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December 20, 2007

**VIA HAND DELIVERY**

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

**Re: Docket 070003-GU: In re Purchased Gas Adjustment (PGA) True-Up**

Dear Ms. Cole:

Enclosed for filing in the above-referenced Docket, please find an original and 7 copies of Florida City Gas' ("FCG") Request for Confidential Classification of certain material contained in Staff Audit Workpapers, in connection with the above-referenced Docket. Included with this filing are one highlighted copy of the confidential material, and two redacted copies, in accordance with Rule 25-22.006, F.A.C..

CMP \_\_\_\_\_

COM \_\_\_\_\_

CTR \_\_\_\_\_ Thank you for your assistance with this filing, and please do not hesitate to contact me with any questions or concerns.

ECR \_\_\_\_\_

GCL 1

OPC \_\_\_\_\_

**RCA** \_\_\_\_\_

SCR \_\_\_\_\_

SGA \_\_\_\_\_

SEC \_\_\_\_\_

OTH 1 conf records  
cc: Elizabeth Wade

Enclosures

Sincerely,

Beth Keating  
106 E. College Avenue  
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DOCUMENT NUMBER - DATE

11099 DEC 20 5

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**BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION**

**In re: Purchased Gas Adjustment )  
(PGA) True-Up )  
\_\_\_\_\_ )**

**Docket No. 070003-GU  
Date Filed: December 20, 2007**

**REQUEST FOR CONFIDENTIAL CLASSIFICATION**

Florida City Gas ("Petitioner," "FCG," or "the Company"), by and through its undersigned counsel, and pursuant to Section 366.093, Florida Statutes, and Rule 25-22.006, Florida Administrative Code, hereby requests confidential classification of certain material provided to the Florida Public Service Commission auditors ("Commission," "PSC," or "Staff") in connection with FCG's Purchased Gas Adjustment ("PGA") True-Up, PSC Docket 070003-GU, and set forth in staff's audit workpapers, Audit Control No. 07-067-4-1. This information is similar to information provided in response to Staff's First Set of Interrogatories to Florida City Gas, for which FCG previously requested confidential treatment in this Docket, as well as information for which this Commission granted Confidential Classification in Order No. PSC-07-0845-CFO-GU, issued October 18, 2007, in Docket No. 060657-GU. Included with this Request is a highlighted copy of the confidential information being provided, as well as two copies of a public, redacted version of the document. In support of this Request, FCG states as follows:

1. Subsection 366.093(1), Florida Statutes, provides that upon request, records received by the PSC which are "found by the commission to be proprietary confidential business information shall be kept confidential and shall be exempt from s. 119.07(1)."

2. "Proprietary confidential business information" is defined as meaning "information, regardless of form or characteristics, which is owned or controlled by the ... company, is intended to be and is treated by the ... company as private in that the disclosure of

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the information would cause harm to the ratepayers or the 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." § 366.093(3), Fla. Stat.

3. Proprietary confidential business information includes information concerning "contractual data, the disclosure of which would impair the efforts of a public utility or its affiliates to contract for goods or services on favorable terms." § 366.093(3)(d), Fla. Stat.

4. The designated portions of the information being provided to the Commission fall within these statutory definitions, and therefore constitute proprietary confidential business information entitled to protection under Section 366.093 and Rule 25-22.006.

5. The audit workpapers contain information, including specific contractual information, prices, and pricing data, which has been treated by FCG as private and has not been publicly disclosed. These terms and data, if disclosed, would impair the efforts of FCG to contract for goods or services on favorable terms in the future. In fact, within the answer itself is a statement attesting to the confidential nature of the information being supplied to the Staff. The contractual terms and pricing data therein is therefore proprietary confidential business information and is entitled to protection under Section 366.093 and Rule 25-22.006.

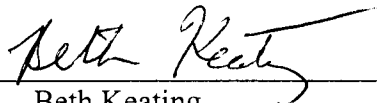
6. Specifically, FCG seeks confidential treatment of specific information as set forth in Attachment A.

7. Pursuant to Section 366.093(4), Florida Statutes, and Rule 25-22.006(9), Florida Administrative Code, FCG 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 should be returned to FCG as soon as the information is no longer necessary for the Commission to conduct its business.

Respectfully submitted this   20   day of December, 2007.

**FLORIDA CITY GAS**

By: 

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Florida Bar No. 0022756  
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*Attorneys for Florida City Gas*

Attachment A

Confidentiality Justification

DOCUMENT	line/column	RATIONALE
Sequent Physical Purchases Compared to Index Pricing – January 2006	<p>All information in Sequent Purchase Price Column</p> <p>All information in FOM price column</p> <p>All information in difference column</p> <p>All information in column composed of auditor notes</p> <p>Specific highlighted information in pertaining to Weighted Average Price for Sequent purchases at Destin, FGT Zone 1, and Mobile Bay</p> <p>Specific highlighted information and amounts in auditor notes at the bottom of the page</p>	See paragraph 5 of the Request
Sequent Physical Purchases Compared to Index Pricing – February 2006	<p>All information in Sequent Purchase Price Column</p> <p>All information in FOM price column</p> <p>All information in difference column</p> <p>All information in column composed of auditor notes</p> <p>Specific highlighted information in pertaining to Weighted Average Price for Sequent purchases at Destin, FGT Zone 1, High Island</p>	See paragraph 5 of the Request

DOCUMENT NUMBER-DATE

DOCUMENT	line/column	RATIONALE
	Operating System, and Mobile Bay	
Sequent Physical Purchases Compared to Index Pricing – March 2006	<p>All information in Sequent Purchase Price Column</p> <p>All information in FOM price column</p> <p>All information in difference column</p> <p>All information in column composed of auditor notes</p> <p>Specific highlighted information in pertaining to Weighted Average Price for Sequent purchases at Destin, FGT Zone 1, High Island Operating System, and Mobile Bay</p>	See paragraph 5 of the Request
Sequent Physical Purchases Compared to Index Pricing – April 2006	<p>All information in Sequent Purchase Price Column</p> <p>All information in FOM price column</p> <p>All information in difference column</p> <p>All information in column composed of auditor notes</p> <p>Specific highlighted information in pertaining to Weighted Average Price for Sequent purchases at Destin, FGT Zone 1 and 2, Houston Pipeline, Northern Natural Gas/MOPS, Southern Natural Gas/MOPS, and</p>	See paragraph 5 of the Request

DOCUMENT	line/column	RATIONALE
	Mobile Bay	
Sequent Physical Purchases Compared to Index Pricing – May 2006	<p>All information in Sequent Purchase Price Column</p> <p>All information in FOM price column</p> <p>All information in difference column</p> <p>All information in column composed of auditor notes</p> <p>Specific highlighted information in pertaining to Weighted Average Price for Sequent purchases at Destin, FGT Zones 1 and 2, Northern Natural Gas/MOPS, Southern Natural Gas/MOPS, and Mobile Bay</p>	See paragraph 5 of the Request
Sequent Physical Purchases Compared to Index Pricing – June 2006	<p>All information in Sequent Purchase Price Column</p> <p>All information in FOM price column</p> <p>All information in difference column</p> <p>All information in column composed of auditor notes</p> <p>Specific highlighted information in pertaining to Weighted Average Price for Sequent purchases at Destin, FGT Zones 1 and 2, Northern Natural Gas/MOPS, Southern Natural</p>	See paragraph 5 of the Request

DOCUMENT	line/column	RATIONALE
	Gas/MOPS, and Mobile Bay	
Sequent Physical Purchases Compared to Index Pricing – July 2006	<p>All information in Sequent Purchase Price Column</p> <p>All information in FOM price column</p> <p>All information in difference column</p> <p>All information in column composed of auditor notes</p> <p>Specific highlighted information in pertaining to Weighted Average Price for Sequent purchases at Destin, FGT Zones 1 and 2, Northern Natural Gas/MOPS, Southern Natural Gas/MOPS, and Mobile Bay</p>	See paragraph 5 of the Request
Sequent Physical Purchases Compared to Index Pricing – August 2006	<p>All information in Sequent Purchase Price Column</p> <p>All information in FOM price column</p> <p>All information in difference column</p> <p>All information in column composed of auditor notes</p> <p>Specific highlighted information in pertaining to Weighted Average Price for Sequent purchases at Destin, FGT Zones 1 and 2, Northern Natural Gas/MOPS, Southern Natural</p>	See paragraph 5 of the Request



DOCUMENT	line/column	RATIONALE
	Gas/MOPS, and Mobile Bay	
Sequent Physical Purchases Compared to Index Pricing – September 2006	<p>All information in Sequent Purchase Price Column</p> <p>All information in FOM price column</p> <p>All information in difference column</p> <p>All information in column composed of auditor notes</p> <p>Specific highlighted information in pertaining to Weighted Average Price for Sequent purchases at Destin, FGT Zones 1 and 2, Northern Natural Gas/MOPS, Southern Natural Gas/MOPS, and Mobile Bay</p>	See paragraph 5 of the Request
Sequent Physical Purchases Compared to Index Pricing – October 2006	<p>All information in Sequent Purchase Price Column</p> <p>All information in FOM price column</p> <p>All information in difference column</p> <p>All information in column composed of auditor notes</p> <p>Specific highlighted information in pertaining to Weighted Average Price for Sequent purchases at Destin, FGT Zones 1 and 2, and Mobile Bay</p>	See paragraph 5 of the Request
Sequent Physical Purchases Compared to Index Pricing –	All information in Sequent Purchase Price Column	See paragraph 5 of the Request

<b>DOCUMENT</b>	<b>line/column</b>	<b>RATIONALE</b>
November 2006	<p>All information in FOM price column</p> <p>All information in difference column</p> <p>All information in column composed of auditor notes</p> <p>Specific highlighted information in pertaining to Weighted Average Price for Sequent purchases at Destin, FGT Zones 1 and 2, and Mobile Bay</p>	
Sequent Physical Purchases Compared to Index Pricing – December 2006	<p>All information in Sequent Purchase Price Column</p> <p>All information in FOM price column</p> <p>All information in difference column</p> <p>All information in column composed of auditor notes</p> <p>Specific highlighted information in pertaining to Weighted Average Price for Sequent purchases at Destin, FGT Zones 1 and 2, Northern Natural Gas Company/MOPS, and Mobile Bay</p>	See paragraph 5 of the Request
Audit Workpaper 43-1/1 -1 p. 2	<p>All information in "Counterparty" column</p> <p>Highlighted numbers in +/- spread column</p>	See paragraph 5 of the Request
Audit Workpaper 43-1/2	Highlighted information in line 44 of auditor notes	See paragraph 5 of the Request

<b>DOCUMENT</b>	<b>line/column</b>	<b>RATIONALE</b>
Audit Source: Request 1/p. 1 (8/17/07)	Highlighted information in first paragraph of Response	See paragraph 5 of the Request
Audit Source: Request (43-1/2-1; 43-1/3; 43-1/4) p. 2, 3, and 4 (9/16/07)	Highlighted information in second, third, and fourth paragraphs of Response under subject line "Market Price and Cost of Gas"	See paragraph 5 of the Request
Attachment III – Comparison of Sequent Daily Purchase Cost to FCG Daily Purchase Cost	Total Sequent Daily Purchase – All information in the Price and Amount columns  FCG Daily Ordered – All information in the Price and Amount columns  All information in the Difference and Value columns  Highlighted information in the auditor notes below chart	See paragraph 5 of the Request
Attachment IV – Sequent Energy Management FCG Allocated Cost Year-ended 2006	All amounts identified for Florida City Gas 2006  All amounts identified for Sequent 2006 Earnings Summary  Percentage Gross Margin  Estimated expense calculation  Amount associated with Percentage Gross Margin in last line  Highlighted information and amounts in auditor handwritten notes	See paragraph 5 of the Request
PGA Audit Supplement Page –	All information in Sequent	See paragraph 5 of the Request

<b>DOCUMENT</b>	<b>line/column</b>	<b>RATIONALE</b>
<p>May Comparison - Sequent Physical Purchases Compared to Index Pricing – May 2006</p>	<p>Purchase Price Column</p> <p>All information in FOM price column</p> <p>All information in difference column</p> <p>Specific highlighted information in pertaining to Weighted Average Price for Sequent purchases at Destin, FGT Zones 1 and 2, Northern Natural Gas/MOPS, Southern Natural Gas/MOPS, and Mobile Bay</p>	
<p>2006 PGA Audit Supplement – Sequent Cost Including Gas Daily Purchases – Workpaper 43 - 4</p>	<p>All information in the Total Cost Column; all information in the Z1 cost column; all information in the Z2 cost column; all information in the Z3 cost column; all information in the Average Cost line; all information in the Market line; all information in the Difference line; all information in the City Therm Purchases line; all information in the Difference Between Avg. Cost and Cost to City line; and all information in the Allocation of Sequent Expenses Net Difference for May line.</p>	<p>See paragraph 5 of the Request</p>

**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that a copy of the foregoing Request for Confidential Classification, including a redacted copy of the document for which confidentiality is requested, has been furnished by electronic and U.S. Mail to Katherine E. Fleming, Esquire, Office of the General Counsel, Florida Public Service Commission, 2540 Shumard Oak Boulevard, Tallahassee, Florida 32399-0850, and that a copy of each has been furnished by U.S. Mail to the following parties of record this 20th day of December 2007.

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Norman Horton, Jr.  
Messer Law Firm  
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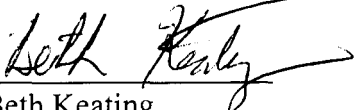
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COMMISSION CLERK  
(850) 413-6770

**Public Service Commission** **CONFIDENTIAL**

ACKNOWLEDGEMENT

DATE: December 20, 2007

TO: Beth Keating/Akerman Law Firm

FROM: Ruth Nettles, Office of Commission Clerk

RE: **Acknowledgement of Receipt of Confidential Filing**

This will acknowledge receipt of a **CONFIDENTIAL DOCUMENT** filed in Docket Number 070003 or, if filed in an undocketed matter, concerning certain material provided to auditors and set forth in staff's audit workpapers [Audit Control No. 07-067-4-1], and filed on behalf of Florida City Gas. The document will be maintained in locked storage.

If you have any questions regarding this document, please contact Marguerite Lockard, Deputy Clerk, at (850) 413-6770.

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