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November 4, 2022

VIA HAND DELIVERY

Mr. Adam Teitzman
Division of the Commission Clerk and Administrative Services
Florida Public Service Commission
2540 Shumard Oak Blvd.
Tallahassee, FL 32399-0850

REDACTED

**Re: Docket No. 20220069-GU
Florida City Gas's Request for Confidential Classification**

Dear Mr. Teitzman:

I enclose for filing in the above docket Florida City Gas's ("FCG") Request for Confidential Classification of Information contained in its response to the Office of Public Counsel's ("OPC") Seventh Request for Production of Documents No. 53. The request includes Exhibits A, B (two copies), C and D.

Exhibit A consists of the confidential documents, all of which are provided on a disc, and FCG asserts that all the information contained therein is entitled to confidential treatment. Exhibit B is an edited version of Exhibit A, consisting of an identifying cover page. Exhibit C is a justification table in support of FCG's Request for Confidential Classification. Exhibit D contains the declaration in support of FCG's Request. In accordance with Rule 25-22.006(3)(d), Florida Administrative Code, FCG requests confidential treatment of the information in Exhibit A pending disposition of FCG's Request for Confidential Classification.

Please contact me if you or your Staff has any questions regarding this filing.

Sincerely,
/s/ Joel T. Baker
Joel T. Baker
Fla. Bar No. 0108202

Enclosures

- COM _____
- AFD _____
- APA _____
- ECO _____
- ENG** 1 Exh "B" _____
- GCL _____
- IDM _____
- CLK _____

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COMMISSION CLERK

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Petition for rate increase by Florida
City Gas

Docket No. 20220069-GU

Filed: November 4, 2022

**FLORIDA CITY GAS'S REQUEST FOR CONFIDENTIAL CLASSIFICATION
OF CERTAIN INFORMATION CONTAINED IN ITS RESPONSE TO THE
OFFICE OF PUBLIC COUNSEL'S SEVENTH REQUEST FOR
PRODUCTION OF DOCUMENTS (No. 53)**

Pursuant to Section 366.093, Florida Statutes ("F.S."), and Rule 25-22.006, Florida Administrative Code, Florida City Gas ("FCG") hereby requests confidential classification of certain information provided in its response to the Office of Public Counsel's ("OPC") Seventh Request for Production of Documents No. 53, filed contemporaneously in this proceeding (referred to herein as the "Confidential Information"). In support of its Request, FCG states as follows:

1. FCG served its responses to OPC's Seventh Request for Production of Documents on November 4, 2022. This request is being filed contemporaneously with service of those responses to request confidential classification of certain information contained in its response to OPC's Seventh Request for Production of Documents No. 53, consistent with Rule 25-22.006, Florida Administrative Code. The following exhibits are included with and made a part of this request:

a. Exhibit A consists of a copy of the Confidential Information, provided in electronic format on CD, wherein all of the information contained is entitled to confidential treatment. Because the confidential materials are being provided in electronic format and are voluminous, and therefore cannot be readily highlighted, FCG has not highlighted the entirety of the information contained on the CD, in accordance with Rule 25-22.006(4)(b).

b. Exhibit B consists of a summary page that identifies the confidential documents, which are entitled to confidential treatment in their entirety

c. Exhibit C is a table that identifies the information in Exhibit A and references the specific statutory basis for the claim of confidentiality and identifies the Declarant who supports the requested classification.

d. Exhibit D contains the declaration of Johana Molina-Parks in support of this Request.

2. The Confidential Information is intended to be and has been treated by FCG as private, its confidentiality has been maintained, and its disclosure would cause harm to FCG and its customers. Pursuant to Section 366.093, F.S., such materials are entitled to confidential treatment and are exempt from the disclosure provisions of the public records law. Thus, once the Commission determines that the information in question is proprietary confidential business information, the Commission is not required to engage in any further analysis or review such as weighing the harm of disclosure against the public interest in access to the information.

3. As described in the declaration included in Exhibit D, the Confidential Information that is the subject of this Request contains information concerning bids or other contractual data, the disclosure of which would impair the efforts of FCG or its affiliates to contract for goods or services on favorable terms. This information is protected by Section 366.093(3)(d), F.S. The Confidential Information also includes information relating to competitive interests, the disclosure of which would impair the competitive business of the provider of the information. Specifically, the information contains information related to insurance contracts, including pricing. This information is protected by Section 366.093(3)(e), F.S.

4. Upon a finding by the Commission that the Confidential Information is proprietary confidential business information, the information should not be declassified for a period of at least eighteen (18) months and should be returned to FCG as soon as the information is no longer necessary for the Commission to conduct its business. See Section 366.093(4), F.S.

WHEREFORE, for the above and foregoing reasons, as more fully set forth in the supporting materials, Florida City Gas respectfully requests that its Request for Confidential Classification be granted.

Respectfully submitted this 4th day of November 2022.

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Fax: 561-691-7135
Email: joel.baker@fpl.com

By: /s/ Joel T. Baker
Joel T. Baker
Fla. Bar No. 0108202

CERTIFICATE OF SERVICE

20220069-GU

I **HEREBY CERTIFY** that a true and correct copy of the foregoing has been furnished by electronic mail this 4th day of November 2022 to the following parties:

<p>Walter Trierweiler, Esquire Matthew Jones, Esquire Florida Public Service Commission 2540 Shumard Oak Boulevard Tallahassee, FL 32399 wtrierwe@psc.state.fl.us majones@psc.state.fl.us <i>For Commission Staff</i></p>	<p>Office of Public Counsel c/o The Florida Legislature 111 West Madison Street, Room 812 Tallahassee, FL 32399-1400 Gentry.richard@leg.state.fl.us wessling.mary@leg.state.fl.us <i>For Office of Public Counsel</i></p>
<p>Beth Keating Gunster, Yoakley & Stewart, P.A. 215 South Monroe St., Suite 601 Tallahassee, FL 32301 BKeating@gunster.com <i>For Florida City Gas</i></p>	<p>T. Jernigan/H. Buchanan/E. Payton/R. Franjul 139 Barnes Drive, Suite 1 Tyndall AFB FL 32403 thomas.jernigan.3@us.af.mil holly.buchanan.1@us.af.mil ebony.payton.ctr@us.af.mil rafael.franjul@us.af.mil ULFSC.Tyndall@us.af.mil marcus.duffy.3@us.af.mil <i>For Federal Executive Agencies</i></p>

By: /s/ Joel T. Baker
Joel T. Baker
Fla. Bar No. 0108202

EXHIBIT B

REDACTED

The documents responsive to OPC's Seventh Request for Production of Documents No. 53, Bates Nos. 001225-001435, 005098-008065 and 008238-011435, are confidential in their entirety.

EXHIBIT C

JUSTIFICATION TABLE

EXHIBIT C

COMPANY: Florida City Gas
TITLE: Petition for rate increase by Florida City Gas
DOCKET NO.: 20220069-GU
DATE: November 4, 2022

Int/POD No.	Description	Bates Nos.	Page	Florida Statute 366.093(3) Subsection	Declarants
OPC 7 th POD, No. 53	2018-2019\FSLSO POLICY RPT XXXXX 15-WC-2011 FPL EMPL WC 01-01-2018 Confidential.pdf	009124-009140	All	(d) (e)	Johana Molina-Parks
OPC 7 th POD, No. 53	2018-2019\NextEra-FPL OCIP 18-19 XXXXX XSWC Policy_Confidential.pdf	009141	All	(d) (e)	Johana Molina-Parks
OPC 7 th POD, No. 53	2018-2019\Florida Power XXXXX 18-19 XS WC Policy_Confidential.pdf	009142	All	(d) (e)	Johana Molina-Parks
OPC 7 th POD, No. 53	2018-2019\ XXXXX POLICY RPT XXXXX 9-WCC-2012 FPL CONT WC 01-01-2018 Confidential.pdf	009143-009157	All	(d) (e)	Johana Molina-Parks
OPC 7 th POD, No. 53	2018-2019 Bar 2018-2019 Confidential\2018 XXXXX BAR Policy.pdf	009337-009379	All	(d) (e)	Johana Molina-Parks
OPC 7 th POD, No. 53	2018-2019 Bar 2018-2019 Confidential\2018 XXXXX BAR Policy.pdf	009380-009434	All	(d) (e)	Johana Molina-Parks
OPC 7 th POD, No. 53	2018-2019 Bar 2018-2019 Confidential\2018 XXXXX BAR Policy.pdf	009435-009484	All	(d) (e)	Johana Molina-Parks
OPC 7 th POD, No. 53	2018-2019 Bar 2018-2019 Confidential\2018 XXXXX BAR Policy.pdf	009158-009207	All	(d) (e)	Johana Molina-Parks
OPC 7 th POD, No. 53	2018-2019 Bar 2018-2019 Confidential\2018 XXXXX BAR Policy.pdf	009208-009258	All	(d) (e)	Johana Molina-Parks
OPC 7 th POD, No. 53	2018-2019 Bar 2018-2019 Confidential\2018 XXXXX BAR.pdf	009259-009303	All	(d) (e)	Johana Molina-Parks

Int/POD No.	Description	Bates Nos.	Page	Florida Statute 366.093(3) Subsection	Declarants
OPC 7 th POD, No. 53	2018-2019 Bar 2018-2019 Confidential\2018 XXXXX BAR Policy 30 32-BAR-2018 - signed.pdf	009304-009336	All	(d) (e)	Johana Molina-Parks
OPC 7 th POD, No. 53	2018-2019 Dec Pages\7. XXXXX - x.pdf	008714-008716	All	(d) (e)	Johana Molina-Parks
OPC 7 th POD, No. 53	2018-2019 Dec Pages\8. XXXXX - x.pdf	008717-008718	All	(d) (e)	Johana Molina-Parks
OPC 7 th POD, No. 53	2018-2019 Dec Pages\9. XXXXX - x.pdf	008719-008720	All	(d) (e)	Johana Molina-Parks
OPC 7 th POD, No. 53	2018-2019 Dec Pages\10. XXXXX - x.pdf	008721-008722	All	(d) (e)	Johana Molina-Parks
OPC 7 th POD, No. 53	2018-2019 Dec Pages\11. XXXXX - x.pdf	008723-008728	All	(d) (e)	Johana Molina-Parks
OPC 7 th POD, No. 53	2018-2019 Dec Pages\0. 2018 Excess Liability Slide.pdf	008697	All	(d) (e)	Johana Molina-Parks
OPC 7 th POD, No. 53	2018-2019 Dec Pages\1. XXXXX -35.pdf	008698-008699	All	(d) (e)	Johana Molina-Parks
OPC 7 th POD, No. 53	2018-2019 Dec Pages\2. XXXXX -x.pdf	008700	All	(d) (e)	Johana Molina-Parks
OPC 7 th POD, No. 53	2018-2019 Dec Pages\3. XXXXX - x .pdf	008701-008707	All	(d) (e)	Johana Molina-Parks
OPC 7 th POD, No. 53	2018-2019 Dec Pages\4. XXXXX - x.pdf	008708	All	(d) (e)	Johana Molina-Parks
OPC 7 th POD, No. 53	2018-2019 Dec Pages\5. XXXXX - x.pdf	008709-008711	All	(d) (e)	Johana Molina-Parks
OPC 7 th POD, No. 53	2018-2019 Dec Pages\6. XXXXX - x.pdf	008712-008713	All	(d) (e)	Johana Molina-Parks
OPC 7 th POD, No. 53	2018-2019 Excess Liability Policies\05 . XXXXX - x .pdf	008892-008940	All	(d) (e)	Johana Molina-Parks
OPC 7 th POD, No. 53	2018-2019 Excess Liability Policies\06. XXXXX - x .pdf	008941-008962	All	(d) (e)	Johana Molina-Parks
OPC 7 th POD, No. 53	2018-2019 Excess Liability Policies\07. XXXXX - x .pdf	008963-008987	All	(d) (e)	Johana Molina-Parks
OPC 7 th POD, No. 53	2018-2019 Excess Liability Policies\08. XXXXX x .pdf	008988-009024	All	(d) (e)	Johana Molina-Parks
OPC 7 th POD, No. 53	2018-2019 Excess Liability Policies\09. XXXXX - x .pdf	009025-009057	All	(d) (e)	Johana Molina-Parks
OPC 7 th POD, No. 53	2018-2019 Excess Liability Policies\10. XXXXX - x .pdf	009058-009703	All	(d) (e)	Johana Molina-Parks
OPC 7 th POD, No. 53	2018-2019 Excess Liability Policies\11. XXXXX - x .pdf	009074-009123	All	(d) (e)	Johana Molina-Parks

Int/POD No.	Description	Bates Nos.	Page	Florida Statute 366.093(3) Subsection	Declarants
OPC 7 th POD, No. 53	2018-2019 Excess Liability Policies\01. XXXXX - Primary 35.pdf	008729-008809	All	(d) (e)	Johana Molina-Parks
OPC 7 th POD, No. 53	2018-2019 Excess Liability Policies\02. XXXXX - x .pdf	008810-008831	All	(d) (e)	Johana Molina-Parks
OPC 7 th POD, No. 53	2018-2019 Excess Liability Policies\03. XXXXX - x .pdf	008832-008881	All	(d) (e)	Johana Molina-Parks
OPC 7 th POD, No. 53	2018-2019 Excess Liability Policies\04. XXXXX - x .pdf	008882-008891	All	(d) (e)	Johana Molina-Parks
OPC 7 th POD, No. 53	2018-2019 Property 2018-2019 Confidential\ XXXXX Property Policy 17-PD-2018 -signed.pdf	011166-011213	All	(d) (e)	Johana Molina-Parks
OPC 7 th POD, No. 53	2018-2019 Property 2018-2019 Confidential\ XXXXX Property Wind Policy 21-PDDR-2018 final.pdf	011214-011224	All	(d) (e)	Johana Molina-Parks
OPC 7 th POD, No. 53	2018-2019 Property 2018-2019 Confidential\ XXXXX Property Excess Policy 19-PDXS-2018 - signed.pdf	011161-011165	All	(d) (e)	Johana Molina-Parks
OPC 7 th POD, No. 53	2018-2019 Property 2018-2019 Confidential\\$ XS \$ Excess\2018 XXXXX \$ xs \$ Policy.pdf	009564-009646	All	(d) (e)	Johana Molina-Parks
OPC 7 th POD, No. 53	2018-2019 Property 2018-2019 Confidential\\$ XS \$ Excess\2018 XXXXX \$ xs \$ Policy.pdf	009647-009722	All	(d) (e)	Johana Molina-Parks
OPC 7 th POD, No. 53	2018-2019 Property 2018-2019 Confidential\\$ XS \$ Excess\2018 XXXXX \$ xs \$ Policy.pdf	009723-009909	All	(d) (e)	Johana Molina-Parks
OPC 7 th POD, No. 53	2018-2019 Property 2018-2019 Confidential\\$ XS \$ Excess\2018 XXXXX \$ xs \$ Policy.pdf	009910-009991	All	(d) (e)	Johana Molina-Parks
OPC 7 th POD, No. 53	2018-2019 Property 2018-2019 Confidential\\$ XS \$ Excess\2018 XXXXX \$ xs \$ Policy.PDF	009485-009563	All	(d) (e)	Johana Molina-Parks
OPC 7 th POD, No. 53	2018-2019 Property 2018-2019 Confidential\\$ xs \$ Excess\2018 XXXXX \$ xs \$ Policy.pdf	010071-010151	All	(d) (e)	Johana Molina-Parks
OPC 7 th POD, No. 53	2018-2019 Property 2018-2019 Confidential\\$ xs \$ Excess\2018 XXXXX \$ xs \$ Policy.pdf	010152-010222	All	(d) (e)	Johana Molina-Parks

Int/POD No.	Description	Bates Nos.	Page	Florida Statute 366.093(3) Subsection	Declarants
OPC 7 th POD, No. 53	2018-2019 Property 2018-2019 Confidential\ \$ xs \$ Excess\2018 XXXXX \$ xs \$ Policy.pdf	009992-010070	All	(d) (e)	Johana Molina-Parks
OPC 7 th POD, No. 53	2018-2019 Property 2018-2019 Confidential\Primary \$\2018 XXXXX \$ - Endt 1 - Engineering Fee Reimbursement.pdf	010253	All	(d) (e)	Johana Molina-Parks
OPC 7 th POD, No. 53	2018-2019 Property 2018-2019 Confidential\Primary \$\2018 XXXXX \$ - Endt 2 Multiple Insured Clause.pdf	010254	All	(d) (e)	Johana Molina-Parks
OPC 7 th POD, No. 53	2018-2019 Property 2018-2019 Confidential\Primary \$\2018 XXXXX \$ - Endt 3 misrepresentation Clause.pdf	010255	All	(d) (e)	Johana Molina-Parks
OPC 7 th POD, No. 53	2018-2019 Property 2018-2019 Confidential\Primary \$ \2018 XXXXX \$ and \$ Policy.pdf	010256-010338	All	(d) (e)	Johana Molina-Parks
OPC 7 th POD, No. 53	2018-2019 Property 2018-2019 Confidential\Primary \$\2018 XXXXX \$ - Engineering Fee Reimbursement.pdf	010223-010224	All	(d) (e)	Johana Molina-Parks
OPC 7 th POD, No. 53	2018-2019 Property 2018-2019 Confidential\Primary \$\2018 XXXXX \$ - Multiple insured Clause.pdf	010225	All	(d) (e)	Johana Molina-Parks
OPC 7 th POD, No. 53	2018-2019 Property 2018-2019 Confidential\Primary \$\2018 XXXXX \$ Policy.pdf	010226-010252	All	(d) (e)	Johana Molina-Parks
OPC 7 th POD, No. 53	2018-2019 Property 2018-2019 Confidential\Primary \$\2018 XXXXX Email Confirming Wording Bates Number 010339.msg	010339	All	(d) (e)	Johana Molina-Parks
OPC 7 th POD, No. 53	2018-2019 Property 2018-2019 Confidential\Primary \$\2018 XXXXX \$ - Endt 1 - Engineering Fee Reimbursement.pdf	011064	All	(d) (e)	Johana Molina-Parks
OPC 7 th POD, No. 53	2018-2019 Property 2018-2019 Confidential\Primary \$\2018 XXXXX \$ - Endt 2 - Multiple Insured Clause.pdf	011065	All	(d) (e)	Johana Molina-Parks

Int/POD No.	Description	Bates Nos.	Page	Florida Statute 366.093(3) Subsection	Declarants
OPC 7 th POD, No. 53	2018-2019 Property 2018-2019 Confidential\Primary \$\2018 XXXXX \$ - Endt 3 - Misrepresentation Clause.pdf	011066	All	(d) (e)	Johana Molina-Parks
OPC 7 th POD, No. 53	2018-2019 Property 2018-2019 Confidential\Primary \$\2018 XXXXX \$ Policy.pdf	011067-011150	All	(d) (e)	Johana Molina-Parks
OPC 7 th POD, No. 53	2018-2019 Property 2018-2019 Confidential\Primary \$\ XXXXX \$ - Endt 1 - Engineering Fee Reimbursement.pdf	011151	All	(d) (e)	Johana Molina-Parks
OPC 7 th POD, No. 53	2018-2019 Property 2018-2019 Confidential\Primary \$\ XXXXX \$ - Endt 2 - Multiple Insured Clause.pdf	011152	All	(d) (e)	Johana Molina-Parks
OPC 7 th POD, No. 53	2018-2019 Property 2018-2019 Confidential\Primary \$\ XXXXX \$ - Endt 3 - Misrepresentation Clause.pdf	011153-011154	All	(d) (e)	Johana Molina-Parks
OPC 7 th POD, No. 53	2018-2019 Property 2018-2019 Confidential\Primary \$\ XXXXX \$ - Endt 1 - Engineering Fee Reimbursement.pdf	011155	All	(d) (e)	Johana Molina-Parks
OPC 7 th POD, No. 53	2018-2019 Property 2018-2019 Confidential\Primary \$\ XXXXX \$ - Endt 3 Misrepresentation Clause.pdf	011156	All	(d) (e)	Johana Molina-Parks
OPC 7 th POD, No. 53	2018-2019 Property 2018-2019 Confidential\Primary \$\ XXXXX \$ - Endt 1 - Engineering Fee Reimbursement.pdf	011157	All	(d) (e)	Johana Molina-Parks
OPC 7 th POD, No. 53	2018-2019 Property 2018-2019 Confidential\Primary \$\ XXXXX \$ - Endt 2 Multiple Insured Clause.pdf	011158	All	(d) (e)	Johana Molina-Parks
OPC 7 th POD, No. 53	2018-2019 Property 2018-2019 Confidential\Primary \$\ XXXXX \$ - Endt 3 Misrepresentation Clause.pdf	011159	All	(d) (e)	Johana Molina-Parks

Int/POD No.	Description	Bates Nos.	Page	Florida Statute 366.093(3) Subsection	Declarants
OPC 7 th POD, No. 53	2018-2019 Property 2018-2019 Confidential\Primary \$\2018 XXXXX \$ - Endt 1 - Engineering Fee Reimbursement.PDF	010340-010347	All	(d) (e)	Johana Molina-Parks
OPC 7 th POD, No. 53	2018-2019 Property 2018-2019 Confidential\Primary \$\2018 XXXXX \$ - Endt 2 - Multiple Insured Clause.PDF	010348-010354	All	(d) (e)	Johana Molina-Parks
OPC 7 th POD, No. 53	2018-2019 Property 2018-2019 Confidential\Primary \$\2018 XXXXX \$ - Endt 3 - Misrepresentation Amended.PDF	010355-010361	All	(d) (e)	Johana Molina-Parks
OPC 7 th POD, No. 53	2018-2019 Property 2018-2019 Confidential\Primary \$\2018 XXXXX \$ Policy.PDF	010362-010443	All	(d) (e)	Johana Molina-Parks
OPC 7 th POD, No. 53	2018-2019 Property 2018-2019 Confidential\Primary \$\2018 XXXXX \$ - Endt 1 - Engineering Fee Reimbursement.pdf	010444	All	(d) (e)	Johana Molina-Parks
OPC 7 th POD, No. 53	2018-2019 Property 2018-2019 Confidential\Primary \$\2018 XXXXX \$ - Endt 2 - Multiple Insured Clause.pdf	010445	All	(d) (e)	Johana Molina-Parks
OPC 7 th POD, No. 53	2018-2019 Property 2018-2019 Confidential\Primary \$\2018 XXXXX \$ - Endt 3 Misrepresentation Clause.pdf	010446	All	(d) (e)	Johana Molina-Parks
OPC 7 th POD, No. 53	2018-2019 Property 2018-2019 Confidential\Primary \$\2018 XXXXX \$, \$ and \$ Policy.pdf	010447-010534	All	(d) (e)	Johana Molina-Parks
OPC 7 th POD, No. 53	2018-2019 Property 2018-2019 Confidential\Primary \$\2018 XXXXX \$ - Endt 1 - Engineering Fee Reimbursement.pdf	010535	All	(d) (e)	Johana Molina-Parks
OPC 7 th POD, No. 53	2018-2019 Property 2018-2019 Confidential\Primary \$\2018 XXXXX \$ - Endt 2 - Multiple Insured Clause.pdf	010536	All	(d) (e)	Johana Molina-Parks
OPC 7 th POD, No. 53	2018-2019 Property 2018-2019 Confidential\Primary \$\2018 XXXXX \$ - Endt 3 Misrepresentation Clause.pdf	010537	All	(d) (e)	Johana Molina-Parks

Int/POD No.	Description	Bates Nos.	Page	Florida Statute 366.093(3) Subsection	Declarants
OPC 7 th POD, No. 53	2018-2019 Property 2018-2019 Confidential\Primary \$\2018 XXXXX \$ Policy.pdf	010538-010620	All	(d) (e)	Johana Molina-Parks
OPC 7 th POD, No. 53	2018-2019 Property 2018-2019 Confidential\Primary \$\2018 XXXXX \$ - Endt 1 - Engineering Fee Reimbursement.pdf	010621	All	(d) (e)	Johana Molina-Parks
OPC 7 th POD, No. 53	2018-2019 Property 2018-2019 Confidential\Primary \$\2018 XXXXX \$ - Endt 2 - Multiple Insured Clause.pdf	010622	All	(d) (e)	Johana Molina-Parks
OPC 7 th POD, No. 53	2018-2019 Property 2018-2019 Confidential\Primary \$\2018 XXXXX \$ - Endt 3 - Misrepresentation Clause.pdf	010623-010624	All	(d) (e)	Johana Molina-Parks
OPC 7 th POD, No. 53	2018-2019 Property 2018-2019 Confidential\Primary \$\2018 XXXXX \$ Policy.pdf	010625-010700	All	(d) (e)	Johana Molina-Parks
OPC 7 th POD, No. 53	2018-2019 Property 2018-2019 Confidential\Primary \$\2018 XXXXX \$ Policy.pdf	010701-010783	All	(d) (e)	Johana Molina-Parks
OPC 7 th POD, No. 53	2018-2019 Property 2018-2019 Confidential\Primary \$\2018 XXXXX \$ - Endt 1 - Engineering Fee Reimbursement.pdf	010784-010785	All	(d) (e)	Johana Molina-Parks
OPC 7 th POD, No. 53	2018-2019 Property 2018-2019 Confidential\Primary \$\2018 XXXXX \$ - Endt 2 - Multiple Insured Clause.pdf	010786	All	(d) (e)	Johana Molina-Parks
OPC 7 th POD, No. 53	2018-2019 Property 2018-2019 Confidential\Primary \$\2018 XXXXX \$ Policy.pdf	010787-010811	All	(d) (e)	Johana Molina-Parks
OPC 7 th POD, No. 53	2018-2019 Property 2018-2019 Confidential\Primary \$\2018 XXXXX Email Confirming Wording	011160	All	(d) (e)	Johana Molina-Parks
OPC 7 th POD, No. 53	2018-2019 Property 2018-2019 Confidential\Primary \$\2018 XXXXX Re \$ - Endt 1 - Engineering Fee Reimbursement.pdf	010812	All	(d) (e)	Johana Molina-Parks

Int/POD No.	Description	Bates Nos.	Page	Florida Statute 366.093(3) Subsection	Declarants
OPC 7 th POD, No. 53	2018-2019 Property 2018-2019 Confidential\Primary \$\2018 XXXXX Re \$ - Endt 2 Multiple Insured Clause.pdf	010813	All	(d) (e)	Johana Molina-Parks
OPC 7 th POD, No. 53	2018-2019 Property 2018-2019 Confidential\Primary \$\2018 XXXXX Re \$ - Endt 3 Misrepresentation Clause.pdf	010814	All	(d) (e)	Johana Molina-Parks
OPC 7 th POD, No. 53	2018-2019 Property 2018-2019 Confidential\Primary \$\2018 XXXXX Re \$ Policy.pdf	010815-010893	All	(d) (e)	Johana Molina-Parks
OPC 7 th POD, No. 53	2018-2019 Property 2018-2019 Confidential\Primary \$\2018 XXXXX \$ and \$ Policy.pdf	010894-010976	All	(d) (e)	Johana Molina-Parks
OPC 7 th POD, No. 53	2018-2019 Property 2018-2019 Confidential\Primary \$\2018 XXXXX \$ Policy.pdf	010977-011063	All	(d) (e)	Johana Molina-Parks
OPC 7 th POD, No. 53	2019-2020\NextEra 19-20 XXXXX Policy 254493-19GL_Confidential.pdf	006765-006782	All	(d) (e)	Johana Molina-Parks
OPC 7 th POD, No. 53	2019-2020\NextEra-FPL 19-20 XXXXX OCP Policy_Confidential.pdf	006783-006834	All	(d) (e)	Johana Molina-Parks
OPC 7 th POD, No. 53	2019-2020\ XXXXX _FPL & Subs (incl FCG)_ 2019 Premium_Employee WC \$ confidential.pdf	006835-006836	All	(d) (e)	Johana Molina-Parks
OPC 7 th POD, No. 53	2019-2020\ XXXXX _FPL and Subs (excl FCG)_ Auto Coverage_ 2019 Policy \$ confidential.pdf	006837	All	(d) (e)	Johana Molina-Parks
OPC 7 th POD, No. 53	2019-2020\ XXXXX _FPL_ 2019 Premium_Contractor WC \$ confidential.pdf	006838-006839	All	(d) (e)	Johana Molina-Parks
OPC 7 th POD, No. 53	2019-2020\2019 - US BAR - XXXXX Re Policy(Lead)_ Confidential.pdf	006580-006624	All	(d) (e)	Johana Molina-Parks
OPC 7 th POD, No. 53	2019-2020\2019 XXXXX BAR Policy 30 32-BAR-2019_Confidential.pdf	006625-006659	All	(d) (e)	Johana Molina-Parks

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OPC 7 th POD, No. 53	2019-2020\FPL 19-20 XXXXX XS WC Policy EN4EW00013-191_Confidential.pdf	006660-006678	All	(d) (e)	Johana Molina-Parks
OPC 7 th POD, No. 53	2019-2020\FPL XXXXX 19-20 AEGIS XS WC Policy WC5370508P_Confidential.pdf	006679-006692	All	(d) (e)	Johana Molina-Parks
OPC 7 th POD, No. 53	2019-2020\NextEra 19-20 XXXXX Policy No XL5054509P_Confidential.pdf	006693-006764	All	(d) (e)	Johana Molina-Parks
OPC 7 th POD, No. 53	2019-2020 XXXXX Property Policy 17-PD-2019_GJ 071119_Confidential\ XXXXX Property Policy 17-PD-2019.pdf	005098-005163	All	(d) (e)	Johana Molina-Parks
OPC 7 th POD, No. 53	2019-2020 XXXXX Property Policy 17-PD-2019_GJ 071119_Confidential\Excess \$\2019_US PROP Excess \$ - XXXXX.pdf	005242-005324	All	(d) (e)	Johana Molina-Parks
OPC 7 th POD, No. 53	2019-2020 XXXXX Property Policy 17-PD-2019_GJ 071119_Confidential\Excess \$\2019_US PROP Excess \$ - XXXXX.pdf	005325-005405	All	(d) (e)	Johana Molina-Parks
OPC 7 th POD, No. 53	2019-2020 XXXXX Property Policy 17-PD-2019_GJ 071119_Confidential\Excess \$\2019_US PROP Excess \$ - XXXXX.pdf	005165-005241	All	(d) (e)	Johana Molina-Parks
OPC 7 th POD, No. 53	2019-2020 XXXXX Property Policy 17-PD-2019_GJ 071119_Confidential\Excess \$\2019_US PROP \$ and \$ XXXXX.pdf	005487-005509	All	(d) (e)	Johana Molina-Parks
OPC 7 th POD, No. 53	2019-2020 XXXXX Property Policy 17-PD-2019_GJ 071119_Confidential\Excess \$\2019_US Prop # XXXXX.pdf	005406-005486	All	(d) (e)	Johana Molina-Parks
OPC 7 th POD, No. 53	2019-2020 XXXXX Property Policy 17-PD-2019_GJ 071119_Confidential\Primary \$ \2019_US PROP \$ Primary, \$ and \$ Excess XXXXX.pdf	005534-005612	All	(d) (e)	Johana Molina-Parks

Int/POD No.	Description	Bates Nos.	Page	Florida Statute 366.093(3) Subsection	Declarants
OPC 7 th POD, No. 53	2019-2020 XXXXX Property Policy 17-PD-2019_GJ 071119_Confidential\Primary \$\2019 US PROP \$ XXXXX.pdf	005510-005533	All	(d) (e)	Johana Molina-Parks
OPC 7 th POD, No. 53	2019-2020 XXXXX Property Policy 17-PD-2019_GJ 071119_Confidential\Primary \$ \2019 US PROP Primary \$ XXXXX.pdf	006198-006247	All	(d) (e)	Johana Molina-Parks
OPC 7 th POD, No. 53	2019-2020 XXXXX Property Policy 17-PD-2019_GJ 071119_Confidential\Primary \$ \2019 US PROP Primary \$ XXXXX.pdf	006248-006324	All	(d) (e)	Johana Molina-Parks
OPC 7 th POD, No. 53	2019-2020 XXXXX Property Policy 17-PD-2019_GJ 071119_Confidential\Primary \$ \2019 US PROP Primary \$ XXXXX.pdf	006325-006402	All	(d) (e)	Johana Molina-Parks
OPC 7 th POD, No. 53	2019-2020 XXXXX Property Policy 17-PD-2019_GJ 071119_Confidential\Primary \$ \2019 US PROP Primary \$ XXXXX.pdf	006403-006489	All	(d) (e)	Johana Molina-Parks
OPC 7 th POD, No. 53	2019-2020 XXXXX Property Policy 17-PD-2019_GJ 071119_Confidential\Primary \$ \2019 US PROP Primary \$ XXXXX.pdf	005613-005775	All	(d) (e)	Johana Molina-Parks
OPC 7 th POD, No. 53	2019-2020 XXXXX Property Policy 17-PD-2019_GJ 071119_Confidential\Primary \$ \2019 US PROP Primary \$ XXXXX.pdf	005776-005862	All	(d) (e)	Johana Molina-Parks
OPC 7 th POD, No. 53	2019-2020 XXXXX Property Policy 17-PD-2019_GJ 071119_Confidential\Primary \$ \2019 US PROP Primary \$ and \$ XXXXX.pdf	005863-006025	All	(d) (e)	Johana Molina-Parks

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OPC 7 th POD, No. 53	2019-2020 XXXXX Property Policy 17-PD-2019_GJ 071119_Confidential\Primary \$ \2019 US PROP Primary \$ XXXXX Policy.pdf	006026-006107	All	(d) (e)	Johana Molina-Parks
OPC 7 th POD, No. 53	2019-2020 XXXXX Property Policy 17-PD-2019_GJ 071119_Confidential\Primary \$ \2019 US PROP Primary \$ XXXXX.pdf	006108-006197	All	(d) (e)	Johana Molina-Parks
OPC 7 th POD, No. 53	2019-2020 xsl Dec Pages\6. XXXXX.pdf	006506-006508	All	(d) (e)	Johana Molina-Parks
OPC 7 th POD, No. 53	2019-2020 xsl Dec Pages\7.a. XXXXX.pdf	006509-006511	All	(d) (e)	Johana Molina-Parks
OPC 7 th POD, No. 53	2019-2020 xsl Dec Pages\7.b. XXXXX.pdf	006512-006515	All	(d) (e)	Johana Molina-Parks
OPC 7 th POD, No. 53	2019-2020 xsl Dec Pages\8. XXXXX.pdf	006516-006517	All	(d) (e)	Johana Molina-Parks
OPC 7 th POD, No. 53	2019-2020 xsl Dec Pages\9.a. XXXXX.pdf	006518-006521	All	(d) (e)	Johana Molina-Parks
OPC 7 th POD, No. 53	2019-2020 xsl Dec Pages\9.b. XXXXX.pdf	006522-006525	All	(d) (e)	Johana Molina-Parks
OPC 7 th POD, No. 53	2019-2020 xsl Dec Pages\10. XXXXX.pdf	006526-006527	All	(d) (e)	Johana Molina-Parks
OPC 7 th POD, No. 53	2019-2020 xsl Dec Pages\11. XXXXX.pdf	006528-006529	All	(d) (e)	Johana Molina-Parks
OPC 7 th POD, No. 53	2019-2020 xsl Dec Pages\12.a. XXXXX.pdf	006530-006532	All	(d) (e)	Johana Molina-Parks
OPC 7 th POD, No. 53	2019-2020 xsl Dec Pages\12.b. XXXXX.pdf	006533-006534	All	(d) (e)	Johana Molina-Parks
OPC 7 th POD, No. 53	2019-2020 xsl Dec Pages\2019 - US BAR - XXXXX Policy(Lead) Confidential.pdf	006535-006579	All	(d) (e)	Johana Molina-Parks
OPC 7 th POD, No. 53	2019-2020 xsl Dec Pages\1. XXXXX.pdf	006490-006492	All	(d) (e)	Johana Molina-Parks
OPC 7 th POD, No. 53	2019-2020 xsl Dec Pages\2. XXXXX.pdf	006493	All	(d) (e)	Johana Molina-Parks
OPC 7 th POD, No. 53	2019-2020 xsl Dec Pages\3.a.b. XXXXX.pdf	006494-006497	All	(d) (e)	Johana Molina-Parks
OPC 7 th POD, No. 53	2019-2020 xsl Dec Pages\3.c. XXXXX.pdf	006498-006501	All	(d) (e)	Johana Molina-Parks

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OPC 7 th POD, No. 53	2019-2020 xsl Dec Pages\4. XXXXX.pdf	006502-006503	All	(d) (e)	Johana Molina-Parks
OPC 7 th POD, No. 53	2019-2020 xsl Dec Pages\5. XXXXX.pdf	006504-006505	All	(d) (e)	Johana Molina-Parks
OPC 7 th POD, No. 53	2020-2021\NextEra 20-21 XS - XXXXX \$ xs \$ - Policy No 254844-20GL_confidential.pdf	001301-001317	All	(d) (e)	Johana Molina-Parks
OPC 7 th POD, No. 53	2020-2021\NextEra 20-21 XS - XXXXX FPL OCIP XS WC Policy EW5-64N-443108-080 - INCL Endts 1-4_confidential.pdf	011318-011379	All	(d) (e)	Johana Molina-Parks
OPC 7 th POD, No. 53	2020-2021\NextEra 20-21 XS - XXXXX FPL XS WC Policy EW5-64N-443108-070 - INCL Endts 1-2_confidential.pdf	011380-011433	All	(d) (e)	Johana Molina-Parks
OPC 7 th POD, No. 53	2020-2021\ XXXXX Binder - Policy No 9-WCC-2021_confidential.pdf	011434-011435	All	(d) (e)	Johana Molina-Parks
OPC 7 th POD, No. 53	2020-2021\NextEra 20-21 XS - XXXXX \$ - Policy No. XL5054510P_confidential.pdf	011225-011300	All	(d) (e)	Johana Molina-Parks
OPC 7 th POD, No. 53	2020-2021 x \Policy NextEra Energy PWAECN620 XXXXX (\$x \$).pdf	007083-007198	All	(d) (e)	Johana Molina-Parks
OPC 7 th POD, No. 53	2020-2021 x \OAR - 12.5% XS x (x) ST - XXXXX Co policy #EUTN18212201.pdf	006840-007082	All	(d) (e)	Johana Molina-Parks
OPC 7 th POD, No. 53	2020-2021 xs \ME2011111 - USD Xs U - Endt 001 (XXXXX) - Policy Wording.pdf	007226-007227	All	(d) (e)	Johana Molina-Parks
OPC 7 th POD, No. 53	2020-2021 xs \OAR - 12.5% XS x (x) ST - XXXXX policy #EUTN18212201.pdf	007228-007470	All	(d) (e)	Johana Molina-Parks
OPC 7 th POD, No. 53	2020-2021 xs \ME2011111 - XXXXX - 2% XS x (x).pdf	007199-007225	All	(d) (e)	Johana Molina-Parks
OPC 7 th POD, No. 53	2020-2021 xs \ME2020619 - XXXXX - 6.5% qs x.pdf	007586-007611	All	(d) (e)	Johana Molina-Parks
OPC 7 th POD, No. 53	2020-2021 xs \ME2020619 - USD Xs USD - Endt 001 (XXXXX) - Policy Wording.pdf	007612-007613	All	(d) (e)	Johana Molina-Parks

Int/POD No.	Description	Bates Nos.	Page	Florida Statute 366.093(3) Subsection	Declarants
OPC 7 th POD, No. 53	2020-2021 xs \Policy NextEra Energy 58-A3-XP-0000106-00 XXXXX (\$x \$).pdf	007614-007725	All	(d) (e)	Johana Molina-Parks
OPC 7 th POD, No. 53	2020-2021 xs \Policy NextEra Energy 311194-20GP XXXXX (\$x \$).pdf	007726-007835	All	(d) (e)	Johana Molina-Parks
OPC 7 th POD, No. 53	2020-2021 xs \Policy NextEra Energy AJW087977M20 XXXXX (\$x \$).pdf	007836-007952	All	(d) (e)	Johana Molina-Parks
OPC 7 th POD, No. 53	2020-2021 xs \Policy NextEra Energy PO5287808P XXXXX (\$x \$).pdf	007953-008065	All	(d) (e)	Johana Molina-Parks
OPC 7 th POD, No. 53	2020-2021 xs \ME2009220 - XXXXX - 7.5% qs x.pdf	007471-007497	All	(d) (e)	Johana Molina-Parks
OPC 7 th POD, No. 53	2020-2021 xs \ME2009220 - USD Xs USD - Endt 002 (XXXXX) - Policy Wording.pdf	008098	All	(d) (e)	Johana Molina-Parks
OPC 7 th POD, No. 53	2020-2021 xs \ME2020556 - USD Xs USD - Endt 001 (XXXXX) - Policy Wording.pdf	008099-008900	All	(d) (e)	Johana Molina-Parks
OPC 7 th POD, No. 53	2020-2021 xs \ME2020556 - XXXXX - 1.5% qs x.pdf	008901-008927	All	(d) (e)	Johana Molina-Parks
OPC 7 th POD, No. 53	2020-2021 xs \ME2020563 - XXXXX - 1.5% qs x RKH.pdf	008928-008955	All	(d) (e)	Johana Molina-Parks
OPC 7 th POD, No. 53	2020-2021 xs \ME2020563 - USD XS USD - Endt 001 (XXXXX) - Policy Wording.pdf	008956-008957	All	(d) (e)	Johana Molina-Parks
OPC 7 th POD, No. 53	2020-2021 xs \ME2020578 - XXXXX - 2% qs x.pdf	008958-008985	All	(d) (e)	Johana Molina-Parks
OPC 7 th POD, No. 53	2020-2021 xs \ME2020578 - USD Xs USD - Endt 001 (XXXXX) - Policy Wording.pdf	008986-008987	All	(d) (e)	Johana Molina-Parks
OPC 7 th POD, No. 53	2020-2021 NEE OAR London final\ME2020563 - USD XS USD - Endt 001 (XXXXX) - Policy Wording.pdf	008179-008180	All	(d) (e)	Johana Molina-Parks
OPC 7 th POD, No. 53	2020-2021 NEE OAR London final\ME2020578 - XXXXX - 2% qs x.pdf	008182-008207	All	(d) (e)	Johana Molina-Parks

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OPC 7 th POD, No. 53	2020-2021 NEE OAR London final\ME2020578 - USD Xs USD - Endt 001 (XXXXX) - Policy Wording.pdf	008208- 008209	All	(d) (e)	Johana Molina- Parks
OPC 7 th POD, No. 53	2020-2021 NEE XXXXX final\ME2020619 - XXXXX - 6.5% qs x.pdf	008210- 008235	All	(d) (e)	Johana Molina- Parks
OPC 7 th POD, No. 53	2020-2021 NEE XXXXX final\ME2020619 - USD Xs USD - Endt 001 (XXXXX) - Policy Wording.pdf	008236- 008237	All	(d) (e)	Johana Molina- Parks
OPC 7 th POD, No. 53	2020-2021 NEE XXXXX final\ME2009220 - XXXXX - 7.5% qs x.pdf	008066- 008092	All	(d) (e)	Johana Molina- Parks
OPC 7 th POD, No. 53	2020-2021 NEE XXXXX final\ME2009220 - USD Xs USD - Endt 002 (XXXXX) - Policy Wording.pdf	008093	All	(d) (e)	Johana Molina- Parks
OPC 7 th POD, No. 53	2020-2021 NEE XXXXX final\ME2011111 - XXXXX - 2% XS x (x).pdf	008094- 008120	All	(d) (e)	Johana Molina- Parks
OPC 7 th POD, No. 53	2020-2021 NEE XXXXX final\ME2011111 - USD Xs U - Endt 001 (XXXXX) - Policy Wording.pdf	008121- 008122	All	(d) (e)	Johana Molina- Parks
OPC 7 th POD, No. 53	2020-2021 NEE XXXXX final\ME2020556 - USD Xs USD - Endt 001 (XXXXX) - Policy Wording.pdf	008123- 008124	All	(d) (e)	Johana Molina- Parks
OPC 7 th POD, No. 53	2020-2021 NEE XXXXX final\ME2020556 - XXXXX - 1.5% qs x.pdf	008125- 008151	All	(d) (e)	Johana Molina- Parks
OPC 7 th POD, No. 53	2020-2021 NEE XXXXX final\ME2020563 - XXXXX - 1.5% qs x RKH .pdf	008152- 008078	All	(d) (e)	Johana Molina- Parks
OPC 7 th POD, No. 53	2020-2021 Primary \$\ XXXXX - NEE - FL Property 43-PD-2020-FL (Executed).pdf	008344- 008449	All	(d) (e)	Johana Molina- Parks
OPC 7 th POD, No. 53	2020-2021 Primary \$\ XXXXX - XXXXXX - NEE - FL Property 43- PD-2020-FL (Executed) - 2020.pdf	008238- 008343	All	(d) (e)	Johana Molina- Parks

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OPC 7 th POD, No. 53	2020-2021 Property - BAR\ XXXXXX 44-BAR-2020 50% QS - (Final).pdf	008591- 008638	All	(d) (e)	Johana Molina- Parks
OPC 7 th POD, No. 53	2020-2021 Property - BAR\ XXXXXX - NextEra Energy, Inc. - BAR Policy (SICON1000650091).pdf	008639- 008696	All	(d) (e)	Johana Molina- Parks
OPC 7 th POD, No. 53	2020-2021 Property - BAR\ XXXXXX - NextEra Energy Inc. USE000326190W.pdf	008450- 008495	All	(d) (e)	Johana Molina- Parks
OPC 7 th POD, No. 53	2020-2021 Property - BAR\ XXXXXX - NextEra - CNAGJ1920.pdf	008496- 008545	All	(d) (e)	Johana Molina- Parks
OPC 7 th POD, No. 53	2020-2021 Property - BAR\BAR Policy NEXTERA 58A2EI123-00 policy - XXXXX Lead.pdf	008546- 008590	All	(d) (e)	Johana Molina- Parks

EXHIBIT D

DECLARATIONS

EXHIBIT D

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

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

Docket No: 20220069-GU

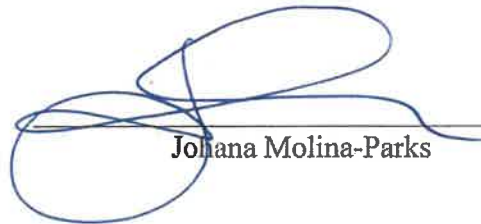
DECLARATION OF JOHANA MOLINA-PARKS

1. My name is Johana Molina-Parks. I am currently employed by Florida Power & Light Company as Director, Risk Management. I have personal knowledge of the matters stated in this written declaration.

2. I have reviewed the documents referenced and incorporated in Florida City Gas's ("FCG") Request for Confidential Classification; specifically the materials provided in response to the Office of Public Counsel's Seventh Request for Production of Documents, No. 53. The documents or materials that I have reviewed and which are asserted by FCG to be proprietary confidential business information contain information concerning bids or other contractual data, the disclosure of which would impair the efforts of FCG to contract for goods or services on favorable terms. The documents or materials also include information relating to competitive interests, the disclosure of which would impair the competitive business of the provider of the information. Specifically, the information contains information related to insurance contracts, including pricing. To the best of my knowledge, FCG has maintained the confidentiality of these documents and materials.

3. Consistent with the provisions of the Florida Administrative Code, such materials should remain confidential for a period of not less than 18 months. In addition, they should be returned to FCG as soon as the information is no longer necessary for the Commission to conduct its business so that FCG can continue to maintain the confidentiality of these documents.

4. Under penalties of perjury, I declare that I have read the foregoing declaration and that the facts stated in it are true to the best of my knowledge and belief.



Johana Molina-Parks

Date: 11-4-22