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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. 136 of Staff's Eleventh 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.

AB/plb Attachment Andrew M. Brown

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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Jon C. Moyle, Jr., Esq./Karen A. Putnal, Esq. (jmoyle@moylelaw.com;

kputnal@moylelaw.com; mqualls@moylelaw.com)

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

_____/

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 its Response to Interrogatory No. 136 of Staff's Eleventh Set of Interrogatories, and in support thereof states:

- Peoples has previously filed a Notice of Intent to Request
 Confidential Treatment on these documents on October 9, 2020.
- 2. Peoples has produced documents 17214 17220 in response to Interrogatory No. 136 of Staff's Eleventh Set of Interrogatories.
 - 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,

Andrew M. Brown, Esq. Thomas R. Farrior, Esq.

Macfarlane Ferguson & McMullen

Post Office Box 1531 Tampa, Florida 33601 (813) 273-4300 ab@macfar.com

trf@macfar.com

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.jr@leg.state.fl.us

Jennifer S. Crawford, Esq. Kurt Schrader, Esq. Bianca Lherisson, Esq. Office of General Counsel Florida Public Service Commission 2540 Shumard Oak Boulevard Paula K. Brown
Regulatory Department
TECO Energy, Inc.
P.O. Box 111
Tampa, FL 33601-0111
regdept@tecoenergy.com

Kandi M. Floyd Peoples Gas System P.O. Box 111 Tampa, FL 33601-0111 kfloyd@tecoenergy.com Tallahassee, FL 32399-0850 jcrawfor@psc.state.fl.us kschrade@psc.state.fl.us blheriss@psc.state.fl.us

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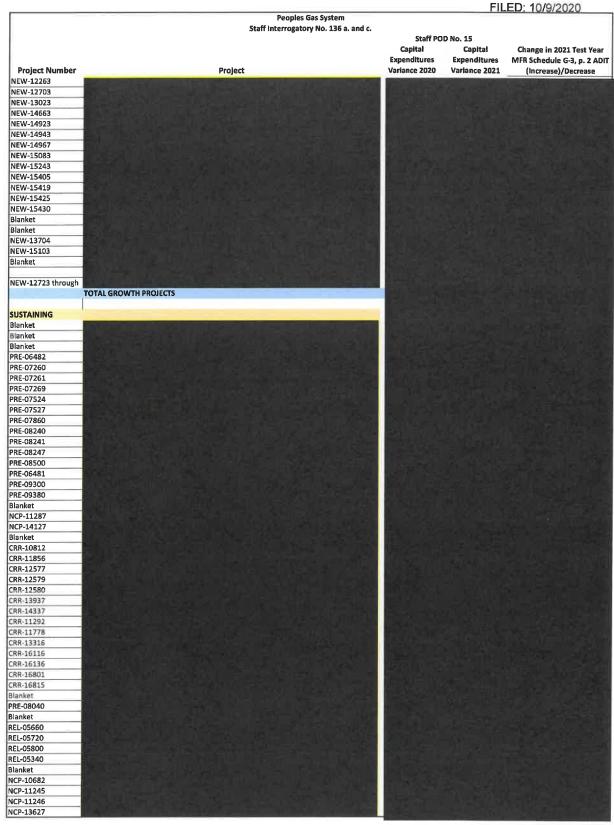
Florida Industrial Power Users Group c/o Jon C. Moyle, Jr.
Karen A. Putnal
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kputnal@moylelaw.com
mqualls@moylelaw.com

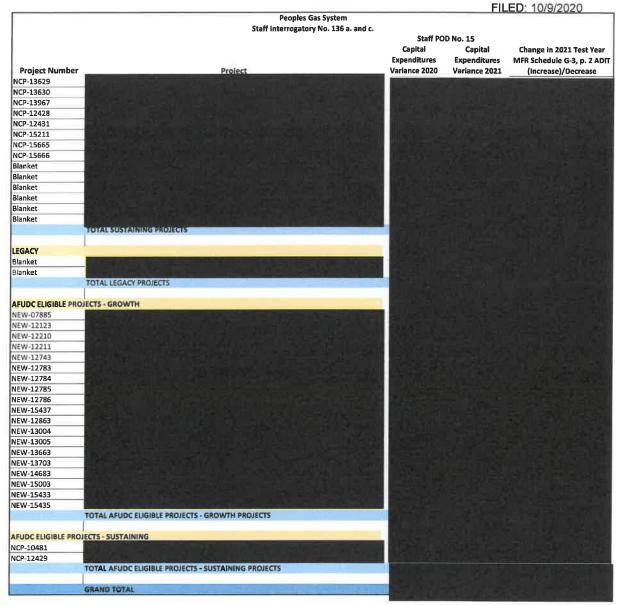
Andrew M. Brown, Esq.

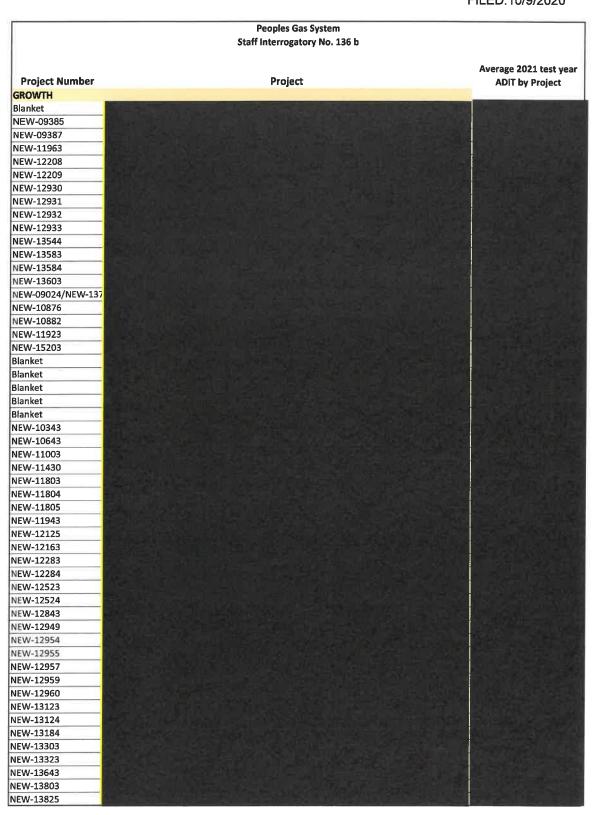
EXHIBIT A CONFIDENTIAL FILED UNDER SEPARATE COVER

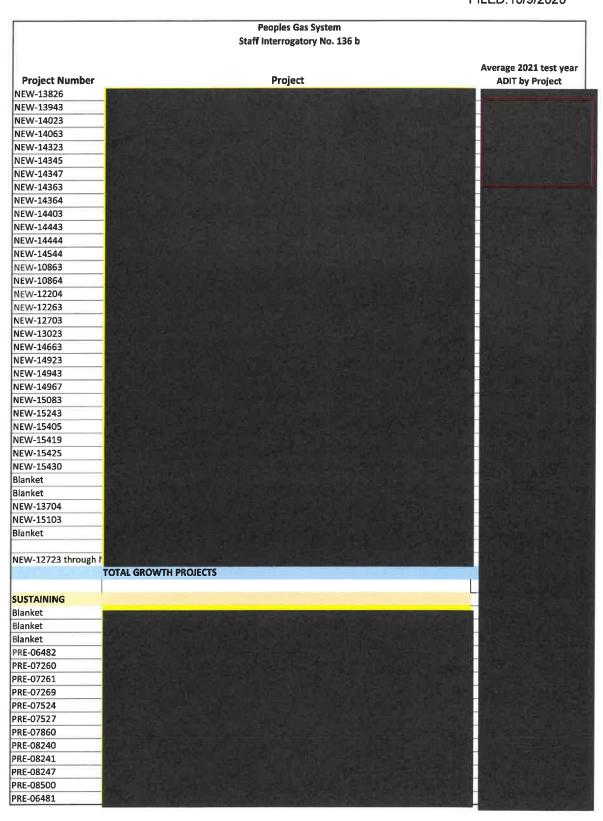
EXHIBIT B REDACTED COPIES

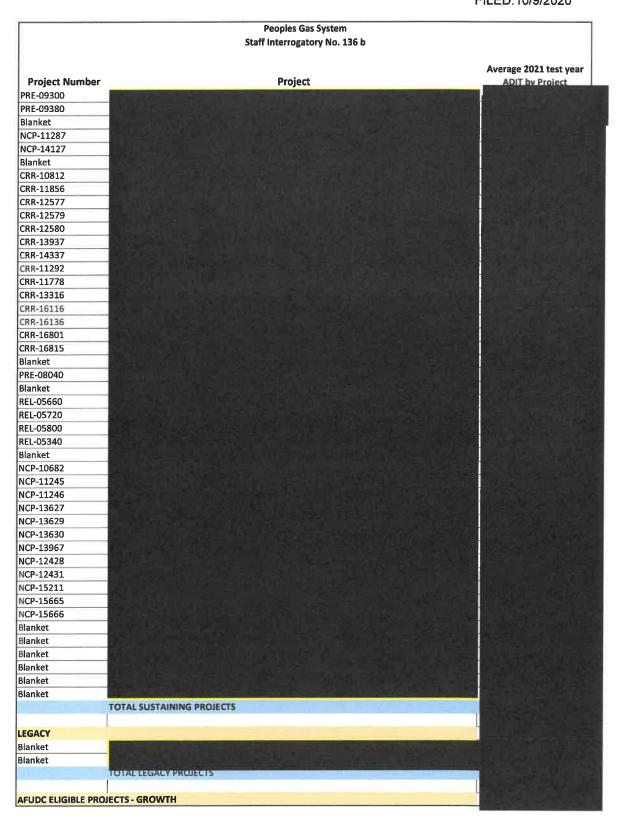
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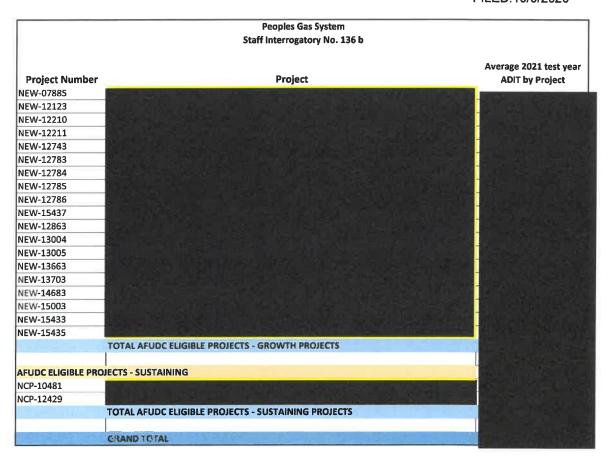


EXHIBIT C JUSTIFICATION TABLE

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) Subsecti on
1	BS 17214	1	Υ	Columns 2-5 excluding headers	(e)
2	BS 17215	1	Υ	Column 2-5, excluding headers	(e)
3	BS 17216	1	Υ	Column 2-5, excluding headers	(e)
4	BS 17217	1	Υ	Column 2-3, excluding headers	(e)
5	BS 17218	1	Υ	Column 2-3, excluding headers	(e)
6	BS 17219	1	Υ	Column 2-3, excluding headers	(e)
7	BS 17220	1	Υ	Column 2-3, excluding headers	(e)