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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 the OPC’s First Request to Produce Documents No. 39 (BS 12674-12683). 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](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);  
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Mr. Adam J. Teitzman  
Commission Clerk  
October 16, 2020  
Page 2

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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 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") First Request to Produce Documents No. 39 (BS 12674-12683) and in support of its request, Peoples states:

1. Peoples has previously filed a Notice of Intent to Request Confidential Treatment of these Documents on September 25, 2020.
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 Request for Confidential Treatment of Peoples Gas System has been furnished via electronic mail to the following, this 16th day of October, 2020:

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

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Regulatory Department  
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Jennifer S. Crawford, Esq.  
Kurt Schrader, Esq.  
Bianca Lherisson, Esq.  
Office of General Counsel  
Florida Public Service Commission  
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Associate Public Counsel

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Florida Industrial Power Users Group

c/o Jon C. Moyle, Jr.

Karen A. Putnal

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Andrew M. Brown, Esq.

**EXHIBIT A**

**CONFIDENTIAL**

**FILED UNDER SEPARATE COVER**

# **EXHIBIT B**

## **REDACTED COPIES**



May 19, 2020 Board Meeting - Item 10 - PGS Projects for Approval



MAY 19, 2020

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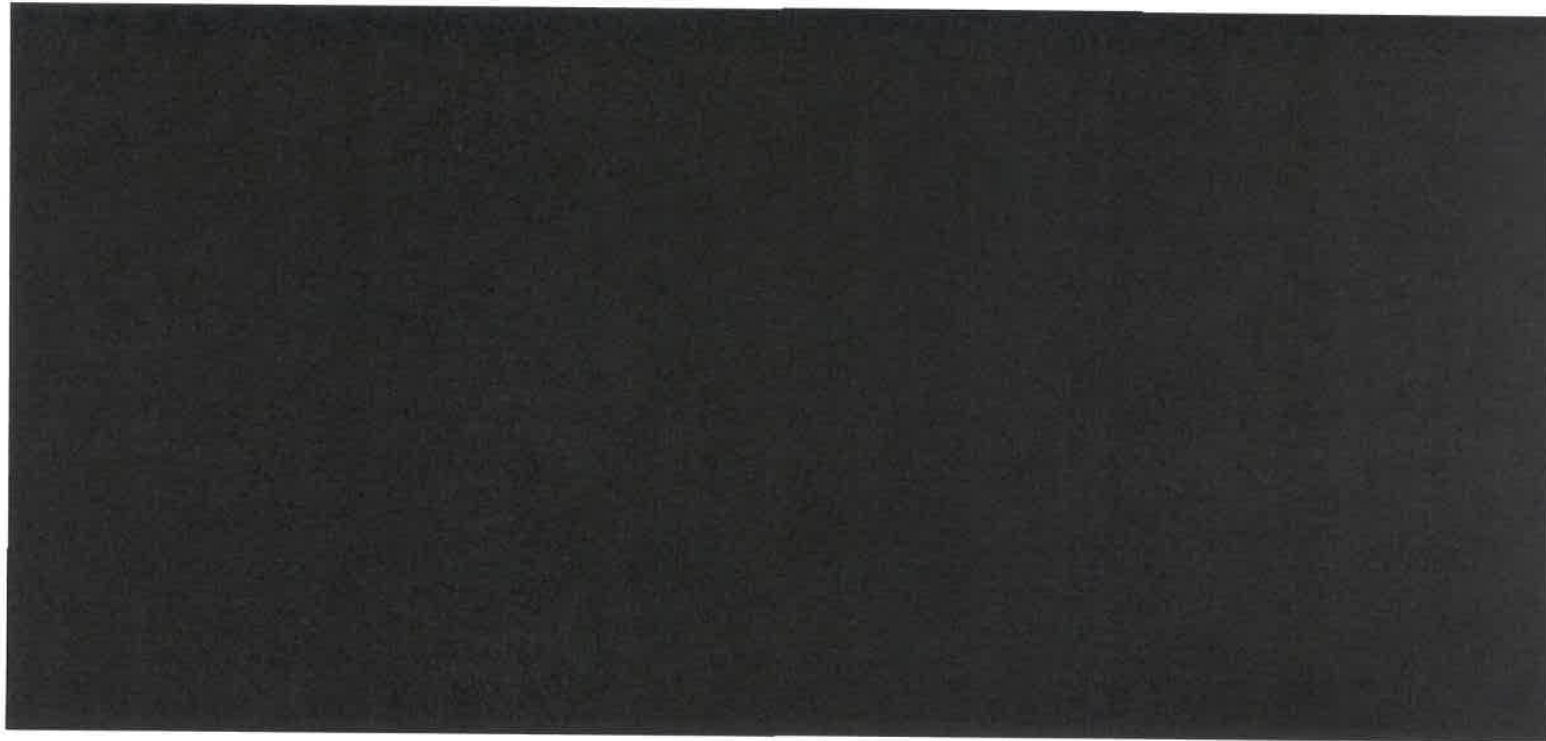
[REDACTED]

Request for Approval

May 19, 2020 Board Meeting - Item 10 - PGS Projects for Approval



## Executive Summary



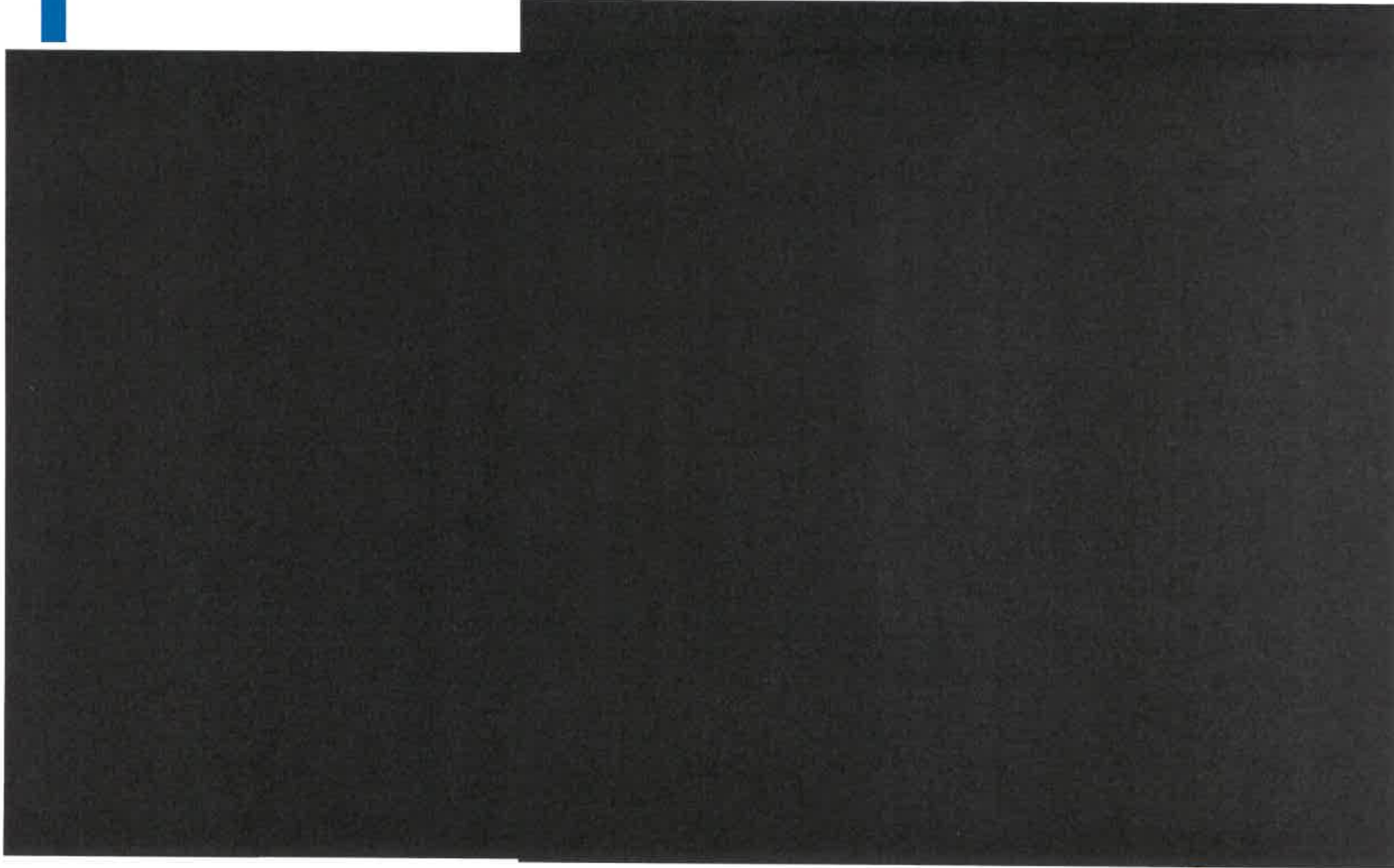
May 19, 2020 Board Meeting - Item 10 - PGS Projects for Approval

# Project Summary

Project	
Description	[REDACTED]
Construction Period	
In-Service Date	
Project Cost	
Revenue Requirement	
Project Rationale	
Capital Profile	
Prudency	
Investment Recovery	

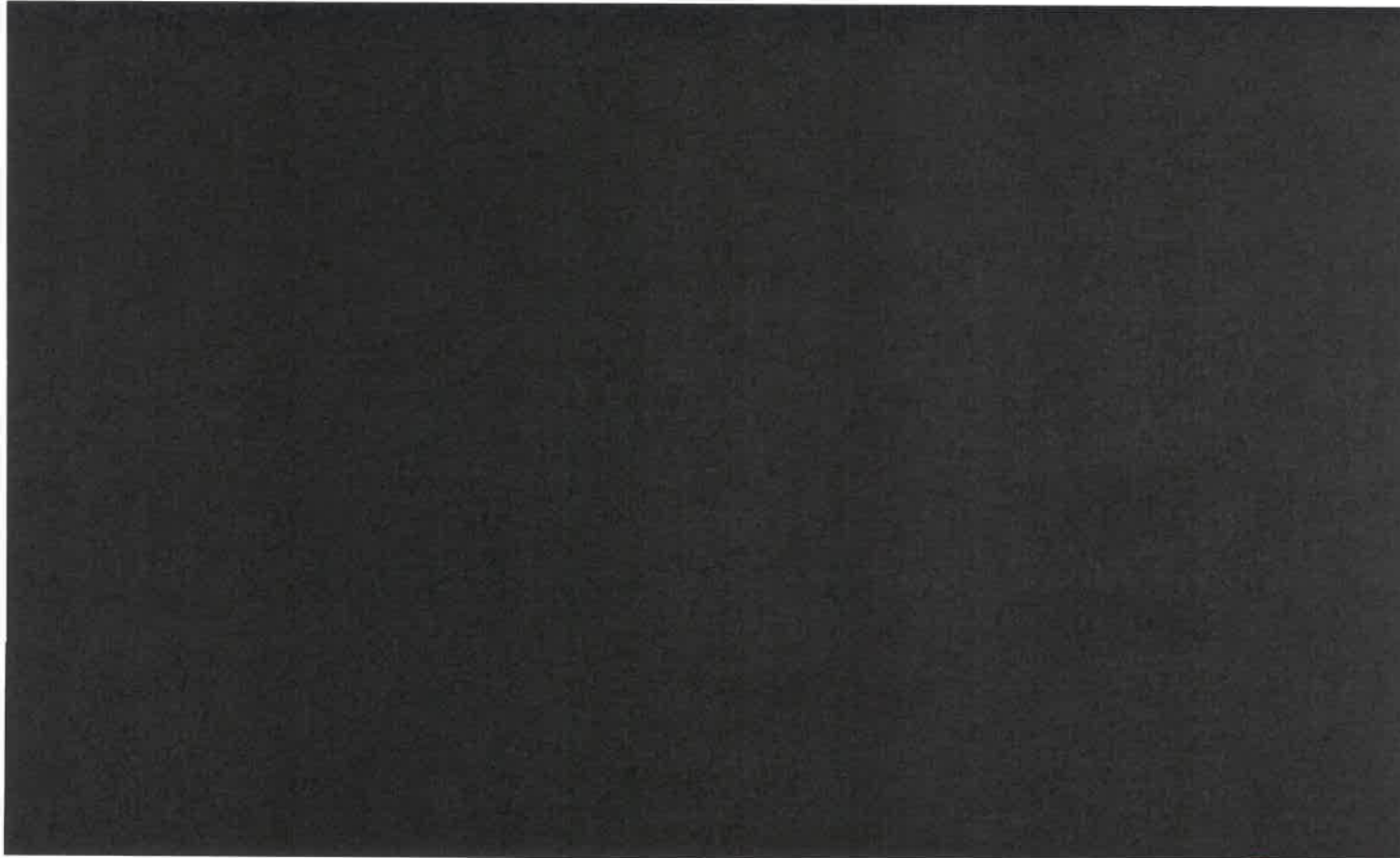
May 19, 2020 Board Meeting - Item 10 - PGS Projects for Approval

# Project Overview



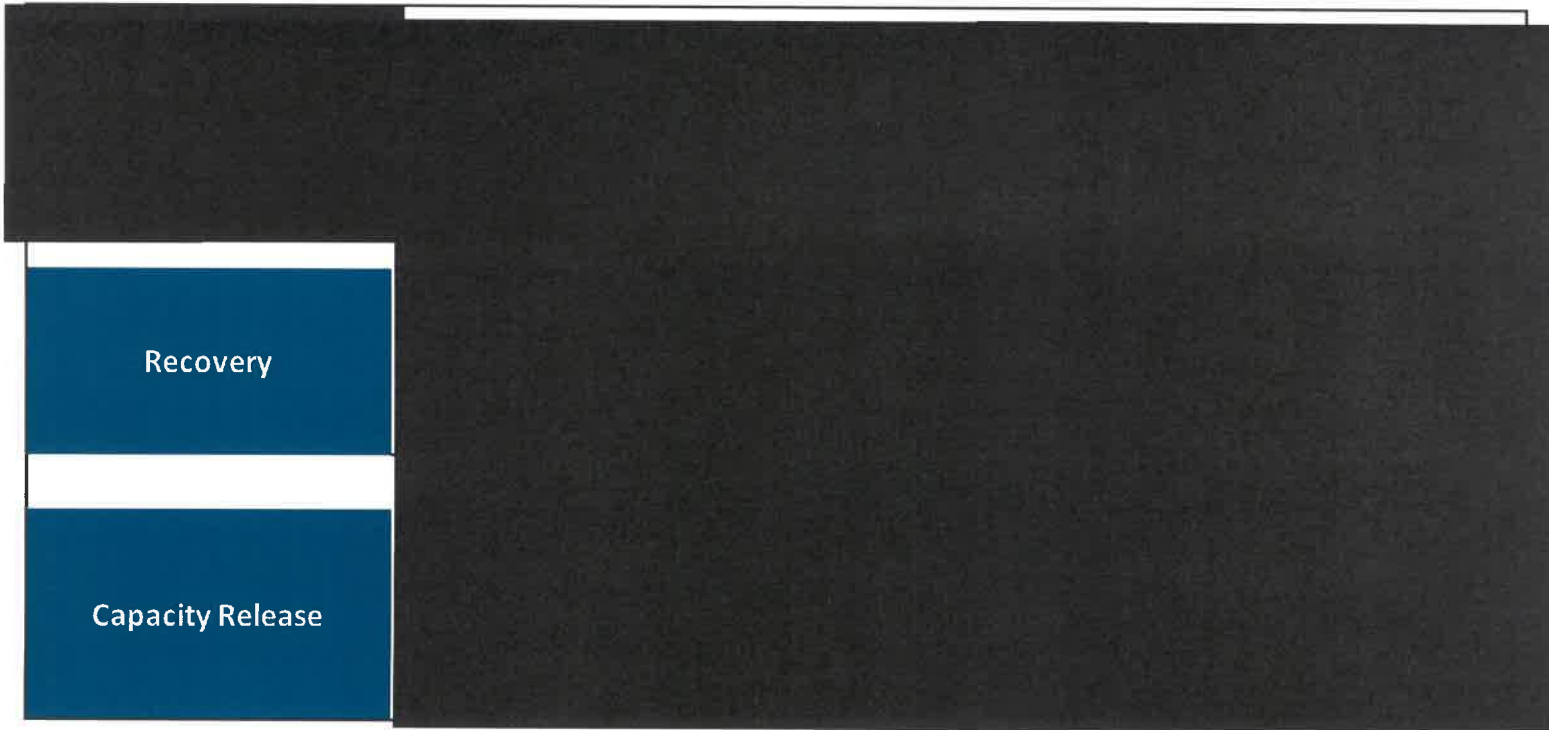
May 19, 2020 Board Meeting - Item 10 - PGS Projects for Approval

# Execution Plan



May 19, 2020 Board Meeting - Item 10 - PGS Projects for Approval

# Regulatory Considerations



May 19, 2020 Board Meeting - Item 10 - PGS Projects for Approval

# Identified Risks & Mitigation

Ranking	Risk	Impact	Likelihood	Mitigation
1	Proposed Route			
2	FGT Minimum Pressure Commitment			
3	Project Cost Overrun			
4	Schedule			
5	Project Permitting			
6	Regulatory			

7  
7



May 19, 2020 Board Meeting - Item 10 - PGS Projects for Approval

# Financial Summary



## Modelling Assumptions

Revenue Requirement	
Effective IRR (UIRR w/o TV)	
ROE	
Tax	
O&M	



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## Salient Terms

<b>Term</b>	
<b>MDQ</b>	
<b>Key Dates</b>	
<b>Receipt Point</b>	
<b>Delivery Points</b>	
<b>Minimum Pressure</b>	
<b>Shipper Termination</b>	
<b>Tariff</b>	
<b>Conditions Precedent</b>	
<b>Regulatory</b>	
<b>Responsibilities</b>	

May 19, 2020 Board Meeting - Item 10 - PGS Projects for Approval



# Approval Requested

## Proposed Resolutions



# **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

<b>Document</b>	<b>Description</b>	<b>No. of Pages</b>	<b>Conf . Y/N</b>	<b>Line No./Col. No.</b>	<b>Florida Statute 366.093(3) Subjecti on</b>
1	Peoples' Response to the Office of Public Counsel ("OPC") First Request to Produce Documents No. 39 (BS 12674)	1	Y	Line below "May 19, 2020" and above Request for Approval in the middle of the page	(e)
2	Peoples' Response to the Office of Public Counsel ("OPC") First Request to Produce Documents No. 39 (BS 12675)	1	Y	Section below "Executive Summary"	(e)
3	Peoples' Response to the Office of Public Counsel ("OPC") First Request to Produce Documents No. 39 (BS 12676)	1	Y	Column 2	(e)
4	Peoples' Response to the Office of Public Counsel ("OPC") First Request to Produce Documents No. 39 (BS 12677)	1	Y	Everything other than title.	(e)
5	Peoples' Response to the Office of Public Counsel	1	Y	Everything other than title.	(e)

	("OPC") First Request to Produce Documents No. 39 (BS 12678)				
6	Peoples' Response to the Office of Public Counsel ("OPC") First Request to Produce Documents No. 39 (BS 12679)	1	Y	Portions of Column 1 and all of Column 2	(e)
7	Peoples' Response to the Office of Public Counsel ("OPC") First Request to Produce Documents No. 39 (BS 12680)	1	Y	Columns 3, 4 and 5	(e)
8	Peoples' Response to the Office of Public Counsel ("OPC") First Request to Produce Documents No. 39 (BS 12681)	1	Y	Everything except column headings	(e)
9	Peoples' Response to the Office of Public Counsel ("OPC") First Request to Produce Documents No. 39 (BS 12682)	1	Y	Two words after "Salient Terms" and Column 2	(e)
10	Peoples' Response to the Office of Public Counsel ("OPC") First Request to Produce Documents No. 39 (BS 12683)	1	Y	Section below "Proposed Resolutions".	(e)