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August 31, 2020

**VIA E-PORTAL FILING**

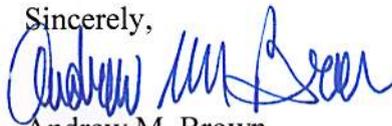
Mr. Adam J. Teitzman  
Commission Clerk  
Florida Public Service Commission  
2540 Shumard Oak Boulevard  
Tallahassee, Florida 32399-0850

**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](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  
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 31, 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 Peoples responses to OPC’s Third Set of Interrogatories Numbers 126, 129, 130 and 131, the response to which has already 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 consisting of the amount of premiums being paid by Peoples for all levels of insurance, the balance sheets and income statements for Emera US Holding, Inc., and O&M Reductions for Peoples proposed budget. All of this information relates to the competitive interests of Peoples. The disclosure of which would impair Peoples competitive 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),(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 interests of Peoples regarding the financial strength of its' parent and its' insurance information and proposed budget changes. 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,

/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 31st day of August, 2020:

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

**EXHIBIT A**  
**PEOPLES' RESPONSE TO OPC's THIRD**  
**SET OF INTERROGATORIES (Nos. 126, 129, 130 and 131)**

**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 Number:

**Peoples' Response to OPC's Third Set of Interrogatories (No. 126):**

The amount of premiums being paid by Peoples for its various insurance policies is information that if released, could impair the competitive business of Peoples.

**Peoples' Response to OPC's Third Set of Interrogatories (No. 129 & 130):**

Interrogatory Numbers 129 and 130 including the balance sheets and income statements for Emera US Holding, Inc. ("EUSHI") would provide confidential business information regarding Peoples and other companies that are held by EUSHI which would provide competitive financial information of benefit to competitors of Peoples and of benefit to competitors of the other companies in the EUSHI umbrella.

**Peoples' Response to OPC's Third Set of Interrogatories (No. 131):**

Disclosure of Peoples O&M costs and specifically the reductions in its proposed budget would be of value to competitors in that they would have access to information about Peoples labor costs and O&M structure. The disclosure of which could be damaging to Peoples and its rate payers. It could also potentially impair Peoples ability to obtain goods and services for the business at the lowest possible cost in that suppliers and contractors could leverage their knowledge of Peoples O&M structure to raise prices and therefore increase costs to Peoples and its shareholders.