

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

March 7, 2016

VIA FEDEX

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

REDACTED

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.

REQUEST FOR CONFIDENTIAL TREATMENT AND MOTION FOR TEMPORARY PROTECTIVE ORDER

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 Classification and Motion for Temporary Protective Order with respect to portions of its answer to Citizens' Interrogatory No. 4 in the above docket. Enclosed with this filing are one highlighted and two redacted copies of that answer.

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.

RECEIVED-FPSC
2016 MAR -8 AM 10:16
COMMISSION
CLERK

COM _____
AFD _____
APA _____
ECO _____
ENG _____
GCL _____
IDM _____
TEL _____
CLK _____

AW/jra
Enclosures
2 - Redacted

Carlotta S. Stauffer, Director
March 7, 2016
Page 2

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

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In Re: 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.)
_____)

Docket No. 150259-GU

Filed: March 8, 2016

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

Pursuant to Section 366.093, *Florida Statutes*, and Rule 25-22.006, *Florida Administrative Code*, Peoples Gas System ("Peoples" or the "Company"), submits the following Request for Confidential Classification of portions of the Company's answer to Citizens' Interrogatory No. 4 to the Company in the above docket (included in the Company's Answers to Citizens' Second Set of Interrogatories served on parties of record on March 7, 2016), and requests the issuance of a temporary protective order with respect to such portions of the Company's answer:

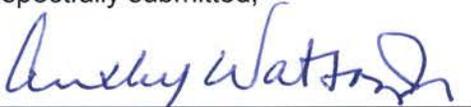
1. Attached hereto as Exhibit A is a detailed justification for the requested confidential treatment of the highlighted portions of the Company's answer to Citizens' Interrogatory No. 4.
2. The material for which confidential classification is sought is intended to be and is treated as private by Peoples, and has not been disclosed.
3. Peoples requests that the information for which it seeks confidential classification not be declassified until at least 18 months after the date of the Commission's order finding the information to be confidential. Such information consists of the names of certain employees of the Company, the disclosure of which could be detrimental to both the employees and the Company.
4. 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)(c), *Florida Administrative Code*, protecting the confidential information from public disclosure.

WHEREFORE, Peoples Gas System respectfully requests that the confidential information that is the subject of this request and motion be accorded confidential classification for the reasons set forth herein and for a minimum period of 18 months. The Company further moves for the entry of a temporary protective order pursuant to Rule 25-22.006(6)(c), *Florida Administrative Code*, protecting the confidential information from public disclosure.

DATED this 7th day of March, 2016.

Respectfully submitted,



ANSLEY WATSON, JR.

Phone: (813) 273-4321

E-mail: aw@macfar.com

ANDREW M. BROWN

Phone: (813) 273-4209

E-mail: ab@macfar.com

Macfarlane Ferguson & McMullen

P. O. Box 1531

Tampa, Florida 33601-1531

Fax: (813) 273-4396

Attorneys for Peoples Gas System

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a copy of the foregoing Request for Confidential Classification and Motion for Temporary Protective Order 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.

A handwritten signature in blue ink, appearing to read "Ansley Watson, Jr.", written over a horizontal line.

Ansley Watson, Jr.

PEOPLES' ANSWER TO CITIZENS' INTERROGATORY NO. 4

**JUSTIFICATION FOR CONFIDENTIAL
TREATMENT OF HIGHLIGHTED INFORMATION**

Peoples seeks specified confidential classification and non-disclosure pursuant to Chapter 119, *Florida Statutes*, of (and issuance of a protective order with respect to) the information highlighted on the Company's answer to Citizens' Interrogatory No. 4.

The highlighted information is information is the names of three former Peoples employees, the disclosure of which could be detrimental to both the employees and the Company. Peoples considers this information proprietary and confidential. Section 366.093(3)(f), *Florida Statutes*, provides that "[p]roprietary confidential business information includes, but is not limited to . . . [e]mployee personnel information unrelated to compensation, duties, qualifications, or responsibilities." Protection from disclosure is sought only for the names of the employees.

REDACTED

4. Please provide the names, job titles, and job responsibilities of the following employees, as referenced on Bates Page #196 of the Company response to OPC's First Request for Production of Documents, Request No. 2.
 - a. The three employees terminated, and
 - b. The one employee given a written reprimand.

- A.
 - a. [REDACTED] Administrative Secretary, PGS Ocala
[REDACTED] Work Coordinator, PGS Ocala
[REDACTED] Division Supervisor, PGS Ocala
 - b. [REDACTED], Utility Technician, PGS Ocala

See attached job descriptions for all referenced employees.

R. Wall