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July 11, 2023

VIA HAND DELIVERY

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

REDACTED

RECEIVED-FPSC
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COMMISSION
CLERK

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 of certain information contained in the June 2, 2023 deposition transcript and exhibits of Timothy O'Connor. Also enclosed in CD format are 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 1 redacted copy
APA _____
ECO _____
ENG _____
GCL _____
IDM _____
CLK _____

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 11, 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 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 5, 2023, Peoples filed a Notice of Intent to Request Confidential Classification for portions of the deposition transcript of Timothy O'Connor. *See* DN 03931-2023. Pursuant to this Notice of Intent, Peoples identified certain portions of Mr. O'Connor's deposition transcript as specified on Exhibit "A," that it believes constitute confidential information ("Confidential 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. 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 out above, Peoples also requests a Temporary Protective Order for the Confidential Information.

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 11th day of July, 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 11th day of July, 2023 to the following:

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ATTORNEY

EXHIBIT A
CONFIDENTIAL DEPOSITION OF TIMOTHY O'CONNOR
JUSTIFICATION FOR CONFIDENTIAL TREATMENT

<u>Document</u>	<u>Page</u>	<u>Line/Row</u>	<u>Justification</u>
Transcript	14	19 and 21	(1)
Transcript	36	20 and 25	(2)
Transcript	37	1 and 18	(2)
Transcript	38	2 and 3	(3)
Transcript	61	20 and 21	(2)
Transcript	64	24	(1)
Transcript	65	3, 7, 9, 11,13,16,18-19,23,25	(1)
Transcript	66	1-3,8, 10	(1)
Transcript	82	9-12, 14-19, and 21-22	(1)
Transcript	118	8 and 11	(1)
Transcript	140	18	(4)
Transcript	142	17, 19-21	(4)
Transcript	143	1-3, 5	(4)

Deposition Exhibits				
Exhibit	Document Description	Bates Pages	Description of information	Justification
2	PGS board presentation originally produced in response to OPC's 1st Request for Production No 37	19701	The Highlighted Text	(2)
3	PGS board presentation originally produced in response to OPC's 1st Request for Production No 37	20622	The Highlighted Text	(2)
7	PGS board presentation originally produced in response to OPC's 1st Request for Production No 37	16478	The Highlighted Text	(2)
8	PGS board presentation originally produced in response to OPC's 1st Request for Production No 37	24130-665	The Highlighted Text	(2)
12	PGS board presentation originally produced in response to OPC's 1st Request for Production No 37	16165-16185	The Highlighted Text	(2)

- (1) This information consists of the identities of current or potential individual Peoples' customers. The highlighted text thus constitutes "[i]nformation relating to competitive interests, the disclosure of which would impair the competitive business of the provider of the information" that constitutes proprietary confidential business information under Section 366.093(3)(e), Florida Statutes.
- (2) This information consists of the content of Peoples Gas board strategy meeting presentations. The highlighted text thus constitutes "[i]nformation relating to competitive interests, the disclosure of which would impair the competitive business of the provider of the information" that constitutes proprietary confidential business information under Section 366.093(3)(e), Florida Statutes.
- (3) This information consists of Peoples' internal strategy regarding potential merger and acquisition activity. The highlighted text thus constitutes "[i]nformation relating to competitive interests, the disclosure of which would impair the competitive business of the provider of the information" that constitutes proprietary confidential business information under Section 366.093(3)(e), Florida Statutes.
- (4) This information consists of the terms of the project agreements for the Alliance Dairies RNG project. The highlighted text thus constitutes "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" that constitutes proprietary confidential business information under Section 366.093(3)(d), 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