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October 10, 2019

**Hand Delivery**

Mr. Adam Teitzman, Clerk  
Florida Public Service Commission  
2540 Shumard Oak Boulevard  
Tallahassee, FL 32399-0850

**REDACTED**

RECEIVED-FPSC  
2019 OCT 10 PM 4:45  
COMMISSION  
CLERK

**Re: Docket No. 20190145-GU: Joint petition for approval of restructured Nassau County agreements to reflect Callahan expansion, by Peoples Gas System, Florida Public Utilities Company, SeaCoast Gas Transmission, and Peninsula Pipeline Company, Inc.**


Dear Mr. Teitzman:

Enclosed, please find an original and 7 copies of Peoples Gas System's Request for Confidential Classification of certain information contained in the Joint Responses to Commission Staff's First Data Requests in the referenced docket. Also enclosed are one highlighted, and two redacted copies of the page 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 don't hesitate to let me know if you have any questions whatsoever.

- COM \_\_\_\_\_
- AFD \_\_\_\_\_
- APA \_\_\_\_\_
- ECO 6
- ENG \_\_\_\_\_
- GCL 1 redacted
- IDM \_\_\_\_\_
- CLK \_\_\_\_\_

Kind regards,

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

MEK  
 Cc:// Kristen Simmons (Office of General Counsel)  
 Sevini Guffey (Division of Economics)  
 Stephanie Morse (Office of Public Counsel)

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Joint Petition for Approval of Restructured ) DOCKET NO. 20190145  
Nassau County Agreements to reflect Callahan )  
Expansion by Florida Public Utilities Company, ) FILED: October 10, 2019  
Peoples Gas System, Peninsula Pipeline Company, )  
Inc. and SeaCoast Gas Transmission, LLC )  
\_\_\_\_\_ )

**PEOPLES GAS SYSTEM'S  
REQUEST FOR CONFIDENTIAL TREATMENT**

Pursuant to Section 366.093, *Florida Statutes*, and Florida Administrative Code Rule 25-22.006, Peoples Gas System ("Peoples" or the "Company") submits the following Request for Confidential Treatment for the joint response to Question 2 (a) of Staff's First Data Request dated September 26, 2019, which joint response is submitted for filing concurrently herewith or has heretofore been filed:

1. Attached hereto as Exhibit A is a detailed justification for the requested confidential treatment of the highlighted portions of the joint response to Staff's First Data Request.
2. The material for which confidential classification is sought is intended to be and is treated as private by Florida Public Utilities Company ("FPUC"), SeaCoast Gas Transmission, LLC ("SeaCoast"), and Peoples and has not been disclosed.
3. Peoples requests that the information for which it seeks confidential classification not be declassified until 18 months after the date of the Commission's order granting this request (see Section 366.093(4), *Florida Statutes*). The time period requested is necessary to protect the competitive information (*i.e.*, the capacity subscribed by Peoples) from disclosure to SeaCoast's and Peoples' competitors and to other potential Peoples and SeaCoast customers in order to allow

Peoples and or SeaCoast, should it become necessary, to negotiate future gas service arrangements with other customers on favorable terms based on the specific factual circumstances of such customers. The period of time requested will ultimately protect Peoples and SeaCoast and their customers by any such future arrangements being entered into based only on the facts and circumstances then applicable.

WHEREFORE, Peoples submits the foregoing as its request for confidential treatment of the information identified in Exhibit A to this request.

Respectfully submitted,



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P. O. Box 1531  
Tampa, FL 33601-1531  
*Attorneys for Peoples Gas System*

#### CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true copy of the foregoing Request for Confidential Treatment, filed on behalf of Peoples Gas System, has been furnished electronically to Adam J. Teitzman, Commission Clerk, Florida Public Service Commission, 2549 Shumard Oak Blvd., Tallahassee, FL 32399-0850; the Office of Public Counsel, 812 Claude Pepper Building, 111 W. Madison Street, Tallahassee, FL 32399-1400; and Beth Keating, The Gunster Firm, 215 S. Monroe Street, Suite 602, Tallahassee, FL 32301, [bkeating@gunster.com](mailto:bkeating@gunster.com), this 10th day of October, 2019.



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Andrew M. Brown

## **JOINT RESPONSE TO STAFF'S FIRST DATA REQUEST**


The only information in the Joint Response to Staff's First Data Request is the information in response to Question 2 (a), for which Peoples seeks specified confidential treatment, and non-disclosure pursuant to Chapter 119, *Florida Statutes*.

The information is the amount of capacity to which Peoples will be subscribed once the Callahan Pipeline goes into effect. This information is directly related to Peoples' competitive interests which, if made public, "would impair the competitive business" of Peoples in negotiating terms in the future for similar arrangements with other customers or potential customers. Section 366.093(3)(d), *Florida Statutes*. Disclosure of the capacity that Peoples is using on the Callahan Pipeline would give competitors, other customers or potential customers significant information that would give them a competitive advantage over Peoples.

## **EXHIBIT A**

2. Regarding the proposed new SeaCoast - Peoples Firm Transportation Agreement discussed on paragraph 19 of the petition, please respond to the following:
  - a. What percentage of the available Callahan capacity will Peoples reserve? How will Peoples recover its payments to SeaCoast? If through the PGA, please state the expected incremental c/therm impact on the PGA cap.
  - b. Paragraph 11 of the agreement refers to operational flow orders. Please explain that term.
  - c. Exhibit B to the SeaCoast – Peoples agreement lists two delivery points. Does this mean these are the only two points Peoples will be able to have gas delivered to its distribution system pursuant to this agreement? Please explain.
  - d. The petition states that Peoples will also receive firm transportation service from FPUC over the Callahan pipeline for an initial term of 10 years. Please explain whether this arrangement is included in an agreement before the Commission or no Commission approvals are needed.
  - e. Please provide the effective date of this agreement.

**Companies' Responses:**

- a. The total Callahan capacity is 148,248 MMBtu/day. Peoples has subscribed to  Peoples will recover its payments to Seacoast and FPUC through the Purchased Gas Adjustment (PGA). Peoples anticipates no additional increase to the 2020 PGA cap of \$.9909 per therm as a result of this project. [Redacted]
- b. Per the SeaCoast tariff, an Operational Flow Order, or OFO, is: “Any Gas Day where Company notifies Shipper(s) of conditions that could threaten the safe operation or system integrity of the Company and where deliveries of Shipper’s Gas to Company Receipt Point(s) are required to be within certain specified hourly or daily Gas flow Quantities.” This method of communication with pipeline shippers is an industry standard that pipelines use to ensure the firm rights of shippers are protected.
- c. At the time of this agreement two delivery points are required for service to Peoples Gas. Peoples may negotiate additional delivery points in the future with SeaCoast if necessary.
- d. The agreement between FPU and Peoples is under FPUC’s Flexible Gas Service tariff. Pursuant to that tariff, the agreement itself does not need to be filed for