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October 16, 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 Request for Confidential Treatment of certain portions of Peoples’ Response to Interrogatory Nos. 148 and 156 of OPC’s Fifth Set of Interrogatories. 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)
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Mr. Adam J. Teitzman
Commission Clerk
October 16, 2020
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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 16, 2020

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PEOPLES GAS SYSTEM'S REQUEST FOR CONFIDENTIAL TREATMENT

Pursuant to Section 366.093 and 119.07, *Florida Statutes*, and Rule 25-22.006, *Florida Administrative Code*, Peoples Gas System ("Peoples") requests confidential treatment to Peoples' Response to the Office of Public Counsel ("OPC") Interrogatory Nos. 148 and 156 of its Fifth Set of Interrogatories and in support of its request states:

1. Peoples has previously filed a Notice of Intent to Request Confidential Treatment of these documents on October 5, 2020.

2. Peoples has provided responses to portions of document BS 17136 provided in response to OPC's Fifth Set of Interrogatories No. 148 and portions of the response to OPC's Fifth Set of Interrogatories No. 156 which contain confidential information.

3. 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 Request for Confidential Treatment of Peoples Gas System has been furnished via electronic mail to the following, this 16th day of October, 2020:

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c/o The Florida Legislature
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Andrew M. Brown, Esq.

EXHIBIT A

CONFIDENTIAL

FILED UNDER SEPARATE COVER

EXHIBIT B

REDACTED COPIES

New Projects:

Project Number	Project	Authorized Date
NEW-15203		April 2020
NEW-12204		March 2020
NEW-13023		March 2020
NEW-14663		March 2020
NEW-14923		March 2020
NEW-14943		March 2020
NEW-14967		March 2020
NEW-15083		March 2020
NEW-15243		April 2020
NEW-15405		June 2020
NEW-15419		June 2020
NEW-15425		August 2020
NEW-15430		August 2020
NEW-15103		March 2020
PRE-09300		March 2020
PRE-09380		March 2020
CRR-11778		March 2020
CRR-16116		August 2020
CRR-16136		March 2020
CRR-16801		August 2020
CRR-16815		August 2020
NCP-15211		August 2020
NCP-15665		August 2020
NCP-15666		August 2020
NEW-14683		May 2020
NEW-15003		May 2020
NEW-15433		August 2020
NEW-15435		August 2020

Additional Project Number for Panama City Expansion Project:

Project Number	Project	Authorized Date
NEW-15437		

These are not new projects, they are Carryover Projects from prior years:

Project Number	Project	Authorized Date
NEW-10876		Carry over from prior years
NEW-10882		Carry over from prior years
NEW-11923		Carry over from prior years
NEW-10863		Carry over from prior years
NEW-10864		Carry over from prior years
NEW-12263		Carry over from prior years
NEW-12703		Carry over from prior years
PRE-06481		Carry over from prior years
CRR-11292		Carry over from prior years
CRR-13316		Carry over from prior years
REL-05340		Carry over from prior years
NCP-12428		Carry over from prior years
NCP-12431		Carry over from prior years

REDACTED

PEOPLES GAS SYSTEM
DOCKET NO. 20200051-GU
DOCKET NO. 20200166-GU
OPC'S FIFTH SET OF
INTERROGATORIES
INTERROGATORY NO. 156
PAGE 1 OF 1
FILED: OCTOBER 5, 2020

156. Has the Company updated its test year revenue projection at present rates? If so, please provide the update. If not, please explain why the Company has not updated its rate case projection.

A. Yes. The Company has prepared new revenue projections as part of the annual business planning process for the 2021 budget. The changes are shown in the table below.

Rate Class	2021 Test Yr.	2021 Update	Change	Reason for Change
Residential	\$92,555,957			
Total Commercial	\$116,609,611			
SGS - GS3	\$87,838,735			
GS4 - GS5, Other	\$28,770,876			
Industrial	\$22,939,039			
Base Revenues	\$232,104,607			
Miscellaneous	\$11,930,685			
Late Fees & Service Revenue	\$7,036,364			
Rent & Other	\$366,097			
CNG Facility Fees	\$2,759,829			
RNG Facility Fees	\$1,768,395			
Total Revenues	\$244,035,292			

* Note: The updated 2020 and 2021 average customer count is 415,935 and 434,750. The resulting customer growth rates are 4.38% and 4.52% for 2020 and 2021, respectively.

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 Interrogatory No. 148 (BS 17136)	1	Y	Column 2 and a portion of Column 3	(e)
2	Peoples' Response to Interrogatory No. 156	1	Y	Columns 2, 3 and 4	(e)