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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](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 21, 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 79 and 109 of Peoples' Response of July 16, 2020 to OPC's Second Set of Interrogatories (Nos. 76-113) 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 form of load and growth projections, net revenues and Peoples' cost information, and the revenue both projected and received from doing business.
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 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**  
**SET OF INTERROGATORIES (Nos. 79 and 109)**

**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 Set of Interrogatories (nos. 79 and 109):**

**79** – Peoples' growth forecast including the total load, total customers, total revenue, net income and rate base are all important elements of the gas business. By knowing Peoples total load, competitors would potentially know areas where the Company has either excess capacity or limited capacity and use that to their advantage to the detriment of Peoples. The rest of the information would give competitive advantage to competitors and impair the competitive business of Peoples Gas.

**109** – The documents produced in response to number 109 include specific information detailing Peoples costs. This information, if widely distributed would allow competitors to gain insight into Peoples cost structure and that information could be used in ways that would impair Peoples efforts to contract for goods or services on favorable terms. In addition, the disclosure of the information generally would impair the competitive business of Peoples.