



July 12, 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 of documents pertaining to Staff's June 5, 2023, request to view certain confidential materials produced to the Office of Public Counsel ("OPC") in response to discovery requests. 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

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COMMISSION
CLERK

VLP/ne
Attachment

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

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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 12, 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."

Notice of Intent to Request Confidential Classification

1. On June 23, 2023, Peoples filed a Notice of Intent to Request Confidential Classification ("Notice of Intent") pursuant to staff's June 5, 2023, request to view certain confidential materials produced to the Office of Public Counsel ("OPC") in response to discovery requests. *See* DN 03776-2023.

2. The company, after further review, has reclassified certain documents identified by staff and subject to the Notice of Intent as non-confidential. The reclassified documents include Peoples responses to (i) OPC's First Request for Production of Documents, Number 36 (Bates Number 15419); (ii) OPC's Second Request for Production of Documents, Number 54 (Bates

Number 140); (iii) OPC's Third Set of Interrogatories, Number 164 (Bates Number 44); and (iv) OPC's Fourth Set of Interrogatories, Number 198. The company's reclassified responses to Request for Production Numbers 36 and 54, and Interrogatory 164 will be provided to staff contemporaneous with this request under a separate cover letter. On June 16, 2023, the company provided staff with the response to OPC's Fourth Set of Interrogatories, Number 198 in response to Staff's Third Set of Interrogatories, Number 33. Thus, this response will not be reproduced.

3. The company also identified documents subject to the Notice of Intent previously provided to staff subject to a Request for Confidential Classification and Request for Temporary Protective Order. *See* DN 03677-2023. These documents include Peoples responses to Staff's Third Request for Production of Documents, Numbers 13 (Bates Number 121) and 14 (Bates Number 123) which was also provided in response to OPC's First Request for Production of Documents, Number 6. Accordingly, these documents have been withheld.

4. Consistent with the Notice of Intent filed on June 23, 2023, the company hereby designates the portions of the discovery responses provided to OPC and requested by Staff, as specified on Exhibit "A," that constitute Confidential Information. Contemporaneous with the filing of this request, Peoples submitted the confidential versions of these materials to the Commission Clerk under a separate, confidential cover letter.

Request

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:

5. 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.

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

7. The public version of the documents with the Confidential Information is included as Exhibit "B".

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

Requested Duration of Confidential Classification

9. 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 be accorded confidential classification for the reasons set forth herein and for 18 months.

DATED this 12th day of July 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 for Confidential Classification, filed on behalf of Peoples Gas System, Inc., has been furnished by electronic mail on this 12th 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
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
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



ATTORNEY

EXHIBIT A
STAFF'S JUNE 5, 2023 CONFIDENTIAL DOCUMENT REQUEST
JUSTIFICATION FOR CONFIDENTIAL TREATMENT

<u>OPC's REQUEST FOR PRODUCTION OF DOCUMENTS TO PEOPLES</u>			
<u>Bates Page</u>	<u>Document Description</u>	<u>Description of Information</u>	<u>Justification</u>
6122-6127	Third party contracts provided in Peoples' Response to OPC's First Request for Production of Documents, Number 3.	The Highlighted Information	(4) & (5)
6129-6149	Same as above.	The Highlighted Information	(4) & (5)
6151-6176	Same as above.	The Highlighted Information	(4) & (5)
6178-6196	Copies of Requests for Proposal provided in Peoples' Response to OPC's First Request for Production of Documents, Number 4.	The Highlighted Information	(4) & (5)
6204-6206	Same as above.	The Highlighted Information	(4) & (5)
8724	MFR supporting documents provided in Peoples' Response to OPC's First Request for Production, Number 6.	The Highlighted Information	(5)
9335-9337	Incentive compensation/bonus/at-risk plans provided in Peoples' Response to OPC's First Request for Production of Documents, Number 12.	The Highlighted Information	(5)
9339-9341	Same as above.	The Highlighted Information	(5)
9343-9349	Same as above.	The Highlighted Information	(5)
9351-9355	Same as above.	The Highlighted Information	(5)

OPC's REQUEST FOR PRODUCTION OF DOCUMENTS TO PEOPLES

<u>Bates Page</u>	<u>Document Description</u>	<u>Description of Information</u>	<u>Justification</u>
9357-9360	Same as above.	The Highlighted Information	(5)
9362-9366	Same as above.	The Highlighted Information	(5)
9368-9372	Same as above.	The Highlighted Information	(5)
9374-9386	Same as above.	The Highlighted Information	(5)
9388-9402	Same as above.	The Highlighted Information	(5)
9404-9418	Same as above.	The Highlighted Information	(5)
9420-9424	Same as above.	The Highlighted Information	(5)
9426-9434	Same as above.	The Highlighted Information	(5)
9437-9594	Investor services reports provided in Peoples' Response to OPC's First Request for Production, Number 14.	The Highlighted Information	(7)
9595-9607	Same as above.	The Highlighted Information	(7)
9608-9610	Same as above.	The Highlighted Information	(7)
9611-9710	Same as above.	The Highlighted Information	(7)
9711-9787	Same as above.	The Highlighted Information	(7)
9788-9801	Same as above.	The Highlighted Information	(7)

OPC's REQUEST FOR PRODUCTION OF DOCUMENTS TO PEOPLES

<u>Bates Page</u>	<u>Document Description</u>	<u>Description of Information</u>	<u>Justification</u>
9802-9805	Same as above.	The Highlighted Information	(7)
9809-9813	Presentation documents provided in Peoples' Response to OPC's First Request for Production, Number 15.	The Highlighted Information	(5)
9815-9816	Same as above.	The Highlighted Information	(5)
9818-9821	Same as above	The Highlighted Information	(5)
9823-9828	Same as above	The Highlighted Information	(5)
9830-9836	Same as above	The Highlighted Information	(5)
9839-9841	Same as above.	The Highlighted Information	(5)
9843-9848	Same as above.	The Highlighted Information	(5)
9850-9854	Same as above.	The Highlighted Information	(5)
9856-9858	Same as above.	The Highlighted Information	(5)
9860-9863	Same as above.	The Highlighted Information	(5)
9866-9870	Same as above.	The Highlighted Information	(5)
9872-9873	Same as above.	The Highlighted Information	(5)
9875-9878	Same as above.	The Highlighted Information	(5)

OPC's REQUEST FOR PRODUCTION OF DOCUMENTS TO PEOPLES

<u>Bates Page</u>	<u>Document Description</u>	<u>Description of Information</u>	<u>Justification</u>
9880-9885	Same as above.	The Highlighted Information	(5)
9887-9893	Same as above.	The Highlighted Information	(5)
9895-9898	Same as above.	The Highlighted Information	(5)
9900	Same as above.	The Highlighted Information	(5)
9902-9917	Same as above.	The Highlighted Information	(5)
9920-9923	Same as above.	The Highlighted Information	(5)
9925-9928	Same as above.	The Highlighted Information	(5)
9930-9933	Same as above.	The Highlighted Information	(5)
9935-9939	Same as above.	The Highlighted Information	(5)
9941-9951	Same as above.	The Highlighted Information	(5)
9954-9956	Same as above.	The Highlighted Information	(5)
9958-9963	Same as above.	The Highlighted Information	(5)
9965-9970	Same as above.	The Highlighted Information	(5)
9972-9973	Same as above.	The Highlighted Information	(5)
9975-9978	Same as above.	The Highlighted Information	(5)

OPC's REQUEST FOR PRODUCTION OF DOCUMENTS TO PEOPLES

<u>Bates Page</u>	<u>Document Description</u>	<u>Description of Information</u>	<u>Justification</u>
9980-9993	Same as above.	The Highlighted Information	(5)
9996-9999	Same as above.	The Highlighted Information	(5)
10001-10004	Same as above.	The Highlighted Information	(5)
10006-10009	Same as above.	The Highlighted Information	(5)
10011-10015	Same as above.	The Highlighted Information	(5)
10017-10027	Same as above.	The Highlighted Information	(5)
10030-10033	Same as above.	The Highlighted Information	(5)
10035-10038	Same as above.	The Highlighted Information	(5)
10040-10043	Same as above.	The Highlighted Information	(5)
10045-10049	Same as above.	The Highlighted Information	(5)
10051-10060	Same as above.	The Highlighted Information	(5)
10063-10070	Same as above.	The Highlighted Information	(5)
10072-10080	Same as above.	The Highlighted Information	(5)
10082-10091	Same as above.	The Highlighted Information	(5)
10093-10103	Same as above.	The Highlighted Information	(5)

OPC's REQUEST FOR PRODUCTION OF DOCUMENTS TO PEOPLES

<u>Bates Page</u>	<u>Document Description</u>	<u>Description of Information</u>	<u>Justification</u>
11298 -11311	Credit reports provided in Peoples' Response to OPC's First Request for Production, Number 18.	The Highlighted Information	(7)
11312-11319	Same as above.	The Highlighted Information	(7)
11320-11327	Same as above.	The Highlighted Information	(7)
11328-11334	Same as above.	The Highlighted Information	(7)
11335-11344	Same as above.	The Highlighted Information	(7)
11345-11354	Same as above.	The Highlighted Information	(7)
11358-11359	Documents and workpapers associated with pension plan assets provided in Peoples' Response to OPC's First Request for Production, Number 19.	The Highlighted Information	(7)
11361-11365	Same as above.	The Highlighted Information	(7)
11367-11370	Same as above.	The Highlighted Information	(7)
11372-11374	Same as above.	The Highlighted Information	(7)
11376-11381	Same as above.	The Highlighted Information	(7)
11383-11387	Same as above.	The Highlighted Information	(7)

OPC's REQUEST FOR PRODUCTION OF DOCUMENTS TO PEOPLES

<u>Bates Page</u>	<u>Document Description</u>	<u>Description of Information</u>	<u>Justification</u>
11392-2	Documents used to project pension costs and expense and OPEB costs and expense provided in Peoples' Response to OPC's First Request for Production, Number 20.	The Highlighted Information	(7)
11394-11404	Same as above.	The Highlighted Information	(7)
11406	Same as above.	The Highlighted Information	(7)
11408-11411	Same as above.	The Highlighted Information	(7)
11441-11454	Supporting documents related to incentive/bonus/at risk pay provided in Peoples' Response to OPC's First Request for Production, Number 22.	The Highlighted Information	(5)
11456-11465	Same as above.	The Highlighted Information	(5)
11467-11468	Same as above.	The Highlighted Information	(5)
11470-11476	Same as above.	The Highlighted Information	(5)
13349	Requests for private letter ruling and IRS' responses provided in Peoples' Response to OPC's First Request for Production, Number 25.	The Highlighted Information	(5)
13351-13352	Same as above.	The Highlighted Information	(5)
13354-11359	Same as above.	The Highlighted Information	(5)
11361	Same as above.	The Highlighted Information	(5)

OPC's REQUEST FOR PRODUCTION OF DOCUMENTS TO PEOPLES

<u>Bates Page</u>	<u>Document Description</u>	<u>Description of Information</u>	<u>Justification</u>
11363-13366	Same as above.	The Highlighted Information	(5)
11368	Same as above.	The Highlighted Information	(5)
11379-13382	Same as above.	The Highlighted Information	(5)
13384	Same as above.	The Highlighted Information	(5)
13386-13442	Same as above.	The Highlighted Information	(5)
13444-13463	Same as above.	The Highlighted Information	(5)
13488-13492	Same as above.	The Highlighted Information	(5)
13498	Same as above.	The Highlighted Information	(5)
13502-13505	Same as above.	The Highlighted Information	(5)
13510-13511	Same as above.	The Highlighted Information	(5)
13521	Same as above.	The Highlighted Information	(5)
13525-13528	Same as above.	The Highlighted Information	(5)
13533-13534	Same as above.	The Highlighted Information	(5)
13757	Capital structure correspondence provided in Peoples' Response to OPC's First Request for Production, Number 29.	The Highlighted Information	(5) & (6)

OPC's REQUEST FOR PRODUCTION OF DOCUMENTS TO PEOPLES

<u>Bates Page</u>	<u>Document Description</u>	<u>Description of Information</u>	<u>Justification</u>
13757-001 - 13757-010	Same as above.	The Highlighted Information	(1)
13758-13765	Same as above.	The Highlighted Information	(5)
13774	Budget variance reports provided in Peoples' Response to OPC's First Request for Production, Number 30.	The Highlighted Information	(5)
13776 - 13777	Same as above.	The Highlighted Information	(5)
13779 - 13782	Same as above.	The Highlighted Information	(5)
13784 - 13785	Same as above.	The Highlighted Information	(5)
13787 - 13790	Same as above.	The Highlighted Information	(5)
13792 - 13794	Same as above.	The Highlighted Information	(5)
13806 - 13811	Same as above.	The Highlighted Information	(5)
13814	Same as above.	The Highlighted Information	(5)
13817 - 13819	Same as above.	The Highlighted Information	(5)
13822	Same as above.	The Highlighted Information	(5)
13831	Same as above.	The Highlighted Information	(5)
13833 - 13837	Same as above.	The Highlighted Information	(5)
13840	Same as above.	The Highlighted Information	(5)

OPC's REQUEST FOR PRODUCTION OF DOCUMENTS TO PEOPLES

<u>Bates Page</u>	<u>Document Description</u>	<u>Description of Information</u>	<u>Justification</u>
13842 - 13844	Same as above.	The Highlighted Information	(5)
13847	Same as above.	The Highlighted Information	(5)
13849 - 13851	Same as above.	The Highlighted Information	(5)
13854	Same as above.	The Highlighted Information	(5)
13864 - 13868	Same as above.	The Highlighted Information	(5)
13870 - 13874	Same as above.	The Highlighted Information	(5)
13876 - 13877	Same as above.	The Highlighted Information	(5)
13880 - 13881	Same as above.	The Highlighted Information	(5)
13883 - 13884	Same as above.	The Highlighted Information	(5)
13887 - 13889	Same as above.	The Highlighted Information	(5)
13892	Same as above.	The Highlighted Information	(5)
13900 - 13901	Same as above.	The Highlighted Information	(5)
13903	Same as above.	The Highlighted Information	(5)
13905 - 13908	Same as above.	The Highlighted Information	(5)
13911 - 13914	Same as above.	The Highlighted Information	(5)
13917 - 13920	Same as above.	The Highlighted Information	(5)

OPC's REQUEST FOR PRODUCTION OF DOCUMENTS TO PEOPLES

<u>Bates Page</u>	<u>Document Description</u>	<u>Description of Information</u>	<u>Justification</u>
13923 - 13925	Same as above.	The Highlighted Information	(5)
13933 - 13938	Same as above.	The Highlighted Information	(5)
13940 - 13945	Same as above.	The Highlighted Information	(5)
13947 - 13949	Same as above.	The Highlighted Information	(5)
13951 - 13968	Business analysis plans provided in Peoples' Response to OPC's First Request for Production, Number 31.	The Highlighted Information	(4) & (6)
13970 - 13978	Same as above.	The Highlighted Information	(4) & (6)
13980 - 14004	Same as above.	The Highlighted Information	(4) & (6)
14006 - 14010	Same as above.	The Highlighted Information	(4) & (6)
14012 - 14015	Same as above.	The Highlighted Information	(4) & (6)
14017 - 14023	Same as above.	The Highlighted Information	(4) & (6)
14025 - 14033	Same as above.	The Highlighted Information	(4) & (6)
14035 - 14038	Same as above.	The Highlighted Information	(4) & (6)
14040 - 14045	Same as above.	The Highlighted Information	(4) & (6)
14047 - 14058	Same as above.	The Highlighted Information	(4) & (6)
14060 - 14067	Same as above.	The Highlighted Information	(4) & (6)

OPC's REQUEST FOR PRODUCTION OF DOCUMENTS TO PEOPLES

<u>Bates Page</u>	<u>Document Description</u>	<u>Description of Information</u>	<u>Justification</u>
14069	Same as above.	The Highlighted Information	(4) & (6)
14072 - 14075	Same as above.	The Highlighted Information	(4) & (6)
14077	Same as above.	The Highlighted Information	(4) & (6)
14080 - 14083	Same as above.	The Highlighted Information	(4) & (6)
14085 - 14098	Same as above.	The Highlighted Information	(4) & (6)
14101 - 14108	Same as above.	The Highlighted Information	(4) & (6)
14110 - 14111	Same as above.	The Highlighted Information	(4) & (6)
14116	Same as above.	The Highlighted Information	(4) & (6)
14121 - 14122	Same as above.	The Highlighted Information	(4) & (6)
14128 - 14129	Same as above.	The Highlighted Information	(4) & (6)
14135 - 14136	Same as above.	The Highlighted Information	(4) & (6)
14142 - 14148	Same as above.	The Highlighted Information	(4) & (6)
14150	Same as above.	The Highlighted Information	(4) & (6)
14152	Same as above.	The Highlighted Information	(4) & (6)
14156	Same as above.	The Highlighted Information	(4) & (6)
14159	Same as above.	The Highlighted Information	(4) & (6)

OPC's REQUEST FOR PRODUCTION OF DOCUMENTS TO PEOPLES

<u>Bates Page</u>	<u>Document Description</u>	<u>Description of Information</u>	<u>Justification</u>
14163	Same as above.	The Highlighted Information	(4) & (6)
14166 - 14179	Same as above.	The Highlighted Information	(4) & (6)
14182 - 14184	Same as above.	The Highlighted Information	(4) & (6)
14187 - 14189	Same as above.	The Highlighted Information	(4) & (6)
14191 - 14192	Same as above.	The Highlighted Information	(4) & (6)
14195	Same as above.	The Highlighted Information	(4) & (6)
14197 - 14203	Same as above.	The Highlighted Information	(4) & (6)
14208	Same as above.	The Highlighted Information	(4) & (6)
14211	Same as above.	The Highlighted Information	(4) & (6)
14213	Same as above.	The Highlighted Information	(4) & (6)
14215 - 14218	Same as above.	The Highlighted Information	(4) & (6)
14221 - 14222	Same as above.	The Highlighted Information	(4) & (6)
14228 - 14229	Same as above.	The Highlighted Information	(4) & (6)
14237	Same as above.	The Highlighted Information	(4) & (6)
14240	Same as above.	The Highlighted Information	(4) & (6)
14243 - 14247	Same as above.	The Highlighted Information	(4) & (6)

OPC's REQUEST FOR PRODUCTION OF DOCUMENTS TO PEOPLES

<u>Bates Page</u>	<u>Document Description</u>	<u>Description of Information</u>	<u>Justification</u>
14252 - 14253	Same as above.	The Highlighted Information	(4) & (6)
14256 - 14257	Same as above.	The Highlighted Information	(4) & (6)
14260 - 14261	Same as above.	The Highlighted Information	(4) & (6)
14264 - 14267	Same as above.	The Highlighted Information	(4) & (6)
14270 - 14272	Same as above.	The Highlighted Information	(4) & (6)
14274 - 14277	Same as above.	The Highlighted Information	(4) & (6)
14281	Same as above.	The Highlighted Information	(4) & (6)
14287 - 14289	Same as above.	The Highlighted Information	(4) & (6)
14291	Same as above.	The Highlighted Information	(4) & (6)
14295	Same as above.	The Highlighted Information	(4) & (6)
14297	Same as above.	The Highlighted Information	(4) & (6)
14299	Same as above.	The Highlighted Information	(4) & (6)
14301	Same as above.	The Highlighted Information	(4) & (6)
14303	Same as above.	The Highlighted Information	(4) & (6)
14305	Same as above.	The Highlighted Information	(4) & (6)
14307 - 14309	Same as above.	The Highlighted Information	(4) & (6)

OPC's REQUEST FOR PRODUCTION OF DOCUMENTS TO PEOPLES

<u>Bates Page</u>	<u>Document Description</u>	<u>Description of Information</u>	<u>Justification</u>
14311 - 14315	Same as above.	The Highlighted Information	(4) & (6)
14318 - 14326	Same as above.	The Highlighted Information	(4) & (6)
14329 - 14331	Same as above.	The Highlighted Information	(4) & (6)
14334 - 14335	Same as above.	The Highlighted Information	(4) & (6)
14337 - 14351	Same as above.	The Highlighted Information	(4) & (6)
14353 - 14355	Same as above.	The Highlighted Information	(4) & (6)
14359	Same as above.	The Highlighted Information	(4) & (6)
14364	Same as above.	The Highlighted Information	(4) & (6)
14368	Same as above.	The Highlighted Information	(4) & (6)
14370 - 14380	Same as above.	The Highlighted Information	(4) & (6)
14385	Same as above.	The Highlighted Information	(4) & (6)
14387 - 14388	Same as above.	The Highlighted Information	(4) & (6)
14390 - 14391	Same as above.	The Highlighted Information	(4) & (6)
14395 - 14397	Same as above.	The Highlighted Information	(4) & (6)
14400 - 14407	Same as above.	The Highlighted Information	(4) & (6)
14411	Same as above.	The Highlighted Information	(4) & (6)

OPC's REQUEST FOR PRODUCTION OF DOCUMENTS TO PEOPLES

<u>Bates Page</u>	<u>Document Description</u>	<u>Description of Information</u>	<u>Justification</u>
14416 - 14418	Same as above.	The Highlighted Information	(4) & (6)
14423 - 14426	Same as above.	The Highlighted Information	(4) & (6)
14428 - 14430	Same as above.	The Highlighted Information	(4) & (6)
14435 - 14437	Same as above.	The Highlighted Information	(4) & (6)
14442	Same as above.	The Highlighted Information	(4) & (6)
14444	Same as above.	The Highlighted Information	(4) & (6)
14447 - 14449	Same as above.	The Highlighted Information	(4) & (6)
14451	Same as above.	The Highlighted Information	(4) & (6)
14454 - 14462	Same as above.	The Highlighted Information	(4) & (6)
14467 - 14470	Same as above.	The Highlighted Information	(4) & (6)
14474 - 14479	Same as above.	The Highlighted Information	(4) & (6)
14484 - 14486	Same as above.	The Highlighted Information	(4) & (6)
14488 - 14489	Same as above.	The Highlighted Information	(4) & (6)
14491 - 14494	Same as above.	The Highlighted Information	(4) & (6)
14496 - 14497	Same as above.	The Highlighted Information	(4) & (6)
14499	Same as above.	The Highlighted Information	(4) & (6)

OPC's REQUEST FOR PRODUCTION OF DOCUMENTS TO PEOPLES

<u>Bates Page</u>	<u>Document Description</u>	<u>Description of Information</u>	<u>Justification</u>
14501 - 14502	Same as above.	The Highlighted Information	(4) & (6)
14504 - 14505	Same as above.	The Highlighted Information	(4) & (6)
14507 - 14509	Same as above.	The Highlighted Information	(4) & (6)
14511 - 14512	Same as above.	The Highlighted Information	(4) & (6)
14514 - 14516	Same as above.	The Highlighted Information	(4) & (6)
14518 - 14522	Same as above.	The Highlighted Information	(4) & (6)
14527 - 14529	Same as above.	The Highlighted Information	(4) & (6)
14532 - 14533	Same as above.	The Highlighted Information	(4) & (6)
14537 - 14540	Same as above.	The Highlighted Information	(4) & (6)
14542 - 14544	Same as above.	The Highlighted Information	(4) & (6)
14546 - 14555	Same as above.	The Highlighted Information	(4) & (6)
14558 - 14565	Same as above.	The Highlighted Information	(4) & (6)
14567 - 14574	Same as above.	The Highlighted Information	(4) & (6)
14576 - 14589	Same as above.	The Highlighted Information	(4) & (6)
14591 - 14593	Same as above.	The Highlighted Information	(4) & (6)
14597 - 14610	Same as above.	The Highlighted Information	(4) & (6)

OPC's REQUEST FOR PRODUCTION OF DOCUMENTS TO PEOPLES

<u>Bates Page</u>	<u>Document Description</u>	<u>Description of Information</u>	<u>Justification</u>
14612 - 14624	Same as above.	The Highlighted Information	(4) & (6)
14627 - 14641	Same as above.	The Highlighted Information	(4) & (6)
14644 - 14650	Same as above.	The Highlighted Information	(4) & (6)
14656 - 14667	Same as above.	The Highlighted Information	(4) & (6)
14669 - 14675	Same as above.	The Highlighted Information	(4) & (6)
14677 - 14694	Same as above.	The Highlighted Information	(4) & (6)
14699 - 14703	Same as above.	The Highlighted Information	(4) & (6)
14706	Same as above.	The Highlighted Information	(4) & (6)
14716	Same as above.	The Highlighted Information	(4) & (6)
14721 - 14732	Same as above.	The Highlighted Information	(4) & (6)
14735 - 14739	Same as above.	The Highlighted Information	(4) & (6)
14742 - 14747	Same as above.	The Highlighted Information	(4) & (6)
14749 - 14753	Same as above.	The Highlighted Information	(4) & (6)
14755 - 14767	Same as above.	The Highlighted Information	(4) & (6)
14770 - 14773	Same as above.	The Highlighted Information	(4) & (6)
14776 - 14783	Same as above.	The Highlighted Information	(4) & (6)

OPC's REQUEST FOR PRODUCTION OF DOCUMENTS TO PEOPLES

<u>Bates Page</u>	<u>Document Description</u>	<u>Description of Information</u>	<u>Justification</u>
14786	Same as above.	The Highlighted Information	(4) & (6)
14788 - 14797	Same as above.	The Highlighted Information	(4) & (6)
14800 - 14808	Same as above.	The Highlighted Information	(4) & (6)
14810	Same as above.	The Highlighted Information	(4) & (6)
14812 - 14817	Same as above.	The Highlighted Information	(4) & (6)
14819	Same as above.	The Highlighted Information	(4) & (6)
14821 - 14825	Same as above.	The Highlighted Information	(4) & (6)
14828 - 14832	Same as above.	The Highlighted Information	(4) & (6)
14835 - 14839	Same as above.	The Highlighted Information	(4) & (6)
14843 - 14854	Same as above.	The Highlighted Information	(4) & (6)
14856 - 14859	Same as above.	The Highlighted Information	(4) & (6)
14861 - 14862	Same as above.	The Highlighted Information	(4) & (6)
14864	Same as above.	The Highlighted Information	(4) & (6)
14867 - 14869	Same as above.	The Highlighted Information	(4) & (6)
14871 - 14872	Same as above.	The Highlighted Information	(4) & (6)
14874	Same as above.	The Highlighted Information	(4) & (6)

OPC's REQUEST FOR PRODUCTION OF DOCUMENTS TO PEOPLES

<u>Bates Page</u>	<u>Document Description</u>	<u>Description of Information</u>	<u>Justification</u>
14879 - 14880	Same as above.	The Highlighted Information	(4) & (6)
14886 - 14887	Same as above.	The Highlighted Information	(4) & (6)
14890 - 14891	Same as above.	The Highlighted Information	(4) & (6)
14893 - 14894	Same as above.	The Highlighted Information	(4) & (6)
14900 - 14906	Same as above.	The Highlighted Information	(4) & (6)
14911 - 14916	Same as above.	The Highlighted Information	(4) & (6)
14921 - 14930	Same as above.	The Highlighted Information	(4) & (6)
14932 - 14937	Same as above.	The Highlighted Information	(4) & (6)
14939 - 14951	Same as above.	The Highlighted Information	(4) & (6)
14956 - 14958	Same as above.	The Highlighted Information	(4) & (6)
14963	Same as above.	The Highlighted Information	(4) & (6)
14968	Same as above.	The Highlighted Information	(4) & (6)
14973	Same as above.	The Highlighted Information	(4) & (6)
14978 - 14980	Same as above.	The Highlighted Information	(4) & (6)
14986 - 14992	Same as above.	The Highlighted Information	(4) & (6)
14994 - 14998	Same as above.	The Highlighted Information	(4) & (6)

OPC's REQUEST FOR PRODUCTION OF DOCUMENTS TO PEOPLES

<u>Bates Page</u>	<u>Document Description</u>	<u>Description of Information</u>	<u>Justification</u>
15000 - 15002	Same as above.	The Highlighted Information	(4) & (6)
15004 - 15010	Same as above.	The Highlighted Information	(4) & (6)
15012 - 15024	Same as above.	The Highlighted Information	(4) & (6)
15033 - 15037	Same as above.	The Highlighted Information	(4) & (6)
15040	Same as above.	The Highlighted Information	(4) & (6)
15042 - 15043	Same as above.	The Highlighted Information	(4) & (6)
15045 - 15049	Same as above.	The Highlighted Information	(4) & (6)
15055 - 15075	Same as above.	The Highlighted Information	(4) & (6)
15077 - 15082	Same as above.	The Highlighted Information	(4) & (6)
15084 - 15088	Same as above.	The Highlighted Information	(4) & (6)
15090 - 15105	Same as above.	The Highlighted Information	(4) & (6)
15107 - 15123	Same as above.	The Highlighted Information	(4) & (6)
15125 - 15142	Same as above.	The Highlighted Information	(4) & (6)
15144 - 15157	Same as above.	The Highlighted Information	(4) & (6)
15159 - 15169	Same as above.	The Highlighted Information	(4) & (6)
15171 - 15180	Same as above.	The Highlighted Information	(4) & (6)

OPC's REQUEST FOR PRODUCTION OF DOCUMENTS TO PEOPLES

<u>Bates Page</u>	<u>Document Description</u>	<u>Description of Information</u>	<u>Justification</u>
15182 - 15194	Same as above.	The Highlighted Information	(4) & (6)
15196 - 15201	Same as above.	The Highlighted Information	(4) & (6)
15204 - 15213	Same as above.	The Highlighted Information	(4) & (6)
15215 - 15219	Same as above.	The Highlighted Information	(4) & (6)
15221 - 15229	Same as above.	The Highlighted Information	(4) & (6)
15231 - 15244	Same as above.	The Highlighted Information	(4) & (6)
15246 - 15256	Same as above.	The Highlighted Information	(4) & (6)
15258 - 15271	Same as above.	The Highlighted Information	(4) & (6)
15273 - 15279	Same as above.	The Highlighted Information	(4) & (6)
15281 - 15285	Same as above.	The Highlighted Information	(4) & (6)
15288-15307	Internal audit reports provided in Peoples' Response to OPC's First Request for Production, Number 32.	The Highlighted Information	(2)
15309-15321	Same as above.	The Highlighted Information	(2)
15323 - 15335	Same as above.	The Highlighted Information	(2)
15336 - 15341	Same as above.	The Highlighted Information	(2)
15343-15350	Same as above.	The Highlighted Information	(2)
15352-15359	Same as above.	The Highlighted Information	(2)

OPC's REQUEST FOR PRODUCTION OF DOCUMENTS TO PEOPLES

<u>Bates Page</u>	<u>Document Description</u>	<u>Description of Information</u>	<u>Justification</u>
15361-15374	Same as above.	The Highlighted Information	(2)
15376-15387	Same as above.	The Highlighted Information	(2)
15389-15397	Same as above.	The Highlighted Information	(2)
15398-01 - 15398-02	Same as above.	The Highlighted Information	(2)
01542-015892	February 5, 2020, board meeting materials provided in Peoples' Response to OPC's First Request for Production of Documents, Number 37.	The Highlighted Information	(5)
05893-016340	August 6, 2020, board meeting materials provided in Peoples' Response to OPC's First Request for Production of Documents, Number 37.	The Highlighted Information	(5)
016341-016572	June 9-10, 2020, board meeting materials provided in Peoples' Response to OPC's First Request for Production of Documents, Number 37.	The Highlighted Information	(5)
016573-016891	May 19, 2020, board meeting materials provided in Peoples' Response to OPC's First Request for Production of Documents, Number 37.	The Highlighted Information	(5)
06892-017369	November 3, 2021, board meeting materials provided in Peoples' Response to OPC's First Request for Production of Documents, Number 37.	The Highlighted Information	(5)

OPC's REQUEST FOR PRODUCTION OF DOCUMENTS TO PEOPLES

<u>Bates Page</u>	<u>Document Description</u>	<u>Description of Information</u>	<u>Justification</u>
017370-017651	April 29, 2021, board meeting materials provided in Peoples' Response to OPC's First Request for Production of Documents, Number 37.	The Highlighted Information	(5)
017652-018014	August 6, 2021, board meeting materials provided in Peoples' Response to OPC's First Request for Production of Documents, Number 37.	The Highlighted Information	(5)
018015-018503	February 4, 2021, board meeting materials provided in Peoples' Response to OPC's First Request for Production of Documents, Number 37.	The Highlighted Information	(5)
018504-018847	April 28, 2022, board meeting materials provided in Peoples' Response to OPC's First Request for Production of Documents, Number 37.	The Highlighted Information	(5)
018848-019220	August 3, 2022, board meeting materials provided in Peoples' Response to OPC's First Request for Production of Documents, Number 37.	The Highlighted Information	(5)
019221-019653	February 2, 2022, board meeting materials provided in Peoples' Response to OPC's First Request for Production of Documents, Number 37.	The Highlighted Information	(5)
019654-019873	June 7, 2022, board meeting materials provided in Peoples' Response to OPC's First Request for Production of Documents, Number 37.	The Highlighted Information	(5)

OPC's REQUEST FOR PRODUCTION OF DOCUMENTS TO PEOPLES

<u>Bates Page</u>	<u>Document Description</u>	<u>Description of Information</u>	<u>Justification</u>
019874-020377	October 27, 2022, board meeting materials provided in Peoples' Response to OPC's First Request for Production of Documents, Number 37.	The Highlighted Information	(5)
020378-020860	February 9, 2023, board meeting materials provided in Peoples' Response to OPC's First Request for Production of Documents, Number 37.	The Highlighted Information	(5)
023857-024130	TEC Board Minutes and Consents, provided in Peoples' Response to OPC's First Request for Production of Documents, Number 37.	The Highlighted Information	(5)
020861-023856	Emera Board materials provided in Peoples' Response to OPC's First Request for Production of Documents, Number 37.	The Highlighted Information	(5)
24130-001 24130-834	– November 3, 2020, board meeting materials provided in Peoples' Response to OPC's First Request for Production of Documents, Number 37.	The Highlighted Information	(5)
24892-24899	Supporting documentation related to the new long-term debt issuances provided in Peoples' Response to OPC's First Request for Production of Documents, Number 44.	The Highlighted Information	(4)
24900	Peoples' Response to OPC's First Request for Production of Documents, Number 44.	The Highlighted Information	(4)
24905-24913	Information related to debt repayment and the company's legal separation provided in Peoples' Response to OPC's First Request for Production of Documents, Number 46.	The Highlighted Information	(4) & (7)

OPC's REQUEST FOR PRODUCTION OF DOCUMENTS TO PEOPLES

<u>Bates Page</u>	<u>Document Description</u>	<u>Description of Information</u>	<u>Justification</u>
24916 - 24918	Same as above.	The Highlighted Information	(4) & (7)
24921 - 24924	Same as above.	The Highlighted Information	(4) & (7)
24926 - 24930	Same as above.	The Highlighted Information	(4) & (7)
24932 - 24933	Same as above.	The Highlighted Information	(4) & (7)
24935 - 24937	Same as above.	The Highlighted Information	(4) & (7)
24940 - 24949	Same as above.	The Highlighted Information	(4) & (7)
24950	Same as above.	The Highlighted Information	(5)
5-16	Reports prepared by security analysts provided in Peoples' Response to OPC's Second Request for Production of Documents, Number 52.	The Highlighted Information	(7)
18-135	Same as above.	The Highlighted Information	(7)
3-321	Vendor charge information related to account 923 provided in Peoples' Response to OPC's Third Request for Production of Documents, Number 57.	The Highlighted Information	(4), (5) & (6)
322	Same as above.	The Highlighted Information	(4)
325-623	Vendor charge information related to account 925 provided in Peoples' Response to OPC's Third Request for Production of Documents, Number 58.	The Highlighted Information	(4), (5) & (6)
625-650	Same as above	The Highlighted Information	(4), (5) & (6)
652-686	Same as above	The Highlighted Information	(4), (5) & (6)
688-695	Same as above	The Highlighted Information	(4), (5) & (6)
697-713	Same as above	The Highlighted Information	(4), (5) & (6)
716	Same as above	The Highlighted Information	(4), (5) & (6)
719-814	Same as above	The Highlighted Information	(4), (5) & (6)

OPC's REQUEST FOR PRODUCTION OF DOCUMENTS TO PEOPLES

<u>Bates Page</u>	<u>Document Description</u>	<u>Description of Information</u>	<u>Justification</u>
816-853	Same as above	The Highlighted Information	(4), (5) & (6)
855-1075	Same as above	The Highlighted Information	(4), (5) & (6)
1077-1277	Same as above	The Highlighted Information	(4), (5) & (6)
1279-1281	Same as above	The Highlighted Information	(4), (5) & (6)
1283-1418	Same as above	The Highlighted Information	(4), (5) & (6)
1420-1487	Same as above	The Highlighted Information	(4), (5) & (6)
1489-1562	Same as above	The Highlighted Information	(4), (5) & (6)
1564-1682	Same as above	The Highlighted Information	(4), (5) & (6)
1684-1801	Same as above	The Highlighted Information	(4), (5) & (6)
1803-1833	Same as above	The Highlighted Information	(4), (5) & (6)
1835-1838	Same as above	The Highlighted Information	(4), (5) & (6)
1840-2246	Same as above	The Highlighted Information	(4), (5) & (6)
2248-2319	Same as above	The Highlighted Information	(4), (5) & (6)
2320	Same as above	The Highlighted Information	(4), (5) & (6)
2321	Same as above	The Highlighted Information	(4), (5) & (6)

OPC's REQUEST FOR PRODUCTION OF DOCUMENTS TO PEOPLES

<u>Bates Page</u>	<u>Document Description</u>	<u>Description of Information</u>	<u>Justification</u>
2323-2324	Vendor charge information related to account 930 provided in Peoples' Response to OPC's Third Request for Production of Documents, Number 59.	The Highlighted Information	(4), (5), (6)
2326-2351	Same as above.	The Highlighted Information	(4), (5) & (6)
2353-2373	Same as above.	The Highlighted Information	(4), (5) & (6)
2376-2377	Same as above.	The Highlighted Information	(4), (5) & (6)
2379-2402	Same as above.	The Highlighted Information	(4), (5) & (6)
2404-2538	Same as above.	The Highlighted Information	(4), (5) & (6)
2540-2576	Same as above.	The Highlighted Information	(4), (5) & (6)
2578-2604	Same as above.	The Highlighted Information	(4), (5) & (6)
2605-001 – 2605-1222	Same as above.	The Highlighted Information	(4), (5) & (6)
2605-1223 - 2605-1626	Same as above.	The Highlighted Information	(4), (5) & (6)
2610-2615	Documents relating to disposal of certain property provided in Peoples' Response to OPC's Third Request for Production of Documents, Number 60.	The Highlighted Information	(5)
2617	Vendor charge information related to Deloitte Consulting, LLP, provided in Peoples' Response to OPC's Third Request for Production of Documents, Number 61.	The Highlighted Information	(3) & (4)

OPC's REQUEST FOR PRODUCTION OF DOCUMENTS TO PEOPLES

<u>Bates Page</u>	<u>Document Description</u>	<u>Description of Information</u>	<u>Justification</u>
2620-2621	Same as above.	The Highlighted Information	(3) & (4)
2624	Same as above.	The Highlighted Information	(3) & (4)
2626-2633	Same as above.	The Highlighted Information	(3) & (4)
2637-2642	Same as above.	The Highlighted Information	(3) & (4)
2652-2653	Same as above.	The Highlighted Information	(3) & (4)
2660	Same as above.	The Highlighted Information	(3) & (4)
2662	Same as above.	The Highlighted Information	(3) & (4)
2664	Same as above.	The Highlighted Information	(3) & (4)
2667-2668	Same as above.	The Highlighted Information	(3) & (4)
2670	Same as above.	The Highlighted Information	(3) & (4)
2672-2674	Same as above.	The Highlighted Information	(3) & (4)
2676-2682	Same as above.	The Highlighted Information	(3) & (4)
2685-2686	Same as above.	The Highlighted Information	(3) & (4)
2688	Same as above.	The Highlighted Information	(3) & (4)
2703	Same as above.	The Highlighted Information	(3) & (4)

OPC's REQUEST FOR PRODUCTION OF DOCUMENTS TO PEOPLES

<u>Bates Page</u>	<u>Document Description</u>	<u>Description of Information</u>	<u>Justification</u>
2705-2719	Same as above.	The Highlighted Information	(3) & (4)
2723	Same as above.	The Highlighted Information	(3) & (4)
2726-2732	Same as above.	The Highlighted Information	(3) & (4)
2734-2762	Same as above.	The Highlighted Information	(3) & (4)
2788	Same as above.	The Highlighted Information	(3) & (4)
2807	Same as above.	The Highlighted Information	(3) & (4)
2817-2820	Same as above.	The Highlighted Information	(3) & (4)
2823-2826	Same as above.	The Highlighted Information	(3) & (4)
2832-2833	Same as above.	The Highlighted Information	(3) & (4)
2838-2839	Same as above.	The Highlighted Information	(3) & (4)
2848-2849	Same as above.	The Highlighted Information	(3) & (4)
2854-2858	Same as above.	The Highlighted Information	(3) & (4)
2860	Same as above.	The Highlighted Information	(3) & (4)
2864	Same as above.	The Highlighted Information	(3) & (4)
2868	Same as above.	The Highlighted Information	(3) & (4)

OPC's REQUEST FOR PRODUCTION OF DOCUMENTS TO PEOPLES

<u>Bates Page</u>	<u>Document Description</u>	<u>Description of Information</u>	<u>Justification</u>
2872-2878	Same as above.	The Highlighted Information	(3) & (4)
2882	Same as above.	The Highlighted Information	(3) & (4)
2884	Same as above.	The Highlighted Information	(3) & (4)
2886-2889	Same as above.	The Highlighted Information	(3) & (4)
2895	Same as above.	The Highlighted Information	(3) & (4)
2901	Vendor charge information related to Margaret Kaigh Doyle provided in Peoples' Response to OPC's Third Request for Production of Documents, No. 62.	The Highlighted Information	(4) & (7)
2910-2911	Same as above.	The Highlighted Information	(4) & (7)
2914-2922	Same as above.	The Highlighted Information	(4) & (7)
2926-2930	Same as above.	The Highlighted Information	(4) & (7)
2933-2942	Vendor charge information related to Straad Consulting, Inc, provided in Peoples' Response to OPC's Third Request for Production of Documents, Number 63.	The Highlighted Information	(7)
2944-2959	Same as above.	The Highlighted Information	(7)
2961	Same as above.	The Highlighted Information	(7)
2963	Same as above.	The Highlighted Information	(7)

OPC's REQUEST FOR PRODUCTION OF DOCUMENTS TO PEOPLES

<u>Bates Page</u>	<u>Document Description</u>	<u>Description of Information</u>	<u>Justification</u>
2965-2966	Same as above.	The Highlighted Information	(7)
2968-2996	Same as above.	The Highlighted Information	(7)
2998-3006	Same as above.	The Highlighted Information	(7)
3008	Same as above.	The Highlighted Information	(7)
3010	Same as above.	The Highlighted Information	(7)
3012	Same as above.	The Highlighted Information	(7)
3014	Same as above.	The Highlighted Information	(4) & (7)
3016-3019	Same as above.	The Highlighted Information	(4) & (7)
3022	Same as above.	The Highlighted Information	(4) & (7)
3024-3028	Same as above.	The Highlighted Information	(4) & (7)
3030-3052	Same as above.	The Highlighted Information	(4) & (7)
3054-3061	Same as above.	The Highlighted Information	(4) & (7)
3063	Same as above.	The Highlighted Information	(7)
3065-3068	Same as above.	The Highlighted Information	(7)
3070-3073	Same as above.	The Highlighted Information	(7)

OPC's REQUEST FOR PRODUCTION OF DOCUMENTS TO PEOPLES

<u>Bates Page</u>	<u>Document Description</u>	<u>Description of Information</u>	<u>Justification</u>
3075-3091	Same as above.	The Highlighted Information	(7)
3093-3105	Same as above.	The Highlighted Information	(7)
3107-3119	Same as above.	The Highlighted Information	(7)
3121-3139	Same as above.	The Highlighted Information	(7)
3147	Same as above.	The Highlighted Information	(6)
3150-3164	Same as above.	The Highlighted Information	(7)
3168	Same as above.	The Highlighted Information	(7)
3170-3172	Same as above.	The Highlighted Information	(7)
3175-3185	Same as above.	The Highlighted Information	(7)
3187-3196	Same as above.	The Highlighted Information	(7)
3198-3212	Same as above.	The Highlighted Information	(7)
3213	Same as above.	The Highlighted Information	(5)
3214	Same as above.	The Highlighted Information	(5)
3215	Same as above.	The Highlighted Information	(5)
3216	Same as above.	The Highlighted Information	(5)

OPC's REQUEST FOR PRODUCTION OF DOCUMENTS TO PEOPLES

<u>Bates Page</u>	<u>Document Description</u>	<u>Description of Information</u>	<u>Justification</u>
3243	Vendor charge information related to the Hunter Group provided in Peoples' Response to OPC's Third Request for Production of Documents, Number 64.	The Highlighted Information	(4) & (7)
3251-3260	Same as above.	The Highlighted Information	(4), (5) & (6)
3282	Same as above.	The Highlighted Information	(4), (5) & (6)
3288-3308	Same as above.	The Highlighted Information	(4) & (5)
3315	Documents related to Marketing Consulting Services provided by TECO Partners provided in Peoples' Response to OPC's Third Request for Production of Documents, No. 65.	The Highlighted Information	(4)
3324-3334	Same as above.	The Highlighted Information.	(4)
3335	Same as above.	The Highlighted Information	(4)
3352-3392	Documents related to the increase in account 375 from December 31, 2022 to December 31, 2024, provided in Peoples' Response to OPC's Third Request for Production of Documents, Number 68.	The Highlighted Information	(4), (7)
3402	Same as above.	The Highlighted Information	(6)
3403	Same as above.	The Highlighted Information	(6)

OPC's REQUEST FOR PRODUCTION OF DOCUMENTS TO PEOPLES

<u>Bates Page</u>	<u>Document Description</u>	<u>Description of Information</u>	<u>Justification</u>
3410	Documents related to the increase in account 303.01 from December 31, 2022 to December 31, 2024, provided in Peoples' Response to OPC's Third Request for Production of Documents, Number 69.	The Highlighted Information	(3), (4), (5)
3412	Same as above.	The Highlighted Information	(3), (4), (5)
3415	Same as above.	The Highlighted Information	(3), (4), (5)
3418	Same as above.	The Highlighted Information	(3), (4), (5)
3419-3422	Same as above.	The Highlighted Information	(3), (4), (5)
3427	Same as above.	The Highlighted Information	(3), (4), (5)
3431-3433	Same as above.	The Highlighted Information	(3), (4), (5)
3439	Same as above.	The Highlighted Information	(3), (4), (5)
3443-3445	Same as above.	The Highlighted Information	(3), (4), (5)
3447-3449	Same as above.	The Highlighted Information	(3), (4), (5)
3451	Same as above.	The Highlighted Information	(3), (4), (5)
3453	Same as above.	The Highlighted Information	(3), (4), (5)
3455	Same as above.	The Highlighted Information	(3), (4), (5)

OPC's REQUEST FOR PRODUCTION OF DOCUMENTS TO PEOPLES

<u>Bates Page</u>	<u>Document Description</u>	<u>Description of Information</u>	<u>Justification</u>
3457-3458	Same as above.	The Highlighted Information	(3), (4), (5)
3460	Same as above.	The Highlighted Information	(3), (4), (5)
3462	Same as above.	The Highlighted Information	(3), (4), (5)
3464	Same as above.	The Highlighted Information	(3), (4), (5)
3467	Same as above.	The Highlighted Information	(3), (4), (5)
3469-3472	Same as above.	The Highlighted Information	(3), (4), (5)
3474	Same as above.	The Highlighted Information	(3), (4), (5)
3477-3487	Same as above.	The Highlighted Information	(3), (4), (5)
3489	Same as above.	The Highlighted Information	(3), (4), (5)
3491-3496	Same as above.	The Highlighted Information	(3), (4), (5)
3498	Same as above.	The Highlighted Information	(3), (4), (5)
3500-3501	Same as above.	The Highlighted Information	(3), (4), (5)
3503	Same as above.	The Highlighted Information	(3), (4), (5)
3505	Same as above.	The Highlighted Information	(3), (4), (5)
3507-3510	Same as above.	The Highlighted Information	(3), (4), (5)

OPC's REQUEST FOR PRODUCTION OF DOCUMENTS TO PEOPLES

<u>Bates Page</u>	<u>Document Description</u>	<u>Description of Information</u>	<u>Justification</u>
3512-3514	Same as above.	The Highlighted Information	(3), (4), (5)
3516-3521	Same as above.	The Highlighted Information	(3), (4), (5)
3524	Same as above.	The Highlighted Information	(3), (4), (5)
7-12	Documents related to the Work and Asset Management project provided in Peoples' Response to OPC's Fourth Request for Production of Documents, Number 74.	The Highlighted Information	(3), (4), (5)
25	Same as above.	The Highlighted Information	(3), (4), (5)
37-38 40-42	Same as above.	The Highlighted Information	(3), (4), (5)
40-42	Same as above.	The Highlighted Information	(3), (4), (5)
52	Same as above.	The Highlighted Information	(3), (4), (5)
57-59	Same as above.	The Highlighted Information	(3), (4), (5)
64-65	Same as above.	The Highlighted Information	(3), (4), (5)
72-76	Same as above.	The Highlighted Information	(3), (4), (5)
78-81	Same as above.	The Highlighted Information	(3), (4), (5)
83-88	Same as above.	The Highlighted Information	(3), (4), (5)
90-109	Same as above.	The Highlighted Information	(3), (4), (5)

OPC's REQUEST FOR PRODUCTION OF DOCUMENTS TO PEOPLES

<u>Bates Page</u>	<u>Document Description</u>	<u>Description of Information</u>	<u>Justification</u>
118	Same as above.	The Highlighted Information	(3), (4), (5)
135	Same as above.	The Highlighted Information	(3), (4), (5)
137-138	Same as above.	The Highlighted Information	(3), (4), (5)
140-141	Same as above.	The Highlighted Information	(3), (4), (5)
147	Same as above.	The Highlighted Information	(3), (4), (5)
149	Same as above.	The Highlighted Information	(3), (4), (5)
152-154	Same as above.	The Highlighted Information	(3), (4), (5)
157-158	Same as above.	The Highlighted Information	(3), (4), (5)
169	Same as above.	The Highlighted Information	(3), (4), (5)
173-180	Same as above.	The Highlighted Information	(3), (4), (5)
182-183	Same as above.	The Highlighted Information	(3), (4), (5)
187-188	Same as above.	The Highlighted Information	(3), (4), (5)
191-192	Same as above.	The Highlighted Information	(3), (4), (5)
197-199	Same as above.	The Highlighted Information	(3), (4), (5)
202-212	Same as above.	The Highlighted Information	(3), (4), (5)

OPC's REQUEST FOR PRODUCTION OF DOCUMENTS TO PEOPLES

<u>Bates Page</u>	<u>Document Description</u>	<u>Description of Information</u>	<u>Justification</u>
215-243	Same as above.	The Highlighted Information	(3), (4), (5)
247-251	Same as above.	The Highlighted Information	(3), (4), (5)
258-260	Same as above.	The Highlighted Information	(3), (4), (5)
300-301	Same as above.	The Highlighted Information	(3), (4), (5)
305	Same as above.	The Highlighted Information	(3), (4), (5)
307-308	Same as above.	The Highlighted Information	(3), (4), (5)
310-313	Same as above.	The Highlighted Information	(3), (4), (5)
315-316	Same as above.	The Highlighted Information	(3), (4), (5)
366-367	Same as above.	The Highlighted Information	(3), (4), (5)
373	Same as above.	The Highlighted Information	(3), (4), (5)
376-377	Same as above.	The Highlighted Information	(3), (4), (5)
379-381	Same as above.	The Highlighted Information	(3), (4), (5)
383-384	Same as above.	The Highlighted Information	(3), (4), (5)
386-387	Same as above.	The Highlighted Information	(3), (4), (5)
392	Same as above.	The Highlighted Information	(3), (4), (5)

OPC's REQUEST FOR PRODUCTION OF DOCUMENTS TO PEOPLES

<u>Bates Page</u>	<u>Document Description</u>	<u>Description of Information</u>	<u>Justification</u>
394	Same as above.	The Highlighted Information	(3), (4), (5)
397-399	Same as above.	The Highlighted Information	(3), (4), (5)
404	Same as above.	The Highlighted Information	(3), (4), (5)
408-411	Same as above.	The Highlighted Information	(3), (4), (5)
414-415	Same as above.	The Highlighted Information	(3), (4), (5)
418-420	Same as above.	The Highlighted Information	(3), (4), (5)
425	Same as above.	The Highlighted Information	(3), (4), (5)
434	Same as above.	The Highlighted Information	(3), (4), (5)
438	Same as above.	The Highlighted Information	(3), (4), (5)
441-444	Same as above.	The Highlighted Information	(3), (4), (5)
446-447	Same as above.	The Highlighted Information	(3), (4), (5)
450	Same as above.	The Highlighted Information	(3), (4), (5)
452-453	Same as above.	The Highlighted Information	(3), (4), (5)
464	Same as above.	The Highlighted Information	(3), (4), (5)
466-476	Same as above.	The Highlighted Information	(3), (4), (5)

OPC's REQUEST FOR PRODUCTION OF DOCUMENTS TO PEOPLES

<u>Bates Page</u>	<u>Document Description</u>	<u>Description of Information</u>	<u>Justification</u>
478	Same as above.	The Highlighted Information	(3), (4), (5)
480	Same as above.	The Highlighted Information	(3), (4), (5)
494	Same as above.	The Highlighted Information	(3), (4), (5)
504-506	Same as above.	The Highlighted Information	(3), (4), (5)
511	Same as above.	The Highlighted Information	(3), (4), (5)
516-520	Same as above.	The Highlighted Information	(3), (4), (5)
523-527	Same as above.	The Highlighted Information	(3), (4), (5)
529-541	Same as above.	The Highlighted Information	(3), (4), (5)
545	Same as above.	The Highlighted Information	(3), (4), (5)
547	Same as above.	The Highlighted Information	(3), (4), (5)
559-560	Same as above.	The Highlighted Information	(3), (4), (5)
565	Same as above.	The Highlighted Information	(3), (4), (5)
568	Same as above.	The Highlighted Information	(3), (4), (5)
570-571	Same as above.	The Highlighted Information	(3), (4), (5)
578-580	Same as above.	The Highlighted Information	(3), (4), (5)

OPC's REQUEST FOR PRODUCTION OF DOCUMENTS TO PEOPLES

<u>Bates Page</u>	<u>Document Description</u>	<u>Description of Information</u>	<u>Justification</u>
585-589	Same as above.	The Highlighted Information	(3), (4), (5)
591-615	Same as above.	The Highlighted Information	(3), (4), (5)
618-622	Same as above.	The Highlighted Information	(3), (4), (5)
624-627	Same as above.	The Highlighted Information	(3), (4), (5)
629-639	Same as above.	The Highlighted Information	(3), (4), (5)
641-653	Same as above.	The Highlighted Information	(3), (4), (5)
656	Same as above.	The Highlighted Information	(3), (4), (5)
660	Same as above.	The Highlighted Information	(3), (4), (5)
663	Same as above.	The Highlighted Information	(3), (4), (5)
670	Same as above.	The Highlighted Information	(3), (4), (5)
672-674	Same as above.	The Highlighted Information	(3), (4), (5)
684-685	Same as above.	The Highlighted Information	(3), (4), (5)
1047	Documents related to the AMI Pilot provided in Peoples' Response to OPC's Fourth Request for Production of Documents, Number 76.	The Highlighted Information	(6)

OPC's REQUEST FOR PRODUCTION OF DOCUMENTS TO PEOPLES

<u>Bates Page</u>	<u>Document Description</u>	<u>Description of Information</u>	<u>Justification</u>
1231-1250	Documents related to the company's new headquarters provided in Peoples' Response to OPC's Fourth Request for Production of Documents, Number 82.	The Highlighted Information	(4) & (5)
1252-1276	Same as above.	The Highlighted Information	(4) & (5)
1278-1298	Same as above.	The Highlighted Information	(4) & (5)
1300-1325	Same as above.	The Highlighted Information	(4) & (5)
1326-1332	Same as above.	The Highlighted Information	(4) & (5)
1333	Same as above.	The Highlighted Information	(4) & (5)
1335-1339	Documents related to compensation methodology provided in Peoples' Response to OPC's Fourth Request for Production of Documents, Number 83.	The Highlighted Information	(4)
61-87	Documents related to reserve accrual accounting provided in Peoples' Response to OPC's Fifth Request for Production of Documents, Number 92.	The Highlighted Information	(5) & (6)
88	Same as above.	The Highlighted Information	(5)

OPC'S INTERROGATORIES TO PEOPLES			
<u>Bates Page</u>	<u>Document Description</u>	<u>Description of Information</u>	<u>Justification</u>
10	Data related to Peoples' forecasted growth rates for certain factors provided in Peoples' Response to OPC's First Set of Interrogatories, Number 6.	The Highlighted Text	(5)
32	Salary structure information provided in Peoples' Response to OPC's First Set of Interrogatories, Number 17.	The Highlighted Text	(4)
47	Information related to compensation tied to an incentive/bonus/at-risk pay mechanism provided in Peoples' Response to OPC's First Set of Interrogatories, Number 27.	The Highlighted Text	(4)
132	Information related to OPEB and pension costs provided in Peoples' Response to OPC's First Set of Interrogatories, Number 41.	The Highlighted Text	(5)
134 - 135	Same as above.	The Highlighted Text	(5)
137	Same as above.	The Highlighted Text	(5)
139 – 144	Same as above.	The Highlighted Text	(5)
146 - 161	Same as above.	The Highlighted Text	(5)
163 – 176	Same as above.	The Highlighted Text	(5)
178	Same as above.	The Highlighted Text	(5)
180 - 184	Same as above.	The Highlighted Text	(5)
187 – 188	Same as above.	The Highlighted Text	(5)
190 – 191	Same as above.	The Highlighted Text	(5)
193	Same as above.	The Highlighted Text	(5)

OPC'S INTERROGATORIES TO PEOPLES			
<u>Bates Page</u>	<u>Document Description</u>	<u>Description of Information</u>	<u>Justification</u>
195 - 210	Same as above.	The Highlighted Text	(5)
212 - 225	Same as above.	The Highlighted Text	(5)
227 - 232	Same as above.	The Highlighted Text	(5)
234	Same as above.	The Highlighted Text	(5)
236 - 240	Same as above.	The Highlighted Text	(5)
251-282	Detailed accounting information related to outside services expense provided in Peoples' Response to OPC's First Set of Interrogatories, Number 44.	The Highlighted Text	(4)
323	Information related to common or shared officers and directors provided in Peoples' Response to OPC's First Set of Interrogatories, Number 69.	The Highlighted Text	(5)
324-03	Salary and benefit information provided in Peoples' Supplemental Response to OPC's First Set of Interrogatories, Number 70.	The Highlighted Text	(5)
324-03	Salary and benefit information provided in Peoples' Revised Response to OPC's First Set of Interrogatories, Number 70, dated July 7, 2023.	The Highlighted Text	(5)
45	Information related to vendor invoices provided in Peoples' Response to OPC's Third Set of Interrogatories, Number 164.	The Highlighted Text	(4) & (5)

OPC'S INTERROGATORIES TO PEOPLES			
<u>Bates Page</u>	<u>Document Description</u>	<u>Description of Information</u>	<u>Justification</u>
30	Information related to labor provided in Peoples' Response to OPC's Fourth Set of Interrogatories, Number 203.	The Highlighted Text	(4) & (5)
61-87	Information related to mergers and acquisitions provided in Peoples' Response to OPC's Fourth Set of Interrogatories, Number 209.	The Highlighted Text	(5)
38	Same as above.	The Highlighted Text	(5)
41	Information related to discussions regarding mergers and acquisitions provided in Peoples' Response to OPC's Fourth Set of Interrogatories, Number 210.	The Highlighted Text	(5)

- (1) The highlighted information consists of trade secrets and is protected by Section 366.093(3)(a), Florida Statutes.
- (2) The highlighted information relates to internal auditing controls and reports of internal auditors and is protected by Section 366.093(b), Florida Statutes.
- (3) The highlighted information relates to security measures, systems, or procedures and is protected by Section 366.093(3)(c), Florida Statutes.
- (4) The 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" under Section 366.093(3)(d), Florida Statutes.
- (5) The highlighted information relates 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)(e), Florida Statutes.
- (6) The highlighted information relates to employee personnel information unrelated to compensation, duties, qualifications, or responsibilities, and is protected under Section 366.093(3)(f), Florida Statutes.
- (7) 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 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

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