

*mfm*  
MACFARLANE FERGUSON & MCMULLEN

ATTORNEYS & COUNSELORS AT LAW EST. 1884

One Tampa City Center, Suite 2000  
201 N. Franklin Street  
P.O. Box 1531 (33601)  
Tampa, FL 33602  
813.273.4200 Fax: 813.273.4396

[WWW.MFMLEGAL.COM](http://WWW.MFMLEGAL.COM)  
EMAIL: [INFO@MFMLEGAL.COM](mailto:INFO@MFMLEGAL.COM)

625 Court Street, Suite 200  
P.O. Box 1669 (33757)  
Clearwater, FL 33756  
727.441.8966 Fax: 727.442.8470

In Reply Refer to:  
Tampa  
[ab@macfar.com](mailto:ab@macfar.com)

June 3, 2020

**VIA FEDERAL EXPRESS**

Adam J. Teitzman, Commission Clerk  
Florida Public Service Commission  
2540 Shumard Oak Boulevard  
Tallahassee, Florida 32399-0850

**REDACTED**

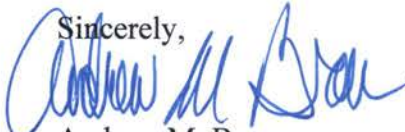
Re: In re: Petition for approval of tariff modifications for liquified natural gas service by Peoples Gas System  
Docket No. 20200093

Dear Mr. Teitzman:

Enclosed please a copy of Peoples Gas System's Request for Confidential Treatment of certain information contained in the Response to Commission Staff's First Data Requests in this matter. Also enclosed are one highlighted, and two redacted copies of the pages containing the referenced information in accordance with Rule 25-22.006, *Florida Administrative Code*.

- COM \_\_\_\_\_
- AFD \_\_\_\_\_
- APA \_\_\_\_\_
- ECO 1
- ENG \_\_\_\_\_
- GCL \_\_\_\_\_
- IDM \_\_\_\_\_
- CLK \_\_\_\_\_

Thank you for your usual assistance.

Sincerely,  
  
Andrew M. Brown

- AB/plb
- Attachments
- cc: Paula K. Brown  
Ms. Kandi Floyd  
Ms. Karen Bramley  
Thomas F. Farrior, Esq.  
J.R. Kelly/Stephanie Morse ([kelly.jr@leg.state.fl.us](mailto:kelly.jr@leg.state.fl.us); [morse.stephanie@leg.state.fl.us](mailto:morse.stephanie@leg.state.fl.us))  
Linda Berndt ([lindaberndt@eaglelng.com](mailto:lindaberndt@eaglelng.com))  
Edward McKenna ([EMcKenna@appliedLNG.com](mailto:EMcKenna@appliedLNG.com))  
Floyd R. Self, B.C.S. ([fself@bergersingerman.com](mailto:fself@bergersingerman.com))  
Sam Thigpen ([sam@thigpensolutions.com](mailto:sam@thigpensolutions.com))  
Andrew P. Brigham ([abrigham@propertyrights.com](mailto:abrigham@propertyrights.com); [blaing@propertyrights.com](mailto:blaing@propertyrights.com))

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COMMISSION CLERK



4. Counsel for Peoples notes that this Request was not filed within twenty-one (21) days of the Notice of the Intent to File a Request for Confidential Treatment. This was an oversight solely of counsel. Counsel's habit has been to file the request, along with the notice but for some reason that did not occur in this case. Counsel can only surmise that the communication with his staff broke down because of the fact that everyone was working from home which likely led to misunderstandings as to what had been filed. The responsibility of that is for the undersigned counsel and he apologizes for this error. However, it would be unjust and unfair to punish the client, Peoples Gas System for the mistake of its counsel in failing to timely file the request for confidential treatment and Peoples believes that the inadvertent failure of its counsel to timely file the request constitutes good cause under Rule 25-22.006, *Florida Administrative Code*.

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

Respectfully submitted,

/s/ Andrew M. Brown, Esq.

Andrew M. Brown

Phone: (813) 273-4209

E-mail: [ab@macfar.com](mailto:ab@macfar.com)

Thomas R. Farrior

Phone: (813) 273-4232

E-Mail: [trf@macfar.com](mailto:trf@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 true copy of the foregoing Request for Confidential Treatment, filed on behalf of Peoples Gas System, has been furnished electronically to Adam J. Teitzman, Commission Clerk, Florida Public Service Commission, 2549 Shumard Oak Blvd., Tallahassee, FL 32399-0850; the Office of Public Counsel, J.R. Kelly/Stephanie Morse, c/o The Florida Legislature, 111 W. Madison Street, Room 812, Tallahassee, FL 32399, [kelly.jr@leg.state.fl.us](mailto:kelly.jr@leg.state.fl.us); [morse.stephanie@leg.state.fl.us](mailto:morse.stephanie@leg.state.fl.us); and Linda Berndt, Vice President Government and Public Affairs, Eagle LNG Partners LLC, Research Forest Lakeside No. 4, 2445 Technology Forest Blvd., Suite 500, The Woodlands, TX 77381, [lindaberndt@eaglelng.com](mailto:lindaberndt@eaglelng.com); Edward McKenna, Applied LNG, 5716 Corsa Ave., Ste. 200, Westlake Village, CA 91362, ([EMcKenna@appliedLNG.com](mailto:EMcKenna@appliedLNG.com)); Floyd R. Self, B.C.S., BergerSinger LLP, 313 North Monroe Street, Ste. 301, Tallahassee, FL 32301 ([fself@bergersinger.com](mailto:fself@bergersinger.com)); Sam Thigpen, Thigpen Solutions, 100 I-45 North, Ste. 152A, Conroe, TX 77301, ([sam@thigpensolutions.com](mailto:sam@thigpensolutions.com)); and Andrew P. Brigham, Esq., 2963 Dupont Ave., Ste. #3, Jacksonville, FL 32217, ([abrigham@propertyrights.com](mailto:abrigham@propertyrights.com); [blaing@propertyrights.com](mailto:blaing@propertyrights.com)); on this 3rd day of June, 2020.

/s/ Andrew M. Brown, Esq.  
Andrew M. Brown

**EXHIBIT A**

A description of the information of the way that Peoples would calculate a hypothetical \$25,000,000.00 investment in an LNG facility. The information contains data on Peoples' revenue, expenses, operating income, liabilities and equity, as well as debt for such a facility.

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7. Please provide a calculation of the monthly service charge for a hypothetical LNG facility, showing each step of the calculation including all assumptions (depreciation, return, property taxes, other taxes, etc.)

A.



**REDACTED**

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