



Attorneys and Counselors at Law
123 South Calhoun Street
P.O. Box 391 32302
Tallahassee, FL 32301
P: (850) 224-9115
F: (850) 222-7560
ausley.com

June 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 Third Set of Interrogatories and Staff's Third Request for Production of Documents, served on May 24, 2023. Also enclosed is an accompanying CD containing the public (redacted) version of these documents.

Thank you for your assistance in connection with this matter.

Sincerely,

Virginia Ponder

VLP/ne
Attachment

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

COM _____
AFD _____
APA _____
ECO _____
ENG _____
GCL _____
IDM _____
CLK _____

1 Exh "B" on CD - Redacted

COMMISSION CLERK

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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: June 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)

On June 16, 2023, Peoples filed its responses to Staff's Third Set of Interrogatories (Nos. 23-85) and Third Request for Production of Documents (Nos. 6-22). The company believes that portions of its responses to Staff's Third Set of Interrogatories and Third Request for Production, as specified on Exhibit "A," constitute confidential information ("Confidential Information") and has designated it as such by highlighting, and contemporaneous with the filing of this request and motion, has submitted the confidential responses to the Commission Clerk under a separate, confidential cover letter. 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. In support of this request and motion, 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 June 2023.

Respectfully submitted,



J. JEFFRY WAHLEN
jwahlen@ausley.com
MALCOLM N. MEANS
mmeans@ausley.com
VIRGINIA PONDER
vponder@ausley.com
Ausley McMullen
Post Office Box 391
Tallahassee, Florida 32302
(850) 224-9115

ATTORNEYS FOR PEOPLES GAS SYSTEM, INC.

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing Request, filed on behalf of Peoples Gas System, Inc., has been furnished by electronic mail on this 16th day of June, 2023 to the following:

Major Thompson
Ryan Sandy
Austin Watrous
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
mthomps@psc.state.fl.us
awatrous@psc.state.fl.us
ddose@psc.state.fl.us
dsims@psc.state.fl.us
cvaughan@psc.state.fl.us

Amber Norris
Dylan Andrews
Division of Accounting and Finance
Florida Public Service Commission
Room 160B – Gerald L. Gunter Bldg.
2540 Shumard Oak Boulevard
Tallahassee, FL 32399-0850
amnorris@psc.state.fl.us
dandrews@psc.state.fl.us

Jon C. Moyle, Jr.
Karen A. Putnal
Moyle Law Firm, P.A.
118 North Gadsden Street
Tallahassee, Florida 32301
jmoyle@moylelaw.com
kputnal@moylelaw.com

Walt L. Trierweiler
Charles J. Rehwinkel
Patricia A. Christensen
Mary A. Wessling
Danijela Janjic
Office of Public Counsel
111 West Madison Street – Room 812
Tallahassee, FL 32399-1400
trierweiler.walt@leg.state.fl.us
rehwinkel.charles@leg.state.fl.us
christensen.patty@leg.state.fl.us
wessling.mary@leg.state.fl.us
janjic.danijela@leg.state.fl.us



ATTORNEY

**EXHIBIT A
JUSTIFICATION FOR CONFIDENTIAL TREATMENT**

STAFF'S THIRD SET OF INTERROGATORIES (23 – 85)				
<u>Bates Page</u>	<u>Document Description</u>	<u>Column, Paragraph, Page, Line Designation or Other Identifier</u>	<u>Description of Information</u>	<u>Justification</u>
64	Written response provided in response to Staff's Third Set of Interrogatories, No. 56	Material in the first paragraph.	The Highlighted Text	(1)
65	Tampa Electric Company Risk Authorization Committee Mandate December 14, 2022. Produced in response to Staff's Interrogatory No. 56	Material in paragraphs entitled "MANDATE" and "RESPONSIBILITIES"	The Highlighted Text Internal credit vetting procedures that contains dollar thresholds	(1)
66	Same as above.	Material in sections entitled "RESPONSIBILITIES (cont. from BS 65) "MEMBERSHIP" and "OPERATION."	The Highlighted Text	(1)
67	Same as above.	Material in section entitled "OPERATION" (cont. from BS 66) and "RELATIONSHIP WITH RISK MANAGEMENT RESOURCES"	The Highlighted Text	(1)

STAFF'S THIRD SET OF INTERROGATORIES (23 – 85)

<u>Bates Page</u>	<u>Document Description</u>	<u>Column, Paragraph, Page, Line Designation or Other Identifier</u>	<u>Description of Information</u>	<u>Justification</u>
68	Same as above.	Material in sections entitled "REPORTING" and "MANDATE UPDATE"	The Highlighted Text	(1)
69	Same as above.	Sections 3 and 5 in the table of contents.	The Highlighted Text	(1)
72	Same as above.	Section 3	The Highlighted Text	(1)
74	Same as above.	Section 5	The Highlighted Text	(1)
75	Same as above.	Section entitled "Memo Review"	The Highlighted Text	(1)
76	Same as above.	Section entitled "Credit Assurance Approval Process"	The Highlighted Text	(1)
91	This is a component of the revenue requirement model used for the Alliance Project, produced in response to Staff's Interrogatory No. 67.	Columns 2023-2043	The Highlighted Text	(2)
131	Schedule of bidders for WAM project produced in response to Staff Interrogatory No. 80.	Column titled "Vendor Name"	The Highlighted Text	(3)

- (1) The highlighted information consists of internal procedures for vetting creditworthiness of potential counterparties. This information consists of “competitive interests, the disclosure of which would impair the competitive business of the provider of the information.” This information is protected by Section 366.093(3)(e) of the Florida Statutes.
- (2) This document is a revenue requirements model that includes information provided to Peoples by one of the largest market makers/brokers in the environmental credit market and represents their view of the market. This information was provided to Peoples on a confidential basis. Disseminating this information could impact market bids, especially in the environmental credit markets that do not have a formal forward pricing mechanism or forward market. Furthermore, the public dissemination of this information could also adversely impact future efforts to sell the environmental credits produced by the RNG facility on a forward basis. This information accordingly consists of “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” and “information relating to competitive interests, the disclosure of which would impair the competitive business of the provider of the information.” This information is protected by Section 366.093(3)(d) and (e) of the Florida Statutes.
- (3) The highlighted text includes the identities of parties who submitted bids on the WAM project. Disclosure of the identities of these bidders “would impair the efforts of the public utility or its affiliates to contract for goods or services on favorable terms” and the information is accordingly protected by Section 366.093(3)(d) of the Florida Statutes.

STAFF'S THIRD REQUEST FOR PRODUCTION OF DOCUMENTS (6 -22)

<u>Bates Page</u>	<u>Document Description</u>	<u>Column, Paragraph, Page, Line Designation, Header or Other Identifier</u>	<u>Description of Information</u>	<u>Justification</u>
68	Tab identified as "Staff POD No. 10 Raw Data" within the file entitled "(BS 68) Compensation Data File_CONFIDENTIAL" provided in response to Staff's Third Request for Production of Documents, number 10 reflecting compensation structure.	Columns B, C, E and F (lines 6 through 703).	The Highlighted Text	(3)
71	Mercer's Benefits Valuation Analysis, dated November 2022, provided in response to Staff's Third Request for Production of Documents, Number 11.	Contents.	The Highlighted Text	(1)
72	Same as above.	About the Report.	The Highlighted Text	(1)
73	Same as above.	About the Report.	The Highlighted Text	(1)
74	Same as above.	Executive Summary.	The Highlighted Text	(1)
75	Same as above.	Total Benefits.	The Highlighted Text	(1)
76	Same as above.	Retirement/Savings.	The Highlighted Text	(1)
77	Same as above.	Retirement/Savings-Defined Benefit.	The Highlighted Text	(1)

78	Same as above.	Retirement/Savings-Defined Contribution.	The Highlighted Text	(1)
79	Same as above.	Retirement/Savings-Stock Purchase.	The Highlighted Text	(1)
80	Same as above.	Health/Group.	The Highlighted Text	(1)
81	Same as above.	Health/Group -Medical.	The Highlighted Text	(1)
82	Same as above.	Health/Group -Medical.	The Highlighted Text	(1)
83	Same as above.	Health/Group – Post-Retirement Medical.	The Highlighted Text	(1)
84	Same as above.	Health/Group – Dental.	The Highlighted Text	(1)
85	Same as above.	Paid Leave.	The Highlighted Text	(1)
86	Same as above.	Paid Leave - Total Leave.	The Highlighted Text	(1)
87	Same as above.	Paid Leave-Vacation/PTO.	The Highlighted Text	(1)
88	Same as above.	Paid Leave -Personal/Holidays/Sick Leave	The Highlighted Text	(1)
89	Same as above.	Paid Leave – Maternity/Paternity/Parental Leave.	The Highlighted Text	(1)
90	Same as above.	Life Insurance/Disability.	The Highlighted Text	(1)
91	Same as above.	Life Insurance/Disability – Life Insurance.	The Highlighted Text	(1)
92	Same as above.	Life Insurance/Disability-Short-Term Disability.	The Highlighted Text	(1)

93	Same as above.	Life Insurance/Disability-Long-Term Disability.	The Highlighted Text	(1)
94	Same as above.	Nontraditional-Educational Assistance/Student Loan.	The Highlighted Text	(1)
95	Same as above.	Nontraditional – Additional Benefits.	The Highlighted Text	(1)
96	Same as above.	What’s Next?	The Highlighted Text	(1)
100	The McDaniel + Cullen, Supply Chain Improvement Assessment and Opportunity Roadmap, Executive Report, dated April 2022, provided in response to Staff’s Third Request for Production of Documents, Number 12.	Scope and Approach for PGS Project E&C Review And Supply Chain Assessment.	The Highlighted Text	(1)
101	Same as above.	Summary & Call to Action	The Highlighted Text	(1)
102	Same as above.	Big Bend Project – Lessons Learned / Best Practices	The Highlighted Text	(1)
103	Same as above.	The Voice of the Organization (key sound bites about Supply Chain)	The Highlighted Text	(1)
104	Same as above.	The Voice of the Organization (key sound bites about Supply Chain)	The Highlighted Text	(1)
106	Same as above.	Spend Overview	The Highlighted Text	(1)
107	Same as above.	Spend by Group and Category	The Highlighted Text	(1)
108	Same as above.	Entire page.	The Highlighted Text	(1)
109	Same as above.	Opportunity Summary	The Highlighted Text	(1)

111	Same as above.	Five Key Dimensions	The Highlighted Text	(1)
112	Same as above.	Supply Chain Organization Recommendations	The Highlighted Text	(1)
113	Same as above.	Entire page.	The Highlighted Text	(1)
114	Same as above.	Continued TEC Support	The Highlighted Text	(1)
115	Same as above.	Transition Into Stand-Alone SCM Organization	The Highlighted Text	(1)
116	Same as above.	Supply Chain Roadmap: From Assessment to Action	The Highlighted Text	(1)
121	The 2022 Forecast Deliveries from Moody's provided in response to Staff's Third Request for Production of Documents, Number 13.	Columns D through L (lines 14 through 1198); column L (lines and columns O through Y (lines 1143 through 1163).	The Highlighted Text	(1)
123	The 2022 Forecast Deliveries from Moody's produced in response to Staff's Third Request for Production of Documents, Number 14.	Columns D through L (lines 14 through 1198) and column O through Y (lines 1143 through 1163)	The Highlighted Text	(1)
145	Renewable Natural Gas Service Agreement provided in response to Staff's Third Request for Production of Documents, Number 16.	Section 4.5, RNG Delivery Service.	The Highlighted Text	(2)
147	Same as above.	Section 7.2, Monthly Service Charge.	The Highlighted Text	(2)
147	Same as above.	Section 7.4, Guaranty.	The Highlighted Text	(2)

Exhibit A

152	Same as above.	Appendix A- PGS Receipt Point(s).	The Highlighted Text	(2)
153	Same as above.	Appendix B – PGS Delivery Point(s)	The Highlighted Text	(2)
156	Same as above.	Appendix E, Monthly Services Charges.	The Highlighted Text	(2)
164	The Biogas Incentives Agreement, provided in response to Staff’s Third Request for Production of Documents, Number 17.	Section 2.2, Digester Connection Fee.	The Highlighted Text	(2)
166	Same as above.	Section 5, Distribution of Proceeds; 5.2 Second.	The Highlighted Text	(2)
167	Same as above.	Section 5, Distribution of Proceeds, 5.2 Second.	The Highlighted Text	(2)
167	Same as above.	Section 5.2.2., Payments and Reimbursements.	The Highlighted Text	(2)
183	Same as above.	Section 27, Notices.	The Highlighted Text	(2)
193	The company’s confidential response (Capital Leadership Team Project Review) to Staff’s Third Request for Production of Documents, Number 18.	Overview.	The Highlighted Text	(3)
194	Same as above.	Basis of Change	The Highlighted Text	(3)
195	Same as above.	Financial Update	The Highlighted Text	(3)
200	Same as above.	First full paragraph.	The Highlighted Text	(3)

201	Same as above.	Second full paragraph.	The Highlighted Text	(3)
203	Same as above.	Scope Changes.	The Highlighted Text	(3)
204	Same as above.	Basis of Change.	The Highlighted Text	(3)
205	Same as above.	Capital Recovery and Required Return.	The Highlighted Text	(3)
211	The company's confidential response (Capital Leadership Team Project Review, December 11, 2018) to Staff's Third Request for Production of Documents, Number 19.	Background.	The Highlighted Text	(3)
212	Same as above.	First sentence.	The Highlighted Text	(3)
212	Same as above.	Project Description.	The Highlighted Text	(3)
213	Same as above.	Contribution of Project to Corporate Objectives.	The Highlighted Text	(3)
223	Same as above.	System Need for Jacksonville Expansion.	The Highlighted Text	(3)
224	Same as above.	Current PGS Position – JAX Port.	The Highlighted Text	(3)
225	Same as above.	Planned PGS position with Expansion – JAX Port.	The Highlighted Text	(3)
236	The company's confidential response (November 13, 2018, PGS Panama Express & PGS Southwest Florida) to Staff's Third	Panama Express.	The Highlighted Text Identifying Customer Information	(3)

	Request for Production of Documents, Number 21.			
237	Same as above.	System Need for Panama Express.	The Highlighted Text	(3)
238	Same as above.	Panama Express Detailed Project Description.	The Highlighted Text Identifying Customer Information	(3)
242	Same as above.	Mitigation Plan.	The Highlighted Text	(3)
249	The company's confidential response (Capital Leadership Team, Project Review, November 13, 2018) to Staff's Third Request for Production of Documents, Number 22.	Background	The Highlighted Text	(3)
254	Same as above.	Panama Express	The Highlighted Text Identifying Customer Information	(3)
255	Same as above.	System Need for Panama Express	The Highlighted Text	(3)
256	Same as above.	Panama Express, Detailed Project Description	The Highlighted Text	(3)
260	Same as above.	Project Risks – Panama Express and SW Florida, Mitigation Plan.	The Highlighted Text	(3)

(1) The highlighted information consists of the proprietary work product of certain third parties. Public disclosure of this information would allow duplication of these entity's work without compensation for their efforts. This information is in the nature of a trade secret

Exhibit A

owned by such entities and disclosure of this information would impair their competitive business interests by revealing competitive pricing related information. This information is protected by Section 366.093(3)(a) and (e) of the Florida Statutes.

(2) The highlighted information consists of negotiated, non-standard contractual terms regarding Peoples' rights and remedies under the project agreements. This information 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." Section 366.093(3)(d), Florida Statutes. It also constitutes "[i]nformation 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), Florida Statutes. This information is accordingly entitled to confidential protection pursuant to 366.093, Florida Statutes, and Rule 25-22.006, Florida Administrative Code.

(3) The highlighted text includes constitutes "[i]nformation 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), Florida Statutes.

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 _____

Public Version(s) of the Document(s) attached in CD format X_____

EXHIBIT C
JUSTIFICATION FOR EXTENSION OF CONFIDENTIALITY PERIOD

N/A