



ATTORNEYS & COUNSELORS AT LAW EST. 1884

One Tampa City Center, Suite 2000  
201 N. Franklin Street  
P.O. Box 1531 (33601)  
Tampa, FL 33602  
813.273.4200 Fax: 813.273.4396

[WWW.MFMLEGAL.COM](http://WWW.MFMLEGAL.COM)  
EMAIL: [INFO@MFMLEGAL.COM](mailto:INFO@MFMLEGAL.COM)

625 Court Street, Suite 200  
P.O. Box 1669 (33757)  
Clearwater, FL 33756  
727.441.8966 Fax: 727.442.8470

In Reply Refer to:  
Tampa  
[ab@macfar.com](mailto:ab@macfar.com)

September 1, 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 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))  
Kurt Schrader/Jennifer S. Crawford/Bianca Lherisson ([kschrade@psc.state.fl.us](mailto:kschrade@psc.state.fl.us);  
[jcrawfor@psc.state.fl.us](mailto:jcrawfor@psc.state.fl.us); [blheriss@psc.state.fl.us](mailto:blheriss@psc.state.fl.us))  
Jon C. Moyle, Jr., Esq./Karen A. Putnal, Esq. ([jmoyle@moylslaw.com](mailto:jmoyle@moylslaw.com);  
[kputnal@moylslaw.com](mailto:kputnal@moylslaw.com); [mqualls@moylslaw.com](mailto:mqualls@moylslaw.com))  
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: September 1, 2020

\_\_\_\_\_ /

**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 to testimony by witness Andrea Crane for the Office of Public Counsel ("OPC") who reviewed and offered testimony concerning documents produced in response to Interrogatory No. 109 of Citizen's Second Set of Interrogatories.

1. Based upon communication between Peoples counsel and counsel with the OPC, Peoples has been informed that Andrea Crane and/or other of OPC's witnesses have offered testimony directly commenting on and referencing documents produced in response to Interrogatory no. 109 of Citizen's Second Set of Interrogatories.

2. Peoples served a Notice of Intent to Request Confidential Treatment with regard to those documents on June 20, 2020. Subsequently on July 21, 2020, Peoples served its Request for Confidential Treatment regarding the documents produced in response to Interrogatory No. 109.

3. Peoples intends to request confidential treatment of those portions of the testimony related to the response to Interrogatory No. 109.

4. Accordingly, the Material (for which confidential classification is sought) is intended to be and is treated as private by Peoples because it contains proprietary confidential business information under Section 366.093(2) and (3)(b) and (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 revenue, income or other documents related to financial analysis and work papers and Peoples requests confidential treatment related to the testimony of OPC witnesses which was served on August 31, 2020. 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 testimony described above.

Respectfully submitted,

/s/ Andrew M. Brown, Esq.

Andrew M. Brown

Phone: (813) 273-4209

E-mail: [ab@macfar.com](mailto:ab@macfar.com)

Thomas R. Farrior

Phone: (813) 273-4232

E-Mail: [trf@macfar.com](mailto:trf@macfar.com)

Macfarlane Ferguson & McMullen

P. O. Box 1531

Tampa, Florida 33601-1531

Fax: (813) 273-4396

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 1st day of September, 2020:

J.R. Kelly, Esq.  
Office of Public Counsel  
c/o The Florida Legislature  
111 West Madison St., Room 812  
Tallahassee, FL 32399-1400  
[kellyjr@leg.state.fl.us](mailto:kellyjr@leg.state.fl.us)

Paula K. Brown  
Regulatory Department  
TECO Energy, Inc.  
P.O. Box 111  
Tampa, FL 33601-0111  
[regdept@tecoenergy.com](mailto:regdept@tecoenergy.com)

Jennifer S. Crawford, Esq.  
Kurt Schrader, Esq.  
Bianca Lherisson, Esq.  
Office of General Counsel  
Florida Public Service Commission  
2540 Shumard Oak Boulevard  
Tallahassee, FL 32399-0850  
[jcrawfor@psc.state.fl.us](mailto:jcrawfor@psc.state.fl.us)  
[kschrade@psc.state.fl.us](mailto:kschrade@psc.state.fl.us)  
[blheriss@psc.state.fl.us](mailto:blheriss@psc.state.fl.us)

Kandi M. Floyd  
Peoples Gas System  
P.O. Box 111  
Tampa, FL 33601-0111  
[kfloyd@tecoenergy.com](mailto:kfloyd@tecoenergy.com)

Mireille Fall-Fry, Esq.  
Associate Public Counsel  
Office of Public Counsel  
c/o The Florida Legislature  
111 West Madison Street, Room 812  
Tallahassee, FL 32399-1400  
[fall-fry.mireille@leg.state.fl.us](mailto:fall-fry.mireille@leg.state.fl.us)

Florida Industrial Power Users Group  
c/o Jon C. Moyle, Jr.  
Karen A. Putnal  
Moyle Law Firm, P.A.  
118 North Gadsden Street  
Tallahassee, FL 32301  
[jmoyle@moylelaw.com](mailto:jmoyle@moylelaw.com)  
[kputnal@moylelaw.com](mailto:kputnal@moylelaw.com)  
[mqualls@moylelaw.com](mailto:mqualls@moylelaw.com)

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