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February 22, 2018

**Hand Delivery**

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

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COMMISSION  
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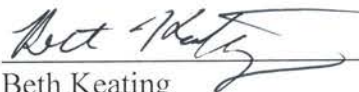
**Re: DOCKET NO. 20170179-GU - Petition for rate increase and approval of depreciation study by Florida City Gas.**

Dear Ms. Stauffer:

Enclosed for filing, please find the original and seven (7) copies of Florida City Gas's Request for Confidential Classification and Motion for Protective Order for certain information provided in response to Commission Staff's Eleventh Set of Interrogatories (No. 133) to the Company. Also included with this filing is the referenced confidential document on DVD.

As always, please don't hesitate to let me know if you have any questions. Thank you for your assistance with this filing.

Kind regards,

  
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 rate increase by Florida City  
Gas.

DOCKET NO. 20170179-GU

DATED: February 22, 2018

**REQUEST FOR CONFIDENTIAL CLASSIFICATION  
AND MOTION FOR PROTECTIVE ORDER**

FLORIDA CITY GAS (FCG or the Company), by and through undersigned counsel, and 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 information contained in the Company's response to Staff Interrogatory 133. 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 and Minimum Filing Requirements.

2. On February 1, 2018, the Staff of the Commission (Staff), served FCG with its Eleventh Set of Interrogatories (Nos.129-133). Information provided in the Company's Attachment ROG 11-133 contains competitively sensitive information regarding the Company's budgeting and planning processes. Given the nature of the information provided, the Company believes that disclosure of any of this information would cause harm to FCG and its customers, because it would provide competitors, as well as entities with whom the Company contracts, information that could provide an unfair advantage, or otherwise impair, the Company's ability to contract for rates and services on fair and reasonable terms.

3. The information for which FCG seeks confidential classification is information

that 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. Specifically, Attachment ROG 11-133, outlines the Company’s budgeting process, which the Company considers, in its entirety, to be proprietary. As such, FCG asks that the entire document be considered confidential. To the extent that FCG is aware, this information

has not otherwise been publicly disclosed.

5. Submitted herewith, in substantial compliance with Rule 25-22.006, Florida Administrative Code, is a copy of the document on a DVD marked "confidential." The Company is unable to provide redacted pages, given that providing redacted copies would amount to providing blank pages.

9. FCG further requests that the Commission issue a protective order, in accordance with Rule 25-22.006(6), Florida Administrative Code, to protect this information when provided to the Office of Public Counsel, which is a party to this proceeding.

**WHEREFORE**, FCG respectfully requests that:

1. The Commission enter an order protecting the identified information in Florida City Gas's Responses to Staff Interrogatories No. 133, Attachment SROG 11-133, from public disclosure as proprietary confidential business information, as described herein;

2. The Commission issue a protective order, in accordance with Rule 25-22.006(6), Florida Administrative Code, to protect this information when provided to the Office of Public Counsel; and

2. The Commission grant confidential classification for this information for a period of at least 18 months.

Respectfully submitted this 22nd day of February, 2018, by:

  
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Beth Keating, Esquire  
Florida Bar No. 0022756  
Gunster Law Firm  
215 South Monroe Street Suite 601  
Tallahassee, FL 32301  
*Attorneys 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 or Electronic Mail (redacted only) this 22nd day of February, 2018, upon the following:

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