


MACFARLANE FERGUSON & MCMULLEN

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.MFMLLEGAL.COM
EMAIL: 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

September 25, 2020

VIA E-PORTAL FILING

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

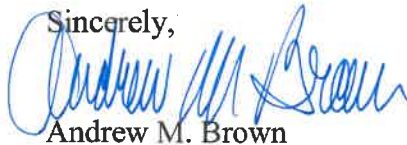
**Re: Docket No. 20200051-GU – Petition for rate increase by Peoples Gas System
Docket No. 20200166-GU-Petition for approval of 2020 depreciation study
by Peoples Gas System**

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)
Kurt Schrader/Jennifer S. Crawford/Bianca Lherisson (kschrade@psc.state.fl.us;
jcrawfor@psc.state.fl.us; blheriss@psc.state.fl.us)
Jon C. Moyle, Jr., Esq./Karen A. Putnal, Esq. (jmoyle@moylelaw.com;
kputnal@moylelaw.com; mqualls@moylelaw.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 25, 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 to documents produced in response to Request for Production No. 15 of Peoples’ September 21, 2020 Response to Staff’s Seventh Request for Production of Documents.

1. The documents bates numbered BS 16756 – 16766 contain confidential information about the details of Peoples current and future capital projects.
2. Peoples hereby seeks confidential treatment with regard to the above referenced documents which is described more fully in Exhibit A.
3. The documents contain confidential proprietary business information primarily in the form of details concerning capital projects the disclosure of which would impair Peoples competitive business operations.
4. 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.
5. Peoples is seeking confidential status under Section 366.093(2), (3)(b), (3)(c) and (3)(d), (3)(e), *Florida Statutes*.
6. 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 Peoples current and future capital projects which includes Peoples future expansion plans. 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
Thomas R. Farrior
Macfarlane Ferguson & McMullen
Post Office Box 1531
Tampa, Florida 33601
(813) 273-4300
ab@macfar.com
trf@macfar.com

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 25th 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

Paula K. Brown
Regulatory Department
TECO Energy, Inc.
P.O. Box 111
Tampa, FL 33601-0111
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
kschrade@psc.state.fl.us
blheriss@psc.state.fl.us

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

Kandi M. Floyd
Peoples Gas System
P.O. Box 111
Tampa, FL 33601-0111
kfloyd@tecoenergy.com

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
kputnal@moylelaw.com
mqualls@moylelaw.com

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

EXHIBIT A

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 15 of Peoples' September 21, 2020 Response to Staff's Seventh Request for Production of Documents:

Documents bates numbered BS 16756 - 16766.

The documents contain confidential information about the operational and financial details of Peoples current and future capital projects. This information could impair Peoples competitive business activities and provide information that could impair the Company's ability to contract for goods and services.