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July 21, 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;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 21, 2020

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 49-51 of Peoples' Response of July 16, 2020 to OPC's Second Request for Production of Documents (Nos. 46-51) dated June 16, 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 forms of financial data, information and forecasts and conclusions including 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, Emera, Tampa Electric and TECO Energy 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, TECO Energy 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,

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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 has been furnished via electronic mail to the following, this 21st day of July, 2020:

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

EXHIBIT A
PEOPLES' RESPONSES TO OPC'S SECOND
REQUEST FOR PRODUCTION OF DOCUMENTS (Nos. 46-51)

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 Second Request for Production of Documents (nos. 46-51):

49-51 – The reports from the rating agencies are to be kept under a limited distribution pursuant to the terms of agreements between Emera and those rating agencies. In addition, the reports contain business information about Emera, TECO Energy and Tampa Electric which would be of great value to competitors and contains information about investments and business plans unrelated to the business of Peoples Gas. This would be particularly true for the presentations involving Emera as the company has a wide range of companies and investments that are unrelated to Peoples Gas. The disclosure of this information would impair the competitive business of Emera and TECO Energy and Tampa Electric as well as Peoples Gas if this information were to be disseminated without the benefit of confidentiality.