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May 16, 2023

VIA HAND DELIVERY

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

REDACTED

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

Docket No. 20220219-GU; Peoples Gas System's Petition for Rate Approval of 2022 Depreciation Study

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

Dear Mr. Teitzman:

Enclosed for filing in the above docket is Peoples Gas System, Inc.'s Request for Confidential Classification and Request for Temporary Protective Order of certain information contained in its Response to Staff's First Request for Production of Documents (No. 1), served on April 26, 2023.

Thank you for your assistance in connection with this matter.

Sincerely,

Virginia Ponder

VLP/nc
Attachment

cc: All parties of record (w/att.)

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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 Rate Approval of 2022 Depreciation Study	DOCKET NO. 20220219-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: May 16, 2023

**PEOPLES GAS SYSTEM INC.'S
REQUEST FOR CONFIDENTIAL CLASSIFICATION
AND REQUEST FOR TEMPORARY PROTECTIVE ORDER**

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 of the yellow highlighted information contained in the following described document(s) ("the Document(s)") stamped "CONFIDENTIAL" and all information that is or may be printed on yellow paper stock stamped "CONFIDENTIAL" within the Document(s), all of said confidential information being hereinafter referred to as "Confidential Information.").

Description of the Document(s)

The information for which confidential treatment is requested is highlighted in yellow on (i) "CONF_35MM Installment plus bio gas pipe – PE" at Bates 2; (ii) "CONF_Final BME Rates 3-3-2023" at Bates 3; and (iii) "CONF_New Debt_Eq-levROE-03-07-23 Brightmark Update 7.9 MM Pipe Model Corporate SPM – PE" at Bates 4 (the "Documents"). In support of this request, the company states:

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 shall be exempt from s. 119.07(1), Florida Statutes [requiring disclosure under the Public Records

Act].” Proprietary confidential business information includes but is not limited to: (a) trade secrets; (b) internal auditing controls and reports of internal auditors; (c) security measures, systems, or procedures; (d) 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 or services on favorable terms; (e) information relating to competitive interests, the disclosure of which would impair the competitive business of the provider of the information; and (f) employee personnel information unrelated to compensation, duties, qualifications, or responsibilities. §366.093(3)(a)-(f), Fla. Stat. The Confidential Information that is the subject of this request and motion falls within one or more of 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.

2. Attached hereto as Exhibit "A" is a justification for confidential treatment of the Confidential Information contained in the Documents.

3. The public versions of the Documents with the Confidential Information are included as Exhibit B.

4. The Confidential Information contained in the Documents is intended to be and is treated by Peoples as private and has not been publicly disclosed.

5. For the same reasons set forth herein in support of its request for confidential classification, Peoples also moves the Commission for entry of a Temporary Protective Order pursuant to Rule 25-22.006(6)(a) of the Florida Administrative Code.

Requested Duration of Confidential Classification

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

months. If, and to the extent that the company is in need of confidential classification of the Confidential Information beyond the 18-month period set forth in the Commission rule, the justification and grounds for such extended confidential treatment are set forth in Exhibit "C" to this request and motion.

WHEREFORE, Peoples Gas System, Inc. respectfully requests that the Confidential Information that is the subject of this request and motion be accorded confidential classification for the reasons set forth herein and for 18 months.

DATED this 16th day of May, 2023.

Respectfully submitted,



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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 16th day of May, 2023 to the following:

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ATTORNEY

EXHIBIT A
JUSTIFICATION FOR CONFIDENTIAL TREATMENT

<u>Document</u>	<u>Page</u>	<u>Line/Row</u>	<u>Rationale</u>
“CONF_35MM Installment plus bio gas pipe – PE”	Bates Page 2	Entire Document	(1)
“CONF_Final BME Rates 3-3-2023”	Bates Page 3	Entire Document	(1)
“CONF_New Debt_Eq-levROE-03-07-23 Brightmark Update 7.9 MM Pipe Model Corporate SPM – PE”	Bates Page 4	Entire Document	(1)

(1) As explained in Peoples’ response to Staff First Request for Production No. 1, these documents consist of the company’s discounted cash flow and internal rate of return models. These models fall into the definition of “proprietary confidential business information” pursuant to Section 366.093(3)(a) and (e), Fla. Stat. The models constitute a “trade secret” under Section 366.093(3)(a) because they contain the company’s proprietary financial model and methodology for determining contract pricing and because public disclosure of these models would allow Peoples’ competitors to determine how the company arrives at contract pricing and would allow customers to identify the company’s negotiating range for pricing. For the same reasons, these models constitute “information relating to competitive interests, the disclosure of which would impair the competitive business of the provider of the information” under Section 366.093(3)(e). These documents are accordingly entitled to protection from public disclosure as “proprietary confidential business information.”

EXHIBIT B
PUBLIC VERSION(S) OF THE DOCUMENT(S)

Attached hereto (unless previously filed as may be noted below) are two public versions of the Document(s) with the Confidential Information redacted.

Public Version(s) of the Document(s) attached	<u> X </u>
Public Version(s) of the Document(s) attached in CD format	<u> </u>

CONFIDENTIAL MATERIAL REDACTED

BATES STAMPED PAGE 2

CONFIDENTIAL MATERIAL REDACTED

BATES STAMPED PAGE 3

CONFIDENTIAL MATERIAL REDACTED

BATES STAMPED PAGE 4