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February 26, 2018

Hand Delivery

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

REDACTED

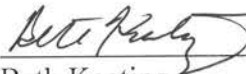
Re: DOCKET NO. 20170179-GU - Petition for rate increase and approval of depreciation study by Florida City Gas.

Dear Ms. Stauffer:

Attached, please find the original and seven (7) copies of Florida City Gas's Request for Confidential Classification of revised MFR Schedule H-1, along with one highlighted and two redacted copies of the confidential material. Also, included is a DVD marked "Confidential" containing the Excel version of the revised schedule with the confidential information highlighted.

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

cc:/ (Service List)

- COM _____
- AFD _____
- APA _____
- ECO _____
- ENG _____
- GCL _____
- IDM _____
- CLK _____

7 copies + 1 redacted copy.

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

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

DOCKET NO. 20170179-GU

DATED: February 26, 2018

REQUEST FOR CONFIDENTIAL CLASSIFICATION
AND MOTION FOR PROTECTIVE ORDER

On October 23, 2017, Florida City Gas (FCG or the Company), pursuant to Rule 25-22.006, Fla. Admin. Code, submitted a Request for Confidential Classification to the Florida Public Service Commission (the Commission) seeking entry of an order protecting from public disclosure, *inter alia*, certain portions of Exhibit DJN-14 to the Direct Testimony of Daniel J. Nikolich (cross-reference Commission document no. 09065-2017).

On October 26, 2017, by Supplemental Request, the Company asked that, in ruling upon the Company's October 23, 2017, Request for Confidential Classification, the Commission also grant a Temporary Protective Order, in accordance with Rule 25-22.006(6), Florida Admin. Code, to protect this same information to be provided to the Office of Public Counsel.

On January 11, 2018, FCG filed an Amended and Supplemental Request, identifying information in Exhibit DJN-14 and identical information in MFR Schedule H-1 to be treated as confidential. Subsequently, in response to interrogatories from the Office of Public Counsel, MFR Schedule H-1 was revised. The revised MFR Schedule H-1 contained the same confidential information previously identified in Exhibit DJN-14 and non-revised MFR Schedule H-1. Therefore, on February 2, the Company also sought to have the same information previously treated as confidential in Exhibit DJN-14 and the non-revised MFR Schedule H-1 treated as confidential in the revised MFR Schedule H-1.

The Company has now been asked to submit, consolidated under one cover, the MFR schedules that have been impacted by the federal tax reform law. Consequently, FCG now submits, among other schedules, the MFR Schedule H-1, containing the same information for which it has previously requested confidential classification.

In support of this request, the Company incorporates and adopts in full its rationale and requests as set forth in the October 23 and October 26, 2017, requests. In further support of this amended and supplemental request, the Company states:

1. The confidential information contained in the previous non-revised MFR Schedule H-1 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 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.

2. The information in revised MFR Schedule H-1 is the same as the information included in the previous non-revised MFR Schedule H-1 both in content and in format. For the same reasons that the information highlighted information in the previous non-revised MFR Schedule H-1 should be granted confidential classification, so should the information in revised MFR Schedule H-1 be granted confidential classification.

3. Included with this filing is a copy of revised MFR Schedule H-1, highlighted, consistent with Commission practice, to reflect the information for which confidential classification is requested, as well as a copy of the Excel file version of MFR H, with the information highlighted. Highlighted and redacted versions of the previous non-revised MFR Schedule H-1 were previously submitted on January 11 and February 2, 2018. *See, cross-reference* Commission document no. 00270-2018. The highlighted information should be treated as confidential pending a ruling on this request. Also included are two redacted copies of revised MFR Schedule H-1, which may be made available for public review and inspection.

WHEREFORE, FCG respectfully requests that:

1. The Commission enter an Order protecting the information highlighted on revised MFR Schedule H-1 from public disclosure as proprietary confidential information;

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

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

Respectfully submitted this 26th day of February, 2018, by:



Beth Keating
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 (w/o confidential attachments), this 26th day of February, 2018, upon the following:

Virginia Ponder
Office of the Public Counsel
c/o The Florida Legislature
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Danijela Janjic
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By: _____


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SCHEDULE H-1

COST OF SERVICE

PAGE 1 OF 6

FLORIDA PUBLIC SERVICE COMMISSION

EXPLANATION: FULLY ALLOCATED EMBEDDED COST OF SERVICE STUDY

TYPE OF DATA SHOWN: PROJECTED TEST YEAR: 12/31/2018

COMPANY: PIVOTAL UTILITY HOLDINGS, INC
D/B/A FLORIDA CITY GAS
DOCKET NO: 20170179-GU OPC ROG 8-175

CALCULATION OF PROPOSED RATES
SCHEDULE A

WITNESS: D. NIKOLICH

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
PROPOSED TOTAL TARGET REVENUES	\$ 7,089,561	\$ 18,572,299	\$ 571,948	\$ 6,719,445	\$ 11,402,309	\$ 6,757,391	\$ 10,969,033	\$ 3,619,212			\$ 15,345	\$ -	\$ 173,818	\$ 265,891	\$ 66,154,031
LESS: OTHER OPERATING REVENUE	\$ 742,272	\$ 1,571,770	\$ 30,482	\$ 264,473	\$ 329,830	\$ 175,419	\$ 37,846	\$ 9,834			\$ 132	\$ -	\$ 2,020	\$ -	\$ 3,164,078
Less: Proposed Customer Charge Revenues															
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	
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
EQUALS: CUSTOMER CHARGE REVENUES	\$ 4,876,392	\$ 11,965,065	\$ 232,640	\$ 1,497,775	\$ 998,830	\$ 701,700	\$ 363,600	\$ 42,000	\$ 0	\$ 0	\$ 0	\$ 0	\$ 6,000	\$ 52,800	\$ 20,736,802
Less: Proposed Demand Charge Revenues															
Proposed demand charges: SALES & TRANSPORTATION	\$ 0	\$ 0	\$ 0	\$ 0	\$ 0	\$ 0	\$ 5.75	\$ 5.75	\$ 5.75	\$ 5.75	\$ 0	\$ 0	\$ 0	\$ 6.05	
TIMES: DCQ: SALES & TRANSPORTATION							206,816	238,651						33,807	479,275
EQUALS: DEMAND CHARGE REVENUES	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ 1,169,194	\$ 1,372,244	\$ -	\$ -	\$ -	\$ -	\$ -	\$ 204,422	\$ 2,765,860
EQUALS: PER-THERM TARGET REVENUES	\$ 1,470,896	\$ 5,035,464	\$ 308,826	\$ 4,957,197	\$ 10,073,650	\$ 5,880,272	\$ 9,378,392	\$ 2,195,134	\$ -	\$ -	\$ 15,213	\$ -	\$ 165,598	\$ 8,669	\$ 39,487,291
DIVIDED BY: NUMBER OF THERMS	2,886,825	12,240,769	767,899	12,382,178	28,127,107	17,386,101	34,439,392	15,613,100			38,033		5,492,320		129,373,714
EQUALS: PER-THERM RATES (Unrounded)	\$ 0.509520	\$ 0.411368	\$ 0.402170	\$ 0.400349	\$ 0.358147	\$ 0.338217	\$ 0.272316	\$ 0.140596	\$ 0.080000	\$ 0.040000	\$ 0.400000	\$ 0.400349	\$ -	\$ -	
PER-THERM RATES (Rounded)	\$ 0.50952	\$ 0.41137	\$ 0.40217	\$ 0.40035	\$ 0.35815	\$ 0.33822	\$ 0.27232	\$ 0.14060	\$ 0.08000	\$ 0.04000	\$ 0.40000	\$ 0.40035	\$ -	\$ -	
PER-THERM-RATE REVENUES (Rounded Rates)	\$ 1,470,895	\$ 5,035,485	\$ 308,826	\$ 4,957,205	\$ 10,073,723	\$ 5,880,327	\$ 9,378,533	\$ 2,195,202	\$ -	\$ -	\$ 15,213	\$ -	\$ -	\$ -	\$ 39,481,003

SUMMARY: PROPOSED TARIFF RATES

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	
DEMAND CHARGES	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ 5.75	\$ 5.75	\$ 5.75	\$ 5.75	\$ -	\$ -	\$ -	\$ 6.05	
ENERGY CHARGES															
NON-GAS (CENTS PER THERM)	50.9520	41.1368	40.2170	40.0349	35.8147	33.8217	27.2316	14.0596	8.0000	4.0000	40.0000	40.0349	\$ -	\$ -	
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	
TOTAL (INCLUDING PGA)	104.9520	95.1368	94.2170	94.0349	89.8147	87.8217	81.2316	68.0596	62.0000	58.0000	94.0000	94.0349	\$ -	\$ -	

SUMMARY: PRESENT TARIFF RATES

CUSTOMER CHARGES															
RESIDENTIAL	\$ 8.00	\$ 9.86	\$ 12.50												
COMMERCIAL AND INDUSTRIAL SALES				\$ 14.07	\$ 30.00	\$ 93.21	\$ 267.33	\$ 500.00					\$ 15.00	\$ -	
DEMAND CHARGES NON-GAS (CENTS PER THERM)															
RESIDENTIAL								28.9000	28.9000						
COMMERCIAL AND INDUSTRIAL															
ENERGY CHARGES NON-GAS (CENTS PER THERM)															
RESIDENTIAL	56.2130	51.3242	39.8577								56.2130				
COMMERCIAL AND INDUSTRIAL				33.4308	27.4870	27.5660	21.4152	12.2250				23.2320	\$ -	\$ -	
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	
TOTAL (INCLUDING PGA)	110.2130	105.3242	93.8577	87.4308	81.4870	81.5660	75.4152	66.2250	54.0000	54.0000	110.2130	77.2320	56.3000		

SUMMARY: OTHER OPERATING REVENUE

	PRESENT REVENUE	PROPOSED REVENUE
CONNECTION CHARGE	\$50.00-\$110.00 \$895,821	\$50.00-\$200.00 \$ 1,121,632
COLLECTION IN LIEU OF DISCONNECT CHARGE	\$20.00 \$263,406	\$25.00-\$32.00 \$331,467
RECONNECT CHARGE	\$37.00-\$80.00 \$139,591	\$40.00-\$100.00 \$150,523
BAD CHECKS	\$25.00 \$37,766	\$25.00 \$37,775
LATE PAYMENT CHARGES	\$5.00 OR 1.5% \$1,107,835	\$5.00 OR 1.5% \$1,107,835
DAMAGE BILLING	\$192,297	\$192,297
CHANGE OF ACCOUNT		\$15.00-\$22.00 \$100,766
METER READ		\$35.00-\$45.00 \$103,562
TEMPORARY DISCONNECT		\$20.00 \$18,220
FAILED TRIP		
TOTAL	\$2,436,716	\$3,164,078

SUPPORTING SCHEDULES: E-2, E-3 p.1-6, H-1 p.3-4

RECAP SCHEDULES:

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