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July 22, 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
Docket No. 20200166-GU-Petition for approval of 2020 depreciation study
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

In re: Petition for approval of 2020 depreciation study by Peoples Gas System.

DOCKET NO. 20200166-GU

Submitted for Filing: July 22, 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 Answer Numbers 1, 3, and 4 of Peoples’ Answers of July 20, 2020 to Staff’s First Set of Interrogatories (Nos. 1-8) dated June 30, 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 information in Panama City, and detailed documentation of Peoples costs of performing capital projects.
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, including cost of labor and materials information for Peoples. The period of time requested will ultimately protect Peoples 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 22nd day of July, 2020:

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

EXHIBIT A
PEOPLES' ANSWERS TO STAFF'S FIRST
SET OF INTERROGATORIES (Nos. 1, 3, and 4)

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 Staff's First Set of Interrogatories (Nos. 1, 3, and 4):

1 – This information seeking the details of every capital project over a two year period including the capital amount in bidding process is clearly information that would impair the efforts of Peoples to contract for goods or services on favorable terms.

3 – Document no. 357 contains detailed information about the historic demand in the Panama City division and includes demand for specific commercial customers. This information would be of great benefit to competitors of Peoples and disclosing this information would impair the competitive business of Peoples.

4 – Document numbers 358 – 360 show details of the cost components for labor and equipment for the Jacksonville expansion project. Disclosure of that information would impair the efforts of Peoples to contract for goods or services on favorable terms in that contractors and suppliers would know the amounts Peoples had previously paid. Such information would also be of benefit to competitors and disclosure of that information would impair the competitive business of Peoples.