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July 18, 2023

VIA HAND DELIVERY

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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 certain information contained in the May 31, 2023 deposition transcript and exhibits of Christian Richard. 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.)

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AFD 1 redacted CD
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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: July 18, 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 27, 2023, Peoples filed a Notice of Intent to Request Confidential Classification for portions of the deposition transcript of Christian Richard. *See* DN 03833-2023. Consistent with that Notice of Intent, the company identified certain portions of Mr. Richard's transcript as specified on Exhibit "A," that it believes constitute Confidential Information and has designated it as such by highlighting. 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. 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. Attached hereto as Exhibit “B” is the public version of the documents with the Confidential Information.

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 18th 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 Request for Confidential Classification, filed on behalf of Peoples Gas System, Inc., has been furnished by electronic mail on this 18th day of July, 2023 to the following:

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ATTORNEY

EXHIBIT A
CONFIDENTIAL DEPOSITION OF CHRISTIAN RICHARD
JUSTIFICATION FOR CONFIDENTIAL TREATMENT

<u>Document</u>	<u>Page</u>	<u>Line/Row</u>	<u>Description of Information</u>	<u>Justification</u>
Transcript	21	16-18	The Highlighted Text	(3)
Transcript	58	24	The Highlighted Text	(2)
Transcript	118	22-25	The Highlighted Text	(3)
Transcript	119	4, 11, and 12	The Highlighted Text	(3)
Transcript	123	10-21	The Highlighted Text	(3)
Transcript	124	2-10	The Highlighted Text	(3)
Transcript	124	19-25	The Highlighted Text	(3)
Transcript	125	11-14	The Highlighted Text	(3)
Transcript	209	6-7	The Highlighted Text	(2)
Transcript	211	11-12	The Highlighted Text	(3)
Transcript	216	17-25	The Highlighted Text	(3)
Transcript	217	1	The Highlighted Text	(3)
Transcript	217	9-25	The Highlighted Text	(3)
Transcript	218	1-16, 21-25	The Highlighted Text	(3)
Transcript	219	1-24	The Highlighted Text	(3)
Transcript	243	10-25	The Highlighted Text	(1)
Transcript	244	1-25	The Highlighted Text	(1)
Transcript	245	1-25	The Highlighted Text	(1)
Transcript	246	1-25	The Highlighted Text	(1)
Transcript	247	1-25	The Highlighted Text	(1)
Transcript	248	1-25	The Highlighted Text	(1)
Transcript	249	1-10	The Highlighted Text	(1)

Confidential Deposition Exhibits				
<u>Exhibit No.</u>	<u>Document Description</u>	<u>Bates Pages</u>	<u>Description of Information</u>	<u>Justification</u>
2	06/07/22 PGS Strategy, 2022 Refresh	019684-019701	The Highlighted Information	(1)
(Late Filed) 3	Project Cost Capture Procedure	1-20	The Highlighted Information	(2)
4	08/06/20 Peoples Gas Five-year Financial Forecast	16217-16210	The Highlighted Information	(1)
5	Board of Directors Meeting, Strategic Rate Base vs. MFR Rate Base	019702	The Highlighted Information	(1)
8	02/09/23 Regulatory Update	20571-20575	The Highlighted Information	(1)
17	PGS Strategy, 2020 Refresh	016478	The Highlighted Information	(1)
(Late Filed) 18	Supply Chain Analysis	1-18	The Highlighted Information	(4)
19	Blanket Capital Projects Review	15372	The Highlighted Information	(5)

(1) The highlighted 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.

(2) The highlighted information includes company specific cost information or cost estimating procedures. Thus, 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), Florida Statutes.

(3) The highlighted information identifies current or potential individual customers of Peoples. Thus, 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), Florida Statutes.

(4) 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.

(5) The highlighted information consists of internal auditing report. Thus, this information constitutes “internal auditing controls and reports of internal auditors” and is protected by Section 366.093(3)(b), 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