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IN REPLY REFER TO:

Ansley Watson, Jr.  
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e-mail: [aw@macfar.com](mailto:aw@macfar.com)

March 7, 2016

**VIA E-PORTAL FILING**

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

**Re: Docket No. 150259-GU -- Initiation of show cause proceedings against Peoples Gas System for apparent violations of Sections 368.01 - 05, F.S., and Chapter 25-12, F.A.C.**

Dear Ms. Stauffer:

Attached for filing with the Commission on behalf of Peoples Gas System, please find its Objections and Response to Citizens' Second Request for Production of Documents (Nos. 8-41) to Peoples Gas System in the above docket.

Thank you for your usual assistance.

Sincerely,



Ansley Watson, Jr.

AWjr/a  
Enclosures

cc: Danielle M. Roth, Esquire  
J.R. Kelly, Esquire  
Charles Rehwinkel, Esquire  
Bianca Lherisson, Esquire  
Keino Young, Esquire  
Kelley Corbari, Esquire  
Ms. Kandi M. Floyd



1. Peoples objects to each and every individual discovery request to the extent it calls for information protected by the attorney-client privilege, the work product doctrine, the accountant-client privilege, the trade secret privilege, or any other applicable privilege or protection afforded by law, whether such privilege or protection appears at the time response is first made or is later determined to be applicable for any reason. Peoples in no way intends to waive any such privilege or protection. The nature of any such document(s) will be described in a privilege log filed/prepared by Peoples.

2. Peoples objects to each individual request to the extent it requires production of information that is proprietary, confidential business information without provisions in place to protect the confidentiality of the information. Peoples in no way intends to waive claims of confidentiality and will only produce such information subject to protective order and the Commission's rule on confidentiality. Documents which are confidential will be identified and separated for review following OPC's inspection of documents produced for inspection.

3. Peoples objects to any definitions or instructions accompanying the discovery request to the extent the same are inconsistent with and expand the scope of discovery specified in the Florida Rules of Civil Procedure that are incorporated into the Model Rules of Procedure or the Commission's rules on discovery. If a question arises as to Peoples' discovery obligations, Peoples will comply with applicable rules and not with any definitions or instructions accompanying the discovery requests that are inconsistent with or that exceed the requirements of those rules. Furthermore, Peoples objects to any discovery request that calls for Peoples to create data or information that it otherwise does not possess because there is no such requirement under the applicable rules and law.

4. Peoples objects to any definition or instruction in any discovery request that seeks production of documents from persons or entities who are not parties to this proceeding or that are not subject to discovery under applicable rules.

5. Peoples is a large operation with employees located in many different areas throughout Florida. In the course of its business, Peoples creates numerous documents that are not subject to Commission or other governmental record retention requirements. These documents are kept in numerous locations and are sometimes moved from site to site as employees change jobs or as the Company's operations are reorganized. Therefore, it is possible that not every relevant document may have been reviewed or considered in developing Peoples' responses to OPC's discovery requests. Rather, Peoples will produce all information Peoples has obtained after a good faith, reasonable and diligent search conducted in connection with these discovery requests. To the extent the discovery requests propose to require more, Peoples objects to the requests individually and collectively on the grounds that compliance would impose an undue burden or expense on the Company.

6. Peoples objects to each discovery request to the extent that it seeks information not relevant to the subject matter of this docket or is not reasonably calculated to lead to the discovery of admissible evidence.

7. Peoples objects to each and every discovery request to the extent it is vague, ambiguous, overly broad, burdensome, imprecise, or utilizes terms that are subject to multiple interpretations but not properly defined or explained for purposes of such discovery requests.

8. Peoples objects on grounds of relevancy to each discovery request seeking information relating to transactions or other business activity of Peoples' nonregulated affiliates where Peoples was not a party to the transaction or a participant in the business activity.

9. Peoples expressly reserves and does not waive any objections it may have to the admissibility, authenticity or relevancy of the information provided in its responses to the subject discovery requests.

10. Peoples objects to any attempt by OPC to evade any numerical limitations which may be set on interrogatories or requests for production of documents by asking multiple independent discovery requests within single individual discovery requests and subparts

thereof. By making these general objections at this time, Peoples does not waive or relinquish its right to assert additional general and specific objections to the subject discovery.

11. Peoples objects to the time and place designated for production of requested documents on grounds that producing documents that may be responsive to the requests at the specified time and place would require the Company to transport, or to copy and ship, voluminous documents to Tallahassee, copies of which the OPC may not even elect to ask be copied after inspection. As such, Peoples' compliance with the time and place designated for production would be burdensome on Peoples. The Company will produce documents that are or may be responsive to the requests at the office of TECO Energy in Tallahassee, Florida at mutually agreeable dates and times. The Company will copy and provide specific documents identified by OPC, with a view to reducing the number of requests the company must make to protect proprietary confidential information from disclosure.

### **III. Specific Objections and Responses.**

In addition to the general objections set forth above, which are incorporated herein by reference, Peoples asserts (in connection with the individual document production requests repeated below) certain specific objections, and – subject to such objections -- responds to the correspondingly numbered categories of the request.

8. Please provide an organizational chart of Peoples Gas as of the following dates:
- a. January 1, 2010
  - b. January 1, 2011
  - c. January 1, 2012
  - d. January 1, 2013
  - e. January 1, 2014
  - f. January 1, 2015

**Response:** Peoples has no documents responsive to this category of the request.

9. Please provide an updated version of the organizational chart previously provided in discovery (OPC's First Request for Production of Documents, Request No. 2, Bates Page #94).

**Response:** Peoples has no documents responsive to this category of the request but, subject to the foregoing general objections, will produce for inspection a gas operations roster.

10. Please provide an organizational chart of each of the 14 locations: Jacksonville, Ocala, Panama City, Eustis, Daytona Beach, Orlando, Tampa, St. Petersburg, Lakeland, Avon Park, Miami, Jupiter, Ft. Myers, and Sarasota that shows the job titles/positions present at each location and the number of employees occupying each job title/position.

**Response:** Peoples has no documents responsive to this category of the request but, subject to the foregoing general objections, will produce for inspection a gas operations roster.

11. Please provide a copy of the personnel evaluation form used during the years 2011 through 2015 to evaluate technicians. If different versions are used for different types of technicians, please provide a copy of each version.

**Response:** Subject to the foregoing general objections, copies of documents responsive to this category of the request will be produced for inspection by OPC.

12. Please provide all correspondence between you and the PSC regarding the fraud allegations in the Ocala division.

**Response:** Subject to the foregoing general objections, copies of documents responsive to this category of the request will be produced for inspection by OPC.

13. Please provide copies of the most up-to-date maps showing operating or functional divisions of Peoples, specifically which delineate what territory is included in each division.

**Response:** Subject to the foregoing general objections, copies of documents responsive to this category of the request will be produced for inspection by OPC.

14. Please provide all changes in the maps produced above in Request No. 13 for the years 2010 through the date of the map provided in Request No. 13.

**Response:** Peoples has no documents responsive to this category of the request, but has created the chart below in response:

2010-2013	2014	2015 - 2016
<u>East Region</u> Jacksonville Daytona Beach Jupiter Miami Orlando Eustis	<u>NW Territory</u> Ocala Eustis Panama City Lakeland Avon Park	<u>North Territory</u> Jacksonville Daytona Beach Ocala Eustis Panama City
<u>West Region</u> St Petersburg Tampa Panama City Ocala Lakeland Avon Park Sarasota Ft Myers	<u>NE Territory</u> Jacksonville Daytona Beach	<u>Central Territory</u> St Petersburg Tampa Lakeland Avon Park Orlando
	<u>Central Territory</u> St Petersburg Tampa Orlando	<u>South Territory</u> Sarasota Ft Myers Miami Jupiter
	<u>South Territory</u> Sarasota Ft Myers Miami Jupiter	

15. Please provide a copy of the review/investigation performed by Human Resources for PGS, ID #Q3-15 (PSC inquiry: Leak survey falsification and CP records keeping (investigation) Personal request – officer request) as referenced in response to OPC’s First Request for Production of Documents, Request No. 1.

**Objection and Response:** Peoples objects to this request to the extent it requires production of information that is proprietary, confidential business information, without provisions in place to protect the confidentiality of the information. Peoples in no way intends to waive claims of confidentiality and will only produce such information subject to protective order and the Commission's rule on confidentiality. Subject to the foregoing objection, copies of documents responsive to this category of the request will be produced for inspection by OPC.

16. Please provide a copy of the following reviews/investigations performed by Corporate Compliance for PGS as referenced in response to OPC's First Request for Production of Documents, Request No. 1:

- a. 2013 ID #491: Downgraded leaks; PGS St. Petersburg (investigation) – Personal request (from officer), and
- b. 2015 ID #033: PSC inquiry: Leak survey and CP records falsification (investigation) Personal request – officer request.

**Objection and Response:** Peoples objects to this request to the extent it requires production of information that is proprietary, confidential business information, without provisions in place to protect the confidentiality of the information. Peoples in no way intends to waive claims of confidentiality and will only produce such information subject to protective order and the Commission's rule on confidentiality. Subject to the foregoing objection, copies of documents responsive to this category of the request will be produced for inspection by OPC.

17. Please provide a copy of the following reviews/investigations performed by Internal Audit for PGS as referenced in response to OPC's First Request for Production of Documents, Request No. 1:

- a. 2015: PGS PHMSA Compliance – Fraud Investigation: Evaluate the control environment and fraud risk factors at the Divisions to determine whether the overall environment allowed for actual or potential fraud.



Identify whether occurrences of fraud and/or misconduct existed in 2014 and 2015.

**Objection and Response:** Peoples objects to this request to the extent it requires production of information that is proprietary, confidential business information, without provisions in place to protect the confidentiality of the information. Peoples in no way intends to waive claims of confidentiality and will only produce such information subject to protective order and the Commission's rule on confidentiality. Subject to the foregoing objection, copies of documents responsive to this category of the request will be produced for inspection by OPC at such time as the requested document has been created.

- b. 2016: PGS PHMSA Compliance Governance: Evaluate the Company's PHMSA Compliance program to evaluate controls, monitoring activities and other aspects of governance to ensure risks are properly mitigated.

**Response:** Peoples has no documents responsive to this category of the request.

18. Please provide all contracts between the Company and Veriforce, and any other companies performing a similar function as Veriforce has or is performing in a similar relationship with PGS, and which were entered into during the period 2011 - 2015.

**Objection and Response:** Peoples objects to this request to the extent it requires production of information that is proprietary, confidential business information, without provisions in place to protect the confidentiality of the information. Peoples in no way intends to waive claims of confidentiality and will only produce such information subject to protective order and the Commission's rule on confidentiality. Subject to the foregoing objection, copies of documents responsive to this category of the request will be produced for inspection by OPC.

19. Please provide all reports issued by Veriforce, and any other companies in a similar relationship with the Company, during the period 2011 - 2015.

**Objection and Response:** Peoples objects to this request to the extent it requires production of information that is proprietary, confidential business information, without provisions in place to protect the confidentiality of the information. Peoples in no way intends to waive claims of confidentiality and will only produce such information subject to protective order and the Commission's rule on confidentiality. Subject to the foregoing objection, copies of documents responsive to this category of the request will be produced for inspection by OPC.

20. Please provide all documents describing and governing each type of performance based incentive, target award or other similarly named or functioning, compensation plan, program or arrangement which is applicable for any employee of PGS, TECO Services or TECO Energy who has or had responsibility for achieving compliance with FPSC or PHMSA safety regulations for any of the plan or program periods between January 1, 2011 through December 31, 2016 (as described in Interrogatory No. 30).

**Response:** Subject to the forgoing general objections, copies of documents responsive to this category of the request will be produced for inspection by OPC.

21. On Bates Page #1841 of the response to OPC's First Request for Production of Documents, Request No. 7, the Company comments that it participates in an AGA PEER Review Program.

a. Please provide all reports dated 2011 – 2016 that reflect any inspection or reporting activities regarding the Peoples Gas System operation.

**Response:** Peoples has no documents responsive to this category of the request. No AGA Peer Review of Peoples has yet been conducted.

b. Please provide all other documents provided by the AGA and any of your analyses incorporating or considering incorporating the AGA Peer Review Program in your business operation, as identified in Interrogatory No. 6.

**Response:** Subject to the forgoing general objections, copies of documents responsive to this category of the request will be produced for inspection by OPC.

22. Please provide a copy of the Company response (and all related internal PGS correspondence and documentation) to the Florida Public Service Commission regarding Customer Complaint #1197557G regarding a possible gas leak.

**Response:** Subject to the foregoing general objections, copies of documents responsive to this category of the request will be produced for inspection by OPC.

23. Please provide copies of the following confidential Company responses to the Florida Public Service Commission in the 2015 audit:

- a. Bates Pages 30-44 in response to Document Request 1.7,
- b. Bates Pages 48-986 in response to Document Request 1.8,
- c. Bates Pages 30-44 in response to Document Request 1.7,
- d. Response to Document Request 3.1 regarding all results and documentation from the management audits performed by the consultants (ex-PHMSA inspectors). *Audit note indicates two summary reports from the St. Petersburg assessment that occurred August 3-6, 2015: • A high level Exit Summary Report containing a summary of observations that was shared with PGS at the end of the 4 day visit. • A detailed Final Report dated August 21, 2015 containing specific observations and recommendations.*
- e. Response to Document Request 3.14 requesting a list of all Ethics investigations regarding reporting, compliance, and safety issues,
- f. The documents responsive to Document Request 3.15 requesting:
  - i. A list of all inquiries or reports made to the Ethics Guide Line regarding gas operations during the years 2013 to date,

- ii. A list and description of all Ethics investigations triggered by the Ethics Guide Line regarding gas operations during the years 2013 to date,
  - iii. A list and description of all Ethics investigations initiated as a result of information gathered by means other than the Ethics Guide Line regarding gas operations during the years 2013 to date, and
  - iv. A list of all Ethics investigations of the Ocala, Panama City, Lakeland/Avon Park, and Eustis divisions.
- g. Response to Document Request 3.16 requesting an update of the current Ethics investigation regarding the Ocala division,
  - h. Bates Pages 3-9 in response to Document Request 4.2,
  - i. Bates Pages 117-244 in response to Document Request 4.5,
  - j. Response to Document Request 4.6 requesting a description of actions taken against the three suspended Ocala employees,
  - k. Response to Document Request 4.7 requesting all documents provided by Tim Collins and George Pitard in support of all allegations of improper conduct of other Peoples employees,
  - l. Response to Document Request 4.8 requesting the range of dates over which any falsification of leak survey results was determined to have occurred,
  - m. Response to Document Request 4.9 requesting the number of service addresses for which leak surveys were falsely reported to have been completed over this period,

- n. Response to Document Request 4.10 requesting the 2013 investigation report created in response to the May 3, 2013 letter to management and all actions taken as a result of this investigation,
- o. Response to Document Request 4.11 requesting the 2013 investigation report created in response to investigation of downgraded leaks in the St. Petersburg division and all actions taken as a result of this investigation,
- p. Response to Document Request 4.12 requesting a description of any remedial action taken to correct or improve cathodic protection systems in The Villages community over the period 2013 to date and all documentation (including but not limited to emails, reports, records of telephone calls, written opinions, field notes, invoices) from contractors related to these activities,
- q. Bates Pages 246-277 in response to Document Request 4.14 and 4.15,
- r. Bates Pages 280-337 in response to Document Request 4.17, and
- s. Response to Document Request 5.1 requesting a follow up to DR 4.4.

**Objection and Response:** Peoples objects to this request to the extent it requires production of information that is proprietary, confidential business information, without provisions in place to protect the confidentiality of the information. Peoples in no way intends to waive claims of confidentiality and will only produce such information subject to protective order and the Commission's rule on confidentiality. Subject to the foregoing objection, copies of documents responsive to this category of the request will be produced for inspection by OPC.

24. In the PSC 2015 Audit, on Bates Page #200 of the Company response to Staff's First Data Request No. 5, the Company states that in regards to the roll-out of GL Essentials, it "Experienced some minor issues the first week of go-live, however, most were resolved during the initial week of implementation. There are still a few outstanding issues (See Essentials

Jacksonville Roll-out Issues List).” Please provide a copy of the Issues List referenced and all documentation related to the resolution of the issues listed.

**Response:** Subject to the foregoing general objections, copies of documents responsive to this request will be produced for inspection by OPC.

25. Please provide a copy of the purchase order, master contract, invoice, and other documents supporting the purchase of GL Essentials.

**Objection and Response:** Peoples objects to this request to the extent it requires production of information that is proprietary, confidential business information, without provisions in place to protect the confidentiality of the information. Peoples in no way intends to waive claims of confidentiality and will only produce such information subject to protective order and the Commission’s rule on confidentiality. Subject to the foregoing objection, copies of documents responsive to this category of the request will be produced for inspection by the Office of Public Counsel.

26. On Bates Page 434 of the Company’s response to OPC’s First Request for Production of Documents, Request No. 4, the response indicates the consideration of several other compliance tracking programs. Please provide the documents identified in Interrogatory No. 10 that contain analyses that led to the selection of GL Essentials as well as any documents containing analyses that led to the exclusion of any other programs the Company considered.

**Response:** Peoples has no documents responsive to this category of the request.

27. Please provide copies of any handouts provided at the PHMSA training held at the FPSC in the last few years that was open to Commission staff and utility personnel (as referenced in Interrogatory No. 23).

**Response:** Subject to the foregoing general objections, copies of documents responsive to this request will be produced for inspection by OPC.

28. Please provide all e-mails and correspondence between TECO Peoples Gas and the PSC Gas Safety Engineering staff and supervisors, for the period January 1, 2011 – December 31, 2015.

**Response:** Peoples does not intend at this time to produce for inspection documents which may be responsive to this category of the request inasmuch as a preliminary search of e-mails alone revealed in excess of 102,000 e-mails that may or may not be responsive. Further, by letter dated March 3, 2016, OPC made a public records request of the Commission to provide essentially the same e-mails. Depending on the results of OPC's inspection of such records as may be provided pursuant to that request, Peoples will be willing to discuss with OPC the production of other documents that may be responsive to this category of the request.

29. Please provide all e-mails and correspondence, for the period January 1, 2011 to December 31, 2015 between TECO Peoples Gas and non-PSC personnel regarding the gas safety violations. These should include correspondence with PHMSA, Veriforce, KPMG, and other similar entities.

**Response:** Peoples does not intend at this time to produce for inspection at this time documents that may be responsive to this category of the request, but is willing to discuss with OPC the production of such documents following OPC's review of documents produced by Peoples pursuant to this request.

30. Please provide any manual or other document that includes all the compliance tasks and the time standard for each task, if there is one, that field technicians could be expected to perform.

**Response:** Subject to the foregoing general objections, copies of documents responsive to this request will be produced for inspection by OPC.

31. In response to OPC's First Request for Production of Documents, Request No. 4, Bates Page #434, the Company identifies an RFP process for the TECO Peoples Gas – Compliance Management System initiative. Please provide a copy of the RFP.

- a. Please provide copies of any side by side comparisons of the four options.
- b. Please provide all of your IT department and your finance and budget area's documentation evaluating the relative merits of the solutions under consideration.

**Response:** Peoples has no documents responsive to this category of the request.

32. In an August 10, 2015 Compliance Update, TECO Peoples Gas discusses 2013 Plan Adjustments on Page 10 of the Handout. Please provide a copy of the New Mexico Best Practices as referenced in the handout.

**Response:** Peoples has no documents responsive to this category of the request.

33. Please produce all documents identifying the synergies or other factors resulting in earnings (or EPS) accretion in 2014 and 2015 due to the acquisition of NMGI and NMGC (Reference p. 40 of the 2013 Form 10-K, Filed 2/28/2014).

**Objection and Response:** Peoples objects to this request to the extent it requires production of information that is proprietary, confidential business information, without provisions in place to protect the confidentiality of the information. Peoples in no way intends to waive claims of confidentiality and will only produce such information subject to protective order and the Commission's rule on confidentiality. Subject to the foregoing and general objections, copies of documents responsive to this category of the request will be produced for inspection by OPC.

34. Please produce all documents calculating, describing and quantifying the anticipated benefits of the acquisition of NMGC/NMGI based on estimates of the transaction and integration related costs. This request includes all such documents relied upon in statements to investors and to management and the TECO Energy Board of Directors related to the acquisition. (Reference p. 29 of the 2013 Form 10-K, Filed 2/28/2014).



**Objection and Response:** Peoples objects to this request to the extent it requires production of information that is proprietary, confidential business information, without provisions in place to protect the confidentiality of the information. Peoples in no way intends to waive claims of confidentiality and will only produce such information subject to protective order and the Commission's rule on confidentiality. Subject to the foregoing and general objections, copies of documents responsive to this category of the request will be produced for inspection by OPC.

35. Please provide all documents assessing, describing and quantifying the "significant investments to convert several NMGC computer systems to the systems" PGS uses in Florida. (Reference p. 19 of the 2014 Form 10-K, Filed 2/27/2015).

**Objection and Response:** Peoples objects to this request to the extent it requires production of information that is proprietary, confidential business information, without provisions in place to protect the confidentiality of the information. Peoples in no way intends to waive claims of confidentiality and will only produce such information subject to protective order and the Commission's rule on confidentiality. Subject to the foregoing and general objections, copies of documents responsive to this category of the request will be produced for inspection by OPC.

36. Please provide all documents produced **prior to** the May 2013 announcement of the signing of an agreement by TECO to acquire NMGC, assessing, describing and quantifying the opportunities to achieve savings through the use of common IT platforms including hardware and software applications.

**Objection and Response:** Peoples objects to this request to the extent it requires production of information that is proprietary, confidential business information, without provisions in place to protect the confidentiality of the information. Peoples in no way intends to waive claims of confidentiality and will only produce such information subject to protective order and the Commission's rule on confidentiality. Subject to the foregoing and general objections,

copies of documents responsive to this category of the request will be produced for inspection by OPC.

37. Please provide all documents produced after the May 2013 announcement of the signing of an agreement by TECO to acquire NMGC, assessing, describing and quantifying the opportunities to achieve savings through the use of common IT platforms including hardware and software applications.

**Objection and Response:** Peoples objects to this request to the extent it requires production of information that is proprietary, confidential business information, without provisions in place to protect the confidentiality of the information. Peoples in no way intends to waive claims of confidentiality and will only produce such information subject to protective order and the Commission's rule on confidentiality. Subject to the foregoing and general objections, copies of documents responsive to this category of the request will be produced for inspection by OPC.

38. Please provide copies of all agreements, contracts and other documents indicating the responsibilities of ISN regarding contract operator qualifications.

**Response:** Subject to the foregoing general objections, copies of documents responsive to this request will be produced for inspection by the Office of Public Counsel.

39. Please provide a copy of the contract and engagement letter between TECO Peoples Gas and KPMG for the current Fraud Assessment.

**Objection and Response:** Peoples objects to this request to the extent it requires production of information that is proprietary, confidential business information, without provisions in place to protect the confidentiality of the information. Peoples in no way intends to waive claims of confidentiality and will only produce such information subject to protective order and the Commission's rule on confidentiality. Subject to the foregoing and general objections, copies of documents responsive to this category of the request will be produced for inspection by OPC.

40. Please provide a copy of the joint KPMG – TECO Energy Audit Services completed report.

**Objection and Response:** Peoples objects to this request to the extent it requires production of information that is proprietary, confidential business information, without provisions in place to protect the confidentiality of the information. Peoples in no way intends to waive claims of confidentiality and will only produce such information subject to protective order and the Commission’s rule on confidentiality. Subject to the foregoing objection, copies of documents responsive to this category of the request will be produced for inspection by the Office of Public Counsel at such time as it has been completed.

41. Please provide all documents used to present the report (provided in response to Document Request No. 40) to the management of TECO Peoples Gas, Board of Directors, and all committees of the Board.

**Response:** Peoples has no documents responsive to this category of the request.

DATED this 7th day of March, 2016.

Respectfully submitted,



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ANDREW M. BROWN

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Tampa, Florida 33601-1531

Fax: (813) 273-4396

Attorneys for Peoples Gas System

**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that a copy of the forgoing Response has been furnished by electronic mail this 7th day of March, 2016, to J.R. Kelly, Esquire, Charles Rehwinkel, Esquire, and Danielle M. Roth, Esquire, Office of Public Counsel, c/o The Florida Legislature, 111 W. Madison St., Room 812, Tallahassee, Florida 32399-1400, and to Bianca Lherisson, Esquire, Keino Young, Esquire, and Kelley F. Corbari, Esquire, Office of General Counsel, Florida Public Service Commission, 2540 Shumard Oak Boulevard, Tallahassee, Florida 32399-0850.

  
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Ansley Watson, Jr.