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IN REPLY REFER TO:

Ansley Watson, Jr.
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June 5, 2015

VIA FEDEX

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

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**Re: Docket No. 150003-GU – Purchased Gas Adjustment (PGA) True-Up
REQUEST FOR CONFIDENTIAL TREATMENT**

Dear Ms. Stauffer:

Enclosed for filing with the Commission on behalf of Peoples Gas System, please find the original and seven (7) copies of Peoples' Request for Confidential Treatment with respect to portions of the Company's documents selected as audit work papers pursuant to the audit in the above docket under Audit Control No. 15-014-2-3. Enclosed with this filing are one highlighted and two redacted copies of the documents for which confidential treatment is sought.

Please acknowledge your receipt of the enclosures on the enclosed copy of this letter, and return the same to me in the enclosed preaddressed envelope.

Thank you for your usual assistance.

Sincerely,



Ansley Watson, Jr.

AWjr/a
Enclosures

cc: Parties of Record
Ms. Kandi M. Floyd

COM _____
AFD _____
APA _____
ECO 4 **Redacted**
ENG _____
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IDM _____
TEL _____
CLK _____

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Purchased gas adjustment)
(PGA) true-up.)
_____)

Docket No. 150003-GU
Submitted for Filing:
6-8-15

**PEOPLES GAS SYSTEM'S REQUEST
FOR CONFIDENTIAL TREATMENT**

Pursuant to Section 366.093, *Florida Statutes*, Peoples Gas System ("Peoples" or the "Company") submits the following Request for Confidential Treatment of highlighted portions of the Company's documents selected as audit work papers pursuant to the audit under Audit Control No. 15-014-2-3 in this docket:

1. Attached hereto as Exhibit A is a detailed justification for the requested confidential treatment of the highlighted portions of the Company's documents.
2. The material for which confidential classification is sought is intended to be and is treated as private by Peoples, and has not been disclosed.

WHEREFORE, Peoples submits the foregoing as its request for confidential treatment of the information identified in Exhibit A.

Respectfully submitted,



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Attorneys for Peoples Gas System

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true copy of the foregoing Request for Confidential Treatment, filed on behalf of Peoples Gas System, has been furnished electronically, this 5th day of June, 2015, to the following:

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Ansley Watson, Jr.

JUSTIFICATIONS FOR CONFIDENTIAL TREATMENT OF HIGHLIGHTED INFORMATION

Peoples seeks specified confidential treatment, and non-disclosure pursuant to Chapter 119, and Section 366.093, *Florida Statutes*, of the information highlighted on the documents selected as audit work papers pursuant to Audit Control No. 15-014-2-3 in this docket. The work papers (which Peoples provided to the Commission's auditor, but has not seen since assembled by the auditor) for which confidential treatment is sought consist entirely of (i) invoices from Peoples' suppliers of natural gas and (ii) internal Peoples documents prepared in connection with the payment of the supplier invoices, which internal documents basically repeat the information shown on the invoices from the Company's suppliers of gas.

Because of the large amount of proprietary and confidential information contained on the supplier invoices and the internal documents that summarize the invoices, Peoples has requested confidential treatment of all pages in their entirety. Peoples has done so to protect from disclosure the following types of information:

(1) Rates - Peoples considers the rates at which it purchases gas confidential because knowledge of the rates would give other competing suppliers information with which to potentially or actually control the pricing of gas either by all quoting a particular price (equal to or exceeding the shaded rates), or by adhering to a rate offered by a particular supplier. A supplier which might have been willing to sell gas at a lower rate would be less likely to make any price concessions. The end result is reasonably likely to be increased gas prices, and therefore an increased cost of gas which Peoples must recover from its ratepayers through the PGA clause.

In addition to protection of the rates, Peoples requests confidential treatment of the volumes and total costs of the purchases in order to prevent the use of such information to calculate the rates.

(2) Supplier Names - Disclosure of supplier names would be detrimental to the interests of Peoples and its ratepayers since it would provide competitors with a list of gas suppliers and would facilitate the intervention of a middleman. The end result is reasonably likely to be increased gas prices, and therefore an increased cost of gas which Peoples must recover from its ratepayers through the PGA clause.

In an effort to protect the names of its suppliers, Peoples has also tried to shield any related information (e.g., addresses, phone and fax numbers, contact persons, logos, etc.) that once revealed would tend to indicate the identity of the gas supplier for which Peoples has requested confidential treatment. In the case of supplier invoices, the format of an invoice alone may indicate to persons knowledgeable in the gas industry which suppliers Peoples is dealing with and the frequency with which it does so.

(3) Receipt Points – The supplier invoices also contain information with respect to the receipt points at which the gas purchased by Peoples was received, information for which Peoples seeks confidential treatment. Disclosure of this information would be detrimental to Peoples and its ratepayers because it would help illustrate Peoples' supply infrastructure. Disclosing the receipt points would give competitors information that would allow them to buy or sell capacity at those points. The resulting increase or decrease in available capacity would affect the cost of gas transportation for supply already secured. The end result is reasonably likely to be higher gas and transportation prices, and therefore an increased cost of gas which Peoples must recover from its ratepayers through the PGA clause.

(4) Sensitive Bank Information – The internal Peoples documents accompanying each supplier invoice (and some of the supplier invoices themselves) contain sensitive bank information that could be used, alone or in conjunction with other publicly available information, to engage in identity theft or other forms of fraudulent activity, gain a competitive advantage over Peoples, or take other action detrimental to Peoples' interests. As such, the information is entitled to confidential treatment pursuant to Section 366.093, *Florida Statutes*.

All of the information referred to above is contractual information which, if made public, "would impair the efforts of [Peoples] to contract for goods or services on favorable terms." Section 366.093(3)(d), *Florida Statutes*, and is entitled to confidential treatment pursuant to Section 366.093, *Florida Statutes*.

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ARE REDACTED