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In Reply Refer to:
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October 15, 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**

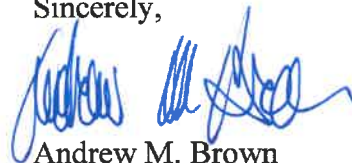
Dear Mr. Teitzman:

Enclosed for filing on behalf of Peoples Gas System (“Peoples”) is a Second Amended Request for Confidential Treatment of certain portions of Peoples’ Response to Staff’s Seventh Request for Production of Documents No. 15. This request is intended to replace Document 09442-2020 and therefore should be filed concurrently with the withdrawal of such documents from this docket. This request includes Exhibits A through C.

Exhibit A is being provided under separate cover and consists of the confidential documents, and all information that Peoples asserts is entitled to confidential treatment has been highlighted. Exhibit B is an edited version of Exhibit A, in which the information Peoples asserts is confidential has been redacted. Exhibit C consists of Peoples’ justification table supporting its Request for 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;fall-fry.mireille@leg.state.fl.us)

Mr. Adam J. Teitzman
Commission Clerk
October 15, 2020
Page 2

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Jon C. Moyle, Jr., Esq./Karen A. Putnal, Esq. (jmoyle@moylelaw.com;
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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: October 15, 2020

**PEOPLES GAS SYSTEM'S SECOND AMENDED REQUEST
FOR CONFIDENTIAL TREATMENT
(amended as to inadvertently omitted attachments only)**

Pursuant to Section 366.093 and 1190.07, *Florida Statutes*, and Rule 25-22.006, *Florida Administrative Code*, Peoples Gas System ("Peoples") requests confidential treatment to Peoples' Response to the Staff's Seventh Request for Production of Documents No. 15 and in support of its request states:

1. Peoples confidential treatment of portions of document BS 16756 - 16766 provided in response to Staff's Seventh Request for Production of Documents No. 15.
2. The following exhibits are included with and made a part of this request:
 - a. Exhibit A consists of the following documents are a copy of the confidential pages on which information that Peoples asserts to be entitled to confidential treatment has been highlighted.
 - b. Exhibit B consists of a copy of the confidential pages on which all information that Peoples asserts is entitled to confidential treatment has been redacted.
 - c. Exhibit C is a table containing an identification of the information

highlighted in Exhibit A, together with references to the specific statutory basis or bases for the claim of confidentiality and to the affidavit in support of the requested classification.

3. Peoples submits that the highlighted information in Exhibit A is proprietary confidential business information within the meaning of Section 366.093(3), *Florida Statutes*. Section 366.093(3), *Florida Statutes*, defines confidential information as information that is intended to be and is treated by the company as private in that disclosure of the information would cause harm to the company's business operations or its customers, and has not been disclosed publicly. The confidential information is intended to be and has been treated by Peoples as private, its confidentiality has been maintained, and its disclosure would cause harm to Peoples and its customers. Pursuant to Section 366.093(3)(2), such information is entitled to confidential treatment and it is exempt from the disclosure provisions of the public records law. Thus, once the Commission determines that the information in question is proprietary confidential business information, the Commission is not required to engage in any further analysis or review such as weighing the harm of disclosure against the public interest in access to the information.

4. Upon a finding by the Commission that the information highlighted in Exhibit A, and referenced in Exhibit C, is proprietary confidential business information, the information should not be declassified for a period of at least eighteen (18) months and should be returned to Peoples as soon as the information is no longer necessary for the Commission to conduct its business. See § 366.093(4), Fla. Stat.

WHEREFORE, Peoples respectfully requests confidential classification of the material described herein.

Respectfully submitted,



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Attorneys for Peoples Gas System

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing Second Amended Request for Confidential Treatment of Peoples Gas System has been furnished via electronic mail to the following, this 15th day of October, 2020:

J.R. Kelly, Esq.
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c/o The Florida Legislature
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Mireille Fall-Fry, Esq.
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Florida Industrial Power Users Group
c/o Jon C. Moyle, Jr.

Karen A. Putnal

Moyle Law Firm, P.A.

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Andrew M. Brown, Esq.

EXHIBIT A

CONFIDENTIAL

FILED UNDER SEPARATE COVER

EXHIBIT B

REDACTED COPIES

PEOPLES GAS SYSTEM 2020 AND 2021 CAPITAL BUDGET STAFF'S PRODUCTION OF DOCUMENTS REQUEST NO 15 a.									
Project Number	Project	Rate Case Budget Filing		Updated Forecast		Variance		Explanation	
		Estimated In-Service Date	2020	2021	Estimated In-Service Date	2020	2021		2020
GROWTH			1,979,953	2,023,512					
NEW-09385	Blanket Measuring and Regulation Station Equipment	In service	100,000	-	In service				
NEW-09387		6/30/2020	834,500	-	11/30/2020				
NEW-11963		7/31/2019	5,000	-	In service				
NEW-12208		3/31/2020	986,499	-	In service				
NEW-12209		8/31/2021	202,798	961,388	8/31/2022				
NEW-12930		10/30/2021	-	3,708,448	10/30/2021				
NEW-12931		7/30/2020	1,370,000	-	9/15/2020				
NEW-12932		11/30/2021	-	2,966,147	11/30/2021				
NEW-12933		10/31/2020	610,149	-	2/28/2021				
NEW-13544		10/31/2020	956,959	-	7/31/2021				
NEW-13583		10/31/2020	3,792,014	-	12/31/2020				
NEW-13584		12/31/2020	2,872,829	-	7/28/2021				
NEW-13603		3/31/2020	305,426	-	12/31/2020				
NEW-09024/									
NEW-13707		11/30/2020	4,725,646	9,428	12/31/2020				
NEW-10878					In service				
NEW-10882					In service				
NEW-11923					In service				
NEW-15203					12/31/2020				
Blanket			3,620,088	3,699,730					
Blanket			4,748,544	4,853,012					
Blanket			4,926,153	5,094,529					
Blanket			801,977	820,642					
Blanket			24,379,026	24,915,365					
NEW-10343		In service	101,300	-	In service				
NEW-10643		7/28/2021	2,915,613	889,418	7/28/2021				
NEW-11003		11/30/2019	30,000	-	In service				
NEW-11430		12/31/2023	223,200	152,000	In service				
NEW-11803		1/31/2020	200,000	-	In service				
NEW-11904		8/30/2019	10,000	-	In service				
NEW-11805		7/31/2021	2,300,000	3,200,000	12/31/2021				
NEW-11943		11/30/2019	40,000	-	In service				
NEW-12125		1/31/2020	75,000	-	9/1/2020				
NEW-12163		6/30/2020	590,000	-	12/31/2020				
NEW-12283		5/30/2020	570,200	-	11/20/2020				
NEW-12284		12/30/2022	-	481,977	12/31/2020				
NEW-12523		5/10/2020	415,000	-	2/28/2021				
NEW-12524		7/31/2020	558,850	-	11/31/2020				
NEW-12843		8/30/2020	1,037,717	-	10/16/2020				
NEW-12949		12/31/2023	100,000	100,000	9/30/2023				
NEW-12954		12/31/2027	200,000	200,000	12/31/2022				
NEW-12955		12/31/2022	-	83,250	12/31/2023				
NEW-12957		12/31/2021	-	750,000	10/31/2021				
NEW-12959		12/31/2021	-	6,486,672	12/31/2022				
NEW-12960		12/31/2020	558,149	-	cancelled				
NEW-13123		9/30/2019	172,550	-	In service				
NEW-13124		7/1/2019	172,550	-	In service				
NEW-13184		11/30/2019	110,000	-	In service				
NEW-13303		7/1/2020	1,940,000	-	12/1/2020				
NEW-13323		6/10/2020	1,017,300	300,000	12/31/2020				
NEW-13643		9/30/2020	1,329,300	-	12/31/2020				
NEW-13803		10/31/2021	64,896	906,250	7/31/2022				
NEW-13825		10/31/2020	1,929,498	-	10/31/2020				
NEW-13826		4/30/2021	396,000	704,000	cancelled				
NEW-13943		9/30/2020	1,058,462	-	1/31/2021				
NEW-14023		7/31/2020	589,028	-	9/15/2020				
NEW-14063		2/28/2020	817,541	124,237	In service				
NEW-14323		4/1/2020	250,000	-	In service				
NEW-14345		5/15/2020	540,000	-	10/31/2020				
NEW-14347		5/15/2020	505,000	-	In service				
NEW-14363		8/1/2020	300,000	-	cancelled				
NEW-14364		8/31/2020	846,000	-	In service				
NEW-14403		8/10/2021	716,946	381,312	11/10/2020				
NEW-14443		3/31/2020	685,300	-	12/31/2020				
NEW-14444		6/10/2020	1,993,462	-	In service				
NEW-14544		12/31/2020	691,614	-	12/31/2020				
NEW-10863					In service				
NEW-10864					In service				
NEW-12204					8/31/2021				
NEW-12263					9/30/2020				
NEW-12703					In service				
NEW-13023					In service				
NEW-14663					In service				
NEW-14773					11/30/2020				

PEOPLES GAS SYSTEM 2020 AND 2021 CAPITAL BUDGET STAFF'S PRODUCTION OF DOCUMENTS REQUEST NO 15 a.									
Project Number	Project	Rate Case Budget Filing			Updated Forecast		Variance		Explanation
		Estimated In-Service Date	2020	2021	Estimated In-Service Date	2020	2021	2020	
NEW-14943					5/1/2021				
NEW-14967					12/31/2021				
NEW-15083					12/31/2020				
NEW-15143					12/31/2020				
NEW-15405					4/30/2021				
NEW-15419					6/30/2021				
NEW-15425					12/31/2020				
NEW-15430					8/15/2021				
Blanket			30,339,279	31,006,744	various				
Blanket									
NEW-13704		12/31/2020	3,000,000		12/31/2022				
NEW-15103					3/31/2021				
Blanket			205,000	210,125					
NEW-11273 through NEW-11276		12/31/2021	500,000	500,000	12/31/2020				
			116,968,212	95,468,195					
SUSTAINING									
Blanket			1,001,611	1,023,646					
Blanket			11,025	11,268					
Blanket			959,798	980,913					
PRE-06482		12/31/2020	1,676,290		3/31/2021				
PRE-07260		6/10/2020	250,000		9/30/2021				
PRE-07261		9/10/2021	268,893	7,294,517	12/31/2022				
PRE-07269		11/31/2021		500,000	11/31/2021				
PRE-07524		2/28/2021	1,207,951	3,091,536	12/31/2021				
PRE-07527		5/12/2021	1,079,524	639,472	12/31/2022				
PRE-07860		6/10/2020	525,000		4/30/2021				
PRE-08240		12/31/2021		2,000,000	12/31/2022				
PRE-08241		12/31/2021		1,000,000	12/31/2022				
PRE-08247		12/31/2023		250,000	12/31/2024				
PRE-09500		11/31/2020	2,000,000		9/30/2020				
PRE-06481					in service				
PRE-09300					12/31/2022				
PRE-09380					5/15/2021				
Blanket			1,588,000	789,350					
NCP-11287		12/31/2021		8,000,000	12/31/2022				
NCP-14127		12/31/2021	288,000	192,000	12/31/2022				
Blanket			11,937,177	12,199,795					
CRR-10812		3/1/2020	621,000		10/31/2020				
CRR-11856		in service	200,000		in service				
CRR-12577		12/31/2021	300,000	300,000	in service				
CRR-12579		7/31/2024		1,468,459	12/31/2023				
CRR-12580		12/31/2023		1,000,000	12/31/2023				
CRR-13937		3/31/2020	455,000		12/31/2020				
CRR-14337		3/31/2020	494,680		10/31/2020				
CRR-11192					in service				
CRR-11778					7/31/2021				
CRR-12216					in service				
CRR-16115					12/31/2023				
CRR-16135					12/31/2023				
CRR-16801					9/30/2021				
CRR-16815					4/30/2021				
Blanket									
PRE-08040		6/30/2020	1,384,818		12/31/2020				
Blanket			5,840,669	5,969,164					
REL-05600		7/29/2020	450,000		in service				
REL-05720		8/1/2021	240,000	160,000	8/30/2021				
REL-05800		12/31/2020	785,000		3/31/2021				
REL-05340					2/28/2021				
Blanket			551,925	564,068					
NCP-10662		2/15/2020	1,007,033		3/30/2021				
NCP-11245		7/31/2022		669,000	12/31/2021				
NCP-11246		12/31/2020	5,000,000		12/31/2020				
NCP-13627		12/31/2021		900,000	12/31/2021				
NCP-13629		6/30/2020	500,000		10/31/2020				
NCP-13630		12/30/2020	100,000		12/30/2021				
NCP-13967		7/31/2020	400,000		9/30/2020				
NCP-12428					in service				
NCP-12431					in service				
NCP-15211					6/30/2021				
NCP-15665					12/31/2021				
NCP-15666					6/30/2021				
Blanket									
Blanket			247,500	327,900					
Blanket			1,874,819	1,380,608					

PEOPLES GAS SYSTEM 2020 AND 2021 CAPITAL BUDGET STAFF'S PRODUCTION OF DOCUMENTS REQUEST NO 15 a.									
Project Number	Project	Rate Case Budget Filing		Updated Forecast		Variance		Explanation	
		Estimated In-Service Date	2020	2021	2020	2021	2020		2021
Blanket			999,300	168,486					
Blanket			559,800	436,076					
Blanket			5,393,371	3,085,020					
			52,210,885	55,341,278					
LEGACY									
Blanket		Various	18,438,693	21,320,140					
Blanket		Various	31,671,659	18,563,362					
			50,110,352	39,883,501					
AFUDC ELIGIBLE PROJECTS - GROWTH									
NEW-07885		9/30/2020	4,389,111	1,824	12/31/2020				
NEW-12123		12/31/2020	29,517,557	77,694	12/31/2020				
NEW-12210		8/30/2020	1,715,215	-	12/31/2020				
NEW-12211		4/30/2020	1,623,813	-	12/31/2020				
NEW-12743		12/31/2020	35,948,886	2,216,667	9/30/2020				
NEW-12783		12/31/2020	1,521,183	-	2/28/2021				
NEW-12784		12/31/2020	1,281,688	-	3/31/2021				
NEW-12785		12/31/2020	3,328,774	-	12/31/2020				
NEW-12786		12/31/2020	10,449,473	285,000	12/30/2020				
NEW-15437					1/31/2021				
NEW-12863		12/31/2020	18,344,078	1,709,188	3/11/2021				
NEW-13004		5/31/2022	2,040,357	30,118,891	12/31/2022				
NEW-13005		12/31/2023	-	2,570,000	12/31/2025				
NEW-13663		6/30/2021	9,498,632	11,080,466	6/30/2022				
NEW-13703		6/30/2021	14,340,000	13,460,000	6/15/2022				
NEW-14683					8/31/2021				
NEW-15003					5/31/2022				
NEW-15433					6/30/2022				
NEW-15435					6/30/2022				
		TOTAL AFUDC ELIGIBLE PROJECTS - GROWTH PROJECTS	133,998,767	61,519,730					
AFUDC ELIGIBLE PROJECTS - SUSTAINING									
NCP-10481		2/15/2020	2,867,803	-	9/1/2020				
NCP-12429		12/31/2022	5,537,593	11,992,229	12/31/2022				
		TOTAL AFUDC ELIGIBLE PROJECTS - SUSTAINING PROJECTS	5,405,396	11,992,229					
		GRAND TOTAL	318,091,413	263,894,281					

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PEOPLES GAS SYSTEM
DOCKET NO. 20200051-GU
DOCKET NO. 20200166-GU
STAFF'S SEVENTH REQUEST FOR
PRODUCTION OF DOCUMENTS
REQUEST NO. 15
FILED: 09/21/2020

**CAPITAL LEADERSHIP TEAM
PROJECT REVIEW
June 24, 2020**

CLT Review Policy:



Project:



Background:

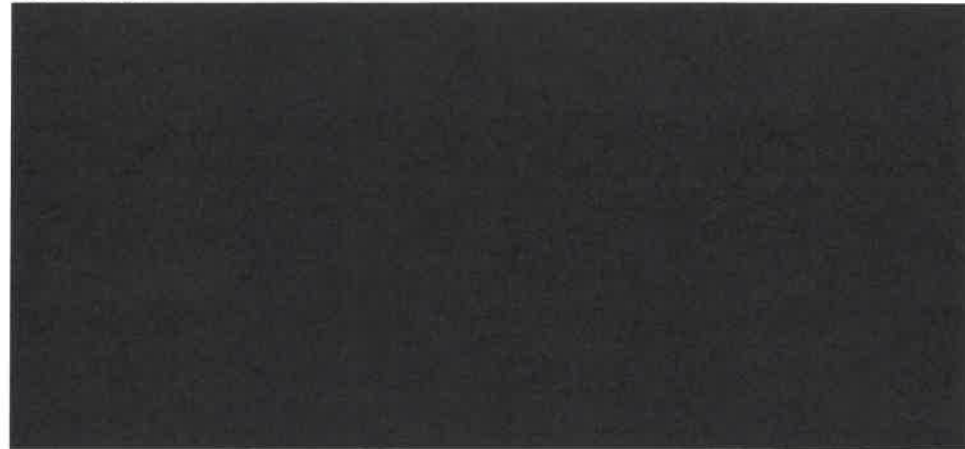


Figure A: Customer Experience Strategy

PEOPLES GAS SYSTEM
DOCKET NO. 20200051-GU
DOCKET NO. 20200166-GU
STAFF'S SEVENTH REQUEST FOR
PRODUCTION OF DOCUMENTS
REQUEST NO. 15
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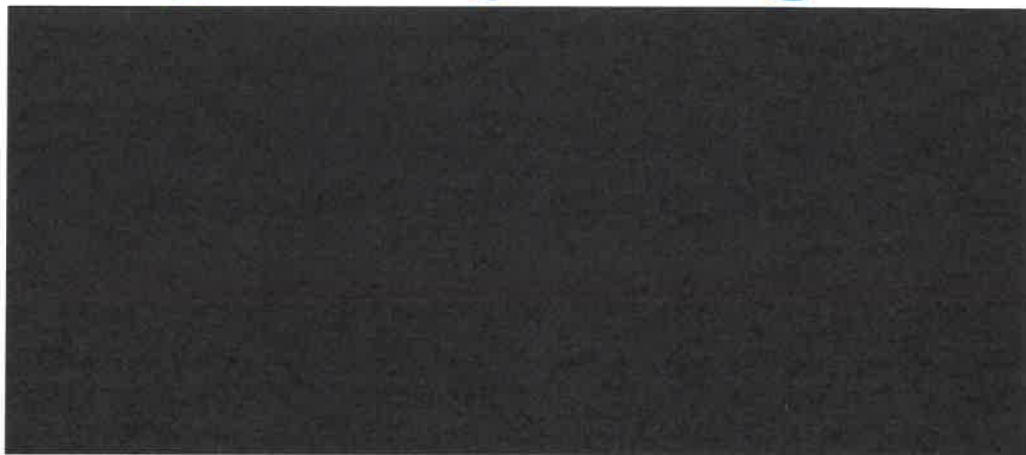
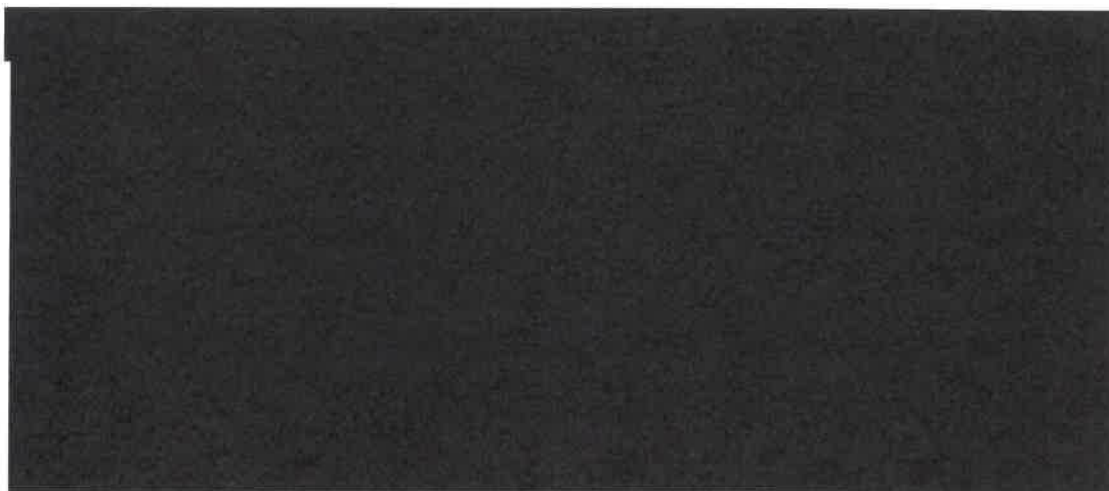


Figure B: Best Practice IVR Self-Service for top performers

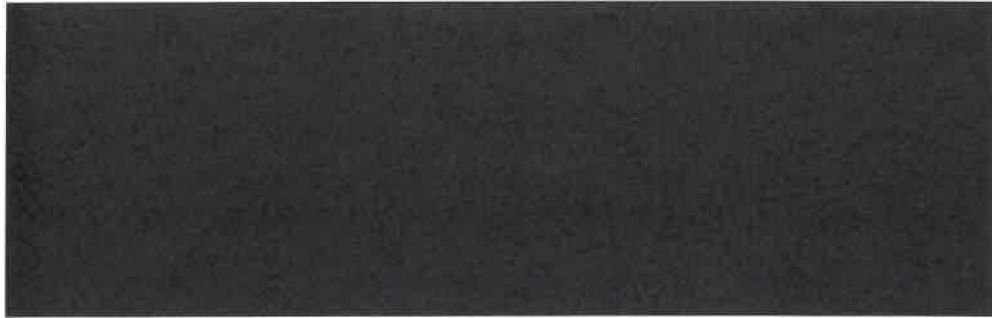


Project Description:

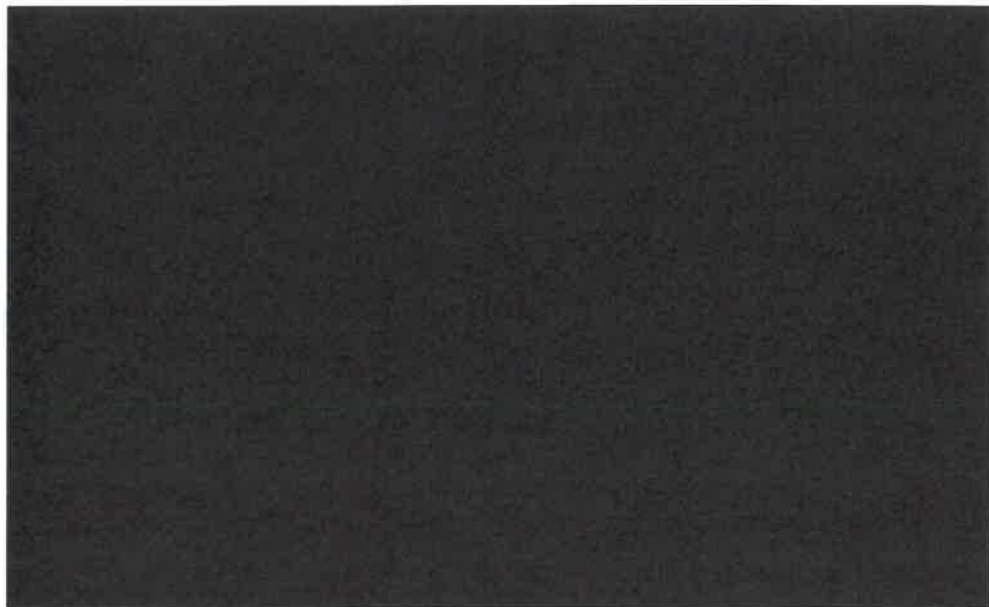
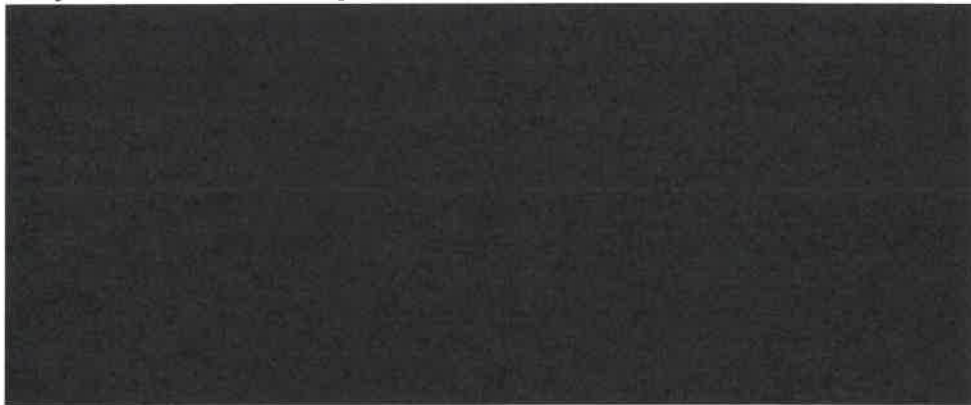


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PEOPLES GAS SYSTEM
DOCKET NO. 20200051-GU
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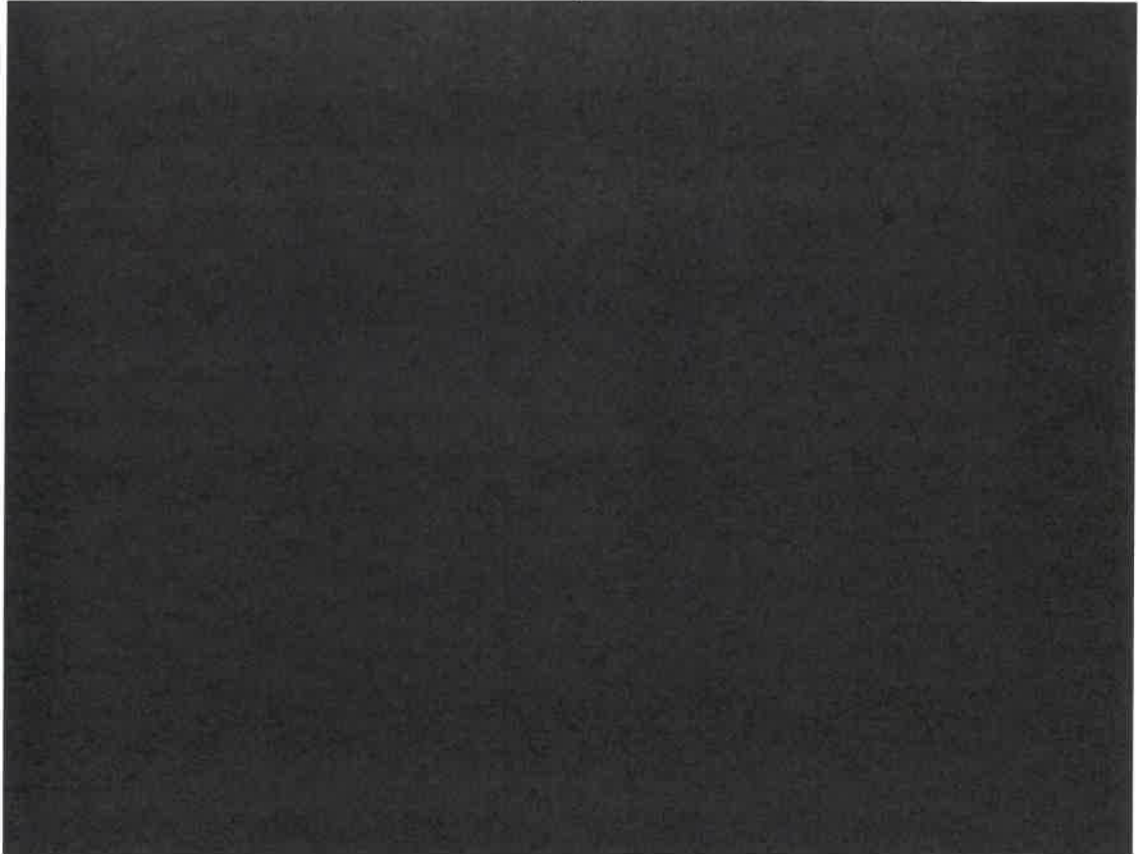


Project Characteristics and Project Risk Assessment:



CONFIDENTIAL

PEOPLES GAS SYSTEM
DOCKET NO. 20200051-GU
DOCKET NO. 20200166-GU
STAFF'S SEVENTH REQUEST FOR
PRODUCTION OF DOCUMENTS
REQUEST NO. 15
FILED: 09/21/2020



Contribution of Project to Corporate Objectives:



Availability of Capital:



Recommendation:





E-Signed: 07/16/2020 01:47 PM EDT
Nancy Tower
ntower@tacoenergy.com
IP: 12.171.196.205
Certif. Electronic Signature
DocID: 20200701145549600

Nancy Tower
President & CEO – Tampa Electric Company
President & CEO – TECO Energy

Greg Blunden
SVP Finance & Accounting and CFO
TECO Energy

TJ Szelistowski
President
Peoples Gas System



Nancy Tower
President & CEO – Tampa Electric Company
President & CEO – TECO Energy

Greg Blunden
SVP Finance & Accounting and CFO
TECO Energy

TJ Szelistowski
President
Peoples Gas System

CONFIDENTIAL

PEOPLES GAS SYSTEM
DOCKET NO. 20200051-GU
DOCKET NO. 20200166-GU
STAFF'S SEVENTH REQUEST FOR
PRODUCTION OF DOCUMENTS
REQUEST NO. 15
FILED: 09/21/2020



Nancy Tower
President & CEO – Tampa Electric Company
President & CEO – TECO Energy

Greg Blunden
SVP Finance & Accounting and CFO
TECO Energy

TJ Szelistowski
President
Peoples Gas System

PGS Technology Project – Planning & Charter

Project: [REDACTED]

Funding Project: NCP-15211

Background / Summary

[REDACTED]

Scope & Objective

[REDACTED]

Benefits

[REDACTED]

Options & Analysis

[REDACTED]

Procurement

[REDACTED]

Timeline & Cost

[REDACTED]

Project Resources



PSI Desc

PSRI Desc

PEI Desc

Strategic Desc

PSI Prob Status Value

Latitude

Longitude

PCI Total Score

PEI Total Score

PGI Total Score

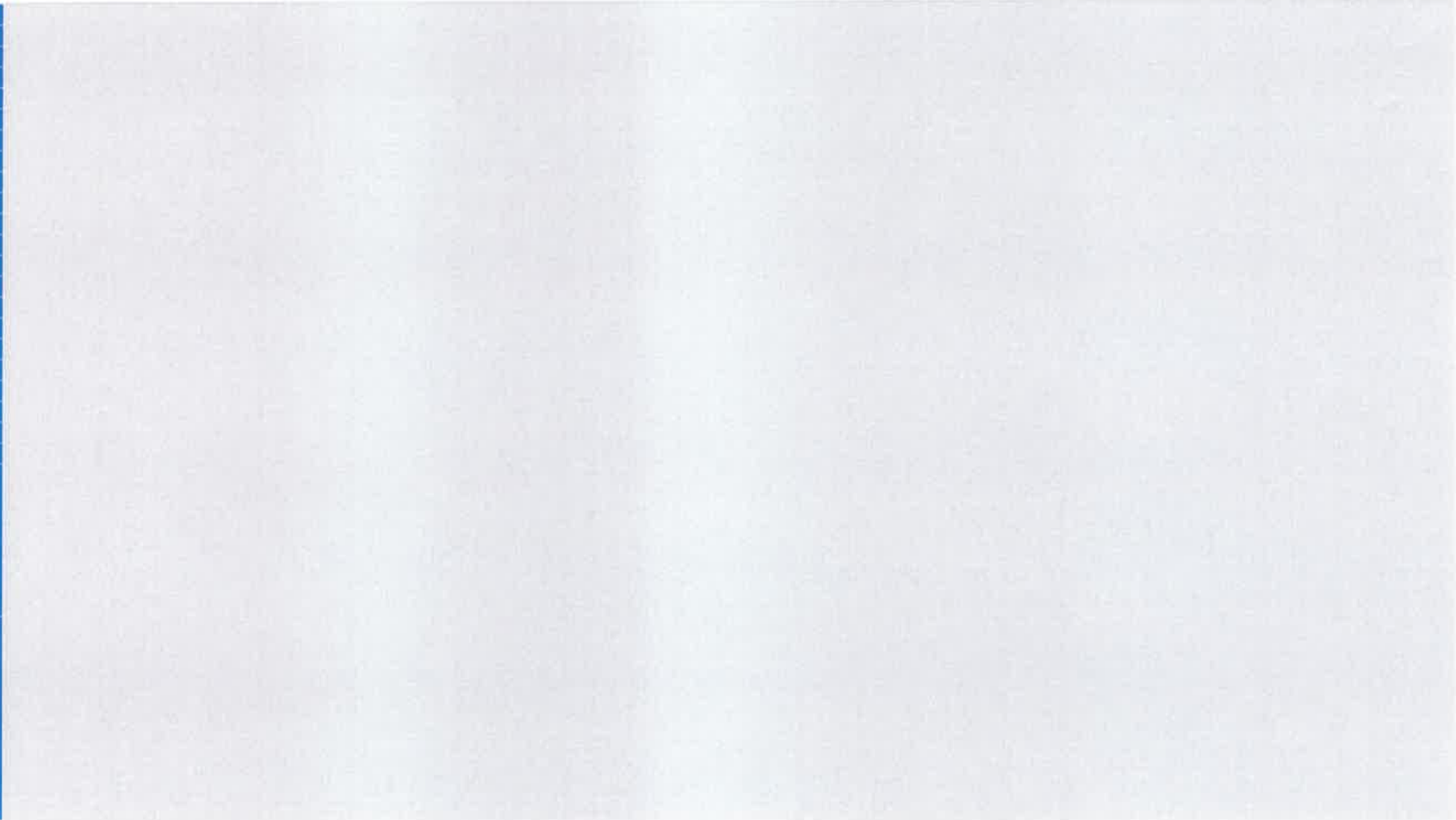
PSI Total Score
PSRI Total Score
Total Strategic Score
Revenue Impact Score

PGI Desc
Item Type

Path

PFN
Project Name
ID
Company
Division
Project Total Cost
Project Score
Project Status
PWO
Revenue Category
Emera FP Group
Project Type
Ops Info
Partners Info
BD Info
Synergi
Eng Analysis
Financial Analysis
Year 1
Project Start Date Float
Eng Start Date
MA Start Date
Cons Start Date
In-Service Date
Completion Date
Estimate Confidence
Eng Weeks
MA Weeks
Cons Weeks
Requested By
Engineer
Project Manager
2018
2019

2020
2021
2022
2023
2024
2025
2026
2027
2028
2029
2030
2031
2032
2033
2034
2035
2036
2037
2038
2039
2040
Year Unknown
PCI Desc
Project Description



PSI Desc	
PSRI Desc	
PEI Desc	
Strategic Desc	
PSI Prob Status Value	
Latitude	
Longitude	
PCI Total Score	
PEI Total Score	
PGI Total Score	

PSI Total Score
PSRI Total Score
Total Strategic Score
Revenue Impact Score

PGI Desc
Item Type

Path

PFN
Project Name
ID
Company
Division
Project Total Cost
Project Score
Project Status
PWO
Revenue Category
Emera FP Group
Project Type
Ops Info
Partners Info
BD Info
Synergi
Eng Analysis
Financial Analysis
Year 1
Project Start Date Float
Eng Start Date
MA Start Date
Cons Start Date
In-Service Date
Completion Date
Estimate Confidence
Eng Weeks
MA Weeks
Cons Weeks
Requested By
Engineer
Project Manager
2018
2019

PSI Desc	
PSRI Desc	
PEI Desc	
Strategic Desc	
PSI Prob Status Value	
Latitude	
Longitude	
PCI Total Score	
PEI Total Score	
PGI Total Score	

PSI Total Score
PSRI Total Score
Total Strategic Score
Revenue Impact Score

PGI Desc
Item Type

Path



EXHIBIT C

JUSTIFICATION TABLE

EXHIBIT C

Company: Peoples Gas System

Title: List of Confidential Documents Included in Peoples' Request for Confidential Treatment

Docket Nos.: 20200051-GU & 20200166-GU

Document	Description	No. of Pages	Conf . Y/N	Line No./Col. No.	Florida Statute 366.093(3) Subsection
1	Peoples' Response to Staff's Seventh Request for Production of Documents No. 15 (BS 16766)		Y	Column Project, Column 2020 and 2021 under Updated Forecast and Columns 2020 and 2021 under Variance and Column Explanation	(e)
2	Peoples' Response to Staff's Seventh Request for Production of Documents No. 15 (BS 16756)	1	Y	Everything other than headings;	(e)
3	Peoples' Response to Staff's Seventh Request for Production of Documents No. 15 (BS 16757)	1	Y	Everything other than headings	(e)
4	Peoples' Response to Staff's Seventh Request for Production of Documents No. 15 (BS 16758)	1	Y	Everything other than headings	(e)
5	Peoples' Response to Staff's Seventh Request for Production of Documents No. 15 (BS 16759)	1	Y	Everything other than headings	(e)

6	Peoples' Response to Staff's Seventh Request for Production of Documents No. 15 (BS 16760)	1	Y	Signature page – lines 1 and 2	(e)
7	Peoples' Response to Staff's Seventh Request for Production of Documents No. 15 (BS 16761)	1	Y	Signature page – lines 1 and 2	(e)
8	Peoples' Response to Staff's Seventh Request for Production of Documents No. 15 (BS 16762)	1	Y	Signature page – lines 1 and 2	(e)
9	Peoples' Response to Staff's Seventh Request for Production of Documents No. 15 (BS 16763)			Everything other than headings	(e)
10	Peoples' Response to Staff's Seventh Request for Production of Documents No. 15 (BS 16764)			Everything other than headings	(e)
11	Peoples' Response to Staff's Seventh Request for Production of Documents No. 15 (BS 16765)			Columns 2-24 below line 1	(e)