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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 Fourth Request to Produce Documents No. 55 (BS 17104-17111). 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 16, 2020
Page 2

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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

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 Request No. 55 of OPC's Fourth Request for Production of Documents 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 documents 17104 – 1711 in response to Request No. 55 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.

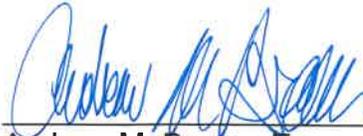
c. Exhibit C is a table containing an identification of the information highlighted in Exhibit A, together with references to the specific statutory basis or bases for the claim of confidentiality and to the affidavit in support of the requested classification.

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:

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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

**PEOPLES GAS SYSTEM
CAPITAL EXPENDITURES (EXCLUDES AFUDC CHARGES)
YEAR-TO-DATE - AUGUST 2020
(In \$ Thousands)**

17104

	2020 Actual	2020 0+12F	Variance Fav/(Unfav)	2019 Actual	Variance Fav/(Unfav)
Growth					
Sustaining					
Cast Iron/Bare Steel and PPP					
AFUDC Eligible Projects					
TOTAL					

**PEOPLES GAS SYSTEM
CAPITAL EXPENDITURES (EXCLUDES AFUDC CHARGES)
YEAR-TO-DATE - AUGUST 2020
(In \$ Thousands)**

17105

	2020 Actual	2020 0+12F	Variance Fav/(Unfav)	2019 Actual	Variance Fav/(Unfav)
Measuring and Regulation Station Equipment					
Meter/Reg Install - Comm					
Meter/Reg Install - Res					
Meters					
New Revenue Mains					
New Revenue Services					
Regulators					
Gas Heat Pump (GHP)					
CNG Fueling Stations					
Total Growth					
Cathodic Protection					
Distribution System Improvements					
Improvements to Property					
Main Replacements					
Measuring and Regulation Improvements					
Misc. Non-Revenue Producing					
Municipal Improvements					
Office Equipment					
Power Operated Equipment					
Service Line Replacements					
Testing and Measuring Equipment					
Tools and Shop Equipment					
Transportation Vehicles					
Total Sustaining					
PPP Main Replacement					
Cast Iron/Bare Steel Main Repl.					
Total Cast Iron/Bare Steel and PPP					
Measuring and Regulation Station Equipment - AFUDC					
New Revenue Mains - AFUDC					
Liquefied Natural Gas (LNG) - AFUDC					
Renewable Natural Gas (RNG) - AFUDC					
Office Equipment - AFUDC					
Total AFUDC Eligible Projects					
Total Capital					

PEOPLES GAS SYSTEM
DOCKET NO. 20200051-GU
DOCKET NO. 20200166-GU
OPC'S FOURTH REQUEST FOR
PRODUCTION OF DOCUMENTS
DOCUMENT NO. 55
FILED: 10/5/2020

PEOPLES GAS SYSTEM
 CAPITAL EXPENDITURES (EXCLUDES AFUDC CHARGES)
 YEAR-TO-DATE - AUGUST 2020
 (In \$ Thousands)

17106

	2020 Actual	2020 0+12F	Variance Fav/(Unfav)	Explanations
Measuring and Regulation Station Equipment				
Meter/Reg Install - Comm				
Meter/Reg Install - Res				
Meters				
New Revenue Mains				
New Revenue Services				
Regulators				
Gas Heat Pump (GHP)				
CNG Fueling Stations				
Total Growth				
Cathodic Protection				
Distribution System Improvements				
Improvements to Property				
Main Replacements				
Measuring and Regulation Improvements				
Misc. Non-Revenue Producing				
Municipal Improvements				
Office Equipment				
Power Operated Equipment				
Service Line Replacements				
Testing and Measuring Equipment				
Tools and Shop Equipment				
Transportation Vehicles				
Total Sustaining				
PPP Main Replacement				
Cast Iron/Bare Steel Main Repl.				
Total Cast Iron/Bare Steel and PPP				
Measuring and Regulation Station Equipment - AFUDC				
New Revenue Mains - AFUDC				
Liquified Natural Gas (LNG) - AFUDC				
Renewable Natural Gas (RNG) - AFUDC				
Office Equipment - AFUDC				
Total AFUDC Eligible Projects				
Total Capital				

PEOPLES GAS SYSTEM
 DOCKET NO. 20200651-GU
 DOCKET NO. 20200166-GU
 OP'S FOURTH REQUEST FOR
 PRODUCTION OF DOCUMENTS
 DOCUMENT NO. 55
 FILED: 10/5/2020

**Peoples Gas System
 Capital Expenditures (Excludes AFUDC Charges)
 Actual vs 0+12F/Rate Case Budget Variance Analysis
 For the Month Ending August 31, 2020**

Updated: 09.04.2020

Funding Project Number	Funding Project Description	2020 YTD Actual	Rate Case Budget		Variance Fav/(Unfav)
			2020 YTD 0+12F	Detail	
GROWTH					
Measuring and Regulation Station Equipment					
Blanket	Measuring and Regulation Station Equipment				
NEW-09024					
NEW-09385					
NEW-09387					
NEW-10876					
NEW-10882					
NEW-11923					
NEW-11963					
NEW-12208					
NEW-12209					
NEW-12930					
NEW-12931					
NEW-12932					
NEW-12933					
NEW-13544					
NEW-13583					
NEW-13584					
NEW-13603					
NEW-15203					
New Revenue Mains					
Blanket	New Revenue Mains				
NEW-10343					
NEW-10643					
NEW-10863					
NEW-10864					
NEW-11003					
NEW-11430					
NEW-11803					
NEW-11804					
NEW-11805					
NEW-11943					
NEW-12125					
NEW-12163					
NEW-12204					
NEW-12263					
NEW-12283					
NEW-12284					
NEW-12523					
NEW-12524					
NEW-12703					
NEW-12843					

**Peoples Gas System
 Capital Expenditures (Excludes AFUDC Charges)
 Actual vs 0+12F/Rate Case Budget Variance Analysis
 For the Month Ending August 31, 2020**

Updated: 09.04.2020

		Rate Case Budget Detail		
Funding Project Number	Funding Project Description	2020 YTD Actual	2020 YTD 0+12F	Variance Fav/(Unfav)
NEW-12949				
NEW-12954				
NEW-12959				
NEW-12960				
NEW-13023				
NEW-13123				
NEW-13124				
NEW-13184				
NEW-13203				
NEW-13303				
NEW-13323				
NEW-13643				
NEW-13707				
NEW-13803				
NEW-13825				
NEW-13826				
NEW-13943				
NEW-14023				
NEW-14063				
NEW-14323				
NEW-14345				
NEW-14347				
NEW-14363				
NEW-14364				
NEW-14403				
NEW-14443				
NEW-14444				
NEW-14544				
NEW-14663				
NEW-14923				
NEW-14943				
NEW-14967				
NEW-15003				
NEW-15083				
NEW-15243				
NEW-15405				
NEW-15419				
NEW-15425				
NEW-15430				
New Revenue Services, Meters, and Regulators				
Blanket	New Revenue Services			

**Peoples Gas System
 Capital Expenditures (Excludes AFUDC Charges)
 Actual vs 0+12F/Rate Case Budget Variance Analysis
 For the Month Ending August 31, 2020**

Updated: 09.04.2020

		Rate Case Budget		
		Detail		
Funding Project Number	Funding Project Description	2020 YTD Actual	2020 YTD 0+12F	Variance Fav/(Unfav)
Blanket	Meter/Reg Install - Comm			
Blanket	Meter/Reg Install - Res			
Blanket	Meters			
Blanket	Regulators			
Growth Initiatives				
Blanket				
NEW-12244				
NEW-13704				
NEW-15103				
Blanket				
NEW-12723				
NEW-12724				
NEW-12725				
NEW-12726				
Blanket - RNG Stat		-	-	-
TOTAL GROWTH				
SUSTAINING				
Blanket	Cathodic Protection			
Distribution System Improvements				
Blanket	Distribution System Improvements			
PRE-06481				
PRE-06482				
PRE-07260				
PRE-07261				
PRE-07269				
PRE-07524				
PRE-07527				
PRE-07860				
PRE-08241				
PRE-08247				
PRE-08500				
Blanket	Misc. Non-Revenue Producing			
Measuring and Regulation Improvements				
Blanket	Measuring and Regulation Improvements			
PRE-08040				
Main and Service Line Replacements				
Blanket	Main Replacements			
CRR-10812				
CRR-11292				
CRR-11778				
CRR-11856				
CRR-12577				
CRR-13316				

**Peoples Gas System
 Capital Expenditures (Excludes AFUDC Charges)
 Actual vs 0+12F/Rate Case Budget Variance Analysis
 For the Month Ending August 31, 2020**

Updated: 09.04.2020

Funding Project Number	Funding Project Description	Rate Case Budget Detail		
		2020 YTD Actual	2020 YTD 0+12F	Variance Fav/(Unfav)
CRR-13937				
CRR-14337				
Blanket	Service Line Replacements			
Municipal Improvements				
Blanket	Municipal Improvements			
REL-05340				
REL-05660				
REL-05720				
REL-05800				
REL-05920				
Software				
Blanket	Office Equipment			
NCP-10682				
NCP-11246				
NCP-12428				
NCP-12431				
NCP-13629				
NCP-13630				
NCP-13967				
Other Non-Construction				
Blanket	Communication Equipment			
Blanket	Improvements to Property			
NCP-14127				
Blanket	Power Operated Equipment			
Blanket	Testing and Measuring Equipment			
Blanket	Tools and Shop Equipment			
Blanket	Transportation Vehicles			
NCP-14308				
TOTAL SUSTAINING				
CAST IRON/BARE STEEL & PPP				
Blanket	PPP Main Replacement			
Blanket	Cast Iron/Bare Steel Main Repl.			
TOTAL CAST IRON/BARE STEEL & PPP				
AFUDC ELIGIBLE PROJECTS				
	Measuring and Regulation Station Equipment			
NEW-12210				
NEW-12211				
NEW-12783				
NEW-12784				
	New Revenue Mains			
NEW-07885				

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 366.09 3(3) Subsection
1	BS 17104	1	Y	Column 2 below heading, Column 3 below heading, Column 4 below heading, Column 5 below heading, Column 6 below heading.	(e)
2	BS 17105	1	Y	Column 2 below heading, Column 3 below heading, Column 4 below heading, Column 5 below heading, Column 6 below heading	(e)
3	BS 17106	1	Y	Column 2 below heading, Column 3 below heading, Column 4 below heading, Column 5 below heading.	(e)
4	BS 17107	1	Y	Columns 2, 3, 4 and 5 except for headings.	(e)
5	BS 17108	1	Y	Columns 2, 3 4 and 5 except for headings.	(e)
6	BS 17109	1	Y	Columns 2, 3, 4, and 5 except for headings.	(e)
7	BS 17110	1	Y	Columns 2, 3, 4, and 5 except for headings	(e)
8	BS 17111	1	Y	Columns 2, 3, 4 and 5 except for headings	(e)