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FPSC - COMMISSION CLERK

Attorneys and Counselors at Law  
123 South Calhoun Street  
P.O. Box 391 32302  
Tallahassee, FL 32301  
P: (850) 224-9115  
F: (850) 222-7560  
[ausley.com](http://ausley.com)

July 27, 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  
2023 JUL 27 AM 2:13  
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Re: Docket No. 20230004-GU; Natural Gas Conservation Cost Recovery

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 its response to Staff's First Request for Production of Documents (Nos. 1-2), served on July 7, 2023. Also enclosed 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

COM \_\_\_  
AFD \_\_\_  
APA \_\_\_  
ECO 1 ex "B"  
ENG \_\_\_  
GCL \_\_\_  
IDM \_\_\_  
CLK \_\_\_

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Natural Gas Conservation     )  
Cost Recovery Clause                 )  
\_\_\_\_\_                                  )

DOCKET NO. 20230004-GU

FILED:             July 27, 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 27, 2023, Peoples filed its response to Staff's First Request for Production of Documents (Nos. 1-2). The company believes that portions of this response, 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. Exhibit "B" contains the public versions 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 27<sup>th</sup> day of July 2023.

Respectfully submitted,



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J. JEFFRY WAHLEN  
[jwahlen@ausley.com](mailto:jwahlen@ausley.com)  
MALCOLM N. MEANS  
[mmeans@ausley.com](mailto:mmeans@ausley.com)  
VIRGINIA PONDER  
[vponder@ausley.com](mailto:vponder@ausley.com)  
Ausley McMullen  
Post Office Box 391  
Tallahassee, Florida 32302  
(850) 224-9115

ATTORNEYS FOR PEOPLES GAS SYSTEM, INC.

**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that a true and correct copy of the foregoing Request, filed on behalf of Peoples Gas System, Inc., has been furnished by electronic mail on this 27<sup>th</sup> day of July, 2023 to the following:

Major Thompson  
Ryan Sandy  
Austin Watrous  
Daniel Dose  
Chasity Vaughan  
Danyel Sims  
Office of General Counsel  
Florida Public Service Commission  
Room 390L – Gerald L. Gunter Building  
2540 Shumard Oak Boulevard  
Tallahassee, FL 32399-0850  
[rsandy@psc.state.fl.us](mailto:rsandy@psc.state.fl.us)  
[mthompso@psc.state.fl.us](mailto:mthompso@psc.state.fl.us)  
[awatrous@psc.state.fl.us](mailto:awatrous@psc.state.fl.us)  
[ddose@psc.state.fl.us](mailto:ddose@psc.state.fl.us)  
[dsims@psc.state.fl.us](mailto:dsims@psc.state.fl.us)  
[cvaughan@psc.state.fl.us](mailto:cvaughan@psc.state.fl.us)

Amber Norris  
Dylan Andrews  
Division of Accounting and Finance  
Florida Public Service Commission  
Room 160B – Gerald L. Gunter Bldg.  
2540 Shumard Oak Boulevard  
Tallahassee, FL 32399-0850  
[amnorris@psc.state.fl.us](mailto:amnorris@psc.state.fl.us)  
[dandrews@psc.state.fl.us](mailto:dandrews@psc.state.fl.us)

Jon C. Moyle, Jr.  
Karen A. Putnal  
Moyle Law Firm, P.A.  
118 North Gadsden Street  
Tallahassee, Florida 32301  
[jmoyle@moylelaw.com](mailto:jmoyle@moylelaw.com)  
[kputnal@moylelaw.com](mailto:kputnal@moylelaw.com)

Walt L. Trierweiler  
Charles J. Rehwinkel  
Patricia A. Christensen  
Mary A. Wessling  
Office of Public Counsel  
111 West Madison Street – Room 812  
Tallahassee, FL 32399-1400  
[trierweiler.walt@leg.state.fl.us](mailto:trierweiler.walt@leg.state.fl.us)  
[rehwinkel.charles@leg.state.fl.us](mailto:rehwinkel.charles@leg.state.fl.us)  
[christensen.patty@leg.state.fl.us](mailto:christensen.patty@leg.state.fl.us)  
[wessling.mary@leg.state.fl.us](mailto:wessling.mary@leg.state.fl.us)



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ATTORNEY

**EXHIBIT A**  
**JUSTIFICATION FOR CONFIDENTIAL TREATMENT**

<b>Document Description</b>	<b>Bates Pages</b>	<b>Description of information</b>	<b>Justification</b>
Request for proposal documents issued by the company to bidders in the development of the Commercial Walkthrough Audit program provided in response to Staff's 1 <sup>st</sup> Request for Production of Documents, No. 1.	28	The Highlighted Text	(3)
Same as above.	29	The Highlighted Text	(3)
Same as above.	30	The Highlighted Text	(3)
Same as above.	31	The Highlighted Text	(3)
Same as above.	32	The Highlighted Text	(3)
Documents that ranked or scored bids received in response to the request for proposal issued by the company for developing the Commercial Walkthrough Audit program provided in response to Staff's 1st Request for Production of Documents, No. 2.	36	The Highlighted Text	(1), (2)
Same as above.	39	The Highlighted Text	(1), (2)
Same as above.	43	The Highlighted Text	(1), (2)
Same as above.	44	The Highlighted Text	(1)
Same as above.	45	The Highlighted Text	(1), (2)
Same as above.	46	The Highlighted Text	(2)

(1) The highlighted text thus constitutes "information concerning bids ... the disclosure of which would impair the efforts of the public utility or its affiliates to contract for goods or services on favorable terms" and is protected under Section 366.093(3)(d), Florida Statutes.

(2) 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.

(3) The highlighted information pertains to security measures, systems, or procedures. This information is protected under Section 366.093(3)(c).

**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   X  

Public Version(s) of the Document(s) attached in CD format

NETWORK & SYSTEM ACCESS EXHIBIT D

[REDACTED]

- [REDACTED]
- [REDACTED]
- [REDACTED]
- [REDACTED]
- [REDACTED]
- [REDACTED]
- [REDACTED]
- [REDACTED]
- [REDACTED]
- [REDACTED]



[REDACTED]

- [REDACTED]

- [REDACTED]

- [REDACTED]

- [REDACTED]

[REDACTED]

[REDACTED]

- [Redacted]
- [Redacted]
- [Redacted]
- [Redacted]
- [Redacted]
- [Redacted]
- [Redacted]

[REDACTED]

- [REDACTED]

[REDACTED]

- [REDACTED]

[REDACTED]

- [REDACTED]

[REDACTED]

- [REDACTED]

[REDACTED]

- [REDACTED]

[REDACTED]

- [REDACTED]

[REDACTED]

- [REDACTED]

[REDACTED]

- [REDACTED]

[REDACTED]

- [REDACTED]
- [REDACTED]
- [REDACTED]
- [REDACTED]
- [REDACTED]
- [REDACTED]



# Recommendation

## Commercial Audit

- Regulatory recommends signing a two-year contract with [REDACTED] to provide Commercial Energy Audits, to begin as soon as possible. Launching this program would satisfy PGS' requirement to the PSC to provide a commercial walkthrough audit.
- [REDACTED] offers a lower, all-inclusive price per audit and no limitations on scheduling.
- At current estimates of 48 audits annually, this will increase annual expenditures in the Conservation Clause by approximately [REDACTED]. The audit will be advertised on social media, the PGS website, and a digital piece will be developed that the PGS sales team can distribute.
- [REDACTED] possesses qualified staff and a history of performing this type of work. It also has an existing relationship with [REDACTED].

## Verifications

- Regulatory recommends signing a two-year contract with [REDACTED] to provide Residential New Construction Appliance Verifications. Verifying rebates in this program would ensure customer funds are being used appropriately.
- [REDACTED] offers a virtual option and a more flexible pricing structure, which will lead to lower expenses in the Conservation Clause.
- At the desired volume of 1,000 verifications per year, this will increase annual expenditures in the Conservation Clause by approximately [REDACTED], depending on the option chosen.

Pricing Detail				
	(Year 1)	(Year 2)	(quarterly)	(2 trips/month)
Audit Price	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
Audit Price (>100)	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
Audit Limit	None	None	[REDACTED]	[REDACTED]
Verification Price (in-person)	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
Verification Price (virtual)	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]

# Recommendation

[REDACTED]

[REDACTED]

Pricing Detail	
Audit Price	[REDACTED]
Audit Price (>100)	[REDACTED]
Audit Limit	[REDACTED]
Verification Price (in-person)	[REDACTED]
Verification Price (virtual)	[REDACTED]

## Commercial Walkthrough Audit

- Recommend signing a two-year contract with [REDACTED]. Launching this program in 2022 would satisfy PGS' requirement to the PSC to provide a commercial walkthrough audit.
- [REDACTED] offers a lower, all-inclusive price per audit and no limitations on scheduling.
- [REDACTED] possesses qualified staff and a history of performing this type of work.
- [REDACTED] has an existing relationship with [REDACTED].
- This program will increase annual expenditures in the Conservation Clause by approximately [REDACTED] (based on 48 audits). The audit will be promoted on social media, the PGS website, and other digital means.

## Appliance Verifications

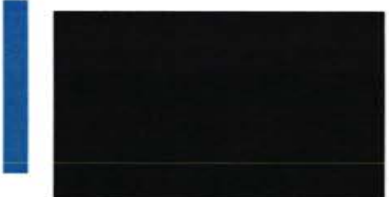
- Recommend signing a two-year contract with [REDACTED].
- Verifying rebates in this program would ensure customer funds are being used appropriately.
- [REDACTED] offers a virtual option and a more flexible pricing structure, which will lead to lower expenses in the Conservation Clause.
- At the desired volume of 1,000 verifications per year, this will increase annual expenditures in the Conservation Clause by approximately [REDACTED], depending on the option chosen.





- Provided a fixed price per audit and per verification, which includes travel and call center scheduling. The price per audit declines at 101, 251, and 501 annual audits. There is no minimum fee, only the fixed price for the completed audits.
- Provided a virtual verification option, where appliances would be verified without someone entering customer homes.
- If PGS chose the in-person verification option and did not provide 1,000 verification leads annually, it would pay [REDACTED] per verification not provided.
- Offers multiple staff members who are Certified Energy Managers by the Association of Energy Engineers.
- Provides various DSM program support for [REDACTED]
- Believes they can begin 3 weeks after Scope of Work execution.
- Full pricing detail:

	Year 1	Year 2
Audit Price	[REDACTED]	[REDACTED]
Audit Price (>100 audits)	[REDACTED]	[REDACTED]
Audit Limit	[REDACTED]	[REDACTED]
Verification Price (in-person)	[REDACTED]	[REDACTED]
Verification Price (virtual)	[REDACTED]	[REDACTED]



- Also provided a fixed price per audit. But the audit price depends on scheduling. [REDACTED] can offer audits at [REDACTED] per audit, plus travel expenses (estimated [REDACTED] total), if 12 audits are scheduled and can be completed in one trip by the auditor. The auditor could also make two trips monthly, however, this would increase the per-audit cost to [REDACTED] (including estimated travel costs).
- Under either scenario above, PGS would be limited to 50 audits annually.
- Offering call center scheduling for [REDACTED] per audit.
- Provided a lump sum price for 1,200 verifications of [REDACTED]. This works out to [REDACTED] per verification.
- Performs other work for PGS, including inspection services, project management services, meter maintenance, and more. A contract is already in place, which may help to begin audits sooner and reduce paperwork.
- Offers [REDACTED] who formerly ran DSM programs for Florida Public Utilities Company.

Full pricing detail:

	One Trip/Quarter	Two Trips/Month
Audit Price	[REDACTED]	[REDACTED]
Audit Limit	[REDACTED]	[REDACTED]
Verification Price	[REDACTED]	[REDACTED]





# Recommendation

- Commercial Energy Audits
  - Regulatory recommends signing a two-year contract with [REDACTED] to provide Commercial Energy Audits, to begin as soon as possible. [REDACTED] offers a lower, all-inclusive price per audit and no limitations on scheduling.
  - At current estimates of 36 audits annually, this will increase annual expenditures in the Conservation Clause by approximately [REDACTED]. The audit will be advertised on social media and the PGS website.
  - CLEAResult possesses qualified staff and a history of performing this type of work. It also has an existing relationship with [REDACTED].
- New Construction Verifications
  - Regulatory recommends signing a two-year contract with [REDACTED] to provide virtual Residential New Construction Appliance Verifications. [REDACTED] offers a more flexible pricing structure, which will lead to lower expenses in the Conservation Clause.
  - At the desired volume of 1,000 verifications per year, this will increase annual expenditures in the Conservation Clause by approximately [REDACTED].

Pricing Detail	
Audit Price	[REDACTED]
Audit Price (>100 audits)	[REDACTED]
Audit Limit	[REDACTED]
Verification Price (in-person)	[REDACTED]
Verification Price (virtual)	[REDACTED]



## Remaining Questions

- Commercial Walkthrough Audit
  - Will the auditors present as PGS or third party?
    - TECO contractors wear their company's uniform but carry a TECO Contractor Badge.
  - Will the auditors provide PGS level of service? How can we prepare them?
    - How do TECO and [REDACTED] handle these types of contractors?
  - What costs will there be beyond the audit fees?
    - Advertising-
    - Ride Alongs- \$1,000 annually
    - How will TPI be involved?
- Residential New Construction Verifications
  - Who will verify the appliances, customers or contractors?



**EXHIBIT C**  
**JUSTIFICATION FOR EXTENSION OF CONFIDENTIALITY PERIOD**

N/A