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July 20, 2020

**VIA E-PORTAL FILING**

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

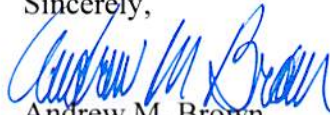
**Re: Docket No. 20200051-GU – Petition for rate increase by Peoples Gas System**

Dear Mr. Teitzman:

Attached for electronic filing in the above docket on behalf of Peoples Gas System, please find its Request for Confidential Treatment in the above case.

Your assistance in this matter is greatly appreciated.

Sincerely,

  
Andrew M. Brown

AB/plb  
Attachment

cc: J.R. Kelly/Mireille Fall-Fry ([kelly.jr@leg.state.fl.us](mailto:kelly.jr@leg.state.fl.us);[fall-fry.mireille@leg.state.fl.us](mailto:fall-fry.mireille@leg.state.fl.us))  
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**BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION**

In re: Petition for rate increase by  
Peoples Gas System.

Docket No. 20200051-GU  
Submitted for Filing: July 20, 2020

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

Pursuant to Sections 366.093 and 119.07, *Florida Statutes* and 25-22.006, *Florida Administrative Code*, Peoples Gas System ("Peoples") submits the following Request for Confidential Treatment of Response Numbers 12, 16, 18, 19, 21, 22, 25, 26, 27, 28, 33, 34, 35, 39 and 43 of Peoples' Response of July 10, 2020 to Citizen's First Request to Produce Documents (Nos. 1-45) dated June 10, 2020 and Interrogatory Answers 7, 13, 50, 64 and 65 to Citizen's First Set of Interrogatories (Nos. 1-75) dated June 10, 2020 (the "Response") which Response is submitted for filing concurrently herewith or has heretofore been filed:

1. Attached hereto as Exhibit A is a detailed justification for the requested confidential treatment.
2. The documents contain confidential proprietary business information primarily in the form of the costs of doing business, the revenue both projected and received from doing business, and highly confidential tax, insurance, and compensation information.
3. The material for which confidential classification is sought is intended to be and is treated as private by Peoples and has not been otherwise disclosed.
4. Peoples is seeking confidential status under Section 366.093(2), (3)(b), (3)(c) and (3)(d), (3)(e), *Florida Statutes*.

5. Peoples requests that the information for which it seeks confidential classification not be declassified until 18 months after the date of the Commission's order granting this request (see Section 366.093(4), *Florida Statutes*). The time period requested is necessary to protect the competitive information regarding cost of doing business, the tax and financing information for all three companies and compensation schedules and benefits from all three companies. The period of time requested will ultimately protect Peoples, Tampa Electric Company, and Emera and its customers.

**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.  
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Attorneys for Peoples Gas System

### **CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that a true and correct copy of the foregoing Request for Confidential Treatment of Peoples Gas System, Tampa Electric Company and Emera has been furnished via electronic mail to the following, this 20th day of July, 2020:

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

**EXHIBIT A**  
**PEOPLES' RESPONSES TO CITIZEN'S FIRST REQUEST TO PRODUCE**  
**DOCUMENTS (Nos. 1-45)**

**JUSTIFICATION FOR CONFIDENTIAL TREATMENT OF CERTAIN DOCUMENTS.**

Peoples has specified confidential treatment, and non-disclosure pursuant to Sections 119.07 and 366.093, *Florida Statutes*, and 25-22.006, *Florida Administrative Code*, of the documents produced in response to Numbers:

**Peoples' Answers to OPC's First Request to Produce Documents (nos. 1-45):**

**12** – Contains confidential information relating to comparative interests the disclosure of which could impair the competitiveness of Peoples in that it would show detailed information about Peoples' costs and would also show information of the value of certain outside contracts.

**16, 18, 19** – This information is generally not to be released to the public and contains certain financial information that would relate to the competitive interests of Peoples, Tampa Electric Company and Emera, the disclosure of which could impair those companies' competitive business.

**21, 22** – This response contains confidential information concerning pension plan investments which relate to competitive interests of Peoples that would be of advantage to competitors, if disclosed.

**25** – The information requested contains employee compensation of upper level employees. This knowledge relates to the competitive interests of Peoples because its disclosure would allow competitors to know the compensation of Peoples upper level employees allowing them to "poach" them or otherwise use that information to impair Peoples' competitive business.

**26, 27, 28** – Peoples files a consolidated return with Tampa Electric Company and Emera Holdings, Incorporated. Therefore, the tax returns would contain information relating to the other companies which is confidential and also contains information concerning to Peoples that relates to Peoples competitive interests because it would show a wide range of financial information and tax structure regarding Peoples. The disclosure of this information would impair the competitive business of Peoples.

**33, 34** – The budget information would give information to competitors concerning Peoples costs of doing business which would include Peoples' internal costs as well as costs being paid to third parties.

**35** – The internal auditing controls and reports of internal auditors are specifically deemed confidential pursuant to *Florida Statute* 366.093(3)(b).

**39** – The board minutes and presentations to the three companies contain a wide range of information concerning the Company's business practices, future strategic plans, and costs of doing business. All that information would be valued by competitors to Peoples and the disclosure would impair the competitive interests of Peoples, Tampa Electric Company and Emera.

**43** – Peoples' tax sharing agreements contain business information and tax structure, the disclosure of which would impair the competitive business of Peoples.

**Peoples' Answers to OPC's First Set of Interrogatories (Nos. 1-75):**

**7, 13, 64, 65** – Peoples' general salary structure and the officer compensation is kept confidential and that information, were it disclosed, would impair the competitive business of Peoples by allowing competitors to know the general wage rates for employee classifications and the compensation available to Company officers.

**50** – The documents produced in conjunction with this interrogatory contain information about how Peoples is able to fill positions and the Company's demand for more labor. This information would impair the competitive business of Peoples if this information were disclosed.