

MACFARLANE FERGUSON & McMULLEN

ATTORNEYS AND COUNSELORS AT LAW

ONE TAMPA CITY CENTER, SUITE 2000
201 NORTH FRANKLIN STREET
P.O. BOX 1531 (ZIP 33601)
TAMPA, FLORIDA 33602
(813) 273-4200 FAX (813) 273-4396

www.mfmlegal.com
EMAIL: info@mfmlegal.com

625 COURT STREET
P.O. BOX 1669 (ZIP 33757)
CLEARWATER, FLORIDA 33756
(727) 441-8966 FAX (727) 442-8470

IN REPLY REFER TO:

Ansley Watson, Jr.
P.O. Box 1531
Tampa, Florida 33601
e-mail: aw@macfar.com

July 14, 2015

VIA FEDEX

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

REDACTED

RECEIVED FPSC
15 JUL 16 PM 2:15
COMMISSION
CLERK

**Re: Docket No. 150003-GU – Purchased Gas Adjustment (PGA) True-Up
MODIFIED 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' Modified 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.

Ansley Watson, Jr.

COM _____
AFD _____
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ENG _____
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TEL _____
CLK _____

AWjr/a
Enclosures

cc: Parties of Record
Ms. Kandi M. Floyd

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

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

Docket No. 150003-GU
Submitted for Filing:
7-15-15

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

Pursuant to Section 366.093, *Florida Statutes*, Peoples Gas System ("Peoples" or the "Company") submits the following Modified 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. Peoples filed its initial request for confidential treatment of the material identified in Exhibit A hereto on June 8, 2015, but was advised by Commission Staff that the request did not match the page numbers of the confidential workpapers collected by the Commission auditor (which Peoples had not seen as assembled by the auditor). Thus, Peoples is filing this modified request for confidential treatment.

2. Attached hereto as Exhibit A is a detailed justification for the requested confidential treatment of the highlighted portions of the Company's documents.

3. The material for which confidential classification is sought is intended to be and is treated as private by Peoples, and has not been disclosed.

4. Peoples requests that all information for which it seeks confidential classification (except the sensitive bank information highlighted in blue/green on the identified pages containing the confidential information) not be declassified until 18 months following the Commission's finding that such information is confidential proprietary business information entitled to protection from disclosure. Peoples requests that all sensitive bank information for which it seeks confidential classification (highlighted in blue/green on the identified pages

containing the confidential information) not be declassified until such time as the pages containing such information have been returned by the Commission to the Company.

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

Respectfully submitted,



Ansley Watson, Jr.
Phone: (813) 273-4321
E-mail: aw@macfar.com
Ashley R. Kellgren
Phone: (813) 273-4247
E-mail: ark@macfar.com
Macfarlane Ferguson & McMullen
P. O. Box 1531
Tampa, Florida 33601-1531

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 14th day of July, 2015, to the following:

Kyesha Mapp, Esquire
Office of General Counsel
Florida Public Service Commission
2540 Shumard Oak Boulevard
Tallahassee, FL 32399-0850
kmapp@psc.state.fl.us

Office of Public Counsel
J.R. Kelly/P. Christensen/C. Rehwinkel
c/o The Florida Legislature
111 West Madison St., Room 812
Tallahassee, FL 32399-1400
Kelly.JR@leg.state.fl.us
Rehwinkel.charles@leg.state.fl.us

Beth Keating, Esquire
Gunster Law Firm
215 South Monroe St. Suite 618
Tallahassee, FL 32301
bkeating@gunster.com

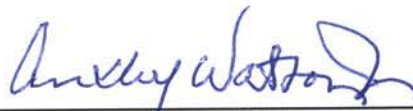
Mr. Andy Shoaf
St. Joe Natural Gas Company, Inc.
P. O. Box 549
Port St. Joe, FL 32457-0549
andy@stjoegas.com

Carolyn Bermudez
Florida City Gas
933 East 25th Street
Hialeah, FL 33013-3403
cbermude@aglresources.com

Kandi M. Floyd / Paula K. Brown
Regulatory Affairs
Peoples Gas System
P. O. Box 111
Tampa, FL 33601-0111
kfloyd@tecoenergy.com
regdept@tecoenergy.com

Mike Cassel
Florida Public Utilities Company
1750 SW 14th Street – Suite 200
Fernandina Beach, FL 32034
mcassel@fpuc.com

Elizabeth Wade/Shannon Pierce
AGL Resources Inc.
Ten Peachtree Place
Location 1470
Atlanta, GA 30309
spierce@aglresources.com
ewade@aglresources.com



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 had not seen since assembled by the auditor at the time of filing its initial request for confidential treatment of the same on June 8, 2015 (Document No. 03460-15)) 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 identified below in their entirety (and such pages have been printed on yellow paper to reflect that fact).

Audit Workpaper Pages 43-6 (Pages 1 of 23 through 23 of 23, inclusive):

Peoples has sought confidential treatment of the information shown on these pages 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. This sensitive bank information has been highlighted in blue on the pages referenced above (which may appear to be green) on the yellow pages). 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*.

State of Florida



Public Service Commission

CAPITAL CIRCLE OFFICE CENTER • 2540 SHUMARD OAK BOULEVARD
TALLAHASSEE, FLORIDA 32399-0850

-M-E-M-O-R-A-N-D-U-M-

DATE: May 20, 2015
TO: Marguerite McLean, Records Technician, Office of Commission Clerk
FROM: Lynn M. Deamer, Chief of Auditing, Office of Auditing and Performance Analysis
RE: Docket No.: 150003-GU
 Company Name: Peoples Gas System
 Company Code: GU608
 Audit Purpose: Purchased Gas Cost Recovery Clause
 Audit Control No: 15-014-2-3


Volume 2 of the audit working papers are forwarded for confidential treatment pursuant to Rule 25-22.006, Florida Administrative Code. The audit report, and volume 1 of the work papers are public and held by the Bureau of Auditing. The audit exit conference was held May 19, 2015.

LD

Attachments: Confidential Document Index
Confidential Binder(s) Listed Above

cc: Bureau of Auditing (File copy)

RECEIVED - PSC
15 MAY 20 PM 2: 59
COMMISSION
CLERK



Received By

May 20th 2015

Date

Peoples Gas System
Docket #150003-GU
Year Ended 12/31/2014
Auditor: Ron Mavrides

CONFIDENTIAL FILE LOG

Confidential Workpaper Page Number

43-6 p. 1
43-6 p. 2
43-6 p. 3
43-6 p. 4
43-6 p.5
43-6 p.6
43-6p.7
43-6p.8
43-6p.9
43-6p.10
43-6p.11
43-6p.12
43-6p.13
43-6p.14
43-6p.15
43-6p.16
43-6p.17
43-6p.18
43-6p.19
43-6p.20
43-6p.21
43-6p.22
43-6p.23

FLORIDA PUBLIC SERVICE COMMISSION
OFFICE OF COMMISSION CLERK



DOCUMENT NUMBER ASSIGNMENT*

FILED DATE: 05/20/2015

DOCKET NO.: 150003-GU

DOCUMENT NO.: 02990-15

CONFIDENTIAL

DOCUMENT DESCRIPTION:

APA/Deamer - (CONFIDENTIAL) Working papers Vol 2 [of 2] for PGS, for purchased gas cost recovery clause audit (Audit Control No. 15-014-2-3). [x-ref DN 03462-15]

***This document number has been assigned to a confidential document.
For further information, contact the Office of Commission Clerk.**

E-MAIL: CLERK@PSC.STATE.FL.US PHONE NO. (850) 413-6770 FAX NO. (850) 717-0114

KAM
5/20/15

Peoples Gas System
Docket #150003-GU
Year Ended 12/31/2014
Auditor: Ron Mavrides

18
4-16-15

CONFIDENTIAL FILE LOG

Confidential Workpaper Page Number

- 43-6 p. 1
- 43-6 p. 2
- 43-6 p. 3
- 43-6 p. 4
- 43-6 p.5
- 43-6 p.6
- 43-6p.7
- 43-6p.8
- 43-6p.9
- 43-6p.10
- 43-6p.11
- 43-6p.12
- 43-6p.13
- 43-6p.14
- 43-6p.15
- 43-6p.16
- 43-6p.17
- 43-6p.18
- 43-6p.19
- 43-6p.20
- 43-6p.21
- 43-6p.22
- 43-6p.23

11

Confidential Document Control Log

RAM
5/20/15
EX

Company: Peoples Gas System
Audit Purpose: Purchased Gas Adjustment
Docket Number: 150003-GU

Audit Manager: Ron Mavrides
Audit Control No.: 15-014-2-3
Period Ending: December 31, 2014

1

RECIPT OF MATERIAL

Item Number	Document Description	Doc. Req. Number	Received From	Received By	Date	To	By
1	Invoices & Contracts - Thumbdrive	6	Sarahjak	Mavrides	5/19/15	Sarahjak	Mavrides

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STATE OF FLORIDA



TAMPA DISTRICT OFFICE
1313 N. TAMPA STREET
SUITE 220
TAMPA, FL 33602-3328
(813) 637-8660

Handwritten initials "JK" and "RPM" with the date "5/20/15" written below them.

Public Service Commission

May 19, 2015

RE: Peoples Gas System purchased gas adjustment

Dear Ms. Djak

We have completed our field work in the above-referenced audit. Included with this letter is a copy of the audit workpapers which the Commission is maintaining in a Temporary Confidential Status and a listing of these workpapers. Please sign and date a copy of this letter indicating that you have received these copies.

The Utility must file a request for Confidential Classification according to Rule 25-22.006, F.A.C. in order to maintain this confidentiality. This request must be filed with the Commission within twenty-one days from today or these workpapers will become public documents.

Sincerely,

Audit Manager

Received By:

Sarah Djak 5-19-2015

Enclosure

Copy: Audit File

**AUDIT WORKPAPER PAGE 43-6
(PAGES 1-16 INCLUSIVE)
ARE REDACTED**

RAM
3/10/15

Ronald Mavrides

From: Djak, Sarah L. <SLDjak@tecoenergy.com> Peoples Gas System
Sent: Tuesday, March 24, 2015 9:00 AM P.G.C.Recovery
To: Ronald Mavrides Docket #150003-GU
Subject: RE: Sept. Samples Year Ended 12/31/2014
 APA #15-014-2-3

That is actually the correct one. FPU is an invoice we have to estimate the month prior (we estimated [redacted] and then the next month when the actual invoice comes in (for [redacted] we make a true up. So on the October tab you should see a true up amount for (338.68) in cell J35 (row 17). That is the true up so that the Open Access Report matches the invoice.

43-6 p16

✓
4/10/15

Does that make sense?

-Sarah

From: Ronald Mavrides [mailto:RMAVRIDE@PSC.STATE.FL.US]
Sent: Monday, 23 March, 2015 5:03 PM
To: Djak, Sarah L.
Subject: Sept. Samples

***** This email is from an external sender. Be cautious about clicking links or opening attachments from unknown sources. *****

Sarah-

I don't see the requested September sample of [redacted] for [redacted] I believe I may have gotten a Florida Public Utilities invoice by mistake. Can you check when you get a chance? Thank you.

Ron Mavrides
 Public Utilities Analyst II
 Florida Public Service Commission
 1313 N. Tampa Street
 Suite 220
 Tampa, Florida 33602
 Phone (813) 637-8665
 Fax: (813) 356-1429

CONFIDENTIAL

NOTICE: This email is intended only for the individual(s) to whom it is addressed and may contain confidential information. If you have received this email by mistake, please notify the sender immediately, delete this email from your system and do not copy or disclose it to anyone else. Although we take precautions to protect against viruses, we advise you to take your own precautions to protect against viruses as we accept no liability for any which remain.

SOURCE PBC

43-6
p 17 of 23

**AUDIT WORKPAPER PAGE 43-6
(PAGES 18-23 INCLUSIVE)
ARE REDACTED**

State of Florida



Public Service Commission

CAPITAL CIRCLE OFFICE CENTER • 2540 SHUMARD OAK BOULEVARD
TALLAHASSEE, FLORIDA 32399-0850

-M-E-M-O-R-A-N-D-U-M-

DATE: May 20, 2015

TO: Marguerite McLean, Records Technician, Office of Commission Clerk

FROM: Lynn M. Deamer, Chief of Auditing, Office of Auditing and Performance Analysis


RE: Docket No.: 150003-GU
 Company Name: Peoples Gas System
 Company Code: GU608
 Audit Purpose: Purchased Gas Cost Recovery Clause
 Audit Control No: 15-014-2-3

Volume 2 of the audit working papers are forwarded for confidential treatment pursuant to Rule 25-22.006, Florida Administrative Code. The audit report, and volume 1 of the work papers are public and held by the Bureau of Auditing. The audit exit conference was held May 19, 2015.

LD
 Attachments: Confidential Document Index
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cc: Bureau of Auditing (File copy)

RECEIVED
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 15 MAY 20 11 21 AM '15
 COMMISSION
 CLERK



 Received By

May 20th 2015

 Date

Peoples Gas System
Docket #150003-GU
Year Ended 12/31/2014
Auditor: Ron Mavrides

CONFIDENTIAL FILE LOG

Confidential Workpaper Page Number

43-6 p. 1
43-6 p. 2
43-6 p. 3
43-6 p. 4
43-6 p.5
43-6 p.6
43-6p.7
43-6p.8
43-6p.9
43-6p.10
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43-6p.12
43-6p.13
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43-6p.15
43-6p.16
43-6p.17
43-6p.18
43-6p.19
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43-6p.22
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FLORIDA PUBLIC SERVICE COMMISSION
OFFICE OF COMMISSION CLERK



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E-MAIL: CLERK@PSC.STATE.FL.US PHONE NO. (850) 413-6770 FAX NO. (850) 717-0114

RAM
5/2005

Peoples Gas System
Docket #150003-GU
Year Ended 12/31/2014
Auditor: Ron Mavrides

18
4-16-15

CONFIDENTIAL FILE LOG

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- 43-6 p. 1
- 43-6 p. 2
- 43-6 p. 3
- 43-6 p. 4
- 43-6 p.5
- 43-6 p.6
- 43-6p.7
- 43-6p.8
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- 43-6p.15
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- 43-6p.17
- 43-6p.18
- 43-6p.19
- 43-6p.20
- 43-6p.21
- 43-6p.22
- 43-6p.23

11

Confidential Document Control Log

AM
5/19/15
NR

Company: Peoples Gas System
Audit Purpose: Purchased Gas Adjustment
Docket Number: 150003-GU

Audit Manager: Ron Mavrides
Audit Control No.: 15-014-2-3
Period Ending: December 31, 2014

1

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STATE OF FLORIDA



TAMPA DISTRICT OFFICE
1313 N. TAMPA STREET
SUITE 220
TAMPA, FL 33602-3328
(813) 637-8660

Handwritten initials "KJ" and date "5/20/15".

Public Service Commission

May 19, 2015

RE: Peoples Gas System purchased gas adjustment

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Sincerely,

Audit Manager

Received By: Sarah Djak 5-19-2015

Enclosure

Copy: Audit File

Handwritten number "11-2".