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July 24, 2023

VIA HAND DELIVERY

RECEIVED-FPSC  
2023 JUL 24 AM 10:28  
COMMISSION  
CLERK

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 Tenth Request for Production of Documents, served by electronic mail on June 13, 2023. Also attached in CD format are the public (redacted) version of these documents.

Thank you for your assistance in connection with this matter.

Sincerely,

Virginia Ponder

COM \_\_\_\_\_  
AFD 1 redacted CD  
APA \_\_\_\_\_  
ECO \_\_\_\_\_  
ENG \_\_\_\_\_  
GCL \_\_\_\_\_  
IDM \_\_\_\_\_  
CLK \_\_\_\_\_

VLP/ne  
Attachment

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

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 24, 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 July 5, 2023, Peoples filed its responses to the Office of Public Counsel's ("OPC") Twelfth Set of Interrogatories (Nos. 259-266) and Tenth Request for Production of Documents (Nos. 98-99). *See* DN 03915-2023. That same day, Peoples filed (i) a Motion for Temporary Protective Order for documents produced in response to OPC's Request for Production No. 98<sup>1</sup>; and (ii) a Notice of Intent to Request Confidential Classification regarding the company's responses to OPC's Tenth Request for Production of Documents.<sup>2</sup> Peoples now files this Request for Confidential Classification so that Staff may review the confidential documents produced in

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<sup>1</sup> *See* DN 03913-2023.

<sup>2</sup> *See* DN 03932-2023

response to Request for Production No. 98. These documents, as specified on Exhibit "A," constitute confidential information ("Confidential Information"). Peoples has designated it as such by highlighting. 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 Documents.

3. The public versions of the Documents with the Confidential Information are included as Exhibit "B".

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

**Requested Duration of Confidential Classification**

5. 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 24th 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 Motion, filed on behalf of Peoples Gas System, Inc., has been furnished by electronic mail on this 24<sup>th</sup> day of July, 2023 to the following:

Major Thompson  
Ryan Sandy  
Austin Watrous  
Daniel Dose  
Chasity Vaughan  
Danyel Sims  
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Florida Public Service Commission  
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\_\_\_\_\_  
ATTORNEY

**EXHIBIT A**  
**STAFF'S CONFIDENTIAL DOCUMENT REQUEST**  
**JUSTIFICATION FOR CONFIDENTIAL TREATMENT**

<b><u>Bates Page</u></b>	<b><u>Document Description</u></b>	<b><u>Description of Information</u></b>	<b><u>Justification</u></b>
2-4	Confidential board slides produced in Response to OPC's Tenth Request for Production of Documents, Number 98.	The Highlighted Text	(1) & (2)
6	Same as above.	The Highlighted Text	(2)
9-13	Same as above.	The Highlighted Text	(1) & (2)
16-25	Same as above.	The Highlighted Text	(1) & (2)
27-35	Same as above.	The Highlighted Text	(1) & (2)
37-46	Same as above.	The Highlighted Text	(1) & (2)
48-50	Same as above.	The Highlighted Text	(1) & (2)
54-56	Same as above.	The Highlighted Text	(1) & (2)
58-62	Same as above.	The Highlighted Text	(2)
66	Same as above.	The Highlighted Text	(1) & (2)
68-69	Same as above.	The Highlighted Text	(2)
73-74	Same as above.	The Highlighted Text	(2)
75-79	Same as above.	The Highlighted Text	(1) & (2)
81	Same as above.	The Highlighted Text	(1) & (2)
83-85	Same as above.	The Highlighted Text	(1) & (2)
87-91	Same as above.	The Highlighted Text	(1) & (2)
93-97	Same as above.	The Highlighted Text	(1) & (2)
99-105	Same as above.	The Highlighted Text	(1) & (2)
107	Same as above.	The Highlighted Text	(1) & (2)
109-116	Same as above.	The Highlighted Text	(1) & (2)
118-120	Same as above.	The Highlighted Text	(1) & (2)
123-125	Same as above.	The Highlighted Text	(1) & (2)
128	Same as above.	The Highlighted Text	(1) & (2)
131	Same as above.	The Highlighted Text	(1) & (2)
133-137	Same as above.	The Highlighted Text	(1) & (2)
139-142	Same as above.	The Highlighted Text	(1) & (2)
145-147	Same as above.	The Highlighted Text	(1) & (2)
153-154	Same as above.	The Highlighted Text	(1) & (2)
156-164	Same as above.	The Highlighted Text	(1) & (2)
169-173	Same as above.	The Highlighted Text	(1) & (2)
175	Same as above.	The Highlighted Text	(1) & (2)
177	Same as above.	The Highlighted Text	(2)
179-185	Same as above.	The Highlighted Text	(1) & (2)

<b><u>Bates Page</u></b>	<b><u>Document Description</u></b>	<b><u>Description of Information</u></b>	<b><u>Justification</u></b>
187	Same as above.	The Highlighted Text	(2)
189-192	Same as above.	The Highlighted Text	(1) & (2)
194-195	Same as above.	The Highlighted Text	(1) & (2)
197-201	Same as above.	The Highlighted Text	(1) & (2)
203-212	Same as above.	The Highlighted Text	(1) & (2)
214-215	Same as above.	The Highlighted Text	(1) & (2)
216 to 216-01	Same as above.	The Highlighted Text	(1) & (2)
216-03 to 216-06	Same as above.	The Highlighted Text	(2)
217 to 217-01	Same as above.	The Highlighted Text	(1) & (2)
218	Same as above.	The Highlighted Text	(1) & (2)
219-01 to 219-02	Same as above.	The Highlighted Text	(1) & (2)
220	Same as above.	The Highlighted Text	(1) & (2)
221 to 221-02	Same as above.	The Highlighted Text	(1) & (2)
222-01 to 222-02	Same as above.	The Highlighted Text	(1) & (2)
223 to 223-01	Same as above.	The Highlighted Text	(1) & (2)
224-01 to 224-04	Same as above.	The Highlighted Text	(2)
225 to 225-01	Same as above.	The Highlighted Text	(1) & (2)
226 to 226-01	Same as above.	The Highlighted Text	(2)
227	Same as above.	The Highlighted Text	(1) & (2)
227-02	Same as above.	The Highlighted Text	(2)
227-04 to 227-09	Same as above.	The Highlighted Text	(2)
228	Same as above.	The Highlighted Text	(2)
228-02 to 228-03	Same as above.	The Highlighted Text	(2)
229 to 229-01	Same as above.	The Highlighted Text	(1) & (2)
230	Same as above.	The Highlighted Text	(1) & (2)
231-01 to 231-15	Same as above.	The Highlighted Text	(1) & (2)
232-02 to 232-03	Same as above.	The Highlighted Text	(1) & (2)
232-05 to 232-07	Same as above.	The Highlighted Text	(1) & (2)
232-10	Same as above.	The Highlighted Text	(2)
232-12 to 232-13	Same as above.	The Highlighted Text	(1) & (2)
232-15 to 232-16	Same as above.	The Highlighted Text	(1) & (2)
235-02 to 235-06	Same as above.	The Highlighted Text	(1) & (2)
236-02	Same as above.	The Highlighted Text	(2)
236-04	Same as above.	The Highlighted Text	(1) & (2)
236-06 to 236-11	Same as above.	The Highlighted Text	(1) & (2)
236-13 to 236-15	Same as above.	The Highlighted Text	(1) & (2)
236-18 to 236-20	Same as above.	The Highlighted Text	(1) & (2)
237 to 237-01	Same as above.	The Highlighted Text	(1) & (2)
237-03	Same as above.	The Highlighted Text	(2)
237-06	Same as above.	The Highlighted Text	(1) & (2)
237-08 to 237-12	Same as above.	The Highlighted Text	(1) & (2)
238-01 to 238-09	Same as above.	The Highlighted Text	(1) & (2)

<b><u>Bates Page</u></b>	<b><u>Document Description</u></b>	<b><u>Description of Information</u></b>	<b><u>Justification</u></b>
238-11	Same as above.	The Highlighted Text	(1) & (2)
238-13 to 238-14	Same as above.	The Highlighted Text	(1) & (2)
239	Same as above.	The Highlighted Text	(1) & (2)
240	Same as above.	The Highlighted Text	(1) & (2)
240-02 to 240-7	Same as above.	The Highlighted Text	(1) & (2)
240-9 to 240-11	Same as above.	The Highlighted Text	
240-15 to 240-22	Same as above.	The Highlighted Text	(1) & (2)
240-24	Same as above.	The Highlighted Text	(1) & (2)
240-26 to 240-27	Same as above.	The Highlighted Text	(1) & (2)
242-02 to 242-13	Same as above.	The Highlighted Text	(2)
243-03 to 243-19	Same as above.	The Highlighted Text	(1) & (2)
244-03 to 244-05	Same as above.	The Highlighted Text	(1) & (2)
245	Same as above.	The Highlighted Text	(1) & (2)
245-02 to 245-04	Same as above.	The Highlighted Text	(1) & (2)
246	Same as above.	The Highlighted Text	(1) & (2)
246-02	Same as above.	The Highlighted Text	(1) & (2)
247-02 to 247-03	Same as above.	The Highlighted Text	(2)
248-02	Same as above.	The Highlighted Text	(2)
249 to 249-02	Same as above.	The Highlighted Text	(2)
250	Same as above.	The Highlighted Text	(1) & (2)
251	Same as above.	The Highlighted Text	(1) & (2)
252	Same as above.	The Highlighted Text	(1) & (2)
253-01	Same as above.	The Highlighted Text	(2)
254-01 to 254-02	Same as above.	The Highlighted Text	(1) & (2)
255-01	Same as above.	The Highlighted Text	(1) & (2)
256-01 to 256-02	Same as above.	The Highlighted Text	(1) & (2)
257-01	Same as above.	The Highlighted Text	(1) & (2)
258	Same as above.	The Highlighted Text	(1) & (2)
259-03 to 259-06	Same as above.	The Highlighted Text	(1) & (2)
259-09 to 259-10	Same as above.	The Highlighted Text	
261 to 261-02	Same as above.	The Highlighted Text	(1) & (2)
262	Same as above.	The Highlighted Text	(2)
262-02 to 262-03	Same as above.	The Highlighted Text	(2)
263-02	Same as above.	The Highlighted Text	(2)
263-04	Same as above.	The Highlighted Text	(2)
264-01	Same as above.	The Highlighted Text	(2)
265 to 265-01	Same as above.	The Highlighted Text	(1) & (2)
266	Same as above.	The Highlighted Text	(1) & (2)
267-02 to 267-08	Same as above.	The Highlighted Text	(1) & (2)
268	Same as above.	The Highlighted Text	(2)
268-04 to 268-05	Same as above.	The Highlighted Text	(1) & (2)
268-10	Same as above.	The Highlighted Text	(2)

<b><u>Bates Page</u></b>	<b><u>Document Description</u></b>	<b><u>Description of Information</u></b>	<b><u>Justification</u></b>
268-12	Same as above.	The Highlighted Text	(1) & (2)
268-14 to 268-18	Same as above.	The Highlighted Text	(1) & (2)
268-20 to 268-22	Same as above.	The Highlighted Text	(1) & (2)
268-25 to 268-27	Same as above.	The Highlighted Text	(1) & (2)
269 to 269-03	Same as above.	The Highlighted Text	(1) & (2)
270	Same as above.	The Highlighted Text	(2)
270-03 to 270-16	Same as above.	The Highlighted Text	(1) & (2)
271-01	Same as above.	The Highlighted Text	(2)
272 to 272-01	Same as above.	The Highlighted Text	(1) & (2)
273-02	Same as above.	The Highlighted Text	(2)
274 to 274-01	Same as above.	The Highlighted Text	(1) & (2)
274-05 to 274-10	Same as above.	The Highlighted Text	(1) & (2)
274-12	Same as above.	The Highlighted Text	(1) & (2)
274-14	Same as above.	The Highlighted Text	(2)
274-16 to 274-19	Same as above.	The Highlighted Text	(1) & (2)
275 to 275-03	Same as above.	The Highlighted Text	(2)
276	Same as above.	The Highlighted Text	(1) & (2)
276-02	Same as above.	The Highlighted Text	(1) & (2)
277-03 to 277-07	Same as above.	The Highlighted Text	(1) & (2)
277-10 to 277-12	Same as above.	The Highlighted Text	(1) & (2)
277-15	Same as above.	The Highlighted Text	(2)
277-17 to 277-18	Same as above.	The Highlighted Text	(1) & (2)
277-20 to 277-21	Same as above.	The Highlighted Text	(1) & (2)
279 to 279-01	Same as above.	The Highlighted Text	(1) & (2)
281-03 to 281-09	Same as above.	The Highlighted Text	(2)
282	Same as above.	The Highlighted Text	(1) & (2)
283-02 to 283-03	Same as above.	The Highlighted Text	(1) & (2)
284	Same as above.	The Highlighted Text	(1) & (2)
285	Same as above.	The Highlighted Text	(2)
285-02 to 285-03	Same as above.	The Highlighted Text	(1) & (2)
287	Same as above.	The Highlighted Text	(1) & (2)
287-02	Same as above.	The Highlighted Text	(1) & (2)
289-01	Same as above.	The Highlighted Text	(2)
290-03 to 290-05	Same as above.	The Highlighted Text	(1) & (2)
290-08	Same as above.	The Highlighted Text	(1) & (2)
290-10	Same as above.	The Highlighted Text	(1) & (2)
290-12	Same as above.	The Highlighted Text	(2)
290-15 to 290-18	Same as above.	The Highlighted Text	(1) & (2)
290-19	Same as above.	The Highlighted Text	(2)
290-23 to 290-26	Same as above.	The Highlighted Text	(1) & (2)
290-28 to 290-29	Same as above.	The Highlighted Text	(2)
290-31 to 290-32	Same as above.	The Highlighted Text	(2)

<b><u>Bates Page</u></b>	<b><u>Document Description</u></b>	<b><u>Description of Information</u></b>	<b><u>Justification</u></b>
291-02 to 291-04	Same as above.	The Highlighted Text	(1) & (2)
293	Same as above.	The Highlighted Text	(1) & (2)
294 to 294-01	Same as above.	The Highlighted Text	(1) & (2)
295-03 to 295-04	Same as above.	The Highlighted Text	(1) & (2)
295-06 to 295-12	Same as above.	The Highlighted Text	(1) & (2)
297-02	Same as above.	The Highlighted Text	(2)
298	Same as above.	The Highlighted Text	(1) & (2)
299	Same as above.	The Highlighted Text	(1) & (2)
300	Same as above.	The Highlighted Text	(1) & (2)
303-03 to 303-07	Same as above.	The Highlighted Text	(1) & (2)
303-09 to 303-10	Same as above.	The Highlighted Text	(1) & (2)
304	Same as above.	The Highlighted Text	(1) & (2)
305	Same as above.	The Highlighted Text	(2)
306-02 to 306-04	Same as above.	The Highlighted Text	(1) & (2)
306-07	Same as above.	The Highlighted Text	(1) & (2)
306-9	Same as above.	The Highlighted Text	(2)
306-11	Same as above.	The Highlighted Text	(2)
306-14 to 306-18	Same as above.	The Highlighted Text	(1) & (2)
306-22 to 306-25	Same as above.	The Highlighted Text	(1) & (2)
306-27 to 306-28	Same as above.	The Highlighted Text	(2)
306-30 to 306-31	Same as above.	The Highlighted Text	(2)
307-02 to 306-07	Same as above.	The Highlighted Text	(1) & (2)
307-10	Same as above.	The Highlighted Text	(1) & (2)
307-12 to 307-14	Same as above.	The Highlighted Text	(1) & (2)
308-02	Same as above.	The Highlighted Text	(2)
308-04	Same as above.	The Highlighted Text	(1) & (2)
308-06 to 308-11	Same as above.	The Highlighted Text	(1) & (2)
308-13 to 308-15	Same as above.	The Highlighted Text	(1) & (2)
308-18 to 308-20	Same as above.	The Highlighted Text	(1) & (2)
309-02	Same as above.	The Highlighted Text	(2)
309-04	Same as above.	The Highlighted Text	(1) & (2)
309-06 to 309-10	Same as above.	The Highlighted Text	(1) & (2)
309-12 to 309-14	Same as above.	The Highlighted Text	(1) & (2)
309-17 to 309-19	Same as above.	The Highlighted Text	(1) & (2)
310-01 to 310-02	Same as above.	The Highlighted Text	(2)
311-01	Same as above.	The Highlighted Text	(1) & (2)
312-03 to 312-08	Same as above.	The Highlighted Text	(1) & (2)
312-10	Same as above.	The Highlighted Text	(1) & (2)
312-12	Same as above.	The Highlighted Text	(2)
312-14 to 312-17	Same as above.	The Highlighted Text	(1) & (2)

(1) The highlighted information consists of “[i]nformation concerning bids or other contractual data, the disclosure of which would impair the efforts of the public utility to contract for goods or services on favorable terms” under Section 366.093(3)(d), Florida Statutes. This information constitutes “proprietary confidential business information” that is exempt from disclosure under Chapter 119, Florida Statutes.

(2) The highlighted information relates to “competitive interests, the disclosure of which would impair the competitive business interests of the provider of the information” under Section 366.093(3)(e), Florida Statutes. This information constitutes “proprietary confidential business information” that is exempt from disclosure under Chapter 119, 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

**EXHIBIT C**  
**JUSTIFICATION FOR EXTENSION OF CONFIDENTIALITY PERIOD**

N/A