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January 13, 2025

VIA HAND DELIVERY

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

**REDACTED**

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In re: Petition by Peoples Gas System, Inc. for  
Approval to Modify its Swing Service Charge  
and Individual Transportation Service Rider

DOCKET NO. 2025 0026

FILED: January 13, 2025

Dear Mr. Teitzman:

Attached for filing in the above docket is Peoples Gas System Inc.'s Request for Confidential Classification pertaining to certain information contained in Exhibit A of Peoples Gas System, Inc.'s Petition for Approval to Modify its Swing Service Charge and Individual Transportation Service Rider.

Thank you for your assistance in connection with this matter.

Sincerely,

  
Virginia Ponder

VLP/dh  
Attachment

cc: All parties of record

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Petition by Peoples Gas System, Inc. for  
Approval to Modify its Swing Service Charge  
and Individual Transportation Service Rider

DOCKET NO. 2025 \_\_\_\_\_

FILED: January 13, 2025

**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 January 13, 2025, Peoples filed a petition with the Florida Public Service Commission ("Commission") for approval of tariff modifications related to the company's Swing Service Charge and Individual Transportation Service Rider ("Petition"). The company believes that portions of Exhibit A to the Petition as specified on Exhibit "A" of this Request for Confidential Classification, 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 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.

**Requested Duration of Confidential Classification**

5. 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.

WHEREFORE, Peoples Gas System, Inc. respectfully requests that the Confidential Information that is the subject of this request be accorded confidential classification for the reasons set forth herein and for 18 months.

DATED this 13<sup>th</sup> day of January 2025.

Respectfully submitted,



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ATTORNEYS FOR PEOPLES GAS SYSTEM, INC.

**EXHIBIT A  
JUSTIFICATION FOR CONFIDENTIAL TREATMENT**

<b>Exhibit A to People’s Gas System, Inc.’s Petition</b>			
<b>Bates Page Nos.</b>	<b>Document Description</b>	<b>Description of Information</b>	<b>Justification</b>
22	Exhibit A to People’s Gas System, Inc.’s Petition	The Highlighted Information – Henry Hub Projections and FGT Z3 basis projections	(1) & (2)
23	Same as above.	The Highlighted Information – FGT Z3 full price projections and Storage Expense Projection for 2025	(1) & (2)

**Justifications**

(1) The highlighted information relates to competitive interests of a third party, 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.

(2) The confidential information contained in these tables consist of proprietary work product of People’s Gas System Inc’s consultants which contains trade secrets and is protected by Section 366.093(3)(a), 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	_____
Public Version(s) of the Document(s) filed previously	<u>  X  </u>

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

N/A