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April 8, 2021

VIA E-PORTAL FILING

Mr. Adam J. Teitzman
Commission Clerk
Florida Public Service Commission
2540 Shumard Oak Boulevard
Tallahassee, Florida 32399-0850

In Re: Petition for Approval of Tariff Modifications for Liquefied Natural Gas
Service by Peoples Gas System, Docket No. 20200093-GU

Dear Mr. Teitzman:

Attached for electronic filing in the above docket, on behalf of Peoples Gas System, please find its Request for Confidential Treatment of response to 1c in Peoples Gas System's Response to Staff's Third Data Request (Nos. 1-3).

Exhibit 1 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.

Very truly yours,

Andrew M. Brown

AB/plb

Attachments

cc: Walt Trierweiler, Esq. (wtrierwe@psc.state.fl.us)
Richard Gentry, Esq. (gentry.richard@leg.state.fl.us)
Stephanie Morse, Esq. (morse.stephanie@leg.state.fl.us)
Ms. Paula K. Brown
Ms. Kandi Floyd
Derrick MacDonald, CPA
Thomas R. Farrior, Esq.

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Petition for approval of Tariff Modifications :
for Liquified Natural Gas Service by Peoples : Docket No.:20200093-GU
Gas System : Submitted for Filing: April 8, 2021

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

Pursuant to Section 366.093, *Florida Statutes*, Peoples Gas System (“Peoples” or the “Company”) submits the following Request for Confidential Treatment of Peoples Gas System’s Response to Paragraph 1c of the Staff’s Third Data Request (Nos. 1-3), which response is submitted for filing concurrently herewith:

1. The following exhibits are included with and made a part of this request:
 - a. Exhibit 1 consists of a copy of Peoples Gas System’s response to portions of Paragraph 1c on which all information that Peoples asserts is entitled to confidential treatment has been highlighted.
 - b. Exhibit 2 consists of a copy of Exhibit A on which all information that Peoples asserts is entitled to confidential treatment has been redacted.
 - c. Exhibit 3 is a table containing an identification of the information highlighted in Exhibit 1, together with references to the specific statutory basis or bases for the claim of confidentiality.
2. Peoples submits that the highlighted information in Exhibit 1 is proprietary confidential business information within the meaning of Section 366.093(3), *Florida Statutes*.
3. 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.

4. 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.

5. 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.

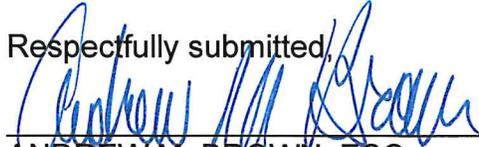
6. Once the Commission determines that the information in question is proprietary confidential business information, the Commission is not required to engage in any further analysis or review such as weighing the harm of disclosure against the public interest in access to the information.

7. Peoples requests that the information for which it seeks confidential classification not be declassified until 18 months after the date of the Commission's order granting this request (see Section 366.093(4), Florida Statutes). The information consists of documents including presentations and email communication and draft contract proposals between Peoples and potential customers of the LNG service from Peoples. The confidential treatment sought by Peoples is necessary to protect the competitive information referenced above from disclosure to Peoples' competitors and to other LNG customers in order to allow Peoples, should it become necessary, to negotiate future LNG service arrangements with other suppliers or customers on favorable terms based on the specific factual circumstances in existence at the time.

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 true and correct copies of the foregoing has been furnished via electronic mail, this 8th day of April, 2021, to the following:

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Andrew M. Brown, Esq.

EXHIBIT 1

CONFIDENTIAL

FILED UNDER SEPARATE COVER

EXHIBIT 2

REDACTED COPIES

REDACTED

PEOPLES GAS SYSTEM
DOCKET NO. 20200093-GU
STAFF'S THIRD DATA REQUEST
REQUEST NO. 1
PAGE 3 OF 3
FILED: APRIL 8, 2021

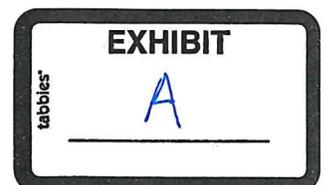
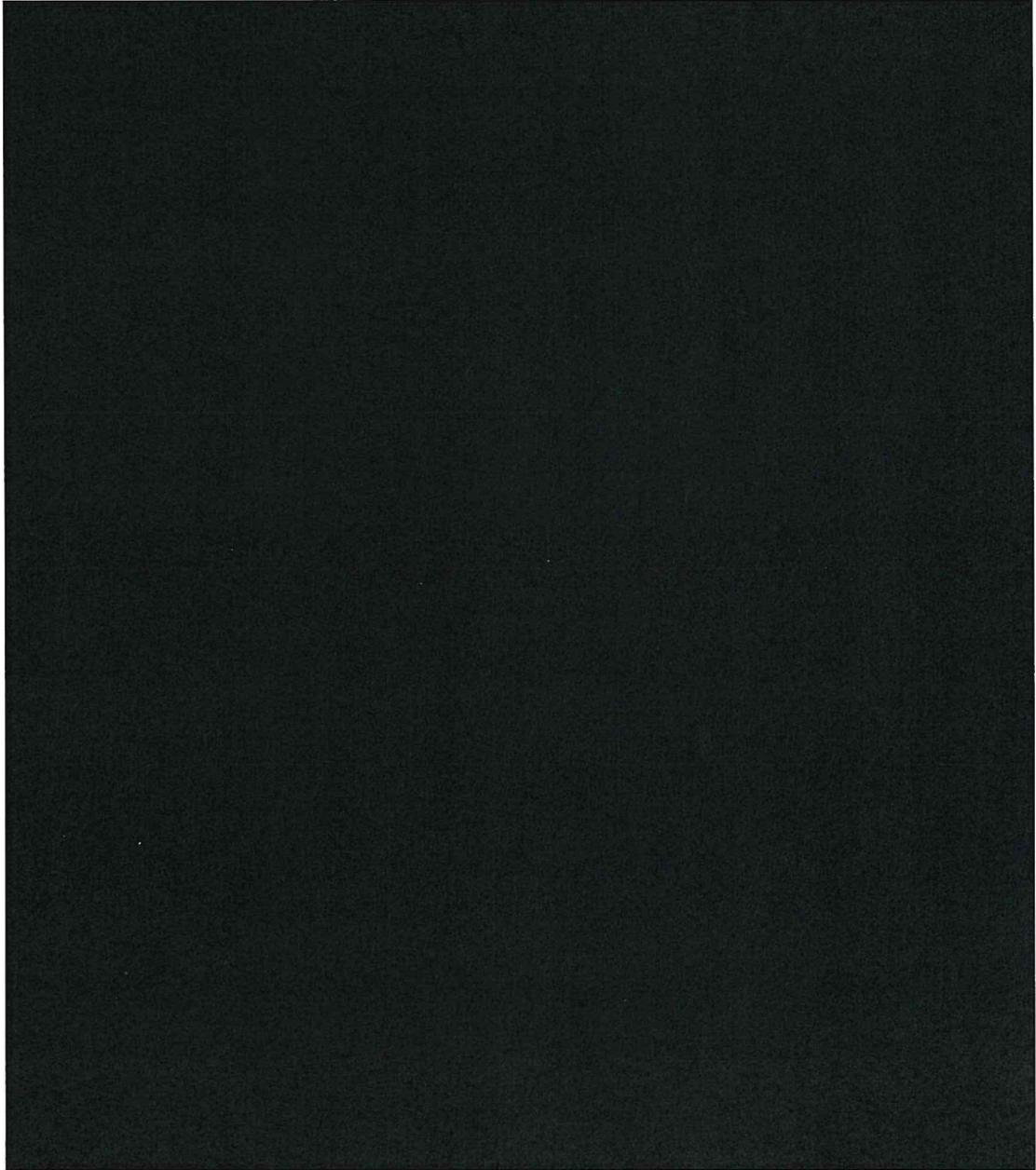


EXHIBIT 3

JUSTIFICATION TABLE

EXHIBIT 3

Company: Peoples Gas System

Title: List of Confidential Documents Included in Peoples' Request for Confidential Treatment

Docket No.: 20200093-GU

Document	Description	No. of Pages	Conf. Y/N	Line No./Col. No.	Florida Statute 366.093(3) Subsection
1	Peoples Gas System's Response to Paragraph a portion of 1c of Staff's Third Data Request (Nos. 1-3)	1	Y	A chart on page 3 which has two columns entitled Income Statement and Facility Charge Calculation, along with a column entitled Balance Sheet towards the lower half of the page.	(a), (d), (e)