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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,

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

1. 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,



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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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Andrew M. Brown, Esq.

EXHIBIT A

CONFIDENTIAL

FILED UNDER SEPARATE COVER

EXHIBIT B

REDACTED COPIES

Peoples Gas System Staff Interrogatory No. 136 a. and c.		Staff POD No. 15		Change in 2021 Test Year MFR Schedule G-3, p. 2 ADIT (Increase)/Decrease
Project Number	Project	Capital Expenditures Variance 2020	Capital Expenditures Variance 2021	
GROWTH				
Blanket				
NEW-09385				
NEW-09387				
NEW-11963				
NEW-12208				
NEW-12209				
NEW-12930				
NEW-12931				
NEW-12932				
NEW-12933				
NEW-13544				
NEW-13583				
NEW-13584				
NEW-13603				
NEW-09024/NEW-13				
NEW-10876				
NEW-10882				
NEW-11923				
NEW-15203				
Blanket				
Blanket				
Blanket				
Blanket				
Blanket				
NEW-10343				
NEW-10643				
NEW-11003				
NEW-11430				
NEW-11803				
NEW-11804				
NEW-11805				
NEW-11943				
NEW-12125				
NEW-12163				
NEW-12283				
NEW-12284				
NEW-12523				
NEW-12524				
NEW-12843				
NEW-12949				
NEW-12954				
NEW-12955				
NEW-12957				
NEW-12959				
NEW-12960				
NEW-13123				
NEW-13124				
NEW-13184				
NEW-13303				
NEW-13323				
NEW-13643				
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-10863				
NEW-10864				
NEW-12204				

Peoples Gas System Staff Interrogatory No. 136 a. and c.		Staff POD No. 15		Change in 2021 Test Year MFR Schedule G-3, p. 2 ADIT (Increase)/Decrease
Project Number	Project	Capital Expenditures Variance 2020	Capital Expenditures Variance 2021	
NEW-12263				
NEW-12703				
NEW-13023				
NEW-14663				
NEW-14923				
NEW-14943				
NEW-14967				
NEW-15083				
NEW-15243				
NEW-15405				
NEW-15419				
NEW-15425				
NEW-15430				
Blanket				
Blanket				
NEW-13704				
NEW-15103				
Blanket				
NEW-12723 through				
TOTAL GROWTH PROJECTS				
SUSTAINING				
Blanket				
Blanket				
Blanket				
PRE-06482				
PRE-07260				
PRE-07261				
PRE-07269				
PRE-07524				
PRE-07527				
PRE-07860				
PRE-08240				
PRE-08241				
PRE-08247				
PRE-08500				
PRE-06481				
PRE-09300				
PRE-09380				
Blanket				
NCP-11287				
NCP-14127				
Blanket				
CRR-10812				
CRR-11856				
CRR-12577				
CRR-12579				
CRR-12580				
CRR-13937				
CRR-14337				
CRR-11292				
CRR-11778				
CRR-13316				
CRR-16116				
CRR-16136				
CRR-16801				
CRR-16815				
Blanket				
PRE-08040				
Blanket				
REL-05660				
REL-05720				
REL-05800				
REL-05340				
Blanket				
NCP-10682				
NCP-11245				
NCP-11246				
NCP-13627				

Peoples Gas System Staff Interrogatory No. 136 a. and c.		Staff POD No. 15		Change in 2021 Test Year MFR Schedule G-3, p. 2 ADIT (Increase)/Decrease
Project Number	Project	Capital Expenditures Variance 2020	Capital Expenditures Variance 2021	
NCP-13629				
NCP-13630				
NCP-13967				
NCP-12428				
NCP-12431				
NCP-15211				
NCP-15665				
NCP-15666				
Blanket				
Blanket				
Blanket				
Blanket				
Blanket				
Blanket				
Blanket				
Blanket				
TOTAL SUSTAINING PROJECTS				
LEGACY				
Blanket				
Blanket				
TOTAL LEGACY PROJECTS				
AFUDC ELIGIBLE PROJECTS - GROWTH				
NEW-07885				
NEW-12123				
NEW-12210				
NEW-12211				
NEW-12743				
NEW-12783				
NEW-12784				
NEW-12785				
NEW-12786				
NEW-15437				
NEW-12863				
NEW-13004				
NEW-13005				
NEW-13663				
NEW-13703				
NEW-14683				
NEW-15003				
NEW-15433				
NEW-15435				
TOTAL AFUDC ELIGIBLE PROJECTS - GROWTH PROJECTS				
AFUDC ELIGIBLE PROJECTS - SUSTAINING				
NCP-10481				
NCP-12429				
TOTAL AFUDC ELIGIBLE PROJECTS - SUSTAINING PROJECTS				
GRAND TOTAL				

Peoples Gas System Staff Interrogatory No. 136 b		
Project Number	Project	Average 2021 test year ADIT by Project
GROWTH		
Blanket		
NEW-09385		
NEW-09387		
NEW-11963		
NEW-12208		
NEW-12209		
NEW-12930		
NEW-12931		
NEW-12932		
NEW-12933		
NEW-13544		
NEW-13583		
NEW-13584		
NEW-13603		
NEW-09024/NEW-137		
NEW-10876		
NEW-10882		
NEW-11923		
NEW-15203		
Blanket		
Blanket		
Blanket		
Blanket		
Blanket		
NEW-10343		
NEW-10643		
NEW-11003		
NEW-11430		
NEW-11803		
NEW-11804		
NEW-11805		
NEW-11943		
NEW-12125		
NEW-12163		
NEW-12283		
NEW-12284		
NEW-12523		
NEW-12524		
NEW-12843		
NEW-12949		
NEW-12954		
NEW-12955		
NEW-12957		
NEW-12959		
NEW-12960		
NEW-13123		
NEW-13124		
NEW-13184		
NEW-13303		
NEW-13323		
NEW-13643		
NEW-13803		
NEW-13825		

Peoples Gas System Staff Interrogatory No. 136 b		
Project Number	Project	Average 2021 test year ADIT by Project
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-10863		
NEW-10864		
NEW-12204		
NEW-12263		
NEW-12703		
NEW-13023		
NEW-14663		
NEW-14923		
NEW-14943		
NEW-14967		
NEW-15083		
NEW-15243		
NEW-15405		
NEW-15419		
NEW-15425		
NEW-15430		
Blanket		
Blanket		
NEW-13704		
NEW-15103		
Blanket		
NEW-12723 through 1		
TOTAL GROWTH PROJECTS		
SUSTAINING		
Blanket		
Blanket		
Blanket		
PRE-06482		
PRE-07260		
PRE-07261		
PRE-07269		
PRE-07524		
PRE-07527		
PRE-07860		
PRE-08240		
PRE-08241		
PRE-08247		
PRE-08500		
PRE-06481		

Peoples Gas System Staff Interrogatory No. 136 b		Average 2021 test year ADIT by Project
Project Number	Project	
PRE-09300		
PRE-09380		
Blanket		
NCP-11287		
NCP-14127		
Blanket		
CRR-10812		
CRR-11856		
CRR-12577		
CRR-12579		
CRR-12580		
CRR-13937		
CRR-14337		
CRR-11292		
CRR-11778		
CRR-13316		
CRR-16116		
CRR-16136		
CRR-16801		
CRR-16815		
Blanket		
PRE-08040		
Blanket		
REL-05660		
REL-05720		
REL-05800		
REL-05340		
Blanket		
NCP-10682		
NCP-11245		
NCP-11246		
NCP-13627		
NCP-13629		
NCP-13630		
NCP-13967		
NCP-12428		
NCP-12431		
NCP-15211		
NCP-15665		
NCP-15666		
Blanket		
Blanket		
Blanket		
Blanket		
Blanket		
Blanket		
	TOTAL SUSTAINING PROJECTS	
LEGACY		
Blanket		
Blanket		
	TOTAL LEGACY PROJECTS	
	AFUDC ELIGIBLE PROJECTS - GROWTH	

Peoples Gas System Staff Interrogatory No. 136 b		Average 2021 test year ADIT by Project
Project Number	Project	
NEW-07885		
NEW-12123		
NEW-12210		
NEW-12211		
NEW-12743		
NEW-12783		
NEW-12784		
NEW-12785		
NEW-12786		
NEW-15437		
NEW-12863		
NEW-13004		
NEW-13005		
NEW-13663		
NEW-13703		
NEW-14683		
NEW-15003		
NEW-15433		
NEW-15435		
TOTAL AFUDC ELIGIBLE PROJECTS - GROWTH PROJECTS		
AFUDC ELIGIBLE PROJECTS - SUSTAINING		
NCP-10481		
NCP-12429		
TOTAL AFUDC ELIGIBLE PROJECTS - SUSTAINING PROJECTS		
GRAND TOTAL		

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