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July 5, 2023

VIA HAND DELIVERY

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

REDACTED

Re: Docket No. 20230023-GU; Petition for Rate Increase by Peoples Gas System, Inc.

Docket No. 20220219-GU; Peoples Gas System's Petition for Rate Approval of 2022 Depreciation Study


Docket No. 20220212-GU; Peoples Gas System's Petition for Approval of Depreciation Rate and Subaccount for Renewable Natural Gas Facilities Leased to Others

Dear Mr. Teitzman:

Enclosed for filing in the above docket is Peoples Gas System, Inc.'s Request for Confidential Classification of certain information contained in its response to Office of Public Counsel's Fourth Request for Production of Documents, Number 77. Also attached in CD format is the public (redacted) version of this document (Bates Page 1050).

Thank you for your assistance in connection with this matter.

Sincerely,


Virginia Ponder

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cc: All parties of record (w/att.)

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BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

Petition for Rate Increase by Peoples Gas System, Inc.	DOCKET NO. 20230023-GU
Peoples Gas System's Petition for Rate Approval of 2022 Depreciation Study	DOCKET NO. 20220219-GU
Peoples Gas System's Petition for Approval of Depreciation Rate and Subaccount for Renewable Natural Gas Facilities Leased to Others	DOCKET NO. 20220212-GU FILED: July 5, 2023

**PEOPLES GAS SYSTEM INC.'S
REQUEST FOR CONFIDENTIAL CLASSIFICATION**

Peoples Gas System, Inc. ("Peoples" or "the company"), pursuant to Section 366.093, Florida Statutes, and Rule 25-22.006, Florida Administrative Code, hereby requests confidential classification of the yellow highlighted information contained in the following described document(s) ("the Document(s)") stamped "CONFIDENTIAL" and all information that is or may be printed on yellow paper stock stamped "CONFIDENTIAL" within the Document(s), all of said confidential information being hereinafter referred to as "Confidential Information.").

Description of the Document(s)

On June 30, 2023, Staff requested Peoples provide its confidential response to the Office of Public Counsel's Fourth Request for Production of Documents, Number 77. The company believes that portions of this response, as specified on Exhibit "A," constitute confidential information ("Confidential Information") and, has designated it as such by highlighting. Contemporaneous with the filing of this request, Peoples submitted the confidential response to the Commission Clerk under a separate, confidential cover letter. Peoples' requests confidential classification for this information such that it will be entitled to protection against public disclosure pursuant to Section 366.093, Florida Statutes. In support of this request, the company states:

1. Subsection 366.093(1), Florida Statutes, provides that any records “found by the Commission to be proprietary confidential business information shall be kept confidential and shall be exempt from s. 119.07(1), Florida Statutes [requiring disclosure under the Public Records Act].” 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; and (f) employee personnel information unrelated to compensation, duties, qualifications, or responsibilities. §366.093(3)(a)-(f), Fla. Stat. The Confidential Information that is the subject of this request and motion falls within one or more of these statutory categories and, thus, constitutes proprietary confidential business information entitled to protection under Section 366.093, Florida Statutes, and Rule 25-22.006, Florida Administrative Code.

2. Attached hereto as Exhibit "A" is a justification for confidential treatment of the Confidential Information contained in the Document.

3. The public version of the Document with the Confidential Information is included as Exhibit B.

4. The Confidential Information contained in the Document is intended to be and is treated by Peoples as private and has not been publicly disclosed.

Requested Duration of Confidential Classification

6. Pursuant to Rule 25-22.006(9)(a), Peoples requests that the Confidential Information be treated by the Commission as confidential proprietary business information for 18

months. If, and to the extent that the company is in need of confidential classification of the Confidential Information beyond the 18-month period set forth in the Commission rule, the justification and grounds for such extended confidential treatment are set forth in Exhibit "C" to this request and motion.

WHEREFORE, Peoples Gas System, Inc. respectfully requests that the Confidential Information that is the subject of this request be accorded confidential classification for the reasons set forth herein and for 18 months.

DATED this 5th day of July 2023.

Respectfully submitted,



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ATTORNEYS FOR PEOPLES GAS SYSTEM, INC.

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing Request for Confidential Classification, filed on behalf of Peoples Gas System, Inc., has been furnished by electronic mail on this 5th day of July, 2023 to the following:

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EXHIBIT A
OFFICE OF PUBLIC COUNSEL'S FOURTH REQUEST FOR PRODUCTION OF DOCUMENTS (NO. 77)
JUSTIFICATION FOR CONFIDENTIAL TREATMENT

<u>Bates Page</u>	<u>Document Description</u>	<u>Column, Paragraph, Page Line Designation or other Identifier</u>	<u>Description of Information</u>	<u>Justification</u>
1050	This document was provided in response to Office of Public Counsel's Request for Production of Documents, Number 77.	Columns 1 through 4; Identifying header information and all footnotes 1 through 13.	Highlighted text	(1)

(1) The highlighted information consists of "information relating to competitive interests, the disclosure of which would impair the competitive business of the provider of the information." This information is protected by Section 366.093(3)(d) and (e) of the Florida Statutes.

EXHIBIT B
PUBLIC VERSION(S) OF THE DOCUMENT(S)

Attached hereto (unless previously filed as may be noted below) are two public versions of the Document(s) with the Confidential Information redacted.

Public Version(s) of the Document(s) attached _____

Public Version(s) of the Document(s) attached in CD format X