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April 28, 2025

VIA HAND DELIVERY

**REDACTED**

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

2025 APR 28 PM 3:43  
COMMISSION  
CLERK

**Re: Docket No. 20250042-GU - Petition for approval of amendment to transportation service agreement between Peninsula Pipeline Company, Inc. and Florida City Gas.**

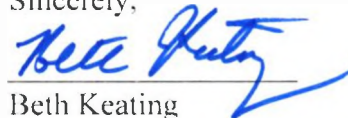
Dear Mr. Teitzman:

Enclosed for filing, please find the original and seven (7) copies of Peninsula Pipeline's Request for Confidential Classification of Attachment A to its Responses to Staff's First Set of Data Requests, which have been provided today under separate cover. Along with this Request, the Company is also providing the required redacted and highlighted copies of the referenced Attachment A.

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 & 1 redacted  
ENG \_\_\_\_\_  
GCL 1 Attach "A"  
IDM \_\_\_\_\_  
CLK \_\_\_\_\_

Sincerely,



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

MEK  
Cc://(certificate of service)

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Petition for Approval of an Amendment )  
to a Transportation Service Agreement with )  
Florida City Gas by Peninsula Pipeline )  
Company, Inc. )

Docket No.:

Filed: April 28, 2025

**PENINSULA PIPELINE COMPANY'S REQUEST FOR CONFIDENTIAL  
CLASSIFICATION**

Peninsula Pipeline Company ("Peninsula" or "Company") by and through its undersigned counsel, pursuant to Section 366.093, Florida Statutes, and consistent with Rule 25-22.006(3), Florida Administrative Code, hereby submits its Request for Confidential Classification for information contained in Attachment A to its Responses to Staff's First Data Requests, which have been submitted under separate cover today. The information for which the Company seeks confidential treatment is information that is essentially the same information for which the Company requested confidential treatment in Docket No. 20240039-GU, in which the original agreement was approved, as well as the Company's earlier request in this proceeding. It is also similar to that which the Commission has afforded confidential classification in prior cases, namely Order No. PSC-2018-0146-CFO-GU, issued March 19, 2018 in Docket No. 20180015-GU. In support thereof, Peninsula hereby states:

1. Peninsula seeks confidential classification of the highlighted amounts in lines 7-9 of Attachment A to its Data Responses Peninsula, which, respectively, identify the Incremental Monthly Reservation Charge (Line 7); the Prior Monthly Reservation Charge (Line 8), and the Total New Reservation Charge (Line 9). This information is directly related to the negotiated rates and terms of the Contract, as well as the modifications necessitated by the FDOT relocation

request, which both Peninsula and FCG treat as proprietary confidential business information consistent with the definition of that term in Section 366.093, Florida Statutes.

2. The information for which Peninsula seeks confidential classification is information that the Company and FCG both treat as confidential, and that 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.

3. Release of the referenced information as a public record would reveal the specific rate included in a competitive contract. Disclosure of this information would impair Peninsula's ability to compete for goods and services and provide its competitors with an unfair competitive advantage. As such, Peninsula requests that the Commission protect this information consistent with Rule 25-22.006, Florida Administrative Code. To the extent of Peninsula's knowledge, this information is not otherwise available in the public domain. Thus, the information meets the

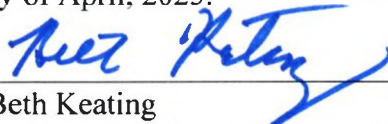
definition of "proprietary confidential business information" as set forth in Sections 366.093(3)(d) and (e), Florida Statutes. As such, Peninsula requests that the Commission protect this information consistent with Rule 25-22.006, Florida Administrative Code.

4. Included with this Request is a highlighted copy of Attachment A. In addition, two redacted copies of the document are enclosed.

5. Peninsula 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, Peninsula respectfully requests that the confidential information be returned to the Company.

WHEREFORE, Peninsula respectfully requests that the highlighted information contained in each of Attachment A to its Responses to Staff's First Data Requests in this proceeding be classified as "proprietary confidential business information," and thus, exempt from Section 119.07, Florida Statutes.

RESPECTFULLY SUBMITTED this 28th day of April, 2025.

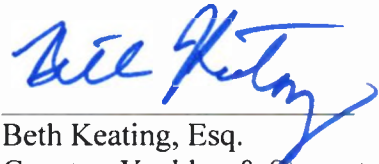
  
\_\_\_\_\_  
Beth Keating  
Gunster, Yoakley & Stewart, P.A.  
215 South Monroe St., Suite 601  
Tallahassee, FL 32301  
(850) 521-1706

**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 28th day of April, 2025:

Daniel Dose, Esquire  
Florida Public Service Commission  
2540 Shumard Oak Blvd.  
Tallahassee, FL 32399  
ddose@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 Peninsula Pipeline  
Company, Inc.*

**Attachment A****PPC - Indian River Relocate  
Monthly Reservation Charge**

1	Capital Costs	\$	3,094,000
2	Incremental O&M	\$	62,000
3	Book Depreciation	\$	68,756
4	Interest Expense and ROE	\$	228,278
5	Tax Expense	\$	58,000
6	Total Annual Reservation Charge	\$	417,034
7	Incremental Monthly Reservation Charge (Line 6/12)	\$	████████
8	Prior Monthly Reservation Charge	\$	████████
9	Total New Reservation Charge	\$	████████