

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 Depreciation Rate and Subaccount for Renewable Natural Gas Facilities Leased to Others	DOCKET NO. 20220212-GU FILED: April 26, 2023

**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 Supplemental Response to Data Request No. 7 in the Florida Public Service Commission ("Commission") Staff's First Data Request (Nos. 1-16), filed March 3, 2023, in Docket No. 20220212. In support thereof, Peoples states:

Description of the Document(s)

On March 3, 2023, Peoples filed its responses to Staff's First Data Request in Docket No. 20220212-GU. One component of that response was a copy of the project agreements for the Brightmark Project. Since that time, Peoples and Brightmark executed amendments to the Purchase and Sale Agreement ("PSA") and the Renewable Natural Gas Service Agreement ("RNGSA"). Peoples supplemented its response to Staff's First Data Request by filing the redacted, non-confidential versions of the PSA and RNGSA amendments on April 26, 2023, in Docket No. 20230023, as directed by Order No. PSC-2023-0218-PCO-GU. The company believes that portions of those two amendments, as specified on Exhibit "A," constitute "proprietary confidential business information" and has designated them 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 amendments to the PSA and RNGSA amendments.

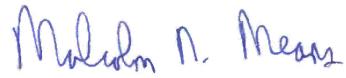
5. Public versions of the documents with the confidential information redacted were previously produced as part of the company’s supplemental response to Staff’s First Data Request.

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.

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,



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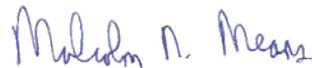
CERTIFICATE OF SERVICE

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 26th day of April 2023 to the following:

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EXHIBIT A

JUSTIFICATION FOR CONFIDENTIAL TREATMENT

First Amendment to the Renewable Natural Gas Service Agreement		
Paragraph	Description of Information	Justification
2.d	The Highlighted Text	(1)

Second Amendment to the Purchase and Sale Agreement		
Paragraph	Description of Information	Justification
2.b	The Highlighted Text	(1)
2.c	The Highlighted Text	(1)
2.e	The Highlighted Text	(1)
2.i	The Highlighted Text	(1)

- (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.