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August 21, 2023

VIA HAND DELIVERY

2023 AUG 21 AM 11:38

RECEIVED-FPSC

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 second supplemental response to Office of Public Counsel's Fourth Set of Interrogatories (No. 209). Also attached are the public (redacted) version of these documents.

Thank you for your assistance in connection with this matter.

Sincerely,

Virginia Ponder

VLP/ne
Attachment

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

COM _____
AFD I redacted Exh "B"
APA _____
ECO _____
ENG _____
GCL _____
IDM _____
CLK _____

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 21, 2023

**PEOPLES GAS SYSTEM INC.'S
REQUEST FOR CONFIDENTIAL CLASSIFICATION
AND REQUEST FOR TEMPORARY PROTECTIVE ORDER**

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 and a motion for temporary protective order for 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 21, 2023, Peoples filed a Second Supplemental Response to the Office of Public Counsel's ("OPC") Fourth Set of Interrogatories No. 209. Portions of this response, as specified on Exhibit "A," constitute proprietary confidential business 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.

5. For the same reasons set forth herein in support of its request for confidential classification, Peoples also moves the Commission for entry of a Temporary Protective Order pursuant to Rule 25-22.006(6)(a) of the Florida Administrative Code.

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 21st 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 21st day of August, 2023 to the following:

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Austin Watrous
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ATTORNEY

EXHIBIT A
SECOND SUPPLEMENTAL RESPONSE TO
OPC'S FOURTH SET OF INTERROGATORIES NO. 209

<u>Bates Page</u>	<u>Description of Information</u>	<u>Justification</u>
38	The Highlighted Information	(1)
40d	The Highlighted Information	(1)
40e	The Highlighted Information	(1)
40f	The Highlighted Information	(1)

- (1) 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

HIGHLY CONFIDENTIAL

209. Mergers & Acquisitions. Are there any current and/or planned internal discussions for the Company to potentially merge or to acquire all or part of another company? If so, provide a detailed discussion on the status of those negotiations.

A. May 16, 2023 Answer:

[REDACTED]

Peoples will provide its confidential answers to interrogatories and confidential documents by posting them in the confidential section of its discovery SharePoint site for this case subject to a Motion for Protective Order or Request for Confidential Classification filed contemporaneously with this response. Please see confidential electronic responsive documents posted to Peoples' Confidential Discovery Responses folder on the External SharePoint site.

[Consumer Parties Access - PGS 2024 Rate Proceeding - CONFIDENTIAL - Rate Proceeding Discovery Responses - All Documents \(sharepoint.com\)](#)

REDACTED

PEOPLES GAS SYSTEM, INC.
DOCKET NO. 20230023-GU
OPC'S FOURTH SET OF
INTERROGATORIES
INTERROGATORY NO. 209
BATES PAGES(S): 40d – 40f
FILED: MAY 18, 2023
SUPPLEMENTED: AUGUST 17, 2023
SECOND SUPPLEMENTED: AUGUST 21, 2023

August 21, 2023 Supplement:

1. [Redacted]

A. [Redacted]

2. [Redacted]

A. [Redacted]

3. [Redacted]

A. [Redacted]

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4. [REDACTED]

A. [REDACTED]

5. [REDACTED]

A. [REDACTED]

6. Referring to the exhibits attached to your rebuttal testimony, there you discuss bill comparisons and base rate comparisons between PGS, FCG, FPUC, and St. Joe gas companies, correct?

A. Yes.

7. On Exhibits HJW-2, document one, the bill comparison exhibit, both FCG and St. Joe have lower bills than PGS, correct?

A. Yes, but the comparison is between existing bills for FCG and St. Joe and hypothetical PGS bills based on the company's proposed increases in this case.

8. And on the next exhibit, FCG and St. Joe also have lower base rates than PGS in two of the three rate classes depicted on this page, correct?

REDACTED

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A. Yes, but the comparison is between existing base rates for FCG and St. Joe and hypothetical PGS rates based on the company's proposed increases in this case.

9. [REDACTED]

A. [REDACTED]

10. [REDACTED]

A. [REDACTED]

EXHIBIT C
JUSTIFICATION FOR EXTENSION OF CONFIDENTIALITY PERIOD

N/A