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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 No. 88 of Staff’s Ninth 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](mailto:kelly.jr@leg.state.fl.us);[fall-fry.mireille@leg.state.fl.us](mailto:fall-fry.mireille@leg.state.fl.us))  
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Mr. Adam J. Teitzman  
Commission Clerk  
October 15, 2020  
Page 2

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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 of Peoples' Response to Interrogatories No. 88 of Staff's Ninth 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 a response to Interrogatory No. 88 which contains 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.

4. 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.

5. 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  
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Florida Industrial Power Users Group

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Andrew M. Brown, Esq.

**EXHIBIT A**

**CONFIDENTIAL**

**FILED UNDER SEPARATE COVER**

# **EXHIBIT B**

## **REDACTED COPIES**

**REDACTED**

**PEOPLES GAS SYSTEM  
DOCKET NO. 20200051-GU  
DOCKET NO. 20200166-GU  
STAFF'S NINTH SET OF  
INTERROGATORIES  
INTERROGATORY NO. 88  
PAGE 1 OF 2  
FILED: OCTOBER 5, 2020**

**88.** For each of the questions (a-d) below, please refer to the Utility's response to staff's first set of interrogatories, no. 1, "Staff IRR No. 1a and 1b", bates stamp page 356.

**88a.** In reference to the [REDACTED] please provide a description and need of the project including estimates of the number of potential customers served and the expected build out period.

**A.** This project includes the installation of 16,175 feet of 4-inch steel gas main from [REDACTED]. Since the existing supply main is difficult to access and is in close proximity to a major roadway and railroad track, this new main is needed to provide additional gas reliability and supply to the area and allow for more flexible operations. Peoples expects to serve approximately 750 residential customers in these communities. The build-out of the residential communities of [REDACTED] will occur between 2018 and 2023 and [REDACTED] will occur between 2018 and 2026, respectively. The expected completion for the supply main is October 2020. Peoples expects additional residential and commercial activity in this area over the next three to five years.

**88b.** In reference to the [REDACTED] please provide a description and need of the project including estimates of the number of potential customers served and the expected build out period.

**A.** The [REDACTED] includes the installation of approximately 15,000 feet of 4-inch steel supply main to serve the growing area around the Florida Polytechnic University, near Lakeland, Florida. Growth is expected in Residential, Commercial and Industrial sectors in the area. Expected in-service - October 31, 2021.

**88c.** In reference to the [REDACTED] please provide a description and need of the project including estimates of the number of potential customers served and the expected build out period.

**A.** The [REDACTED] includes the installation of 30,000 feet of 6-inch supply main to provide gas supply to the newly developed [REDACTED] residential subdivision south of Brandon, Florida.

**REDACTED**

**PEOPLES GAS SYSTEM  
DOCKET NO. 20200051-GU  
DOCKET NO. 20200166-GU  
STAFF'S NINTH SET OF  
INTERROGATORIES  
INTERROGATORY NO. 88  
PAGE 2 OF 2  
FILED: OCTOBER 5, 2020**

Peoples expects to serve approximately 350 residential customers in Phase 1 of this community. At complete build-out a total of approximately 840 residential customers and six commercial customers will be served. The residential homes will be built in phases starting in 2021 and completing in 2026.

A phase of the development main is in place, operational and serving customers with the remaining development main expected to be fully constructed over the next three to five years. The supply main is expected to be completed by December 31, 2020.

**88d.** In reference to the [REDACTED] please provide a description and need of the project including estimates of the number of potential customers served and the expected build out period

**A.** The [REDACTED] is a part of a larger multi-phase residential community in Sarasota, Florida. This project includes the installation of the development mains to serve 1,200 single family residential homes and associated commercial accounts supporting the community. The majority of capital to install these new development mains will be spent between 2020 and 2025. The Company constructed the supply main serving this area in 2019 and a portion of the development main for phase I is complete, operational, and serving customers.

# **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 366.09 3(3) Subsection</b>
1	Page 1 of 2 Peoples' Response to Staff's Interrogatory No. 88	1	Y	Line 4, line 8, line 9, line 11, line 15, line 18, line 23, line 26 and line 27	(e)
2	Page 2 of 2 Peoples' Response to Staff's Interrogatory No. 88			Line 10 and line 13	(e)