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April 30, 2018

HAND DELIVERY

REDACTED

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

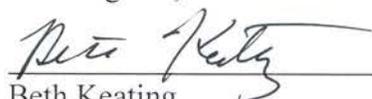
Re: **Docket No. 20180091-EQ – Petition for approval of revisions to standard offer for energy purchased from cogenerators and renewable generating facilities and standard offer contract for purchases of firm capacity and energy, by Florida Public Utilities Company.**

Dear Ms. Stauffer:

Attached for filing, please find the original and 7 copies of Florida Public Utilities Company's Request for Confidential Classification of its Responses to Staff's First Data Requests in the referenced docket.

Thank you for your assistance with this filing. As always, please don't hesitate to let me know if you have any questions whatsoever.

Kind regards,


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

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BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Petition for approval of revisions to standard offer for energy purchased from cogenerators and renewable generating facilities and standard offer contract for purchases of firm capacity and energy, by Florida Public Utilities Company.

DOCKET NO. 20180091-EQ

DATED: April 30, 2018

REQUEST FOR CONFIDENTIAL CLASSIFICATION

Florida Public Utilities Company (“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 of information contained in the documents provided in response to Commission Staff’s First Data Requests in the instant docket. The documents contain proprietary confidential information regarding FPUC’s power purchase agreements, specifically contract rates, which FPUC, considers to be highly confidential and which has not otherwise been publicly disclosed. In support of this Request, FPUC states that:

1. The information contained in the Company’s data responses includes information pertaining to its power arrangements with its wholesale, all requirements providers, as well as information from which contractual information could be extrapolated. The information included in each of these documents is treated by the Company as competitively sensitive information and includes contractual information, the disclosure of which would impair FPUC’s ability to negotiate favorable rates in the future, which would be detrimental to the Company and its customers. The Company treats this information as confidential, as do its contract partners.

2. The information at issue is, as noted, considered proprietary confidential business information by FPUC, and has not otherwise been disclosed publicly. Disclosure of this information, particularly in the format requested, would publicly reveal information that could be used to extrapolate contract information that could adversely impact the Company and its ability to negotiate similar contracts in the future.
3. The information for which FPUC seeks confidential classification meets the definition of “proprietary confidential business information” as set forth in Section 366.093(3), 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.
4. Specifically, FPUC seeks confidential classification for the highlighted information in

the following (lines/pages):

Document	Page/Line/Location	Description	Rationale
Data Response No. 1, pages 2-5	All lines, except last line, in columns titled “Annual Capacity Rate,” “Total Capacity Payments,” and “Total Payments.”	Rates and Payment information from which contractual rates and terms could be extrapolated.	Reveals or could be used to extrapolate contract information, the disclosure of which would impair the Company’s ability to contract for goods and services with other providers. The information is treated by FPUC as confidential and has otherwise not been publicly disclosed. (Section 366.093(d))
Exhibit A, Sheets 1 – 4 (Inside NE FL Division, Inter. NE FL Division, Inside NW FL Division, Inter. NW FL Division)	All lines 2019-2038 and all columns titled “Annual Capacity Rate,” “Total Capacity Payments,” and “Total Payments.”; all lines 2019-NPV(2019\$)	Rates and Payment information from which contractual rates and terms could be extrapolated.	Reveals or could be used to extrapolate contract information, the disclosure of which would impair the Company’s ability to contract for goods and services with other providers. The information is treated by FPUC as confidential and has otherwise not been publicly disclosed. (Section 366.093(d))

5. The information at issue falls squarely under Section 366.093(3)(d), Florida Statutes. Release of the referenced information as a public record would harm FPUC’s business operations and ratepayers by impairing the Company’s ability to effectively negotiate for goods and services. As such, FPUC requests that the Commission afford this information confidential treatment and thus exempt from Section 119.07, Florida Statutes.

6. Included with this Request is a highlighted copy of the referenced documents. Also enclosed are two redacted copies of the information. Exhibit A in Excel is included on a CD marked "Confidential" only, as it is duplicative of the charts otherwise provided.

7. 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, FPUC respectfully requests that:

- 1) the highlighted portions of the documents submitted in response to Staff's First Data Requests be classified as "proprietary confidential business information," and thus, exempt from Section 119.07, Florida Statutes; and
- 2) confidential classification be granted for a period of at least 18 months from the issuance of the Commission's Order.

RESPECTFULLY SUBMITTED this 30th day of April, 2018.


Beth Keating
Bar No. 0022756
Gunster, Yoakley & Stewart, P.A.
215 South Monroe St., Suite 618
Tallahassee, FL 32301
(850) 521-1706

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Petition for approval of revisions to standard offer for energy purchased from cogenerators and renewable generating facilities and standard offer contract for purchases of firm capacity and energy, by Florida Public Utilities Company.

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- (b) Internal auditing controls and reports of internal auditors.
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- (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.
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Beth Keating
Bar No. 0022756
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215 South Monroe St., Suite 618
Tallahassee, FL 32301
(850) 521-1706

Delivery from Inside Northeast Florida Division

Firm Capacity Amount (MW)	10
Capacity Factor	70%
Resulting Energy (MWH)	61,320

FPL Full Requirements Supplier	
FPL Estimated Avoided Cost (\$/MWH)	\$31.00
Annual Estimated Increase (%)	2%
Avoided Transmission Losses	1.5%

Payment to Third Party based on current SOC						
Year	Energy (MWH)	Capacity Rate** (\$/KW-MO)	Total Capacity Payments (\$)	Energy Rate** (\$/MWH)	Total Energy Payments (\$)	Total Payments (\$)
2019	61,320			\$31.00	\$1,929,868	
2020	61,320			\$31.62	\$1,968,465	
2021	61,320			\$32.25	\$2,007,835	
2022	61,320			\$32.90	\$2,047,991	
2023	61,320			\$33.56	\$2,088,951	
2024	61,320			\$34.23	\$2,130,730	
2025	61,320			\$34.91	\$2,173,345	
2026	61,320			\$35.61	\$2,216,812	
2027	61,320			\$36.32	\$2,261,148	
2028	61,320			\$37.05	\$2,306,371	
2029	61,320			\$37.79	\$2,352,498	
2030	61,320			\$38.54	\$2,399,548	
2031	61,320			\$39.32	\$2,447,539	
2032	61,320			\$40.10	\$2,496,490	
2033	61,320			\$40.90	\$2,546,420	
2034	61,320			\$41.72	\$2,597,348	
2035	61,320			\$42.56	\$2,649,295	
2036	61,320			\$43.41	\$2,702,281	
2037	61,320			\$44.28	\$2,756,327	
2038	61,320			\$45.16	\$2,811,453	
Total (nominal)	1,226,400				\$46,890,717	
Total NPV (2019)					37,840,549	
Rate for NPV	2%					

** Capacity and Energy Rates are Estimated

Delivery To Interconnection for Northeast Florida Division

Firm Capacity Amount (MW)	10
Capacity Factor	70%
Resulting Energy (MWH)	61,320

FPL Full Requirements Supplier	
FPL Estimated Avoided Cost (\$/MWH)	\$31.00
Annual Estimated Increase (%)	2%
Avoided Transmission Losses	1.5%

Payment to Third Party based on current SOC						
Year	Energy (MWH)	Capacity Rate** (\$/KW-MO)	Total Capacity Payments (\$)	Energy Rate** (\$/MWH)	Total Energy Payments (\$)	Total Payments (\$)
2019	61,320			\$31.00	\$1,900,920	
2020	61,320			\$31.62	\$1,938,938	
2021	61,320			\$32.25	\$1,977,717	
2022	61,320			\$32.90	\$2,017,272	
2023	61,320			\$33.56	\$2,057,617	
2024	61,320			\$34.23	\$2,098,769	
2025	61,320			\$34.91	\$2,140,745	
2026	61,320			\$35.61	\$2,183,560	
2027	61,320			\$36.32	\$2,227,231	
2028	61,320			\$37.05	\$2,271,775	
2029	61,320			\$37.79	\$2,317,211	
2030	61,320			\$38.54	\$2,363,555	
2031	61,320			\$39.32	\$2,410,826	
2032	61,320			\$40.10	\$2,459,043	
2033	61,320			\$40.90	\$2,508,224	
2034	61,320			\$41.72	\$2,558,388	
2035	61,320			\$42.56	\$2,609,556	
2036	61,320			\$43.41	\$2,661,747	
2037	61,320			\$44.28	\$2,714,982	
2038	61,320			\$45.16	\$2,769,281	
Total (nominal)	1,226,400				\$46,187,356	
Total NPV (2019)					37,272,941	
Rate for NPV	2%					

** Capacity and Energy Rates are Estimated

Delivery from Inside Northeast Florida Division

Firm Capacity Amount (MW)	10
Capacity Factor	70%
Resulting Energy (MWH)	61320

Gulf Power Full Requirements Supplier	
Gulf Power Estimated Avoided Cost (\$/MWH)	\$34.00
Annual Estimated Increase (%)	2%
Avoided Transmission Losses	1.5%

Payment to Third Party based on current SOC						
Year	Energy (MWH)	Capacity Rate** (\$/KW-MO)	Total Capacity Payments (\$)	Energy Rate** (\$/MWH)	Total Energy Payments (\$)	Total Payments (\$)
2019	61,320	\$0.00	\$0	\$34.00	\$2,116,629	
2020	61,320			\$34.68	\$2,158,962	
2021	61,320			\$35.37	\$2,202,141	
2022	61,320			\$36.08	\$2,246,184	
2023	61,320			\$36.80	\$2,291,108	
2024	61,320			\$37.54	\$2,336,930	
2025	61,320			\$38.29	\$2,383,669	
2026	61,320			\$39.06	\$2,431,342	
2027	61,320			\$39.84	\$2,479,969	
2028	61,320			\$40.63	\$2,529,568	
2029	61,320			\$41.45	\$2,580,159	
2030	61,320			\$42.27	\$2,631,763	
2031	61,320			\$43.12	\$2,684,398	
2032	61,320			\$43.98	\$2,738,086	
2033	61,320			\$44.86	\$2,792,848	
2034	61,320			\$45.76	\$2,848,705	
2035	61,320			\$46.67	\$2,905,679	
2036	61,320			\$47.61	\$2,963,792	
2037	61,320			\$48.56	\$3,023,068	
2038	61,320			\$49.53	\$3,083,529	
Total (nominal)	1,226,400				\$51,428,528	
Total NPV (2019)	1,002,670				41,502,538	
Rate for NPV	2%					

** Capacity and Energy Rates are Estimated

Delivery To Interconnection for Northwest Florida Division

Firm Capacity Amount (MW)	10
Capacity Factor	70%
Resulting Energy (MWH)	61,320

Gulf Power Full Requirements Supplier	
Gulf Power Estimated Avoided Cost (\$/MWH)	\$34.00
Annual Estimated Increase (%)	2%
Avoided Transmission Losses	1.5%

Payment to Third Party based on current SOC						
Year	Energy (MWH)	Capacity Rate** (\$/KW-MO)	Total Capacity Payments (\$)	Energy Rate** (\$/MWH)	Total Energy Payments (\$)	Total Payments (\$)
2019	61,320	\$0.00	\$0	\$34.00	\$2,084,880	
2020	61,320			\$34.68	\$2,126,578	
2021	61,320			\$35.37	\$2,169,109	
2022	61,320			\$36.08	\$2,212,491	
2023	61,320			\$36.80	\$2,256,741	
2024	61,320			\$37.54	\$2,301,876	
2025	61,320			\$38.29	\$2,347,914	
2026	61,320			\$39.06	\$2,394,872	
2027	61,320			\$39.84	\$2,442,769	
2028	61,320			\$40.63	\$2,491,625	
2029	61,320			\$41.45	\$2,541,457	
2030	61,320			\$42.27	\$2,592,286	
2031	61,320			\$43.12	\$2,644,132	
2032	61,320			\$43.98	\$2,697,015	
2033	61,320			\$44.86	\$2,750,955	
2034	61,320			\$45.76	\$2,805,974	
2035	61,320			\$46.67	\$2,862,093	
2036	61,320			\$47.61	\$2,919,335	
2037	61,320			\$48.56	\$2,977,722	
2038	61,320			\$49.53	\$3,037,276	
Total (nominal)	1,226,400				\$50,657,100	
Total NPV (2019)					40,880,000	
Rate for NPV	2%					

** Capacity and Energy Rates are Estimated