BERGER SINGERMAN

APR -2 PM 4:

Floyd R. Self (850) 521-6727 fself@bergersingerman.com

April 2, 2018

BY HAND DELIVERY

Ms. Callotta Stauffer, Director Office of the Commission Clerk Florida Public Service Commission 2540 Shumard Oak Boulevard Tallahassee, FL 32399-0850

> Docket No. 20180055-GU Re:

Dear Ms. Stauffer:

Enclosed for filing are an original and seven copies of the South Sumter Gas Company Request for Confidential Classification ("Request"), which contains the confidential document associated with the South Sumter Gas Company Motion to Dismiss filed in this docket on April 2, 2018.

REDACTED

Sincerely,

If you have any questions regarding this filing, please let me know. Thank you for your assistance.

		Berger Singerman LLP Floyd R. Self
FRS/am Attachment cc: Parties of Records	COM AFD APA ECO 3_	
	ENG 1 GCL 3 IDM CLK	

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Petition to resolve territorial dispute in) Sumter County and/or Lake County with) City of Leesburg and/or South Sumter Gas) Company, LLC, by Peoples Gas System)

Docket No. 20180055-GU Filed: April 2, 2018

SOUTH SUMTER GAS COMPANY REQUEST FOR CONFIDENTIAL CLASSIFICATION FOR THE CONFIDENTIAL EXHIBIT A TO ITS MOTION TO DISMISS

South Sumter Gas Company, LLC ("SSGC"), by and through its undersigned counsel, and pursuant to Section 366.093, Florida Statutes, and Rule 25-22.006(4), Florida Administrative Code, hereby files this Request for Confidential Classification ("Request") for Confidential Exhibit A to its Motion to Dismiss ("Motion") as a "public utility or other person" subject to the protection of Section 366.093. Specifically Confidential Exhibit A to the Motion is a map that reflects the confidential future growth and development plan of SSGC and related corporate entities within the larger master planned community known as The Villages Community. In support of this Request, SSGC states as follows:

1. On April 2, 2018, SSGC filed its Motion to Dismiss the Peoples Gas System ("PGS") Petition ("Petition") in the above stated matter because the Petition initiating this matter does not comport with the minimal filing requirements of Florida law and because there is no territorial dispute that requires any action by this Commission.

2. In order to accurately portray the present and future development plan of SSGC and its affiliated entities developing the larger master planned community known as The Villages Community, SSGC has prepared Confidential Exhibit A. This exhibit, more accurately than any map PGS has attached to the Petition, places the PGS facilities in context with the plan for Southern Oaks and the future development of The Villages Community. Because this map

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identifies properties that The Villages Community directly or indirectly presently owns, is presently negotiating to own, or is otherwise in the process of acquiring, this map reflects commercially sensitive, highly confidential, business information constituting (1) trade secrets (Section 366.093(3)(a)), (2) information concerning contractual data which if disclosed would impair the efforts of the Villages Communities to negotiate with land owners (Section 366.093(3)(d)), and (3) competitive information the disclosure of which would impair the competitive business of The Villages Communities to acquire and develop other property in Sumter and Lake counties (Section 366.093(3)(e)). The information on this Confidential Exhibit A constitutes "proprietary confidential business information" entitled to protection under Section 366.093, Florida Statutes, and Rule 25-22.006(4), Florida Administrative Code. If other persons had access to this information, such persons would have access to the SSGC and The Villages Communities business plans and SSGC and The Villages Communities would be at a competitive disadvantage in seeking to negotiate contracts for property and otherwise plan and develop property for future use.

3. Attached to this Request is an envelope marked "CONFIDENTIAL" containing one copy of Confidential Exhibit A for which the confidential information is highlighted. In addition, two public, redacted versions of the confidential information are also provided with this Request.

4. Pursuant to Section 366.093(4), Florida Statutes, and Rule 25-22.006(9), Florida Administrative Code, SSGC requests that the information described above as proprietary confidential business information be protected from disclosure for a period of at least 18 months and all information be returned to FCG as soon as the information is no longer necessary for the Commission to conduct its business.

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WHEREFORE, South Sumter Gas Company, LLC requests that confidential classification

be granted to the Confidential Exhibit A to its Motion to Dismiss.

Respectfully submitted this 2nd day of April, 2018.

Floyd R. Self, B.C.S

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Counsel for South Sumter Gas Company, LLC.

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing has been furnished

by electronic mail on this 2nd day of April, 2018, to the following:

Jon C. Moyle, Jr. Karen A. Putnal Moyle Law Firm, P.A. 118 North Gadsden Street Tallahassee, FL 32301 jmoyle@moylelaw.com kputnal@moylelaw.com

Paula Brown Kandi M. Floyd Peoples Gas System P.O. Box 111 Tampa FL 33601 regdept@tecoenergy.com Andrew M. Brown Ansley Watson, Jr. Macfarlane Law Firm P.O. Box 1531 Tampa, FL 33601 <u>ab@macfar.com</u> <u>aw@macfar.com</u>

Floyd R. Self

