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August 14, 2023

VIA HAND DELIVERY

RECEIVED-FPSC
2023 AUG 14 PM 3:17
COMMISSION
CLERK

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 Christian Richard's late filed exhibit for August 2, 2023, deposition. Also enclosed is the public (redacted) version of this document.

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 I redacted copy
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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: August 14, 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 11, 2023, Peoples filed a Notice of Intent to Request Confidential Classification for portions of a Late-Filed exhibit to the deposition of Christian Richard. *See* DN 04670-2023. Peoples believes that portions of this Late-Filed Exhibit, 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 Information 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 Document with the Confidential Information.

4. The Confidential Information contained in the Document 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 14th 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 14th day of August, 2023 to the following:

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ATTORNEY

**EXHIBIT A
CONFIDENTIAL LATE-FILED EXHIBIT
JUSTIFICATION FOR CONFIDENTIAL TREATMENT**

<u>Document</u>	<u>Column or Other Identifier</u>	<u>Description of Information</u>	<u>Justification</u>
Late-Filed Exhibit No. 2	Column B	The Highlighted Text	(1)

- (1) This information consists of the identities of current or potential individual Peoples customers and specific projects. 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” under Section 366.093(3)(e), 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

 X

CONFIDENTIAL

Christian Richard Late Filed Exhibit Number 2 to August 2, 2023 Deposition		
Project	Base Cost	Max Cost
	\$ 5,200,000	\$ 7,900,000
	\$ 5,200,000	\$ 8,400,000
	\$ 4,600,000	\$ 7,600,000
	\$ 4,300,000	\$ 7,100,000
	\$ 8,500,000	\$ 13,300,000
	\$ 8,100,000	\$ 12,800,000
	\$ 7,800,000	\$ 11,200,000
	\$ 8,800,000	\$ 14,000,000
	\$ 4,700,000	\$ 6,500,000
	\$ 3,500,000	\$ 5,400,000
	\$ 3,300,000	\$ 4,700,000
	\$ 3,000,000	\$ 4,400,000

Notes:

These projects represent the list of projects for which ECT has provided cost estimates that exceeded \$1M and does not indicate if the project will move forward. The Gas Supply and Development team is engaging with the various parties to determine the commercial viability and interest of each project.

EXHIBIT C
JUSTIFICATION FOR EXTENSION OF CONFIDENTIALITY PERIOD

N/A