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IN REPLY REFER TO:

Ansley Watson, Jr.
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March 14, 2016

VIA E-PORTAL FILING

Carlotta S. Stauffer, Director
Office of Commission Clerk
Florida Public Service Commission
2540 Shumard Oak Boulevard
Tallahassee, Florida 32399-0850


Re: Docket No. 150259-GU -- Initiation of show cause proceedings against Peoples Gas System for apparent violations of Sections 368.01 - 05, F.S., and Chapter 25-12, F.A.C.

Dear Ms. Stauffer:

Attached for filing with the Commission on behalf of Peoples Gas System, please find its Notice of Intent to Request Confidential Classification of certain documents in the above docket.

Thank you for your usual assistance.

Sincerely,



Ansley Watson, Jr.

AWjr/a
Enclosures

cc: Danielle M. Roth, Esquire
J.R. Kelly, Esquire
Charles Rehwinkel, Esquire
Bianca Lherisson, Esquire
Keino Young, Esquire
Kelley Corbari, Esquire
Ms. Kandi M. Floyd

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In Re: Initiation of show cause proceedings against)
Peoples Gas System for apparent violations of Sections)
368.01 - 05, F.S., and Chapter 25-12, F.A.C.)
_____)

Docket No. 150259-GU
Filed: March 14, 2016

**PEOPLES GAS SYSTEM'S NOTICE OF INTENT
TO REQUEST CONFIDENTIAL CLASSIFICATION**

Pursuant to Section 366.093, *Florida Statutes*, and subparagraphs (a), (b) and (d) of Rule 25-22.006(3), *Florida Administrative Code*, Peoples Gas System hereby gives notice of its intent to request confidential classification of the documents identified on Attachment A hereto, which documents have been requested by the Office of Public Counsel and are responsive to portions of Citizens' Second Set of Interrogatories to Peoples (Nos. 4-34) and Citizens' Second Request for Production of Documents to Peoples (Nos. 8-41).

DATED this 14th day of March, 2016.

Respectfully submitted,



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Attorneys for Peoples Gas System

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a copy of the foregoing Notice of Intent to Request Confidential Classification and Attachment A has been furnished by electronic mail this 14th day of March, 2016, to J.R. Kelly, Esquire, Charles Rehwinkel, Esquire, and Danielle M. Roth, Esquire, Office of Public Counsel, c/o The Florida Legislature, 111 W. Madison St., Room 812, Tallahassee, Florida 32399-1400, and to Bianca Lherisson, Esquire, Keino Young, Esquire, and Kelley F. Corbari, Esquire, Office of General Counsel, Florida Public Service Commission, 2540 Shumard Oak Boulevard, Tallahassee, Florida 32399-0850.



Ansley Watson, Jr.

OPC's Requested Confidential Documents related to OPC's Second Set of Interrogatories #4-34 and OPC's Second Set of POD's #8-41

CONFIDENTIAL DOCS REQUESTED TO BE RETAINED			
Interrog No.	Document	# Pages	Prev Viewed PSC
4	Response to #4 (Employees Names)	1	Y

POD No.			
15	HR Report for PGS ID # Q3-15	16	Y
16	Corporate Compliance Report for 2013 Investigation (St. Pete)	10	Y
16	Corporate Compliance Report for 2015 Investigation (Ocala)	25	Y
17	Pipeline Compliance Fraud Investigation Report (Joint report of PGS / KPMG Audit)	5	N
18	Veriforce Contract dated 6/25/15	3	N
18	Veriforce Contract Ddated 1/15/16	3	N
19	Veriforce Lakeland Division Compliance Assessment Report	62	N
19	Veriforce Sarasota Division Compliance Assessment Report	64	N
19	Veriforce St. Pete Division Compliance Assessment Report	72	Y
23b	PGS Corporate Engineering Compliance Inspection Reviews (2010 - 2014)	939	Y
23h	Draft Version of HR notes from Ocala Investigation	7	Y
23m	Number of False Leak Surveys Ocala (response to PSC DR)	1	Y
23n	Overview of Findings from 2013 Investigation and HR Actions	5	Y
23p	Villages Remedial Action and Magnolia River Report	18	Y
23q	PSC DR responses related to exploratory digs Villages / Villages CP Notes	5	Y
23s	Various documents from Division Self Auditing Reports	33	Y
25	GL Essentials Contracts	21	N
25	GL Essentials Invoices	25	N
36	Common IT Platform docs prior to May 2013	85	N
33/34 SPoint	Areas of Interest - GL Noble / Essentials - 11 files - See A	11	N
33/34 SPoint	Areas of Interest - Amigo - 2 files - See B	1	N
33/34 SPoint	Areas of Interest - DIMP - 2 files - See C	2	N
33/34 SPoint	Areas of Interest - Operation Shared Services / Compliance - 2 files - See D	2	N
33/34	Consolidated Business Plan Docs - Various - See E	87	N

Documents Viewed, No Request to Retained			
21	AGA Peer Review Program	15	N
23i	Documents provided to PGS from GP / TC	191	Y
23k	Documents provided to PGS from GP/ TC	91	Y
23r	GL Essentials 3 month reports (old version)	65	Y
38	ISN Contract	14	N
23s	Majority of Division Self Auditing Guidelines	1100	Y
34	New Mexico Accretion Calculations	25	N
33/34	Majority of Consolidated Business Plans (NM)	625	N
33/34 SPoint	Sharepoint Site Review (2,007 files)	2007	N

NEW MEXICO PODs	
Docs Related To Essentials - A	
IT and Telecom Business Plan	3/31/2014
Analysis Phase Final Report-out / Gas Ops & Engineering	Sep-13
Analysis Phase Final Report-out / IT&T	Sep-13
Pre-existing Initiatives & Commitments	10/9/2013
Opportunities List	10/31/2013
IT&T Analysis Phase Opportunity and Validation Summary - Final	9/17/2013
Regulatory & External Affairs Business Plan Final	3/31/2014
Gas Ops & Engineering Business Plan	8/13/2014
6 New Mexico Gas Business Unit Roadmap	8/27/2015
IT&T Analysis Phase Opportunity and Validation Summary - Final	3/4/2014
Key Similarities & Differences Summary - Gas Ops Eng Final	9/16/2013

Docs Related to Amigo - B	
6 YEAR Capital Budget 2014-2019 with Synergies	7/13/2015
Combined Application List	9/4/2013

Docs Related to DIMP - C	
LIADRS Process Diagrams	9/23/2013
Gas Ops High Level Implementation PlanV4	6/27/2014

Docs Related To Operations Shared Services / Compliance - D	
Fact Pack - Gas Operations and Engineering	1/14/2014
Process and Activities Mapping Gas Ops Engineering Final	8/21/2013

Docs Related to Consolidated Business Plans - E	PAGE
Savings Opportunities / Cost to achieve	11
Significant Implementation Requirements	11
IT&T Overview, Spending, Definition of Success, Savings, Implementation	82-90, 95, 103
IT&T Key Challenges for Business Unit / Function	108
IT&T Savings and Growth Opportunities	128-133
IT&T System Development Lifecycle	151-152
IT&T Pre-existing Initiatives and Commitments	172-176
HR - Core Values / Definition of Success	185
Gas Ops - Key Performance Measures	302-303
Gas Ops - Significant Implementation Requirements	307-308
Gas Ops - Business Unit; Plan Details; Savings Opportunities	309-361