

State of Florida



Public Service Commission

CAPITAL CIRCLE OFFICE CENTER • 2540 SHUMARD OAK BOULEVARD
TALLAHASSEE, FLORIDA 32399-0850

-M-E-M-O-R-A-N-D-U-M-

DATE: October 5, 2020

TO: Kurt Schrader, Senior Attorney, Office of the General Counsel

FROM: Orlando Wooten, Engineering Specialist II, Division of Engineering

RE: CONFIDENTIALITY OF CERTAIN INFORMATION
DOCKET NO(s): 20200051-EI DOCUMENT NO(s): 03819-2020
DESCRIPTION: PGS (Brown) - (CONFIDENTIAL) Thumb drive containing answers to OPC's 1st set of interrogatories (Nos. 1-75) and 1st request for PODs (Nos. 1-45)..
SOURCE: Peoples Gas System

Pursuant to Section 366.093, Florida Statutes (F.S.), and Rule 25-22.006, Florida Administrative Code, Peoples Gas System (PGS or Company) requests a temporary protective order and confidential classification of certain information filed in response to Office of Public Council (OPC) discovery, in the above referenced docket, dated July 16, 2020. This recommendation specifically addresses PGS's response to OPC's 1st Production of Documents (POD), No. 34.

The Company is claiming confidentiality of its responses to OPC's 1st POD, No. 34 under Section 366.093(3)(e), F.S. Per the Statute, proprietary confidential business information includes, but is not limited to; Subsection (e) "[i]nformation relating to competitive interests, the disclosure of which would impair the competitive business of the provider of the information."

The information provided in response to OPC's POD No. 34, for which a temporary protective order and confidential treatment are being sought, can be described as PGS's budget information and capital leadership team documents. These documents contain confidential project descriptions and evaluations related to future projects.

Staff has reviewed the information PGS filed in response to OPC's POD No. 34 as well as the Company's confidentiality request and request for a temporary protective order. It is staff's opinion that the information that is the subject of this request meets the criteria for confidentiality contained in Section 366.093(3)(e), F.S.



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-M-E-M-O-R-A-N-D-U-M-

DATE: September 8, 2020

TO: Division of Economics, Office of Primary Responsibility

FROM: OFFICE OF COMMISSION CLERK

RE: CONFIDENTIALITY OF CERTAIN INFORMATION

DOCKET NO: 20200051-GU DOCUMENT NO: **03819-2020**

DESCRIPTION: PGS (Brown) - (CONFIDENTIAL) Thumb drive containing answers to OPC's 1st set of interrogatories (Nos. 1-75), specifically Nos. 7, 13, 50, 64 and 65; and 1st request for PODs (Nos. 1-45), specifically Nos. 12, 16, 18, 19, 21, 22, 25-28, 33-35, 39 and 43. [CLK note: Thumb drive contains information that is designated confidential as well as non-confidential; since there is only one thumb drive, all related information is being treated as confidential in CLK.]

SOURCE: Peoples Gas System

The above confidential material was filed along with a **request for confidential classification**. Please complete the following form by checking all applicable information and forward it to the attorney assigned to the docket, along with a brief memorandum supporting your recommendation.

- The document(s) is (are), in fact, what the utility asserts it (them) to be.
- The utility has provided enough details to perform a reasoned analysis of its request.
- The material has been received incident to an inquiry.
- The material is confidential business information because it includes:
 - (a) Trade secrets;
 - (b) Internal auditing controls and reports of internal auditors;
 - (c) Security measures, systems, or procedures;
 - (d) Information concerning bids or other contractual data, the disclosure of which would impair the efforts of the public utility or its affiliates to contract for goods or services on favorable terms;
 - (e) Information relating to competitive interests, the disclosure of which would impair the competitive business of the provider of information;
 - (f) Employee personnel information unrelated to compensation, duties, qualifications, or responsibilities;
- The material appears to be confidential in nature and harm to the company or its ratepayers will result from public disclosure.
- The material appears not to be confidential in nature.

___ The material is a periodic or recurring filing and each filing contains confidential information.

This response was prepared by Orlando Wooten on 10/05/2020, a copy of which has been sent to the Office of Commission Clerk and the Office of General Counsel.