

State of Florida



# Public Service Commission

CAPITAL CIRCLE OFFICE CENTER • 2540 SHUMARD OAK BOULEVARD  
TALLAHASSEE, FLORIDA 32399-0850

**-M-E-M-O-R-A-N-D-U-M-**

**DATE:** August 14, 2023

**TO:** Major Thompson, Senior Attorney, Office of the General Counsel

**FROM:** Takira Thompson, Engineering Specialist IV, Division of Engineering  
Orlando Wooten, Engineering Specialist III, Division of Engineering

*TTT LK  
OW POC*

**RE:** CONFIDENTIALITY OF CERTAIN INFORMATION

DOCKET NOS: **20230023-GU** DOCUMENT NO: **03679-2023**

DESCRIPTION: PGSI (Ponder) - (CONFIDENTIAL) Portions of the information contained in response to staff's 3rd set of interrogatories; specifically, Bates stamp pages 64-69, 72, 74-76, 91, and 131; and staff's 3rd request for PODs; specifically, Bates stamp pages 68, 71-96, 100-104, 106-109, 111-116, 121, 123, 145, 147, 152-153, 156, 164, 166-167, 183, 193-195, 200-201, 203-205, 211-213, 223-225, 236-238, 242, 249, 254-256, and 260.

SOURCE: Peoples Gas System, Inc.

Pursuant to Section 366.093, Florida Statutes (F.S.), and Rule 25-22.006, Florida Administrative Code, Peoples Gas System, Inc. (PGS) requests confidential classification of certain information contained in its response to the Staff's Third Set of Interrogatories (ROGs) and Staff's Third Request for Production of Documents (PODs). PGS requests confidentiality of the portions of the responses addressed in this memo under Section 366.093(3)(d), F.S., which states: "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," and/or Section 366.093(3)(e), F.S., which states: "Information relating to competitive interests, the disclosure of which would impair the competitive business of the provider of the information."

PGS requests confidentiality pursuant to Section 366.093(3)(e), F.S., of certain information provided in response to ROG No. 56 which can be described as PGS's internal procedures for vetting creditworthiness of potential counterparties.

PGS requests confidentiality pursuant to Section 366.093(3)(d), F.S., of the information provided in response to ROG Nos. 67 and 80. The information provided in response to ROG No. 67 can be described as a revenue requirements model that includes information that was provided to

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PGS on a confidential basis by an environmental credit market broker. The information provided in response to ROG No. 80 can be described as the names of the parties who submitted bids on the Work and Asset Management project.

PGS requests confidentiality pursuant to Sections 366.093(3)(d), F.S., and Section 366.093(3)(e), F.S., for the information provided in response to POD Nos. 16 and 17. The information provided in response to POD No. 16 can be described as agreements between PGS and certain counterparties regarding negotiated rates and delivered amounts of renewable natural gas services. The information provided in response to POD No. 17 can be described as agreements between PGS and certain counterparties regarding negotiated contract rates and payment information for signatories.

PGS requests confidentiality pursuant to Section 366.093(3)(e), F.S. of certain information provided in response to POD Nos. 18, 19, 21 and 22. The information provided in response to each can be described as follows: (No. 18) PGS's internal project review presentations containing supporting economic analyses for the Alliance Dairies renewable natural gas project, (No. 19) presentations and internal project documents containing delivered renewable natural gas amounts related to the Jacksonville Expansion project, (No. 21) PGS customer information and internal project documents containing delivered renewable natural gas amounts related to PGS's Southwest Florida project, and (No. 22) PGS customer information and internal project documents containing delivered renewable natural gas amounts related to PGS's Panama City project.

Staff has reviewed PGS's confidentiality requests of each of the ROGs and PODs described above and determined that disclosure of the confidential information identified in the responses could impair PGS's future business negotiations. Therefore, staff recommends that this information meets the criteria for confidential classification pursuant to their respective subparts of Section 366.093(3), F.S.

cc: Office of Commission Clerk (Docket No. 20230023-GU)



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**-M-E-M-O-R-A-N-D-U-M-**

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**DATE:** August 14, 2023  
**TO:** Division of Accounting and Finance, Office of Primary Responsibility  
**FROM:** OFFICE OF COMMISSION CLERK  
**RE:** CONFIDENTIALITY OF CERTAIN INFORMATION

DOCKET NOS: 20230023-GU DOCUMENT NO: 03679-2023

DESCRIPTION: PGSI (Ponder) - (CONFIDENTIAL) Portions of the information contained in response to staff's 3rd set of interrogatories; specifically, Bates stamp pages 64-69, 72, 74-76, 91, and 131; and staff's 3rd request for PODs; specifically, Bates stamp pages 68, 71-96, 100-104, 106-109, 111-116, 121, 123, 145, 147, 152-153, 156, 164, 166-167, 183, 193-195, 200-201, 203-205, 211-213, 223-225, 236-238, 242, 249, 254-256, and 260.

SOURCE: Peoples Gas System, Inc.

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The above confidential material was filed along with a request for confidential classification. Please complete the following form by checking all applicable information and forward it to the attorney assigned to the docket, along with a brief memorandum supporting your recommendation.

- The document(s) is (are), in fact, what the utility asserts it (them) to be.
  - The utility has provided enough details to perform a reasoned analysis of its request.
  - The material has been received incident to an inquiry.
  - The material is confidential business information because it includes:
    - (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 information;
    - (f) Employee personnel information unrelated to compensation, duties, qualifications, or responsibilities;
  - The material appears to be confidential in nature and harm to the company or its ratepayers will result from public disclosure.
  - The material appears not to be confidential in nature.
  - The material is a periodic or recurring filing and each filing contains confidential information.
- This response was prepared by Takira Thompson and Orlando Wooten on August 14, 2023, a copy of which has been sent to the Office of Commission Clerk and the Office of General Counsel.