

Writer's Direct Dial Number: (850) 521-1706
Writer's E-Mail Address: bkeating@gunster.com

March 18, 2024

BY HAND DELIVERY

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

REDACTED

RECEIVED-FPSC
2025 MAR 18 AM 11:58
COMMISSION
CLERK

Docket No. 20250000-OT (Undocketed) – Florida Public Utilities Company's Request for Confidentiality of Information in Forecasted Earnings Surveillance Report (Natural Gas Division).

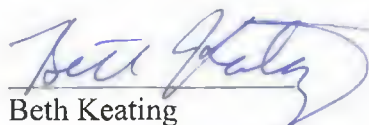
Dear Mr. Teitzman:

Enclosed for filing, please find the original and seven (7) copies of Florida Public Utilities Company's Request for Confidential Classification of its Forecasted Earnings Surveillance Report. Consistent with Rule 25-22.006(4), F.A.C., one highlighted/confidential copy and two redacted copies of the subject report are included.

As always, thank you for your assistance in connection with this filing. If you have any questions whatsoever, please do not hesitate to let me know.

COM
AFD
APA
ECO 6
ENG
GCL 1
IDM
CLK

Sincerely,



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

ENCL

CC:// (Division of Accounting and Finance – Vogel, Hawkes)(email/redacted only)
(Office of the General Counsel – Hetrick)

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Florida Public Utilities Company's)
Forecasted Earnings Surveillance Report for)
2025

Docket No. 20250000-OT
Filed: March 18, 2025

**FLORIDA PUBLIC UTILITIES COMPANY'S REQUEST FOR CONFIDENTIAL
CLASSIFICATION FOR INFORMATION IN FORECASTED EARNINGS
SURVEILLANCE REPORT**

Florida Public Utilities Company (Natural Gas Division)(“FPUC” or “Company”) by and through its undersigned counsel, pursuant to Section 366.093, Florida Statutes, and consistent with Rule 25-22.006(4), Florida Administrative Code, hereby submits its Request for Confidential Classification for information contained in its Forecasted Earnings Surveillance Report, submitted in accordance with Rule 25-7.1353, Florida Administrative Code. The information for which the Company seeks confidential treatment is information that is based upon forecasts and therefore preliminary in nature and does not contemplate pending or planned regulatory actions to be undertaken relative to Florida Public Utilities Company. In addition, the public disclosure of the information could adversely impact the Company’s ability to obtain financing, including re-financing of debt issued at the end of 2023. In support thereof, FPUC hereby states:

1. FPUC seeks confidential classification of the highlighted amounts on Schedules 1, 2 (both pages), 3, and 5 of the Forecasted Earnings Surveillance Report. Specifically, FPUC seeks confidentiality of the amounts in the following locations in the document:

Schedule 1	Sections 1 and 2, Column 1, lines identified as “Net Operating Income,” “Average Rate Base,” and “Average Rate of Return”
“	Sections 1 and 2, Column 2, lines identified as “Net Operating Income,” and “Average Rate

	Base"
"	Sections 1 and 2, Column 3, lines identified as "Net Operating Income," "Average Rate Base," and "Average Rate of Return"
	Sections 1 and 2, Column 4, lines identified as "Net Operating Income" and "Average Rate Base".
"	Sections 1 and 2, Column 5, lines identified as "Net Operating Income," "Average Rate Base," and "Average Rate of Return"
"	Section 3, Column 1, lines identified as "Low," "Midpoint" and "High"
"	Section 4, Column 5, line identified as "Return on Equity"
Schedule 2, page 1 of 2	All amounts in Columns 1-8, in the line identified as "Per Books", Columns 7 & 8 for line 1; Columns 1-3, 5, 6, and 8 for line 2; Columns 1, 2, 3, 6, and 8 for line 4; Columns 7 and 8 for lines 5 and 14; Columns 1-3, and 6-8 for the line identified as "Total FPSC Adjustments;" Columns 1- 3, and 5-8 for the line identified as "FPSC Adjusted;" Columns 1-3, and 5-8 for the line "Adjusted for Comp Rate Revenue;" Columns 1-3, 6 and 8 for "Total Pro Forma Adjustments," and Columns 1-3, and 5-8 of the line "Pro Forma Adjusted."
Schedule 2, page 2 of 2	All amounts in Columns 1-6 and 10 and 11, in the line identified as "Per Books", Columns 6, 10 and 11 for line 1; Columns 1, 2, 5, and 10

	for line 2; Columns 1, 2, 5, and 10 for line 3; Columns 4, 5, 6, 10, and 11 for Line 4; Columns 1, 4, 5, 6, 10, and 11 for Line 5; Columns 1, 5, and 10 for Line 6; Columns 3, 6, 10, and 11 for line 7; Columns 1,3, 6, 10, and 11 for line 9; Columns 3, 6, 10 and 11 for line 11; Columns 5, 6, 10, and 11 for line 13, Columns 5, 6, 10, and 11 for lines 14-16; Columns 1, 2, 3, 4, 5, 6, 10 and 11 for the line "Total FPSC Adjustments;" Columns 1, 3, 4, 5, 6, 10 and 11 for the line "FPSC Adjusted;" Columns 1, 3, 4, 5, 6, 10, and 11 for the line "Adjusted for Comp Rate Revenues;" Columns 4, 6, 10, and 11 for the line "Total Pro Forma Adjusted," and Columns 1, 3, 4, 5, 6, 10 and 11 of the line "Pro Forma Adjusted."
Schedule 3, page 1	All amounts in lines "Per Books," and lines 1-14, all amounts in the lines "Total FPSC Adjustments," "FPSC Adjusted," "Comp Rate Adj Revenues," "Adjusted for Comp Rate Adj Revenue," "Total Pro Forma Adjustments," and "Pro Forma Adjusted."
Schedule 3, page 2	All amounts in lines "Per Books," and lines 1-16, all amounts in the lines "Total FPSC Adjustments," "FPSC Adjusted," "Adjustments for Total Comp Rate Adj Revenues," "Total Pro Forma Adjusted," and "Pro Forma Adjusted."
Schedule 4	All highlighted amounts, for both "Average" and "Year End" sections, in lines "Common

	Equity,” “Long Term Debt-CU,” “Short Term Debt,” “Long Term Debt-FC,” “Short Term Debt- Refinanced LTD,” “Customer Deposits,” “Deferred Income Taxes,” “Tax Credits-Weighted Cost,” as well as the lines “Total Average” and “Total Year End”.
--	--

2. FPUC treats the information described herein as proprietary confidential business information consistent with the definition of that term in Section 366.093, Florida Statutes.

The information meets the definition of “proprietary confidential business information” as set forth in Section 366.093(3)(e), Florida Statutes, which provides:

(3) Proprietary confidential business information means information, regardless of form or characteristics, which is owned or controlled by the person or company, is intended to be and is treated by the person or company as private in that the disclosure of the information would cause harm to the ratepayers or the person’s or 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. Proprietary confidential business information includes, but is not limited to:

- (a) Trade secrets.
- (b) Internal auditing controls and reports of internal auditors.
- (c) Security measures, systems, or procedures.
- (d) Information concerning bids or other contractual data, the disclosure of which would impair the efforts of the public utility or its affiliates to contract for goods or services on favorable terms.
- (e) Information relating to competitive interests, the disclosure of which would impair the competitive business of the provider of the information.
- (f) Employee personnel information unrelated to compensation, duties, qualifications, or responsibilities.

3. Disclosure of this information would impair FPUC's competitive interests in that public disclosure of the information could adversely impact the Company’s ability to obtain financing, including re-financing of debt issued at the time of the Florida City Gas acquisition, at optimal

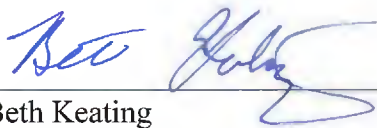
terms and prices. As such, FPUC requests that the Commission protect this information consistent with Rule 25-22.006, Florida Administrative Code. To the extent of FPUC's knowledge, this information is not otherwise available in the public domain. Thus, the information meets the definition of "proprietary confidential business information" as set forth in Sections 366.093(3)(d) and (e), Florida Statutes. As such, FPUC requests that the Commission protect this information consistent with Rule 25-22.006, Florida Administrative Code.

4. Included with this Request is a highlighted copy of the Company's Forecasted Earnings Surveillance Report. In addition, two redacted copies of the document are enclosed.

5. FPUC asks that confidential classification be granted for a period of at least 18 months. Should the Commission no longer find that it needs to retain the information, FPUC respectfully requests that the confidential information be returned to the Company.

WHEREFORE, Florida Public Utilities Company respectfully requests that the highlighted information contained in its Forecasted Earning Surveillance Report be classified as "proprietary confidential business information," and thus, exempt from Section 119.07, Florida Statutes.

RESPECTFULLY SUBMITTED this 18th day of March, 2025.


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

CERTIFICATE OF SERVICE

I HEREBY ATTEST that a true and correct copy of the foregoing Request for Confidentiality has been served upon the following by Electronic Mail (redacted only) this 18th day of March, 2025:

Keith Hetrick, General Counsel
Florida Public Service Commission
2540 Shumard Oak Blvd.
Tallahassee, FL 32399
khetrick@psc.state.fl.us

By:


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

*Attorneys for Florida Public Utilities
Company*

FLORIDA PUBLIC UTILITIES COMPANY
GAS DIVISION
RATE OF RETURN REPORT SUMMARY
Forecast December 31, 2025

SCHEDULE 1

	(1) ACTUAL PER BOOKS	(2) FPSC ADJUSTMENTS	(3) FPSC ADJUSTED	(4) PRO FORMA ADJUSTMENTS	(5) PRO FORMA ADJUSTED
I. AVERAGE RATE OF RETURN (JURISDICTIONAL)					
NET OPERATING INCOME	\$ <u> </u>	\$ <u> </u>	\$ <u> </u>	\$ <u> </u>	\$ <u> </u>
AVERAGE RATE BASE	\$ <u> </u>	\$ <u> </u>	\$ <u> </u>	\$ <u> </u>	\$ <u> </u>
AVERAGE RATE OF RETURN	<u> </u> %		<u> </u> %		<u> </u> %
II. YEAR-END RATE OF RETURN (JURISDICTIONAL)					
NET OPERATING INCOME	\$ <u> </u>	\$ <u> </u>	\$ <u> </u>	\$ <u> </u>	\$ <u> </u>
YEAR-END RATE BASE	\$ <u> </u>	\$ <u> </u>	\$ <u> </u>	\$ <u> </u>	\$ <u> </u>
YEAR-END RATE OF RETURN	<u> </u> %		<u> </u> %		<u> </u> %
III. REQUIRED RATES OF RETURN AVERAGE CAPITAL STRUCTURE (FPSC ADJUSTED BASIS)					
LOW	<u> </u> %				
MIDPOINT	<u> </u> %				
HIGH	<u> </u> %				
IV. EARNED RETURN ON EQUITY (FPSC ADJUSTED BASIS)					
A. INCLUDING ACQ. ADJ.					<u> </u> %

I am aware that Section 837.06, Florida Statutes, provides:

Whoever knowingly makes a false statement in writing with the
intent to mislead a public servant in the performance of his official
duty shall be guilty of a misdemeanor of the second degree punishable
as provided in s. 775.082, s. 775.083, or s. 775.084.

Michelle D. Napier
Director, Regulatory Affairs Distribution

Michelle D Napier

Signature

3/14/2025

Date

	(1) PLANT IN SERVICE	(2) ACCUMULATED DEPRECIATION & AMORTIZATION	(3) PLANT IN SERVICE	(4) NET PROPERTY HELD FOR FUTURE USE	(5) CONSTRUCTION WORK IN PROGRESS	(6) NET UTILITY PLANT	(7) WORKING CAPITAL	(8) TOTAL RATE BASE
PER BOOKS								
FPSC ADJUSTMENTS:								
1) ELIMINATIONS OF 1/2 OF D & O PREPAID	\$	\$	\$					
2) ELIMINATE GOODWILL								
3) FLEX RATE & SPECIAL CONTRACT PLANT								
4) ELIM. NON-UTILITY PLANT								
5) ELIMINATE UNDER-RECOVERIES								
6) OFFSET TO ACCOUNTS RECEIVABLE								
7) REMOVE UNRECOVERED AEP								
8) REMOVE DEFERRED RATE CASE EXPENSE								
9) ALLOCATE ACCRUED INTEREST FROM PARENT								
10) FLEXIBLE LIABILITY ADJUSTMENT								
11) ALLOCATE CORP. HEALTH INSURANCE RES.								
12) ELIMINATE FLEX PLANT WORKING CAPITAL								
13) ELIMINATE DEF. ENVIRONMENTAL COSTS								
14) ELIMINATE AFUDC CWP								
TOTAL FPSC ADJUSTMENTS								
FPSC ADJUSTED	\$							
COMP RATE ADJ REVENUES	\$							
ADJUSTED FOR COMP RATE ADJ REVENUE	\$							
PROFORMA ADJUSTMENTS								
TOTAL PRO FORMA ADJUSTMENTS	\$							
PRO FORMA ADJUSTED	\$							

[illegible]

	(1) PLANT IN SERVICE	(2) ACCUMULATED DEPRECIATION & AMORTIZATION	(3) PLANT IN SERVICE	(4) NET PROPERTY HELD FOR FUTURE USE	(5) CONSTRUCTION WORK IN PROGRESS	(6) NET UTILITY PLANT	(7) WORKING CAPITAL	(8) TOTAL RATE BASE
PER BOOKS	\$							
FPSC ADJUSTMENTS:								
1) ELIMINATIONS OF 12 OF D & O PREPAID	\$	\$	\$			\$	\$	\$
2) ELIMINATE GOODWILL								
3) FLEX RATE & SPECIAL CONTRACT PLANT								
4) ELIM. NON-UTILITY PLANT								
5) ELIMINATE UNDER-RECOVERIES								
6) OFFSET TO ACCOUNTS RECEIVABLE								
7) REMOVE UNRECOVERED AEP								
8) REMOVE DEFERRED RATE CASE EXPENSE								
9) ALLOCATE ACCRUED INTEREST FROM PARENT								
10) FLEXIBLE LIABILITY ADJUSTMENT								
11) ALLOCATE CORP. HEALTH INSURANCE RES.								
12) ELIMINATE FLEX PLANT WORKING CAPITAL								
13) ELIMINATE DEF. ENVIRONMENTAL COSTS								
14) ELIMINATE AFUDC CWP								
TOTAL FPSC ADJUSTMENTS								
FPSC ADJUSTED	\$							
COMP RATE ADJ REVENUES								
ADJUSTED FOR COMP RATE ADJ REVENUE								
PROFORMA ADJUSTMENTS								
TOTAL PRO FORMA ADJUSTMENTS								
PRO FORMA ADJUSTED								

[illegible]

SCHEDULE 4

[illegible]

FLORIDA PUBLIC UTILITIES COMPANY
GAS DIVISION
RATE OF RETURN REPORT SUMMARY
Forecast December 31, 2025

SCHEDULE 1

	(1) ACTUAL PER BOOKS	(2) FPSC ADJUSTMENTS	(3) FPSC ADJUSTED	(4) PRO FORMA ADJUSTMENTS	(5) PRO FORMA ADJUSTED
I. AVERAGE RATE OF RETURN (JURISDICTIONAL)					
NET OPERATING INCOME	\$ [REDACTED]	\$ [REDACTED]	\$ [REDACTED]	\$ [REDACTED]	\$ [REDACTED]
AVERAGE RATE BASE	\$ [REDACTED]	\$ [REDACTED]	\$ [REDACTED]	\$ [REDACTED]	\$ [REDACTED]
AVERAGE RATE OF RETURN	[REDACTED]		[REDACTED]		[REDACTED]
II. YEAR-END RATE OF RETURN (JURISDICTIONAL)					
NET OPERATING INCOME	\$ [REDACTED]	\$ [REDACTED]	\$ [REDACTED]	\$ [REDACTED]	\$ [REDACTED]
YEAR-END RATE BASE	\$ [REDACTED]	\$ [REDACTED]	\$ [REDACTED]	\$ [REDACTED]	\$ [REDACTED]
YEAR-END RATE OF RETURN	[REDACTED]		[REDACTED]		[REDACTED]
III. REQUIRED RATES OF RETURN AVERAGE CAPITAL STRUCTURE (FPSC ADJUSTED BASIS)			IV. EARNED RETURN ON EQUITY (FPSC ADJUSTED BASIS)		
LOW	[REDACTED]%		A. INCLUDING ACQ. ADJ.	[REDACTED]	
MIDPOINT	[REDACTED]%				
HIGH	[REDACTED]%				

I am aware that Section 837.06, Florida Statutes, provides:

Whoever knowingly makes a false statement in writing with the intent to mislead a public servant in the performance of his official duty shall be guilty of a misdemeanor of the second degree punishable as provided in s. 775.082, s. 775.083, or s. 775.084.

Michelle D. Napier
Director, Regulatory Affairs Distribution

Michelle D Napier

Signature

3/14/2025

Date

	(1) PLANT IN SERVICE	(2) ACCUMULATED DEPRECIATION & AMORTIZATION	(3) PLANT IN SERVICE	(4) NET PROPERTY HELD FOR FUTURE USE	(5) CONSTRUCTION WORK IN PROGRESS	(6) NET UTILITY PLANT	(7) WORKING CAPITAL	(8) TOTAL RATE BASE
PER BOOKS								
FPSC ADJUSTMENTS:								
1) ELIMINATIONS OF 1/2 OF D & O PREPAID	\$	\$	\$					
2) ELIMINATE GOODWILL								
3) FLEX RATE & SPECIAL CONTRACT PLANT								
4) ELIM. NON-UTILITY PLANT								
5) ELIMINATE UNDER-RECOVERIES								
6) OFFSET TO ACCOUNTS RECEIVABLE								
7) REMOVE UNRECOVERED ACP								
8) REMOVE DEFERRED RATE CASE EXPENSE								
9) ALLOCATE ACCRUED INTEREST FROM PARENT								
10) FLEXIBLE LIABILITY ADJUSTMENT								
11) ALLOCATE CORP. HEALTH INSURANCE RES.								
12) ELIMINATE FLEX PLANT WORKING CAPITAL								
13) ELIMINATE DEF. ENVIRONMENTAL COSTS								
14) ELIMINATE AFUDC CWIP								
TOTAL FPSC ADJUSTMENTS								
FPSC ADJUSTED	\$							
COMP RATE ADJ REVENUES	\$							
ADJUSTED FOR COMP RATE ADJ REVENUE	\$							
PROFORMA ADJUSTMENTS								
TOTAL PRO FORMA ADJUSTMENTS	\$							
PRO FORMA ADJUSTED	\$							

[illegible]

	(1) PLANT IN SERVICE	(2) ACCUMULATED DEPRECIATION & AMORTIZATION	(3) PLANT IN SERVICE	(4) NET PROPERTY HELD FOR FUTURE USE	(5) CONSTRUCTION WORK IN PROGRESS	(6) NET UTILITY PLANT	(7) WORKING CAPITAL	(8) TOTAL RATE BASE
PER BOOKS	\$							
FPSC ADJUSTMENTS:								
1) ELIMINATIONS OF 1/2 OF D & O PREPAID	\$	\$	\$			\$	\$	\$
2) ELIMINATE GOODWILL								
3) FLEX RATE & SPECIAL CONTRACT PLANT								
4) ELIM. NON-UTILITY PLANT								
5) ELIMINATE UNDER-RECOVERIES								
6) OFFSET TO ACCOUNTS RECEIVABLE								
7) REMOVE UNRECOVERED AEP								
8) REMOVE DEFERRED RATE CASE EXPENSE								
9) ALLOCATE ACCRUED INTEREST FROM PARENT								
10) FLEXIBLE LIABILITY ADJUSTMENT								
11) ALLOCATE CORP. HEALTH INSURANCE RES.								
12) ELIMINATE FLEX PLANT WORKING CAPITAL								
13) ELIMINATE DEF. ENVIRONMENTAL COSTS								
14) ELIMINATE AFUDC CWP								
TOTAL FPSC ADJUSTMENTS								
FPSC ADJUSTED	\$							
COMP RATE ADJ REVENUES								
ADJUSTED FOR COMP RATE ADJ REVENUE								
PROFORMA ADJUSTMENTS								
TOTAL PRO FORMA ADJUSTMENTS								
PRO FORMA ADJUSTED								

	(1) OPERATING REVENUES	(2) O & M GAS EXPENSE	(3) O & M OTHER	(4) DEPRECIATION & AMORTIZATION	(5) TAXES OTHER THAN INCOME	(6) INCOME TAXES CURRENT	(7) D.I.T. (NET)	(8) I.T.C. (NET)	(9) GAIN/LOSS ON DISPOSITION	(10) TOTAL OPERATING EXPENSES	(11) NET OPERATING INCOME
PER BOOKS	\$ [REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]				[REDACTED]	[REDACTED]
FPSC ADJUSTMENTS:											
1) INTEREST SYNC						\$ [REDACTED]				\$ [REDACTED]	\$ [REDACTED]
2) ELIMINATE FUEL & SWING REVENUES AND EXP.	[REDACTED]	[REDACTED]			[REDACTED]	-				[REDACTED]	[REDACTED]
3) ELIMINATE CONSERVATION						-				[REDACTED]	[REDACTED]
4) NON-UTILITY DEPRECIATION EXPENSE				[REDACTED]		-				[REDACTED]	[REDACTED]
5) ELIMINATE AEP REVENUES AND EXPENSES	[REDACTED]				[REDACTED]	-				[REDACTED]	[REDACTED]
6) ELIMINATE REVENUE RELATED TAXES	[REDACTED]				[REDACTED]	-				[REDACTED]	[REDACTED]
7) 5% OF ECONOMIC DEVELOPMENT			[REDACTED]			[REDACTED]				[REDACTED]	[REDACTED]
8) OUT OF PERIOD ADJ						-				[REDACTED]	[REDACTED]
9) FLEX RATE & SPECIAL CONTRACTS	[REDACTED]		[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]				[REDACTED]	[REDACTED]
10) EXPENSE ACCRUAL ADJUSTMENT						-				[REDACTED]	[REDACTED]
11) INTEREST INCOME						-				[REDACTED]	[REDACTED]
12) REMOVE ENVIRONMENTAL AMORTIZATION						-				[REDACTED]	[REDACTED]
13) REMOVE NON-UTILITY PROPERTY TAX					[REDACTED]	-				[REDACTED]	[REDACTED]
14) REMOVE COMPANY EVENTS			[REDACTED]			[REDACTED]				[REDACTED]	[REDACTED]
15) REMOVE 1/2 D & C INSURANCE			[REDACTED]			[REDACTED]				[REDACTED]	[REDACTED]
16) REMOVE SERP			[REDACTED]			[REDACTED]				[REDACTED]	[REDACTED]
TOTAL FPSC ADJUSTMENTS	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]				[REDACTED]	[REDACTED]
FPSC ADJUSTED	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]				[REDACTED]	[REDACTED]
COMP RATE ADJ REVENUES - DEFICIT/(SURPLUS)	\$ [REDACTED]					\$ [REDACTED]				\$ [REDACTED]	\$ [REDACTED]
ADJUSTED FOR COMP RATE ADJ REVENUES	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]				[REDACTED]	[REDACTED]
PROFORMA ADJUSTMENTS											
TOTAL PRO FORMA ADJUSTMENTS	\$ [REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]				[REDACTED]	[REDACTED]
PRO FORMA ADJUSTED	\$ [REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]				[REDACTED]	[REDACTED]

SCHEDULE 4

[illegible]