

FILED 4/14/2023 DOCUMENT NO. 02684-2023 FPSC - COMMISSION CLERK

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April 14, 2023

# VIA ELECTRONIC FILING

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

Re: Docket No. 20230023-GU; Petition for Rate Increase by Peoples Gas System, Inc.

Docket No. 20220212-GU; Peoples Gas System, Inc.'s Petition for Approval of Depreciation Rate and Subaccount for Renewable Natural Gas Facilities Leased to Others

Dear Mr. Teitzman:

Attached for filing in the above docket is Peoples Gas System, Inc.'s Request for Confidential Classification of certain information contained in the company's response to Staff's Third Data Request (Nos. 1-7), served by electronic mail on March 24, 2023.

Peoples is filing these documents in Docket No. 20230023 in compliance with Order PSC-2023-0128-PCO-GU.

Thank you for your assistance in connection with this matter.

Sincerely,

Millien n. Means

Malcolm N. Means

MNM/bml Attachment cc: All parties of record.

### BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

Petition for Rate Increase by Peoples Gas System, Inc.	DOCKET NO. 20230023-GU
Peoples Gas System's Petition for Approval of	DOCKET NO. 20220212-GU
Depreciation Rate and Subaccount for	
Renewable Natural Gas Facilities Leased to	FILED: April 14, 2023
Others	

## PEOPLES GAS SYSTEM, INC.'S REQUEST FOR CONFIDENTIAL CLASSIFICATION

Peoples Gas System, Inc. ("Peoples" or "the company"), pursuant to Section 366.093, Florida Statutes, and Rule 25-22.006, Florida Administrative Code, hereby requests confidential classification for certain information contained in the company's response to Florida Public Service Commission ("Commission") Staff's Third Data Request, filed April 14, 2023, in Docket No. 20230023. In support thereof, Peoples states:

### **Description of the Document(s)**

On April 14, 2023, Peoples filed its responses to Staff's 3<sup>rd</sup> Data Request in the Docket No. 20230023 as directed by Order No. PSC-2023-0218-PCO-GU. The company believes that portions of its responses to Data Request Nos. 1-4 in this set, as specified on Exhibit "A," constitute "proprietary confidential business information" and has designated it as such by highlighting. Peoples' requests confidential classification for this information such that it will be entitled to protection against public disclosure pursuant to Section 366.093, Florida Statutes.

#### Request

1. Subsection 366.093(1), Florida Statutes, provides that any records "[found by the Commission to be proprietary confidential business information shall be kept confidential and exempt from s. 119.07(1), Florida Statutes requiring disclosure under the Public Records Act.]"

2. Proprietary confidential business information includes, but is not limited to: "information concerning bids or other contractual data, the disclosure of which would impair the efforts of the public utility or its affiliates to contract for goods and service on favorable terms" and "information relating to competitive interests, the disclosure of which would impair the competitive business of the provider of the information." §366.093(3)(d)-(e), Fla. Stat.

3. The confidential information that is the subject of this request falls within these statutory categories and thus constitutes proprietary confidential business information entitled to protection under Section 366.093, Florida Statutes and Rule 25-22.006, Florida Administrative Code.

4. Attached hereto as Exhibit A is a justification for confidential treatment of the confidential information contained in the Project Agreements.

5. Public versions of the documents with the confidential information redacted were previously produced as part of the company's responses to Staff's Third Data Request.

6. The confidential information in these responses is intended to be and is treated by Peoples as confidential and has not been publicly disclosed.

7. Pursuant to Rule 25-22.006(9)(a), Peoples requests that the confidential information be treated by the Commission as proprietary confidential business information for 18 months.

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WHEREFORE, Peoples respectfully requests that the confidential information that is the subject of this request be accorded confidential classification for the reasons set forth herein for 18 months.

Respectfully submitted,

Whilm n. Means

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ATTORNEYS FOR PEOPLES GAS SYSTEM, INC.

# **CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that a true and correct copy of the foregoing Motion, filed on behalf of Peoples Gas System, Inc., has been furnished by electronic mail on this 14<sup>th</sup> day of April 2023 to the following:

Major Thompson Ryan Sandy Jennifer Crawford Daniel Dose Chasity Vaughan Danyel Sims Office of General Counsel Florida Public Service Commission Room 390L – Gerald L. Gunter Building 2540 Shumard Oak Boulevard Tallahassee, FL 32399-0850 rsandy@psc.state.fl.us mthompso@psc.state.fl.us jcrawfor@psc.state.fl.us ddose@psc.state.fl.us dsims@psc.state.fl.us cvaughan@psc.state.fl.us

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Mululin n. Means

 $ATTORNE\overline{Y}$ 

### EXHIBIT A

Data Request Response	Description of Information	Justification
1	The Highlighted Text	(1)
2	The Highlighted Text	(1)
3	The Highlighted Text	(1)
4	The Highlighted Text	(1)

## JUSTIFICATION FOR CONFIDENTIAL TREATMENT

(1) This highlighted information consists of negotiated, non-standard contractual terms regarding Peoples' rights and remedies under the project agreements. This constitutes "[i]nformation concerning bids or other contractual data, the disclosure of which would impair the efforts of the public utility to contract for goods or services on favorable terms." §366.093(3)(d), Fla. Stat. It also constitutes "[i]nformation relating to competitive interests, the disclosure of which would impair the competitive business of the provider of the information." §366.093(e), Fla. Stat. This information is accordingly entitled to confidential protection pursuant to Section 366.093, Florida Statutes, and Rule 25-22.006, Florida Administrative Code.