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August 18, 2023

VIA HAND DELIVERY

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

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 ("OPC") (i) First Request for Production of Documents, No. 16; (ii) First Set of Interrogatories, No. 100; and (iii) Tenth Set of Interrogatories, Nos. 244 and 245. Also attached in CD format are the public (redacted) versions of these documents.

Thank you for your assistance in connection with this matter.

Sincerely,

Virginia Ponder

COM _____
AFD 1 CD redacted
APA _____
ECO _____
ENG _____
GCL _____ VLP/ne
IDM _____ Attachment
CLK _____ 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: August 18, 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 August 16, 2023, Peoples filed a Notice of Intent to Request Confidential Classification ("Notice of Intent") pursuant to Staff's August 16, 2023, request to view certain confidential materials produced to the Office of Public Counsel ("OPC") in response to its (i) First Request for Production of Documents, No. 16; (ii) First Set of Interrogatories, No. 100; and (iii) Tenth Set of Interrogatories, Nos. 244 and 245. See DN 04831-2023. Consistent with the Notice of Intent filed on August 16, 2023, the company hereby designates portions of the discovery response requested by Staff, as specified on Exhibit "A," as Confidential Information. Contemporaneous with the

filing of this request, Peoples submitted the confidential versions of these materials to the Commission Clerk under a separate, confidential cover letter.

Request

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 version of the documents with the Confidential Information is 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 18th day of August 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 18th day of August, 2023 to the following:

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**EXHIBIT A
JUSTIFICATION FOR CONFIDENTIAL TREATMENT**

<u>Bates Page</u>	<u>Document Description</u>	<u>Description of Information</u>	<u>Justification</u>
10105-10108	Agreements and documents related to prospectuses provided in response to OPC's First Request for Production of Documents, No. 16.	The Highlighted Information	(1)
10110	Same as above.	The Highlighted Information	(1)
10114-10116	Same as above.	The Highlighted Information	(1)
10118	Same as above.	The Highlighted Information	(1)
10124-10219	Same as above.	The Highlighted Information	(1)
10222	Same as above.	The Highlighted Information	(1)
10224-10235	Same as above.	The Highlighted Information	(1)
10238-10245	Same as above.	The Highlighted Information	(1)
10258-10263	Same as above.	The Highlighted Information	(1)
10265	Same as above.	The Highlighted Information	(1)
10268-10272	Same as above.	The Highlighted Information	(1)
10276-10285	Same as above.	The Highlighted Information	(1)

<u>Bates Page</u>	<u>Document Description</u>	<u>Description of Information</u>	<u>Justification</u>
10288-10299	Same as above.	The Highlighted Information	(1)
10303-10306	Same as above.	The Highlighted Information	(1)
10311-10386	Same as above.	The Highlighted Information	(1)
10388	Same as above.	The Highlighted Information	(1)
10393-10404	Same as above.	The Highlighted Information	(1)
10407-10415	Same as above.	The Highlighted Information	(1)
10431-10436	Same as above.	The Highlighted Information	(1)
10438	Same as above.	The Highlighted Information	(1)
10440	Same as above.	The Highlighted Information	(1)
10446-10526	Same as above.	The Highlighted Information	(1)
10531-10541	Same as above	The Highlighted Information	(1)
10544-10555	Same as above.	The Highlighted Information	(1)
10570-10575	Same as above.	The Highlighted Information	(1)
10577	Same as above.	The Highlighted Information	(1)
10579	Same as above.	The Highlighted Information	(1)

<u>Bates Page</u>	<u>Document Description</u>	<u>Description of Information</u>	<u>Justification</u>
10585-10704	Same as above.	The Highlighted Information	(1)
10709-10726	Same as above.	The Highlighted Information	(1)
10729	Same as above.	The Highlighted Information	(1)
10744	Same as above.	The Highlighted Information	(1)
10746-10753	Same as above.	The Highlighted Information	(1)
10758-10844	Same as above.	The Highlighted Information	(1)
10846-10849	Same as above.	The Highlighted Information	(1)
10852	Same as above.	The Highlighted Information	(1)
10856	Same as above.	The Highlighted Information	(1)
10858-10862	Same as above.	The Highlighted Information	(1)
10864	Same as above.	The Highlighted Information	(1)
10866	Same as above.	The Highlighted Information	(1)
10868-10878	Same as above.	The Highlighted Information	(1)
10880-10890	Same as above.	The Highlighted Information	(1)
10892	Same as above.	The Highlighted Information	(1)

<u>Bates Page</u>	<u>Document Description</u>	<u>Description of Information</u>	<u>Justification</u>
10897-10995	Same as above.	The Highlighted Information	(1)
10999-11000	Same as above.	The Highlighted Information	(1)
11003	Same as above.	The Highlighted Information	(1)
11006-11010	Same as above.	The Highlighted Information	(1)
11012	Same as above.	The Highlighted Information	(1)
11014	Same as above.	The Highlighted Information	(1)
11016-11024	Same as above.	The Highlighted Information	(1)
11029-11092	Same as above.	The Highlighted Information	(1)
11095-11131	Same as above.	The Highlighted Information	(1)
11133-11136	Same as above.	The Highlighted Information	(1)
11140	Same as above.	The Highlighted Information	(1)
11144	Same as above.		(1)
11146-11150	Same as above.		(1)
11152	Same as above.		(1)
11154	Same as above.		(1)

<u>Bates Page</u>	<u>Document Description</u>	<u>Description of Information</u>	<u>Justification</u>
11156-11164	Same as above.		(1)
11169-11228	Same as above.		(1)
11231-11265	Same as above.		(1)
11267-11270	Same as above.		(1)
11273	Same as above.		(1)
11277	Same as above.		(1)
11279-11283	Same as above.		(1)
11285	Same as above.		(1)
11287	Same as above.		(1)
11289-11296	Same as above.		(1)
387	Audit billing and fee information provided in response to OPC's First Set of Interrogatories, No. 100.	The Highlighted Information	(2)
387	Audit billing and fee information provided in response to OPC's First Set of Interrogatories, No. 100 (Revised).	The Highlighted Information	(2)

<u>Bates Page</u>	<u>Document Description</u>	<u>Description of Information</u>	<u>Justification</u>
2	Documents related to the amount of short-term debt commitment fees and any other fees included in the determination of the 4.85% short-term debt rate associated with the short-term facility in the company's filing for the test year provided in response to OPC's Tenth Set of Interrogatories, Number 244.	The Highlighted Information	(2)
4	Documents related to the amount of short-term debt commitment fees and any other fees included in the determination of the 3.83% short-term debt rate associated with the allocation of Tampa Electric Company's short-term facility provided in response to OPC's Tenth Set of Interrogatories, Number 245.	The Highlighted Information	(2)

- (1) The highlighted information consists of negotiated, non-standard contractual terms regarding Peoples' rights and remedies under the project agreements. This constitutes "[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.
- (2) The highlighted information relates 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)(e), 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