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August 8, 2023

VIA HAND DELIVERY

2023 AUG - 8 AM 11: 14

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COMMISSION
CLERK

REDACTED

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

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 response to Staff's Seventh Request for Production of Documents, Number 27, served on July 28, 2023. Also enclosed is a CD containing the public (redacted) version of these documents.

Thank you for your assistance in connection with this matter.

Sincerely,

Virginia Ponder

COM _____
AFD 1 redacted CD
APA _____
ECO _____
ENG _____
GCL _____
IDM _____
CLK _____

VLP/ne
Attachment

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

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: August 8, 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 August 8, 2023, Peoples served its responses to Staff's Seventh Request for Production of Documents (No. 27). The company believes that portions of its responses to these interrogatories, as specified on Exhibit "A," constitute Confidential Information and, has designated it as such by highlighting. Contemporaneous with the filing of this request, Peoples 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, 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 8th day of August 2023.

Respectfully submitted,



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ATTORNEYS FOR PEOPLES GAS SYSTEM, INC.

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing Motion, filed on behalf of Peoples Gas System, Inc., has been furnished by electronic mail on this 8th day of August, 2023 to the following:

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ATTORNEY

EXHIBIT A
JUSTIFICATION FOR CONFIDENTIAL TREATMENT

<u>Bates Page</u>	<u>Document Description</u>	<u>Description of Information</u>	<u>Justification</u>
3	Vendor invoices for rate case services, produced in response to Staff's 7 th Request for Production of Documents, No. 27.	The Highlighted Text	(2)
5-7	Same as above	The Highlighted Text	(1) & (2)
9-12	Same as above	The Highlighted Text	(1)
14-15	Same as above	The Highlighted Text	(1) & (2)
16	Same as above	The Highlighted Text	(1)
18-20	Same as above	The Highlighted Text	(2)
21	Same as above	The Highlighted Text	(1)
23	Same as above	The Highlighted Text	(1)
29-30	Same as above	The Highlighted Text	(2)
31-32	Same as above	The Highlighted Text	(1)
34-35	Same as above	The Highlighted Text	(2)
37	Same as above	The Highlighted Text	(1) & (2)
44-45	Same as above	The Highlighted Text	(1)
46-48	Same as above	The Highlighted Text	(1)
49	Same as above	The Highlighted Text	(1)
51-53	Same as above	The Highlighted Text	(1)
55-57	Same as above	The Highlighted Text	(1)
59-60	Same as above	The Highlighted Text	(1)
61	Same as above	The Highlighted Text	(1)
62	Same as above	The Highlighted Text	(1)
63-64	Same as above	The Highlighted Text	(1)
67	Same as above	The Highlighted Text	(1)
69-70	Same as above	The Highlighted Text	(1)
72-73	Same as above	The Highlighted Text	(1)
74	Same as above	The Highlighted Text	(1)
79	Same as above	The Highlighted Text	(1)
80	Same as above	The Highlighted Text	(1)
84	Same as above	The Highlighted Text	(1)
82	Same as above	The Highlighted Text	(1)
102	Same as above	The Highlighted Text	(2)
117	Same as above	The Highlighted Text	(2)
122	Same as above	The Highlighted Text	(2)
126	Same as above	The Highlighted Text	(2)
131	Same as above	The Highlighted Text	(2)
133-134	Same as above	The Highlighted Text	(2)
138-139	Same as above	The Highlighted Text	(1)

<u>Bates Page</u>	<u>Document Description</u>	<u>Description of Information</u>	<u>Justification</u>
140-141	Same as above	The Highlighted Text	(1) & (2)
143-144	Same as above	The Highlighted Text	(1)
146	Same as above	The Highlighted Text	(1)
160	Same as above	The Highlighted Text	(1)
163	Same as above	The Highlighted Text	(2)
165-166	Same as above	The Highlighted Text	(1)
167-172	Same as above	The Highlighted Text	(1)
179	Same as above	The Highlighted Text	(1)
184	Same as above	The Highlighted Text	(1)
188-189	Same as above	The Highlighted Text	(1)
189	Same as above	The Highlighted Text	(1)
191-192	Same as above	The Highlighted Text	(1)
205-206	Same as above	The Highlighted Text	(1)
206	Same as above	The Highlighted Text	(1)
208	Same as above	The Highlighted Text	(1)
211	Same as above	The Highlighted Text	(1)
213-214	Same as above	The Highlighted Text	(1)
216	Same as above	The Highlighted Text	(2)
221-223	Same as above	The Highlighted Text	(2)
225-226	Same as above	The Highlighted Text	(2)
228-230	Same as above	The Highlighted Text	(1) & (2)
232	Same as above	The Highlighted Text	(2)
234	Same as above	The Highlighted Text	(2)
236-237	Same as above	The Highlighted Text	(2)
239	Same as above	The Highlighted Text	(1)
241-242	Same as above	The Highlighted Text	(1)
244-246	Same as above	The Highlighted Text	(1)
248	Same as above	The Highlighted Text	(1)
249	Same as above	The Highlighted Text	(1)
250	Same as above	The Highlighted Text	(1)
252	Same as above	The Highlighted Text	(1)
253-255	Same as above	The Highlighted Text	(1) & (2)
257	Same as above	The Highlighted Text	(1)
258	Same as above	The Highlighted Text	(1)
259	Same as above	The Highlighted Text	(1)
269	Same as above	The Highlighted Text	(1)
270	Same as above	The Highlighted Text	(1)
272-273	Same as above	The Highlighted Text	(1) & (2)
275-276	Same as above	The Highlighted Text	(2)
279	Same as above	The Highlighted Text	(1)
286-288	Same as above	The Highlighted Text	(1) & (2)
290-292	Same as above	The Highlighted Text	(1)
294	Same as above	The Highlighted Text	(2)

<u>Bates Page</u>	<u>Document Description</u>	<u>Description of Information</u>	<u>Justification</u>
296-298	Same as above	The Highlighted Text	(1) & (2)
306-307	Same as above	The Highlighted Text	(2)

(1) 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.

(2) 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.

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	<u> X </u>

EXHIBIT C
JUSTIFICATION FOR EXTENSION OF CONFIDENTIALITY PERIOD

N/A