



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](http://ausley.com)

July 5, 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 Fourth Set of Interrogatories, served on June 12, 2023. Also attached in CD format are the public (redacted) version of these documents (Bates Pages 5, 7, and 9).

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 1 redacted CD  
APA \_\_\_\_\_  
ECO \_\_\_\_\_  
ENG \_\_\_\_\_  
GCL \_\_\_\_\_  
IDM \_\_\_\_\_  
CLK \_\_\_\_\_

RECEIVED-FPSC  
2023 JUL -5 AM 11:27  
COMMISSION  
CLERK

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: July 5, 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 July 3, 2023, Peoples served its responses to Staff's Fourth Set of Interrogatories (Nos. 86-104). The company believes that portions of its responses to these interrogatories, as specified on Exhibit "A," constitute confidential information ("Confidential Information") and, has designated it as such by highlighting. Contemporaneous with the filing of this request, Peoples 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, 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 5th day of July 2023.

Respectfully submitted,



---

J. JEFFRY WAHLEN  
[jwahlen@ausley.com](mailto:jwahlen@ausley.com)  
MALCOLM N. MEANS  
[mmeans@ausley.com](mailto:mmeans@ausley.com)  
VIRGINIA PONDER  
[vponder@ausley.com](mailto: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 Motion, filed on behalf of Peoples Gas System, Inc., has been furnished by electronic mail on this 5th day of July, 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](mailto:rsandy@psc.state.fl.us)  
[mthomпсо@psc.state.fl.us](mailto:mthomпсо@psc.state.fl.us)  
[awatrous@psc.state.fl.us](mailto:awatrous@psc.state.fl.us)  
[ddose@psc.state.fl.us](mailto:ddose@psc.state.fl.us)  
[dsims@psc.state.fl.us](mailto:dsims@psc.state.fl.us)  
[cvaughan@psc.state.fl.us](mailto: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](mailto:amnorris@psc.state.fl.us)  
[dandrews@psc.state.fl.us](mailto: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](mailto:jmoyle@moylelaw.com)  
[kputnal@moylelaw.com](mailto: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](mailto:trierweiler.walt@leg.state.fl.us)  
[rehwinkel.charles@leg.state.fl.us](mailto:rehwinkel.charles@leg.state.fl.us)  
[christensen.patty@leg.state.fl.us](mailto:christensen.patty@leg.state.fl.us)  
[wessling.mary@leg.state.fl.us](mailto:wessling.mary@leg.state.fl.us)  
[janjic.danijela@leg.state.fl.us](mailto:janjic.danijela@leg.state.fl.us)



---

ATTORNEY

**EXHIBIT A**  
**STAFF'S FOURTH SET OF INTERROGATORIES (86-104)**  
**JUSTIFICATION FOR CONFIDENTIAL TREATMENT**

<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>
5	This is a component of the revenue requirement model used for the Brightmark and New River projects, produced in response to Staff's Interrogatory No. 86c	Columns D through W Lines 7, 8, 18-20 and 22-24  Columns D through S Lines 38 & 40, 50-52 and 54-56	Highlighted text	(1)
7	Written response provided in response to Staff's Fourth Set of Interrogatories, No. 88	The material in the third bullet.	Highlighted text	(2)
9	Written response provided in response to Staff's Fourth Set of Interrogatories, No. 89	The material in the fourth bullet	Highlighted text	(2)

(1) This document is a revenue requirements model. The highlighted information includes "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.

(2) The highlighted information 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.

**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