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August 17, 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. 20200166-GU – Petition for approval of 2020 Depreciation Study  
by Peoples Gas System  
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 Notice of Intent to Request Confidential Treatment.

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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Paula K. Brown

Mr. Adam J. Teitzman  
Commission Clerk  
June 8, 2020  
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Kandi Floyd  
Karen Bramley  
Thomas F. Farrior, Esq.

**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: August 17, 2020

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**PEOPLES GAS SYSTEM's NOTICE OF INTENT TO  
REQUEST 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 its supplemental response to No.1 of Staff's First Set of Interrogatories dated June 30, 2020 which response is submitted for filing concurrently herewith or has heretofore been filed:

1. On or around July 20, 2020 Peoples submitted its Response to Staff's First Set of Interrogatories (Nos. 1-8) dated June 30, 2020.
2. Concurrent therewith, Peoples filed a Notice of Intent to Request Confidential Treatment for its Response to Staff's First Set of Interrogatories (Nos. 1-8).
3. On or around August 14, 2020, it was brought to the attention of Peoples that a document produced in response to No.1 of Staff's First Set of Interrogatories, and regarding project charters, and was illegible.
4. Accordingly, Peoples is supplementing its response to No.1 of Staff's First Set of Interrogatories with an excel file containing project charters and, as requested with the original response, seeks confidential treatment.

5. Peoples has not attached a line by line redaction of the excel file in question because Peoples is asserting confidential treatment for the entire file. The entire excel file produced as supplement to No.1 of Staff's First Set of Interrogatories contains confidential project charter information, which Peoples utilizes to evaluate capital projects, strategy, and the costs and budgeting for those projects. It is necessary to redact the entire document and there would be no purpose served in attaching blank pieces of paper corresponding to the document at issue.

6. The material for which confidential classification is sought is intended to be and is treated as private by Peoples, and contains proprietary confidential business information as defined under Section 366.093(2), and (3)(d), and 3(e), *Florida Statutes*.

7. Peoples gives notice that the documents 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 the manner in which Peoples evaluates capital projects, and the costs and budgeting for those projects. 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 supplemental information provided in response to No.1 of Staff's First Set of Interrogatories dated June 30, 2020.

Respectfully submitted,

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

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Attorneys for Peoples Gas System

### **CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that a true and correct copy of the foregoing Notice of Intent to Request Confidential Treatment of Peoples Gas System has been furnished via electronic mail to the following, this 17th day of August, 2020:

J.R. Kelly, Esq.  
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c/o The Florida Legislature  
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Florida Industrial Power Users Group  
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/s/ Andrew M. Brown, Esq.  
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