak Boulevard
Tallahassee, Florida 32399-0850

J.R. Kelly, Public Counsel
Office of the Public Counsel
c/o The Florida Legislature
111 West Madison St., Rm 812
Tallahassee, FL 32399-1400



Gregory M. Munson
Gunster, Yoakley & Stewart, P.A.
215 South Monroe St., Suite 601
Tallahassee, FL 32301
(850) 521-1713

Docket No. 20170179-GU
Florida City Gas

ATTACHMENT B

ATTACHMENT C

Line-by-Line/Field-by-Field Justification

<u>Line(s)/Field(s)</u>	<u>Justification</u>
Exhibit DJN-14 to Direct Testimony of Daniel J. Nikolich, lines 24-28, 31-36 41, 49 column 14 (“Contract Demand”)	This information is entitled to confidential classification pursuant to sec. 366.093(3)(d), Fla. Stat. The basis for this information being designated as confidential is more fully set forth in paragraph 2 of this Request.
Direct Testimony of Gregory Becker, page 20, line 17.	This information is entitled to confidential classification pursuant to sec. 366.093(3)(d)-(e), Fla. Stat. The basis for this information being designated as confidential is more fully set forth in paragraph 3 of this Request.
Exhibit GB-2 to Direct Testimony of Gregory Becker, line 8, columns 2 (“Reservation Cost”) and 4 (“Annual Cost”).	This information is entitled to confidential classification pursuant to sec. 366.093(3)(d)-(e), Fla. Stat. The basis for this information being designated as confidential is more fully set forth in paragraph 4 of this Request.

Docket No. 20170179-GU
Florida City Gas

ATTACHMENT A

Provided to the Commission Clerk
under separate cover as Confidential Information

Docket No. 20170179-GU
Florida City Gas

ATTACHMENT B

1 gate station leaving over 6,000 customers without service in the Port St.
2 Lucie area. While FCG was able to effectively utilize other Southern
3 Company Gas resources to help restore service expeditiously, onsite
4 peaking resources could have mitigated against such a loss of service
5 with appropriate siting and connectivity to the system.
6

7 Q. How will FCG obtain additional FT service from FGT?

8 A. As I have mentioned, FGT capacity is limited, but FCG is nonetheless in
9 the process of securing some of the last remaining FGT capacity that will
10 be made available through a minor expansion project to create
11 incremental gas supply capability. However, that comes at a cost. The
12 entire gas supply portfolio that FCG has on FGT today costs about \$10.6
13 Million annually in reservation charges for a maximum winter time delivery
14 right of 68,955 Dth/d of firm transport capacity. This last available 20,000
15 Dth/d of capacity on FGT's east leg capacity, which will also need to be
16 coupled with a flowing supply source to produce incremental supply
17 capability through a minor expansion project, will cost [REDACTED]
18 annually to add to the portfolio. While the cost may seem expensive, the
19 great benefit provided to FCG's system makes it worth the cost. This
20 expansion project will create FT capacity that will be deliverable to the
21 Miami-Dade County area and areas in the northern part of FCG's system
22 off the interstate pipeline.
23

24 Q. What is an example of the load growth in the Miami-Dade County area?

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2 Lucie area. While FCG was able to effectively utilize other Southern
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24 Q. What is an example of the load growth in the Miami-Dade County area?

1 **Testimony Exhibit - GB-2: Cost Comparison**

2

3

4

	Reservation Cost	Dth/d	Annual Cost
5 Gulfstream Pipeline	/2 /6 \$ 21.5837 per Dth	10,000	\$2,590,040

6

7 Sabal Trail Pipeline	\$ 61.8016 per Dth		
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8 Florida Southeast Connection	\$ 13.6419 per Dth		
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9	/3 /6 \$ 75.4435	10,000	\$9,053,217
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10

11 Florida Gas Transmission	/4 [REDACTED] per Dth	10,000	[REDACTED]
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12

13 LNG (Annual Rev. Requirements)	/5 \$ 47.8756 per Dth	10,000	\$5,745,066
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14

15

16 Assumptions

17 /1 10,000 Dth/d delivery to approximate sendout of LNG facility

18 /2 Gulfstream Pipeline 6% hourly rate service reservation fee

19 /3 Sabal Trail + Southeast Connection 6% hourly rate service reservation fee

20 /4 Offered FGT expansion reservation rate

21 /5 Imputed rate based on \$5.745M annual revenue requirement

22 /6 Excludes any estimate of FCG infrastructure to deliver gas supply into its system

1 **Testimony Exhibit - GB-2: Cost Comparison**

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3

4

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Dth/d
10,000

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9

/3 /6 \$ 75.4435

10,000

\$9,053,217

10

11 Florida Gas Transmission

/4 [REDACTED] per Dth

10,000

[REDACTED]

12

13 LNG (Annual Rev. Requirements)

/5 \$ 47.8756 per Dth

10,000

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18 /2 Gulfstream Pipeline 6% hourly rate service reservation fee

19 /3 Sabal Trail + Southeast Connection 6% hourly rate service reservation fee

20 /4 Offered FGT expansion reservation rate

21 /5 Imputed rate based on \$5.745M annual revenue requirement

22 /6 Excludes any estimate of FCG infrastructure to deliver gas supply into its system

Calculation of Proposed Rates

SALES & TRANSPORTATION SERVICES															
	RS-1	RS-100	RS-600	GS-1	GS-6k	GS-25k	GS-120k	GS-1250k	GS-11M	GS-25M	GAS LIGHTING	NATURAL GAS VEHICLES	CONTRACT DEMAND	THIRD PARTY SUPPLIER	TOTAL SALES & TRANSPORTATION
6 PROPOSED TOTAL TARGET REVENUES	\$ 7,210,626	\$ 18,807,784	\$ 550,722	\$ 7,041,468	\$ 11,981,069	\$ 7,088,431	\$ 12,514,667	\$ 3,932,041			\$ 74,237	\$ -	\$ 173,632	\$ 266,633	\$ 69,405,425
7 LESS: OTHER OPERATING REVENUE	\$ 740,116	\$ 1,564,482	\$ 29,664	\$ 266,912	\$ 334,748	\$ 178,092	\$ 38,002	\$ 9,895			\$ 131	\$ -	\$ 2,034	\$ -	\$ 3,164,078
10 Less: Proposed Customer Charge Revenues															
11 Proposed Customer charges: SALES & TRANSPORTATION	\$ 12.00	\$ 15.00	\$ 20.00	\$ 25.00	\$ 35.00	\$ 150.00	\$ 300.00	\$ 500.00	\$ 1,000.00	\$ 2,000.00		\$ 25.00	\$ 500.00	\$ 400.00	
12 TIMES: NUMBER OF BILLS: SALES & TRANSPORTATION	406,366	797,671	11,632	59,911	28,538	4,678	1,212	84	0	0	3,936	0	12	132	1,314,172
13 EQUALS: CUSTOMER CHARGE REVENUES	\$ 4,876,392	\$ 11,965,065	\$ 232,640	\$ 1,497,775	\$ 988,830	\$ 701,700	\$ 363,600	\$ 42,000	\$ 0	\$ 0	\$ 0	\$ 0	\$ 6,000	\$ 52,800	\$ 20,736,802
15 Less: Proposed Demand Charge Revenues															
16 Proposed demand charges: SALES & TRANSPORTATION	\$ 0	\$ 0	\$ 0	\$ 0	\$ 0	\$ 0	\$ 5.75	\$ 5.75	\$ 5.75	\$ 5.75	\$ 0	\$ 0	\$ 0	\$ 6.07	
17 TIMES: D.C. SALES & TRANSPORTATION							206,816	238,651						33,807	479,275
18 EQUALS: DEMAND CHARGE REVENUES	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ 1,189,194	\$ 1,372,244	\$ -	\$ -	\$ -	\$ -	\$ -	\$ 205,187	\$ 2,766,646
20 EQUALS: PER-TERM TARGET REVENUES	\$ 1,594,116	\$ 5,278,237	\$ 288,418	\$ 5,276,781	\$ 10,647,491	\$ 6,208,639	\$ 10,923,870	\$ 2,507,901	\$ -	\$ -	\$ 74,105	\$ -	\$ 165,598	\$ 8,665	\$ 42,737,899
22 DIVIDED BY: NUMBER OF TERMS	2,886,825	12,240,769	767,899	12,382,178	28,127,107	17,386,101	34,439,382	15,613,100	-	-	38,033	-	5,492,320	-	143,881,394
24 EQUALS: PER-TERM RATES (Unrounded)	\$ 0.552204	\$ 0.431201	\$ 0.375594	\$ 0.426159	\$ 0.378549	\$ 0.357104	\$ 0.317191	\$ 0.160628	\$ 0.080000	\$ 0.040000	\$ 1.948461	\$ 0.426159			
25 PER-TERM RATES (Rounded)	\$ 0.55220	\$ 0.43120	\$ 0.37559	\$ 0.42616	\$ 0.37855	\$ 0.35710	\$ 0.31719	\$ 0.16063	\$ 0.08000	\$ 0.04000	\$ 1.94846	\$ 0.42616			
28 PER-TERM-RATE REVENUES (Rounded Rates)	\$ 1,594,105	\$ 5,278,219	\$ 288,415	\$ 5,276,789	\$ 10,647,510	\$ 6,208,577	\$ 10,923,828	\$ 2,507,932	\$ -	\$ -	\$ 74,105	\$ -	\$ 165,593	\$ -	\$ 42,729,286
30 SUMMARY: PROPOSED TARIFF RATES															
31 CUSTOMER CHARGES	\$ 12.00	\$ 15.00	\$ 20.00	\$ 25.00	\$ 35.00	\$ 150.00	\$ 300.00	\$ 500.00	\$ 1,000.00	\$ 2,000.00	\$ -	\$ 25.00		\$ 400.00	
32 DEMAND CHARGES	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ 5.75	\$ 5.75	\$ 5.75	\$ 5.75	\$ -	\$ -		\$ 6.07	
33 ENERGY CHARGES															
34 NON-GAS (CENTS PER THERM)	55.2204	43.1201	37.5594	42.6159	37.8549	35.7104	31.7191	16.0628	8.0000	4.0000	40.0000	42.6159			
35 PURCHASED GAS ADJUSTMENT	54.0000	54.0000	54.0000	54.0000	54.0000	54.0000	54.0000	54.0000	54.0000	54.0000	54.0000	54.0000	54.0000	54.0000	54.0000
36 TOTAL (INCLUDING PGA)	109.2204	97.1201	91.5594	96.6159	91.8549	89.7104	85.7191	70.0628	62.0000	58.0000	94.0000	96.6159			
38 SUMMARY: PRESENT TARIFF RATES															
39 CUSTOMER CHARGES															
40 RESIDENTIAL	\$ 8.00	\$ 9.86	\$ 12.50												
41 COMMERCIAL AND INDUSTRIAL SALES				\$ 14.07	\$ 30.00	\$ 93.21	\$ 267.33	\$ 500.00				\$ 15.00			
42 DEMAND CHARGES: NON-GAS (CENTS PER THERM)															
44 RESIDENTIAL															
45 COMMERCIAL AND INDUSTRIAL							28.9000	28.9000							
46 ENERGY CHARGES: NON-GAS (CENTS PER THERM)															
47 RESIDENTIAL	56.2130	51.3242	39.8577								56.2130				
48 COMMERCIAL AND INDUSTRIAL				33.4308	27.4870	27.5660	21.4152	12.2250				23.2320			
49 PURCHASED GAS ADJUSTMENT	54.0000	54.0000	54.0000	54.0000	54.0000	54.0000	54.0000	54.0000	54.0000	54.0000	54.0000	54.0000	54.0000	54.0000	54.0000
50 TOTAL (INCLUDING PGA)															
51 RESIDENTIAL	110.2130	105.3242	93.8577								110.2130				
52 COMMERCIAL AND INDUSTRIAL				87.4308	81.4870	81.5660	75.4152	66.2250	54.0000	54.0000		77.2320	58.3000		
57 SUMMARY: OTHER OPERATING REVENUE															
58 CONNECTION CHARGE	\$50.00-\$110.00	\$695,821	\$50.00-\$200.00	\$ 1,121,632											
59 COLLECTION IN LIEU OF DISCONNECT CHARGE	\$20.00	\$263,406	\$25.00-\$32.00	\$331,467											
60 RECONNECT CHARGE	\$37.00-\$80.00	\$139,591	\$40.00-\$100.00	\$150,523											
61 BAD CHECKS	\$25.00	\$37,766	\$25.00	\$37,775											
62 LATE PAYMENT CHARGES	\$5.00 OR 1.5%	\$1,107,835	\$5.00 OR 1.5%	\$1,107,835											
63 DAMAGE BILLING		\$192,297		\$192,297											
64 CHANGE OF ACCOUNT															
65 METER READ			\$15.00-\$22.00	\$100,766											
66 TEMPORARY DISCONNECT			\$35.00-\$45.00	\$103,562											
67 FAILED TRIP			\$20.00	\$18,220											
68 TOTAL															

EXHIBIT NO. (D)-14
 Florida City Gas
 DOCKET NO. 20170179-GU
 PAGE 1 OF 1

Calculation of Proposed Rates

SALES & TRANSPORTATION SERVICES															
	RS-1	RS-100	RS-600	GS-1	GS-6k	GS-25k	GS-120k	GS-1250k	GS-11M	GS-25M	GAS LIGHTING	NATURAL GAS VEHICLES	CONTRACT DEMAND	THIRD PARTY SUPPLIER	TOTAL SALES & TRANSPORTATION
6 PROPOSED TOTAL TARGET REVENUES	\$ 7,210,626	\$ 16,807,784	\$ 550,722	\$ 7,041,468	\$ 11,981,069	\$ 7,088,431	\$ 12,514,667	\$ 3,932,041			\$ 74,237	\$ -	\$ 173,632	\$ 266,633	\$ 69,405,425
8 LESS: OTHER OPERATING REVENUE	\$ 740,118	\$ 1,564,482	\$ 29,864	\$ 266,912	\$ 334,748	\$ 178,092	\$ 38,002	\$ 9,605			\$ 131	\$ -	\$ 2,034	\$ -	\$ 3,164,078
10 Less: Proposed Customer Charge Revenues															
11 Proposed Customer charges: SALES & TRANSPORTATION	\$ 12.00	\$ 15.00	\$ 20.00	\$ 25.00	\$ 35.00	\$ 150.00	\$ 300.00	\$ 500.00	\$ 1,000.00	\$ 2,000.00	\$ -	\$ 25.00	\$ 500.00	\$ 400.00	
12 TIMES: NUMBER OF BILLS: SALES & TRANSPORTATION	406,366	797,671	11,632	59,911	28,538	4,678	1,212	84	0	0	3,936	0	12	132	1,314,172
13 EQUALS: CUSTOMER CHARGE REVENUES	\$ 4,876,352	\$ 11,965,065	\$ 232,640	\$ 1,497,775	\$ 998,830	\$ 701,700	\$ 363,600	\$ 42,000	\$ 0	\$ 0	\$ 0	\$ 0	\$ 6,000	\$ 52,800	\$ 20,736,892
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16 Proposed demand charges: SALES & TRANSPORTATION	\$ 0	\$ 0	\$ 0	\$ 0	\$ 0	\$ 0	\$ 5.75	\$ 5.75	\$ 5.75	\$ 5.75	\$ 0	\$ 0	\$ 0	\$ 6.07	
17 TIMES: DOG: SALES & TRANSPORTATION							206,816	238,651							33,807
18 EQUALS: DEMAND CHARGE REVENUES	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ 1,189,194	\$ 1,372,244	\$ -	\$ -	\$ -	\$ -	\$ -	\$ 205,167	\$ 2,766,646
20 EQUALS: PER-TERM TARGET REVENUES	\$ 1,594,116	\$ 5,278,237	\$ 288,418	\$ 5,276,791	\$ 10,647,491	\$ 6,208,639	\$ 10,923,870	\$ 2,507,901	\$ -	\$ -	\$ 74,105	\$ -	\$ 165,598	\$ 8,665	\$ 42,737,899
22 DIVIDED BY: NUMBER OF TERMS	2,886,825	12,240,769	767,869	12,382,178	28,127,107	17,386,101	34,439,382	15,613,100	-	-	38,033	-	5,492,320	-	143,681,394
24 EQUALS: PER-TERM RATES (Unrounded)	\$ 0.552204	\$ 0.431201	\$ 0.375594	\$ 0.426159	\$ 0.378549	\$ 0.357104	\$ 0.317191	\$ 0.160628	\$ 0.080000	\$ 0.040000	\$ 1.948461	\$ 0.426159			
26 PER-TERM RATES (Rounded)	\$ 0.55220	\$ 0.43120	\$ 0.37559	\$ 0.42616	\$ 0.37855	\$ 0.35710	\$ 0.31719	\$ 0.16063	\$ 0.08000	\$ 0.04000	\$ 1.94846	\$ 0.42616			
28 PER-TERM-RATE REVENUES (Rounded Rates)	\$ 1,594,105	\$ 5,278,219	\$ 288,415	\$ 5,276,789	\$ 10,647,516	\$ 6,208,577	\$ 10,923,828	\$ 2,507,932	\$ -	\$ -	\$ 74,105	\$ -	\$ 165,593	\$ -	\$ 42,729,286
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32 DEMAND CHARGES	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ 5.75	\$ 5.75	\$ 5.75	\$ 5.75	\$ -	\$ -			\$ 6.07
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34 NON-GAS (CENTS PER THERM)	55.2204	43.1201	37.5594	42.6159	37.8549	35.7104	31.7191	16.0628	8.0000	4.0000	40.0000	42.6159			
35 PURCHASED GAS ADJUSTMENT	54.0000	54.0000	54.0000	54.0000	54.0000	54.0000	54.0000	54.0000	54.0000	54.0000	54.0000	54.0000			
36 TOTAL (INCLUDING PGA)	109.2204	97.1201	91.5594	96.6159	91.8549	89.7104	85.7191	70.0628	62.0000	58.0000	94.0000	96.6159			
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51 TOTAL (INCLUDING PGA)															
53 RESIDENTIAL	110.2130	105.3242	93.8577								110.2130				
54 COMMERCIAL AND INDUSTRIAL				87.4308	81.4870	81.5660	75.4152	66.2250	54.0000	54.0000		77.2320		56.3000	
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62 LATE PAYMENT CHARGES	\$5.00 OR 1.5%	\$1,107,835	\$5.00 OR 1.5%	\$1,107,835											
63 DAMAGE BILLING		\$192,217		\$192,297											
64 CHANGE OF ACCOUNT															
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66 TEMPORARY DISCONNECT			\$25.00-\$45.00	\$103,562											
67 FAILED TRIP			\$20.00	\$18,220											
68 TOTAL															

EXHIBIT N-3 (R)-14
 Florida City Gas
 DOCKET NO. 2019-079-6-DJ
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ATTACHMENT C

Line-by-Line/Field-by-Field Justification

<u>Line(s)/Field(s)</u>	<u>Justification</u>
Exhibit DJN-14 to Direct Testimony of Daniel J. Nikolich, lines 24-28, 31-36 41, 49 column 14 (“Contract Demand”)	This information is entitled to confidential classification pursuant to sec. 366.093(3)(d), Fla. Stat. The basis for this information being designated as confidential is more fully set forth in paragraph 2 of this Request.
Direct Testimony of Gregory Becker, page 20, line 17.	This information is entitled to confidential classification pursuant to sec. 366.093(3)(d)-(e), Fla. Stat. The basis for this information being designated as confidential is more fully set forth in paragraph 3 of this Request.
Exhibit GB-2 to Direct Testimony of Gregory Becker, line 8, columns 2 (“Reservation Cost”) and 4 (“Annual Cost”) .	This information is entitled to confidential classification pursuant to sec. 366.093(3)(d)-(e), Fla. Stat. The basis for this information being designated as confidential is more fully set forth in paragraph 4 of this Request.