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July 25, 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 supplemental response to Staff's Third Request for Production (No. 11), served on May 24, 2023. Also attached is 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 I redacted Exh "B"
APA _____
ECO _____
ENG _____
GCL _____
IDM _____
CLK _____

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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 25, 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 25, 2023, Peoples filed its supplemental response to Staff's Third Request for Production of Documents (No. 11). The company believes that portions of this supplemental response to Staff's Third Request for Production, No. 11, as specified on Exhibit "A," constitute Confidential Information and has designated it as such by highlighting, and contemporaneous with the filing of this request and motion, has submitted the confidential responses to the Commission Clerk under a separate, confidential cover letter. Peoples' requests confidential classification for this information such that it will be entitled to protection against public disclosure pursuant to Section 366.093, Florida Statutes. In support of this request and motion, the company states:

1. Subsection 366.093(1), Florida Statutes, provides that any records “found by the Commission to be proprietary confidential business information shall be kept confidential and shall be exempt from s. 119.07(1), Florida Statutes [requiring disclosure under the Public Records Act].” Proprietary confidential business information includes but is not limited to: (a) trade secrets; (b) internal auditing controls and reports of internal auditors; (c) security measures, systems, or procedures; (d) information concerning bids or other contractual data, the disclosure of which would impair the efforts of the public utility or its affiliates to contract for goods or services on favorable terms; (e) information relating to competitive interests, the disclosure of which would impair the competitive business of the provider of the information; and (f) employee personnel information unrelated to compensation, duties, qualifications, or responsibilities. §366.093(3)(a)-(f), Fla. Stat. The Confidential Information that is the subject of this request and motion falls within one or more of these statutory categories and, thus, constitutes proprietary confidential business information entitled to protection under Section 366.093, Florida Statutes, and Rule 25-22.006, Florida Administrative Code.

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

3. The public version of the documents with the Confidential Information is 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 25th 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, filed on behalf of Peoples Gas System, Inc., has been furnished by electronic mail on this 25th day of July, 2023 to the following:

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ATTORNEY

**EXHIBIT A
JUSTIFICATION FOR CONFIDENTIAL TREATMENT**

STAFF'S THIRD REQUEST FOR PRODUCTION OF DOCUMENTS (11)				
<u>Bates Page</u>	<u>Document Description</u>	<u>Column, Paragraph, Page, Line Designation, Header or Other Identifier</u>	<u>Description of Information</u>	<u>Justification</u>
97-02	Mercer Benefits Valuation Analysis – Retirement/Savings, updated July 2023, provided as a supplemental response to Staff's Third Request for Production of Documents, Number 11.	About the Report	The Highlighted Text	(1)
97-03	Same as above.	Retirement/Savings	The Highlighted Text	(1)
97-04	Same as above.	Retirement/Savings – Defined Benefit	The Highlighted Text	(1)
97-05	Same as above.	Retirement/Savings - Defined Contribution	The Highlighted Text	(1)
97-06	Same as above.	Retirement/Savings – Stock Purchase	The Highlighted Text	(1)

(1) The highlighted information consists of the proprietary work product of certain third parties. Public disclosure of this information would allow duplication of these entity's work without compensation for their efforts. This information is in the nature of a trade secret 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	<u>X</u> _____
Public Version(s) of the Document(s) attached in CD format	_____

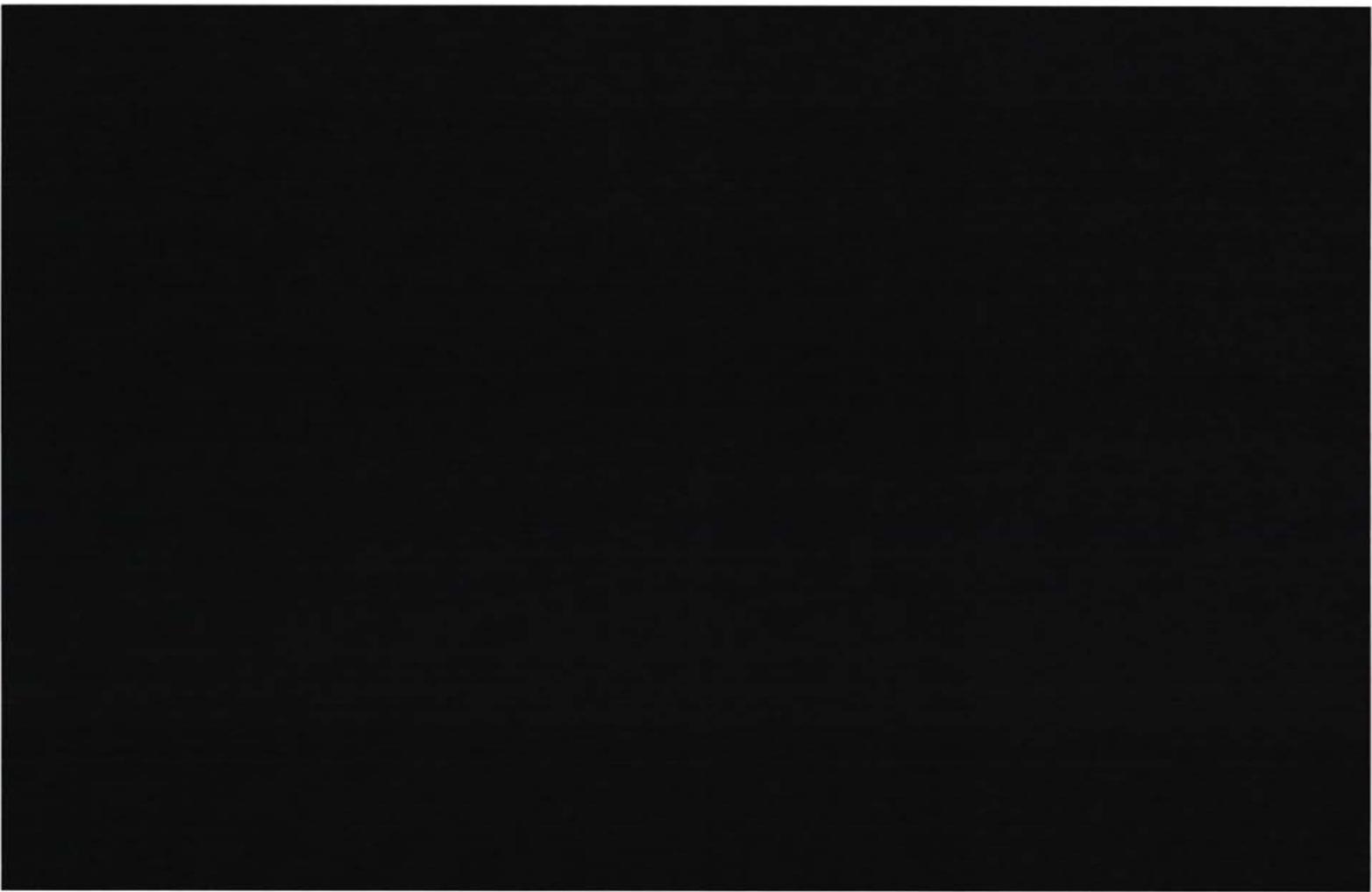
About the Report



Retirement/Savings



Retirement/Savings – Defined Benefit



Retirement/Savings – Defined Contribution



Retirement/Savings – Stock Purchase



EXHIBIT C
JUSTIFICATION FOR EXTENSION OF CONFIDENTIALITY PERIOD

N/A