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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**

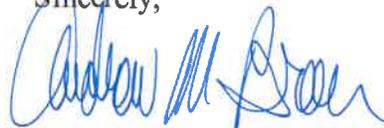
Dear Mr. Teitzman:

Enclosed for filing on behalf of Peoples Gas System (“Peoples”) is a Request for Confidential Treatment of certain portions of Peoples’ Responses to Nos. 23, 25, 28 and 29 of Staff’s Ninth Request for Production of Documents. 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))

Mr. Adam J. Teitzman  
Commission Clerk  
October 16, 2020  
Page 2

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[jcrawfor@psc.state.fl.us](mailto:jcrawfor@psc.state.fl.us); [blheriss@psc.state.fl.us](mailto:blheriss@psc.state.fl.us))

Jon C. Moyle, Jr., Esq./Karen A. Putnal, Esq. ([jmoyle@moylelaw.com](mailto:jmoyle@moylelaw.com);  
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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

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**PEOPLES GAS SYSTEM'S REQUEST FOR CONFIDENTIAL TREATMENT**

Pursuant to Section 366.093 and 1190.07, *Florida Statutes*, and Rule 25-22.006, *Florida Administrative Code*, Peoples Gas System ("Peoples") requests confidential Treatment to testimony by witnesses for the Office of Public Counsel ("OPC") who reviewed documents produced in response to Staff's Ninth Request for Production of Documents Nos. 23, 25, 28 and 29. In support of its request, Peoples states:

1. Peoples has previously filed a Notice of Intent to Request Confidential Treatment of these documents on October 9, 2020.

2. Peoples response to Staff's Ninth Request for Production of Documents Nos. 23, 25, 28 and 29 include certain financial information, the disclosure of which would impair Peoples competitive business.

3. The following exhibits are included with and made a part of this request:

a. Exhibit A consists of a copy of the confidential pages on which all information that Peoples asserts is 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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[trf@macfar.com](mailto: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.ir@leg.state.fl.us](mailto:kelly.ir@leg.state.fl.us)

Paula K. Brown  
Regulatory Department  
TECO Energy, Inc.  
P.O. Box 111  
Tampa, FL 33601-0111  
[regdept@tecoenergy.com](mailto:regdept@tecoenergy.com)

Jennifer S. Crawford, Esq.  
Kurt Schrader, Esq.  
Bianca Lherisson, Esq.  
Office of General Counsel  
Florida Public Service Commission  
2540 Shumard Oak Boulevard  
Tallahassee, FL 32399-0850

Kandi M. Floyd  
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Tampa, FL 33601-0111  
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[jcrawfor@psc.state.fl.us](mailto:jcrawfor@psc.state.fl.us)  
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Mireille Fall-Fry, Esq.  
Associate Public Counsel  
Office of Public Counsel  
c/o The Florida Legislature  
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Tallahassee, FL 32399-1400  
[fall-fry.mireille@leg.state.fl.us](mailto:fall-fry.mireille@leg.state.fl.us)

Florida Industrial Power Users Group  
c/o Jon C. Moyle, Jr.  
Karen A. Putnal  
Moyle Law Firm, P.A.  
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Tallahassee, FL 32301  
[jmoyle@moylelaw.com](mailto:jmoyle@moylelaw.com)  
[kputnal@moylelaw.com](mailto:kputnal@moylelaw.com)  
[mqualls@moylelaw.com](mailto:mqualls@moylelaw.com)



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Andrew M. Brown, Esq.

**EXHIBIT A**

**CONFIDENTIAL**

**FILED UNDER SEPARATE COVER**

# **EXHIBIT B**

## **REDACTED COPIES**



2020 - RES



2020 - Small COM Rates













HEALTH WEALTH CAREER

# COMPENSATION STRUCTURE DEVELOPMENT – PEOPLES GAS SYSTEM



03 SEPTEMBER 2019

***Preliminary Draft***

**DISCUSSION DRAFT  
STRICTLY PRIVATE & CONFIDENTIAL**

*The information included in this report is strictly confidential and is proprietary to Mercer. Any unauthorized use and / or distribution of this material are strictly prohibited unless explicitly agreed to in advance and in writing by Mercer.*



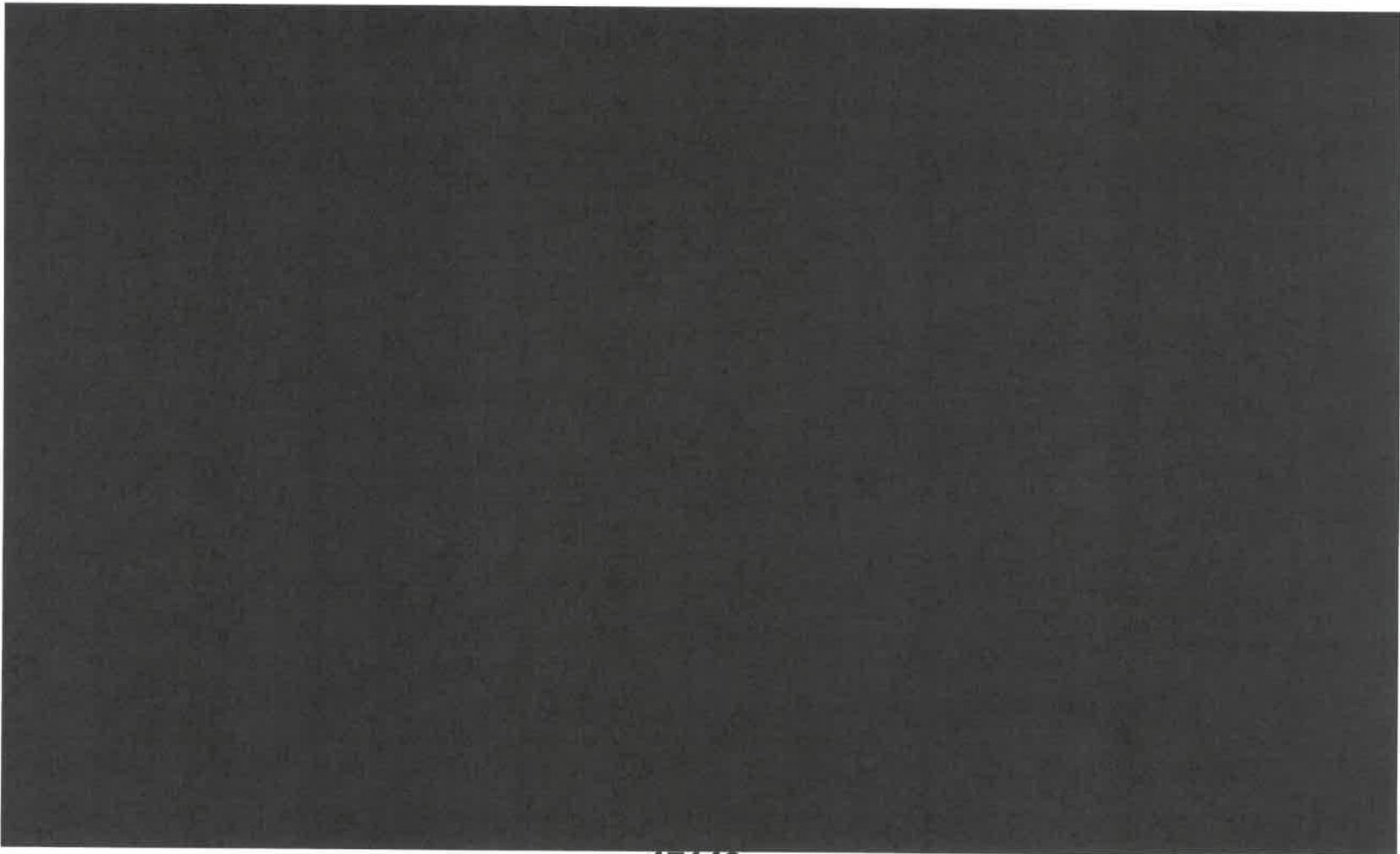
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| Executive Summary                                       | 3    |
| Current State Overview                                  | 5    |
| Market Benchmarking                                     | 7    |
| Proposed Compensation Structure (Base salary, STI, LTI) | 11   |
| Penetration Analysis and Costing                        | 14   |

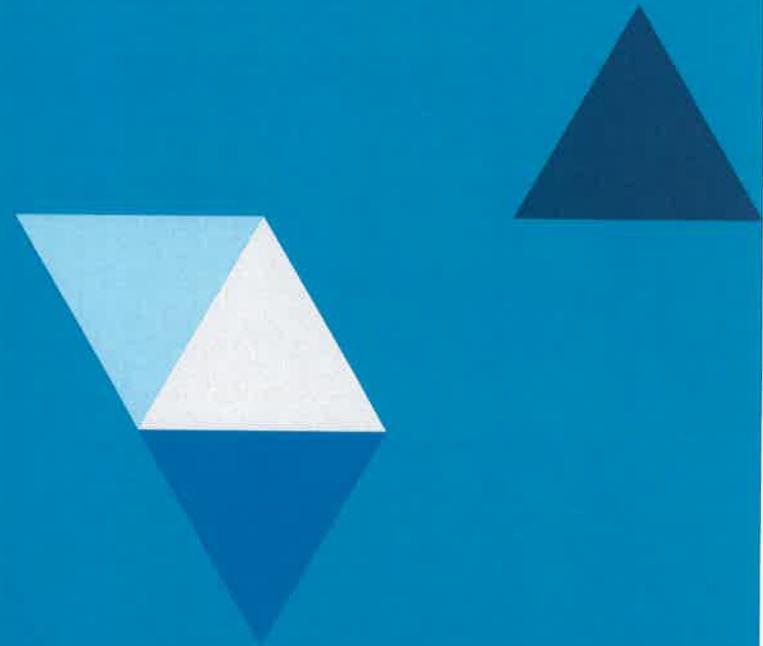
**HIGHLY CONFIDENTIAL**

PEOPLES GAS SYSTEM  
DOCKET NO. 20200051-GU  
STAFF'S NINTH REQUEST FOR  
PRODUCTION OF DOCUMENTS  
REQUEST NO. 25  
FILED: OCTOBER 9, 2020

## **INTRODUCTION**



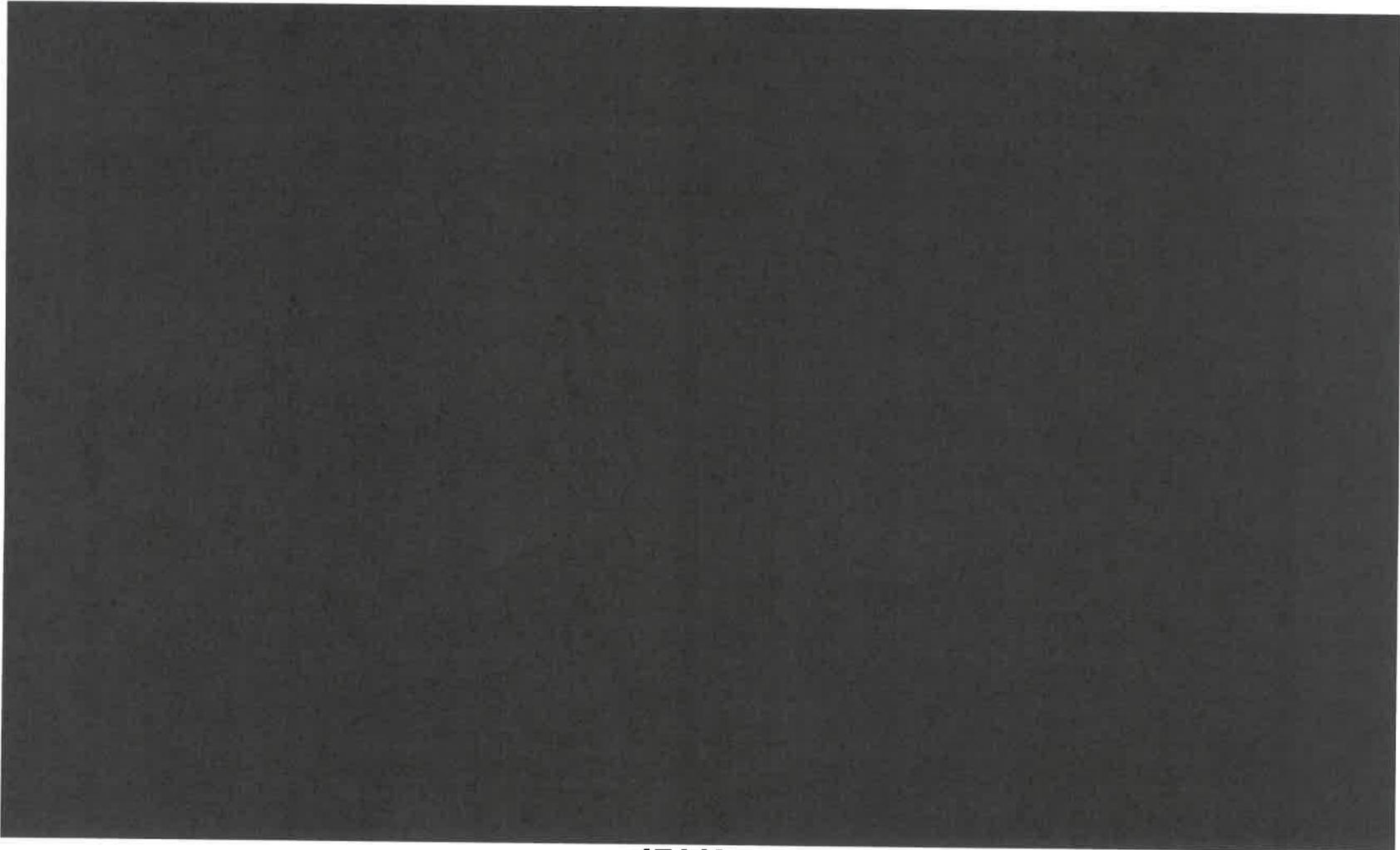
# EXECUTIVE SUMMARY



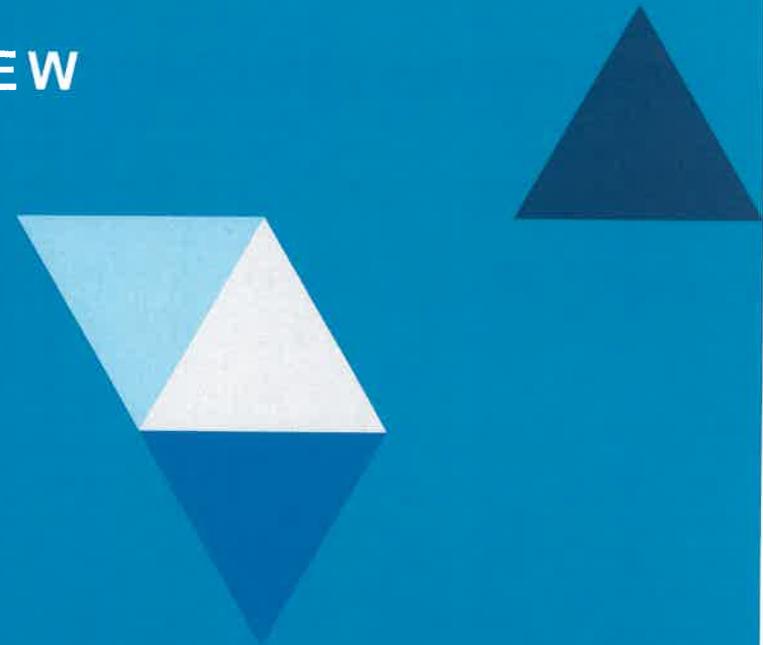
**HIGHLY CONFIDENTIAL**

PEOPLES GAS SYSTEM  
DOCKET NO. 20200051-GU  
STAFF'S NINTH REQUEST FOR  
PRODUCTION OF DOCUMENTS  
REQUEST NO. 25  
FILED: OCTOBER 9, 2020

**EXECUTIVE SUMMARY  
BY THE NUMBERS**



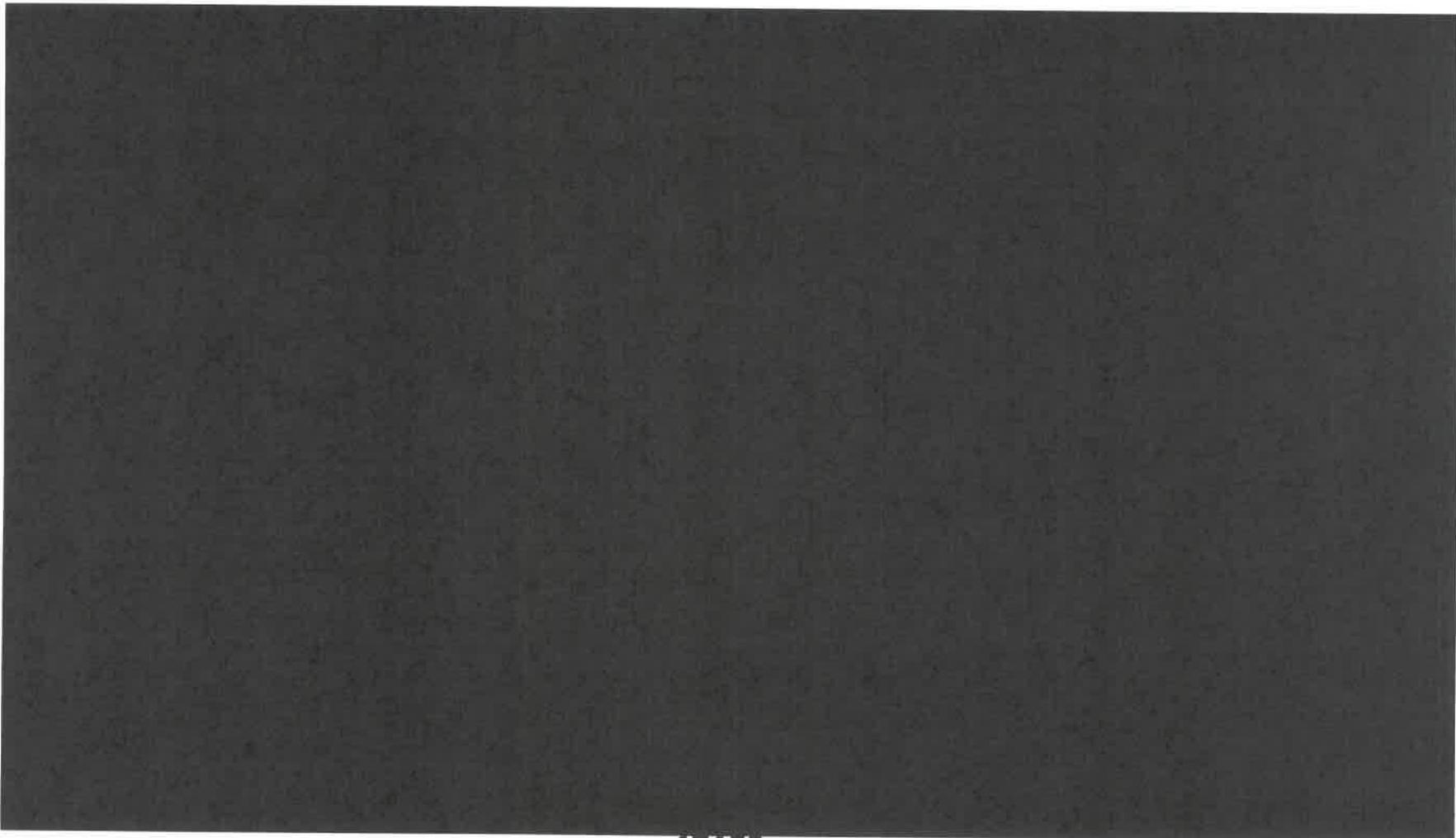
# CURRENT STATE OVERVIEW



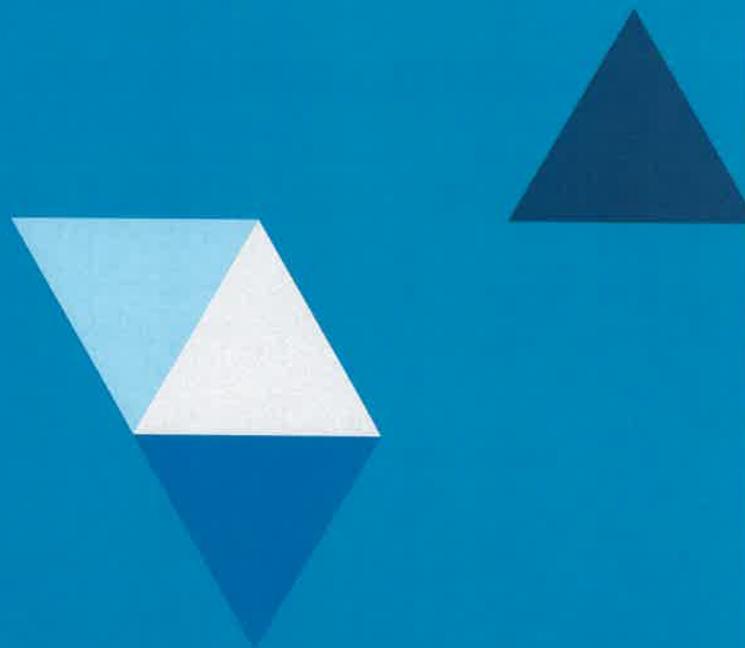
**HIGHLY CONFIDENTIAL**

PEOPLES GAS SYSTEM  
DOCKET NO. 20200051-GU  
STAFF'S NINTH REQUEST FOR  
PRODUCTION OF DOCUMENTS  
REQUEST NO. 25  
FILED: OCTOBER 9, 2020

**CURRENT STATE OVERVIEW**  
**PAY LEVEL DISTRIBUTION TARGET TOTAL DIRECT**



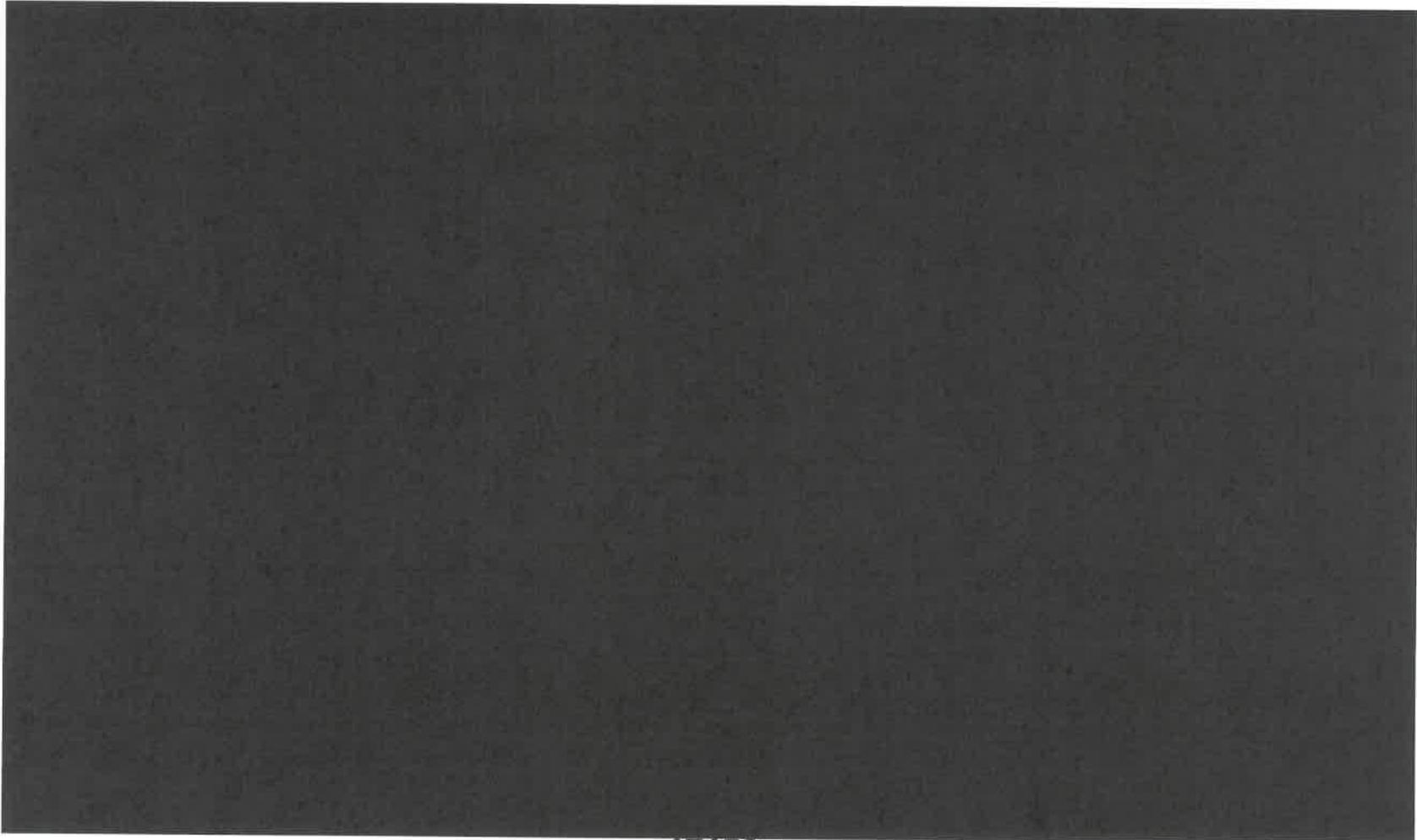
# MARKET BENCHMARKING



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PEOPLES GAS SYSTEM  
DOCKET NO. 20200051-GU  
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PRODUCTION OF DOCUMENTS  
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FILED: OCTOBER 9, 2020

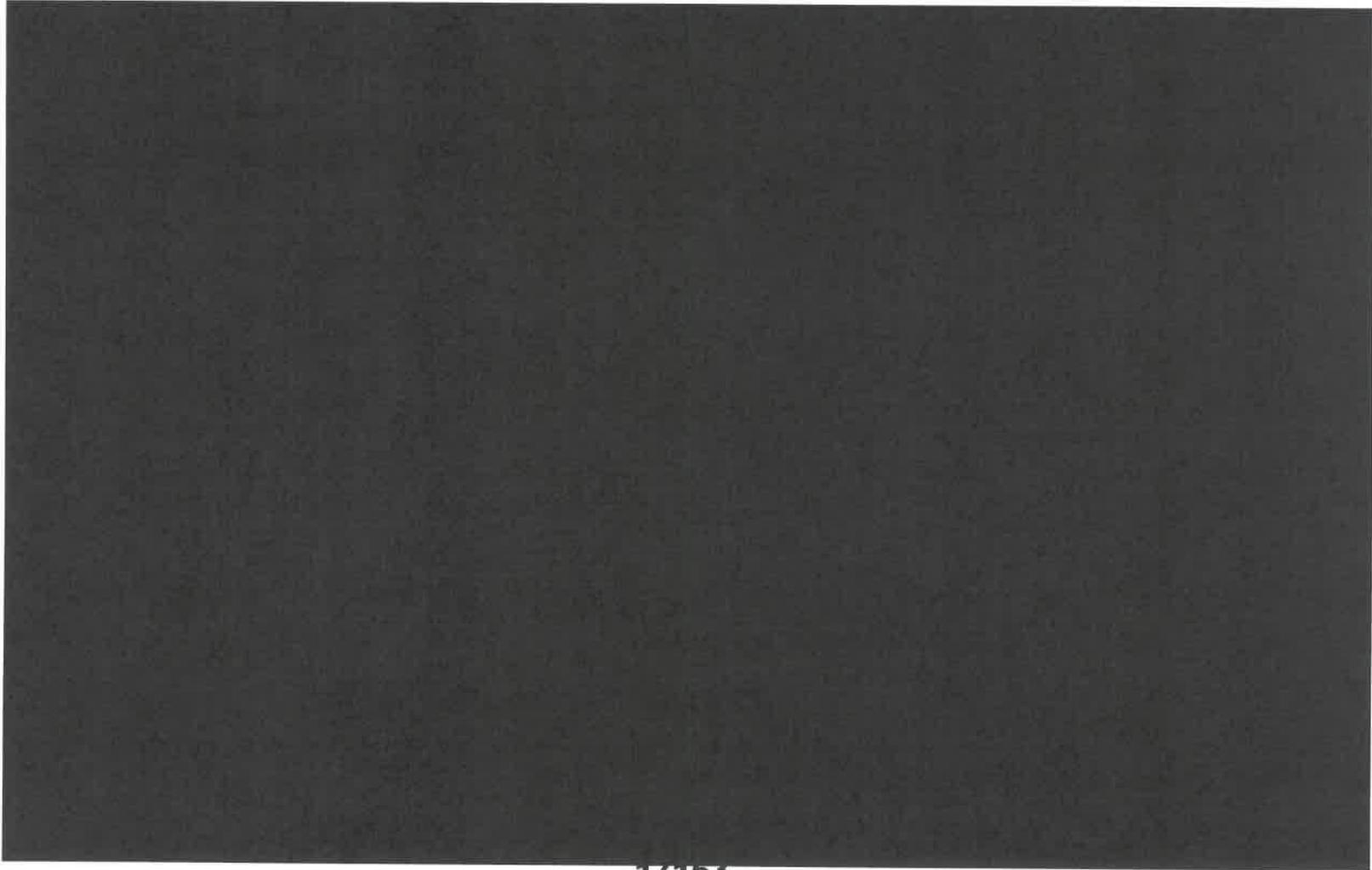
**MARKET BENCHMARKING  
METHODOLOGY**



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PEOPLES GAS SYSTEM  
DOCKET NO. 20200051-GU  
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REQUEST NO. 25  
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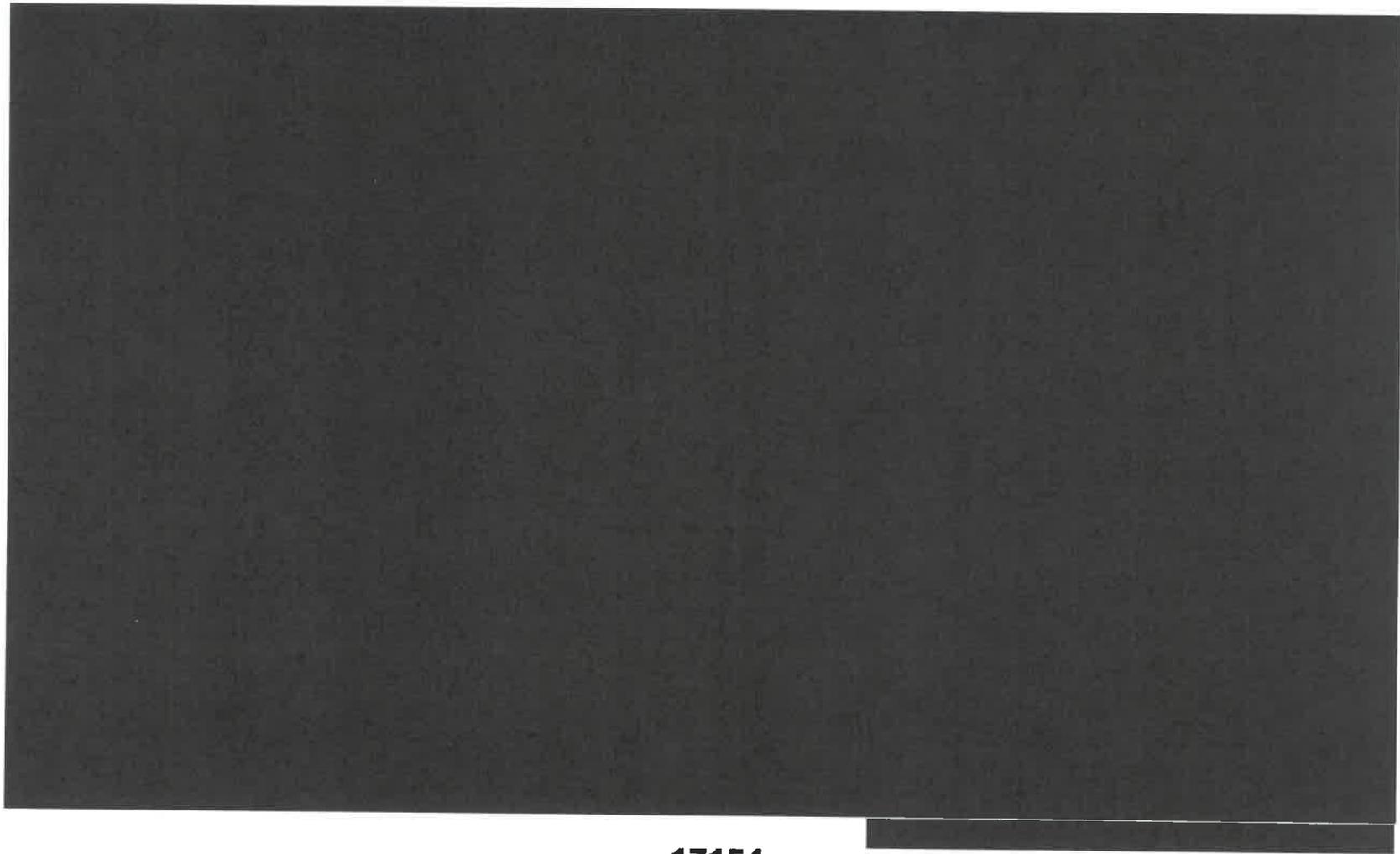
**MARKET BENCHMARKING  
BASE SALARY PAYLINE**



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PEOPLES GAS SYSTEM  
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**MARKET BENCHMARKING  
TARGET TOTAL DIRECT PAYLINE**

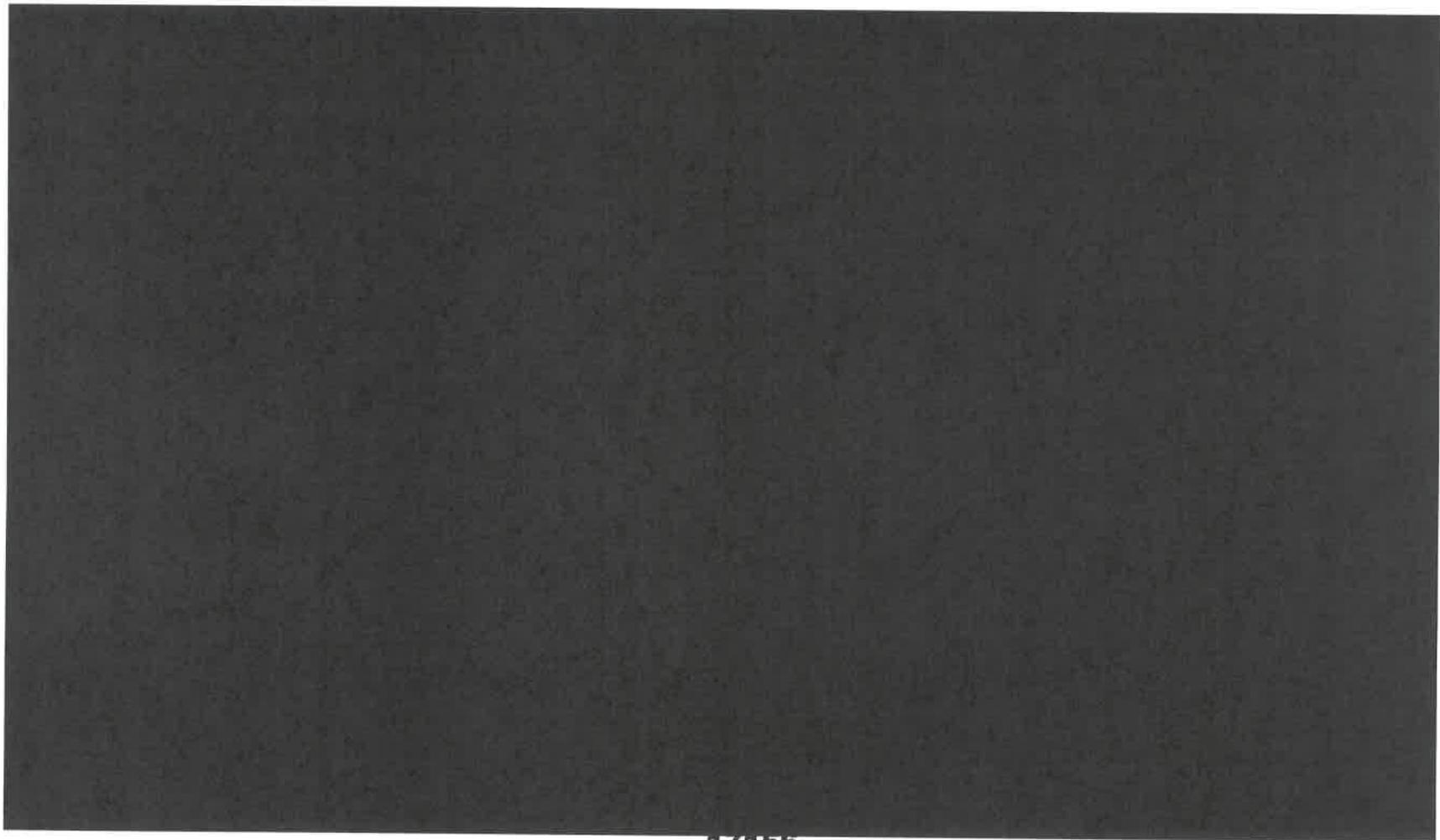


# PROPOSED COMPENSATION STRUCTURE

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PEOPLES GAS SYSTEM  
DOCKET NO. 20200051-GU  
STAFF'S NINTH REQUEST FOR  
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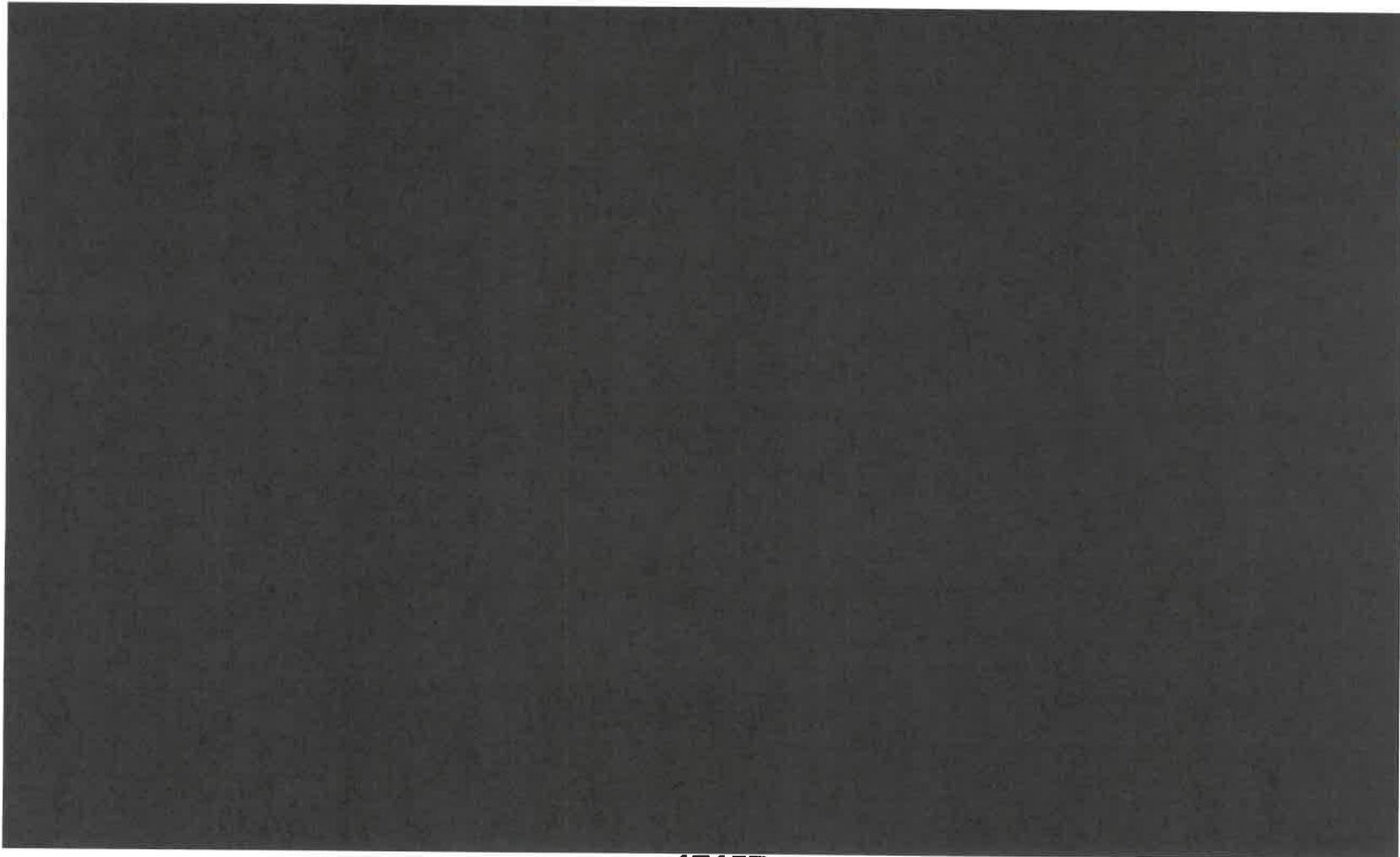
**PROPOSED COMPENSATION STRUCTURE  
PROPOSED STRUCTURE**



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PEOPLES GAS SYSTEM  
DOCKET NO. 20200051-GU  
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**PROPOSED COMPENSATION STRUCTURE  
SHORT-TERM AND LONG-TERM INCENTIVES**



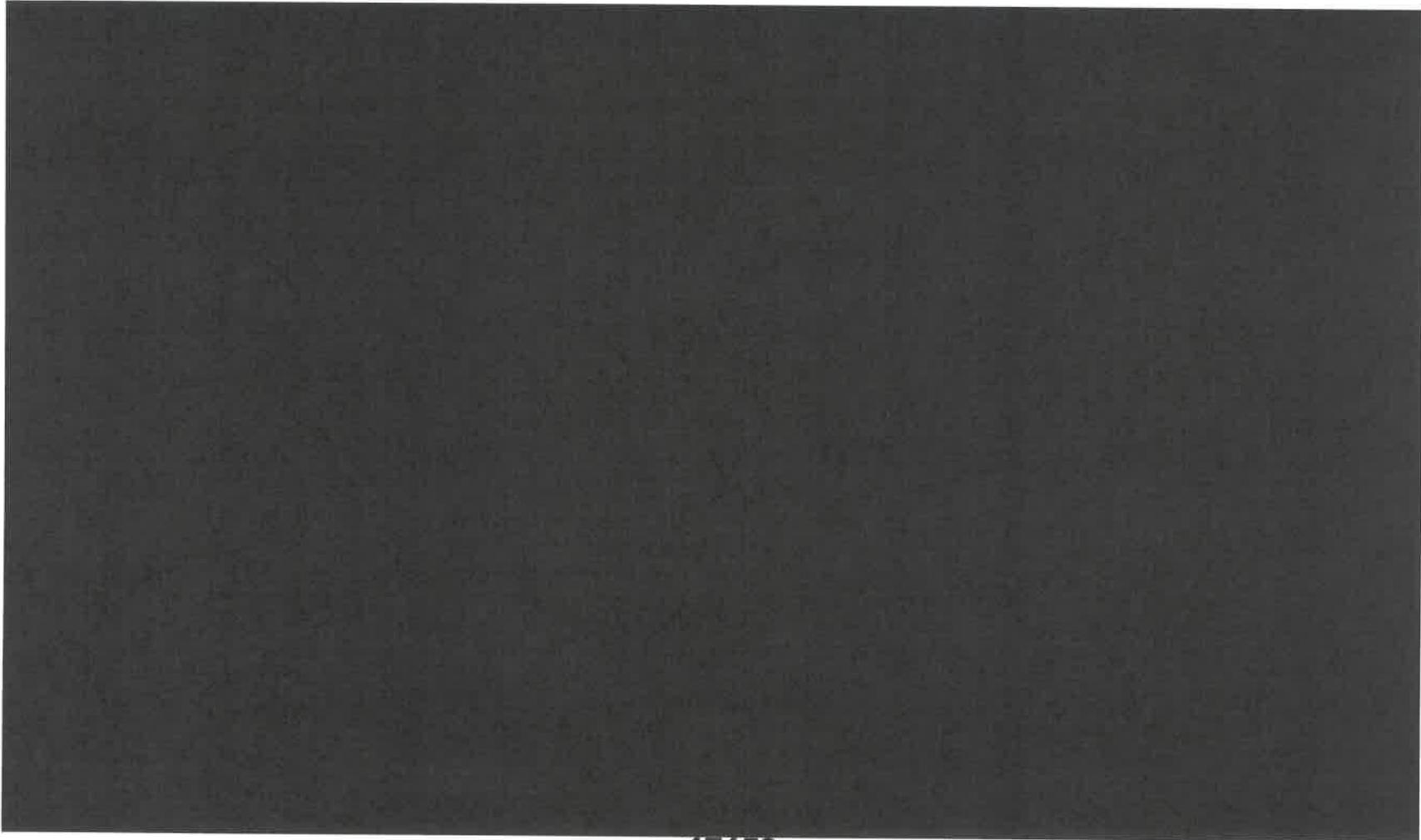
# PENETRATION ANALYSIS AND COSTING



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PEOPLES GAS SYSTEM  
DOCKET NO. 20200051-GU  
STAFF'S NINTH REQUEST FOR  
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REQUEST NO. 25  
FILED: OCTOBER 9, 2020

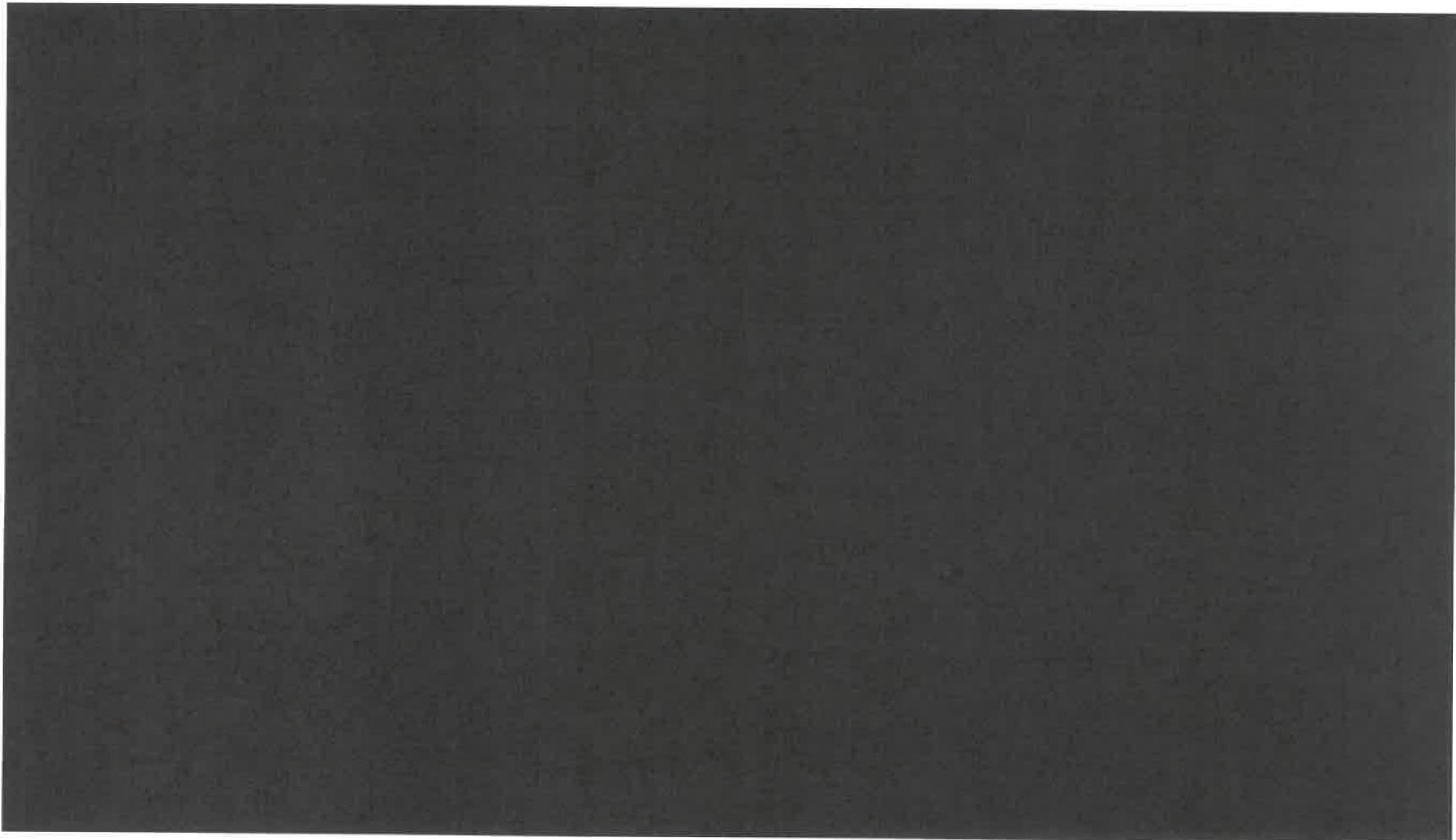
**PENETRATION ANALYSIS, COSTING AND PEOPLE IMPACT  
BASE SALARY – PENETRATION AND COSTING ANALYSIS**



**HIGHLY CONFIDENTIAL**

PEOPLES GAS SYSTEM  
DOCKET NO. 20200051-GU  
STAFF'S NINTH REQUEST FOR  
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**PENETRATION ANALYSIS, COSTING AND PEOPLE IMPACT  
TARGET TOTAL DIRECT COMPENSATION – PENETRATION AND  
COSTING ANALYSIS**



**HIGHLY CONFIDENTIAL**

PEOPLES GAS SYSTEM  
DOCKET NO. 20200051-GU  
STAFF'S NINTH REQUEST FOR  
PRODUCTION OF DOCUMENTS  
REQUEST NO. 25  
FILED: OCTOBER 9, 2020



**Consumer Price Index-All Urban Consumers**

Series Catalog:  
Series ID : CUUR0000SA0  
Not Seasonally Adjusted  
Area : U.S. city average  
Item : All items  
Base Period : 1982-84=100

Source for History: <http://stats.bls.gov/cpihome.htm>; Most Requested Series: <http://146.142.4.24/cgi-bin/survey/most7cu>; U.S. All Items, 1982-84=100 - CUUR0000SA0, not seasonally adjusted

Source for Forecast: Moody's Analytics; CPI - All Urban Consumers, Not Seasonally Adjusted

Data:

| Year | Jan | Feb | Mar | Apr | May | Jun | Jul | Aug | Sep | Oct | Nov | Dec | Annual |
|------|-----|-----|-----|-----|-----|-----|-----|-----|-----|-----|-----|-----|--------|
| 1991 |     |     |     |     |     |     |     |     |     |     |     |     |        |
| 1992 |     |     |     |     |     |     |     |     |     |     |     |     |        |
| 1993 |     |     |     |     |     |     |     |     |     |     |     |     |        |
| 1994 |     |     |     |     |     |     |     |     |     |     |     |     |        |
| 1995 |     |     |     |     |     |     |     |     |     |     |     |     |        |
| 1996 |     |     |     |     |     |     |     |     |     |     |     |     |        |
| 1997 |     |     |     |     |     |     |     |     |     |     |     |     |        |
| 1998 |     |     |     |     |     |     |     |     |     |     |     |     |        |
| 1999 |     |     |     |     |     |     |     |     |     |     |     |     |        |
| 2000 |     |     |     |     |     |     |     |     |     |     |     |     |        |
| 2001 |     |     |     |     |     |     |     |     |     |     |     |     |        |
| 2002 |     |     |     |     |     |     |     |     |     |     |     |     |        |
| 2003 |     |     |     |     |     |     |     |     |     |     |     |     |        |
| 2004 |     |     |     |     |     |     |     |     |     |     |     |     |        |
| 2005 |     |     |     |     |     |     |     |     |     |     |     |     |        |
| 2006 |     |     |     |     |     |     |     |     |     |     |     |     |        |
| 2007 |     |     |     |     |     |     |     |     |     |     |     |     |        |
| 2008 |     |     |     |     |     |     |     |     |     |     |     |     |        |
| 2009 |     |     |     |     |     |     |     |     |     |     |     |     |        |
| 2010 |     |     |     |     |     |     |     |     |     |     |     |     |        |
| 2011 |     |     |     |     |     |     |     |     |     |     |     |     |        |
| 2012 |     |     |     |     |     |     |     |     |     |     |     |     |        |
| 2013 |     |     |     |     |     |     |     |     |     |     |     |     |        |
| 2014 |     |     |     |     |     |     |     |     |     |     |     |     |        |
| 2015 |     |     |     |     |     |     |     |     |     |     |     |     |        |
| 2016 |     |     |     |     |     |     |     |     |     |     |     |     |        |
| 2017 |     |     |     |     |     |     |     |     |     |     |     |     |        |
| 2018 |     |     |     |     |     |     |     |     |     |     |     |     |        |
| 2019 |     |     |     |     |     |     |     |     |     |     |     |     |        |

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**17162**

PEOPLES GAS SYSTEM  
DOCKET NO. 20200051-GU  
DOCKET NO. 20200166-GU  
STAFF'S NINTH REQUEST FOR  
PRODUCTION OF DOCUMENTS  
REQUEST NO. 28  
FILED: 10/9/2020

**Consumer Price Index-All Urban Consumers**

Series Catalog:  
 Series ID : CUUR0000SA0  
 Not Seasonally Adjusted  
 Area : U.S. city average  
 Item : All Items  
 Base Period : 1982-84=100

Source for History: <http://stats.bls.gov/cpihome.htm>; Most Requested Series: <http://146.142.4.24/cgi-bin/surveymost?cu>; U.S. All Items, 1982-84=100 - CUUR0000SA0, not seasonally adjusted

Source for Forecast: Moody's Analytics; CPI - All Urban Consumers, Not Seasonally Adjusted

Data:

| Year | Jan | Feb | Mar | Apr | May | Jun | Jul | Aug | Sep | Oct | Nov | Dec | Annual |
|------|-----|-----|-----|-----|-----|-----|-----|-----|-----|-----|-----|-----|--------|
| 1991 |     |     |     |     |     |     |     |     |     |     |     |     |        |
| 1992 |     |     |     |     |     |     |     |     |     |     |     |     |        |
| 1993 |     |     |     |     |     |     |     |     |     |     |     |     |        |
| 1994 |     |     |     |     |     |     |     |     |     |     |     |     |        |
| 1995 |     |     |     |     |     |     |     |     |     |     |     |     |        |
| 1996 |     |     |     |     |     |     |     |     |     |     |     |     |        |
| 1997 |     |     |     |     |     |     |     |     |     |     |     |     |        |
| 1998 |     |     |     |     |     |     |     |     |     |     |     |     |        |
| 1999 |     |     |     |     |     |     |     |     |     |     |     |     |        |
| 2000 |     |     |     |     |     |     |     |     |     |     |     |     |        |
| 2001 |     |     |     |     |     |     |     |     |     |     |     |     |        |
| 2002 |     |     |     |     |     |     |     |     |     |     |     |     |        |
| 2003 |     |     |     |     |     |     |     |     |     |     |     |     |        |
| 2004 |     |     |     |     |     |     |     |     |     |     |     |     |        |
| 2005 |     |     |     |     |     |     |     |     |     |     |     |     |        |
| 2006 |     |     |     |     |     |     |     |     |     |     |     |     |        |
| 2007 |     |     |     |     |     |     |     |     |     |     |     |     |        |
| 2008 |     |     |     |     |     |     |     |     |     |     |     |     |        |
| 2009 |     |     |     |     |     |     |     |     |     |     |     |     |        |
| 2010 |     |     |     |     |     |     |     |     |     |     |     |     |        |
| 2011 |     |     |     |     |     |     |     |     |     |     |     |     |        |
| 2012 |     |     |     |     |     |     |     |     |     |     |     |     |        |
| 2013 |     |     |     |     |     |     |     |     |     |     |     |     |        |
| 2014 |     |     |     |     |     |     |     |     |     |     |     |     |        |
| 2015 |     |     |     |     |     |     |     |     |     |     |     |     |        |
| 2016 |     |     |     |     |     |     |     |     |     |     |     |     |        |
| 2017 |     |     |     |     |     |     |     |     |     |     |     |     |        |
| 2018 |     |     |     |     |     |     |     |     |     |     |     |     |        |

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**17163**

PEOPLES GAS SYSTEM  
 DOCKET NO. 20200051-GU  
 DOCKET NO. 20200166-GU  
 STAFF'S NINTH REQUEST FOR  
 PRODUCTION OF DOCUMENTS  
 REQUEST NO. 29  
 FILED: 10/9/2020

**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 366.093(3) Subsection</b> |
|-----------------|----------------------------------|---------------------|------------------|---|--|
| 1               | Response to Staff's 23           |                     | Y                | 1) Line 33, Column F and K.<br>2) Graphs associated with data | (e)  |
| 2               | Response to Staff's 25; p. 17146 | 1                   | Y                | Everything except title                                       | (e)  |
| 3               | Response to Staff's 25, p. 17148 | 1                   | Y                | Everything except title                                       | (e)  |
| 4               | Response to Staffs 25, p. 17150  | 1                   | Y                | Everything except title                                       | (e)  |
| 5               | Response to Staff's 25, p. 17152 | 1                   | Y                | Everything except title                                       | (e)  |
| 6               | Response to Staff's 25, p. 17153 | 1                   | Y                | Everything except title                                       | (e)  |
| 7               | Response to Staff's 25, p. 17154 | 1                   | Y                | Everything except title                                       | (e)  |
| 8               | Response to Staff's 25, p. 17156 | 1                   | Y                | Everything except title                                       | (e)  |
| 9               | Response to Staff's 25, p. 17157 | 1                   | Y                | Everything except title                                       | (e)  |
| 10.             | Response to Staff's 25, p. 17159 | 1                   | Y                | Everything except title                                       | (e)  |

|     |                                  |   |   |                                 |          |
|-----|----------------------------------|---|---|---------------------------------|----------|
| 11. | Response to Staff's 25, p. 17160 | 1 | Y | Everything except title         | (e)      |
| 12. | Response to Staff's 28; p. 17162 | 1 | Y | Columns 2-15 except for headers | (d), (e) |
| 13. | Response to Staff's 29; p. 17163 | 1 | Y | Columns 2-15 except for headers | (d), (e) |