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IN REPLY REFER TO:

Ansley Watson, Jr.
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April 4, 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.

MOTION FOR TEMPORARY PROTECTIVE ORDER

Dear Ms. Stauffer:

Attached for filing with the Commission on behalf of Peoples Gas System, please find its Motion for Temporary Protective Order with respect to documents provided/to be provided to the Office of Public Counsel.

Thank you for your usual assistance.

Sincerely,



Ansley Watson, Jr.

AWjr/a
Enclosures

Carlotta S. Stauffer, Director
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cc: J. R. Kelly, Esquire
Charles Rehwinkel, Esquire
Danielle M. Roth, Esquire
Kelley F. Corbari, Esquire
Bianca Lherisson, Esquire
Charles Murphy, Esquire
Kathryn Cowdery, Esquire
Samantha Cibula, Esquire
Ms. Kandi M. Floyd
(all above via e-mail attachment)

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In Re: Initiation of show cause proceedings against)		
Peoples Gas System for apparent violations of Sections)		Docket No. 150259-GU
368.01 - 05, F.S., and Chapter 25-12, F.A.C.)		
_____)		Filed: April 4, 2016

**PEOPLES GAS SYSTEM'S MOTION
FOR TEMPORARY PROTECTIVE ORDER**

Pursuant to Section 366.093, *Florida Statutes*, and Rule 25-22.006(6)(c), *Florida Administrative Code*, Peoples Gas System (“Peoples” or the “Company”) moves the Commission for entry of a temporary protective order with respect to documents to be provided to the Office of Public Counsel (“OPC”) pursuant to OPC’s Second Request for Production of Documents to the Company in this docket.

1. Documents (or categories of documents) provided or to be provided to OPC are listed broadly on Attachment A to this motion. Those documents fall generally into the following categories:

a. Reports of internal audits or investigations. These documents, including notes or work papers used to prepare such reports, constitute proprietary confidential business information. Section 366.093(3)(b), *Florida Statutes*.

b. Costs and estimated future costs of IT equipment, software and personnel. These documents and commentary accompanying the same constitute proprietary confidential business information inasmuch as the disclosure of such information would (i) impair the efforts of [Peoples] or its affiliates to contract for goods or services on favorable terms or (ii) impair the competitive business of Peoples, or both. Sections 366.093(3)(d), (e) and (f), *Florida Statutes*.

c. Current and projected future staffing levels. These documents and commentary accompanying the same constitute proprietary confidential business information inasmuch as the disclosure of such information would (i) impair the efforts of

[Peoples] or its affiliates to contract for goods or services on favorable terms or (ii) impair the competitive business of Peoples, or both. Sections 366.093(3)(d), (e) and (f), *Florida Statutes*.

2. The documents and information summarized on Attachment A hereto are owned or controlled by Peoples or its affiliates, are intended to be and are treated by Peoples or its affiliates as private in that the disclosure of the information would cause harm to the ratepayers or Peoples' or its affiliates' business operations, and have not been disclosed.

3. When a utility such as Peoples allows OPC to inspect or take possession of utility information for the purpose of determining what information is to be used in a proceeding before the Commission, Rule 25-22.006(6)(c), *Florida Administrative Code*, provides for the Commission's issuance of a temporary protective order exempting the information from disclosure under Section 119.07(1), *Florida Statutes*.¹

¹ Peoples understands that notwithstanding the Commission's issuance of the temporary protective order sought by this motion, if any of the documents/information summarized on Attachment A are to be used in a proceeding before the Commission in this docket, Peoples must seek further protection of such documents/information under paragraph (a) of Rule 25-22.006(6) by making specific showings that the documents/information constitute proprietary confidential business information.

WHEREFORE, Peoples Gas System respectfully requests that the Commission enter a temporary protective order pursuant to Rule 25-22.006(6)(c), *Florida Administrative Code*, exempting the documents/information from Section 119.07(1), *Florida Statutes*, in accordance with such rule.

DATED this 4th day of April, 2016.

Respectfully submitted,



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Attorneys for Peoples Gas System

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a copy of the foregoing Motion for Temporary Protective Order has been furnished by electronic mail this 4th day of April, 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, Charles Murphy, Esquire, Kathryn Cowdery, Esquire, Samantha Cibula, Esquire, and Kelley F. Corbari, Esquire, Office of General Counsel, Florida Public Service Commission, 2540 Shumard Oak Boulevard, Tallahassee, Florida 32399-0850.



Ansley Watson, Jr.

OPC's Requested Confidential Documents related to OPC's Second Set of Interrogatories #4-34 and OPC's Second Set of POD's #8-41

CONFIDENTIAL DOCS TO BE RETAINED BY OPC	
POD No.	
15	HR Report for PGS ID # Q3-15
16	Corporate Compliance Report for 2013 Investigation (St. Pete)
16	Corporate Compliance Report for 2015 Investigation (Ocala)
17	Pipeline Compliance Fraud Investigation Report (Joint report of PGS / KPMG Audit)
19	Veriforce Lakeland Division Compliance Assessment Report
19	Veriforce Sarasota Division Compliance Assessment Report
19	Veriforce St. Pete Division Compliance Assessment Report
23b	PGS Corporate Engineering Compliance Inspection Reviews (2010 - 2014)
23h	Draft Version of HR notes from Ocala Investigation
23m	Number of False Leak Surveys Ocala (response to PSC DR)
23n	Overview of Findings from 2013 Investigation and HR Actions
23p	Villages Remedial Action and Magnolia River Report
23q	PSC DR responses related to exploratory digs Villages / Villages CP Notes
23s	Various documents from Division Self Auditing Reports
25	GL Essentials Contracts
25	GL Essentials Invoices
36	Common IT Platform docs prior to May 2013
33/35/37 SPoint	Areas of Interest - GL Noble / Essentials - 9 files - See A
33/35/37 SPoint	Areas of Interest - Amigo - 1 files - See B
33/35/37 SPoint	Areas of Interest - DIMP - 1 files - See C
33/35/37 SPoint	Areas of Interest - Operation Shared Services / Compliance - 2 files - See D

33/35/37 (Share Point Docs)
Docs Related To Essentials - A
IT and Telecom Business Plan
Analysis Phase Final Report-out / Gas Ops & Engineering
Analysis Phase Final Report-out / IT&T
Pre-existing Initiatives & Commitments
Opportunities List
IT&T Analysis Phase Opportunity and Validation Summary - Final
Gas Ops & Engineering Business Plan
IT&T Analysis Phase Opportunity and Validation Summary - Final
Key Similarities & Differences Summary - Gas Ops Eng Final

Docs Related to Amigo - B
6 YEAR Capital Budget 2014-2019 with Synergies

Docs Related to DIMP - C
Gas Ops High Level Implementation PlanV4

Docs Related To Operations Shared Services / Compliance - D
Fact Pack - Gas Operations and Engineering
Process and Activities Mapping Gas Ops Engineering Final