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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**

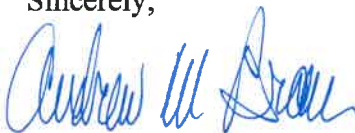
Dear Mr. Teitzman:

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. 90 and 91 of Staff’s Tenth 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)

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

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 its Response to Interrogatory Nos. 90 and 91 of Staff's Tenth Set of Interrogatories, and in support thereof states:

1. Peoples has previously filed a Notice of Intent to Request Confidential Treatment of these documents on October 9, 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

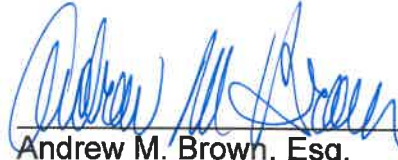
affidavit in support of the requested classification.

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:

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A handwritten signature in blue ink, appearing to read "Andrew M. Brown", is written over a horizontal line.

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 TENTH SET OF
INTERROGATORIES
INTERROGATORY NO. 90
PAGE 1 OF 1
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- 90.** Please refer to PGS Witness Cifuentes' Direct Testimony, Exhibit No. LLC-1, Document No. 7. Please explain why the Company's projected 2021 "Industrial Therms" (sales) are significantly increasing relative to 2020 therm sales while the Company's "Industrial Base Revenues" for 2021 are projected to decrease relative to 2020 revenues.
- A.** The decrease in 2021 industrial revenue is due to the loss of a Jacksonville area customer, [REDACTED], in Q4 2020. In 2020, the Bayside Lateral agreement went into effect adding to Peoples' industrial customer count and adding revenues. Although there is a significant therm sales increase in 2021 due to the projected Bayside Lateral, the revenue increase will not offset the loss of [REDACTED] revenues.



REDACTED

**PEOPLES GAS SYSTEM
DOCKET NO. 20200051-GU
DOCKET NO. 20200166-GU
STAFF'S TENTH SET OF
INTERROGATORIES
INTERROGATORY NO. 91
PAGE 1 OF 1
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91. For the following questions, please refer to PGS's response to OPC's First Request to Produce Documents, POD No. 7, workpapers used to develop testimony and exhibits for PGS witness Cifuentes.
- a. Referring to Customer Counts_PrepFile.xlsx (BS 1654), Tab "IND THERMS", please explain the basis for PGS's projected therm increase in 2021 "Industrial Therm" sales for Division 2 (Tampa) relative to therm sales in 2020 (from 32,343 therms in 2020 to 406,828 therms in 2021).
 - b. Referring to Documents 1-7_prep file.xlsx (BS 1658), Tab "CDD", please explain whether the fact that the company's 20 year CDD averaging methodology resulted in project Cooling Degree Days (CDDs) for 2020 and 2021 lower than any of the last 5 years (2015-2019) raises a concern regarding the efficacy of the methodology.
- A.
- a. The Bayside Lateral 2020 therm sales budget was approximately [REDACTED] [REDACTED] which was a projection for a partial year. In 2021 the therm sales budget is approximately [REDACTED], which is the maximum annual capacity per the agreement.
 - b. The fact that the 2020 and 2021 CDDs are less than CDDs from the past five years does not raise any concern regarding the efficacy of the methodology. The Company's methodology for estimating "normal" weather is based on a review of the past 20 years of degree-days. This methodology is sound and in line with industry practices and has been consistently used by the Company in prior filings. Also, due to the negative correlation between CDD and gas consumption, increasing 2021 CDD would result in lower therm consumption.

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 the Staff's Tenth Interrogatory No. 90	1	Y	Portions of line 2 and line 6 of Peoples' Response to Interrogatory No. 90.	(e)
2	Peoples' Response to Staff's Tenth Interrogatory No. 91	1	Y	Portions of lines 1, 2 and 3 of Peoples' Response to Interrogatory 91A.	(e)