

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Petition for approval of tariff modifications)
for liquified natural gas service) Docket No. 20200093
by Peoples Gas System.) Submitted for Filing:
) June 3, 2020
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**PEOPLES GAS SYSTEM'S
REQUEST FOR CONFIDENTIAL TREATMENT**

Pursuant to Sections 366.093 and 119.07, *Florida Statutes* and 25-22.006, *Florida Administrative Code*, Peoples Gas System (“Peoples”) submits the following Request for Confidential Treatment of Response Number 7 of Peoples’ Response of April 17, 2020 to Staff’s First Data Request dated April 2, 2020 (the “Response”), which response is submitted for filing concurrently herewith or has heretofore been filed:

1. Attached hereto as Exhibit A is a detailed justification for the requested confidential treatment of the highlighted portions of the Response Number 7 of Peoples’ Response to Staff’s First Data Request dated April 2, 2020.
2. The material for which confidential classification is sought is intended to be and is treated as private by Peoples and has not been disclosed.
3. Peoples requests that the information for which it seeks confidential classification not be declassified until 18 months after the date of the Commission’s order granting this request (see Section 366.093(4), *Florida Statutes*). The time period requested is necessary to protect the competitive information regarding the pricing of Peoples’ proposals for the installation and operation of LNG facilities. The period of time requested will ultimately protect Peoples and its customers.

4. Counsel for Peoples notes that this Request was not filed within twenty-one (21) days of the Notice of the Intent to File a Request for Confidential Treatment. This was an oversight solely of counsel. Counsel's habit has been to file the request, along with the notice but for some reason that did not occur in this case. Counsel can only surmise that the communication with his staff broke down because of the fact that everyone was working from home which likely led to misunderstandings as to what had been filed. The responsibility of that is for the undersigned counsel and he apologizes for this error. However, it would be unjust and unfair to punish the client, Peoples Gas System for the mistake of its counsel in failing to timely file the request for confidential treatment and Peoples believes that the inadvertent failure of its counsel to timely file the request constitutes good cause under Rule 25-22.006, *Florida Administrative Code*.

WHEREFORE, Peoples submits the foregoing as its request for confidential treatment of the information identified in Exhibit A to this request.

Respectfully submitted,

/s/ Andrew M. Brown, Esq.

Andrew M. Brown

Phone: (813) 273-4209

E-mail: ab@macfar.com

Thomas R. Farrior

Phone: (813) 273-4232

E-Mail: trf@macfar.com

Macfarlane Ferguson & McMullen

P. O. Box 1531

Tampa, Florida 33601-1531

Fax: (813) 273-4396

Attorneys for Peoples Gas System

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true copy of the foregoing Request for Confidential Treatment, filed on behalf of Peoples Gas System, has been furnished electronically to Adam J. Teitzman, Commission Clerk, Florida Public Service Commission, 2549 Shumard Oak Blvd., Tallahassee, FL 32399-0850; the Office of Public Counsel, J.R. Kelly/Stephanie Morse, c/o The Florida Legislature, 111 W. Madison Street, Room 812, Tallahassee, FL 32399, kelly.jr@leg.state.fl.us; morse.stephanie@leg.state.fl.us; and Linda Berndt, Vice President Government and Public Affairs, Eagle LNG Partners LLC, Research Forest Lakeside No. 4, 2445 Technology Forest Blvd., Suite 500, The Woodlands, TX 77381, lindaberndt@eaglelng.com; Edward McKenna, Applied LNG, 5716 Corsa Ave., Ste. 200, Westlake Village, CA 91362, (EMcKenna@appliedLNG.com); Floyd R. Self, B.C.S., BergerSinger LLP, 313 North Monroe Street, Ste. 301, Tallahassee, FL 32301 (fself@bergersinger.com); Sam Thigpen, Thigpen Solutions, 100 I-45 North, Ste. 152A, Conroe, TX 77301, (sam@thigpensolutions.com); and Andrew P. Brigham, Esq., 2963 Dupont Ave., Ste. #3, Jacksonville, FL 32217, (abrigham@propertyrights.com; blaing@propertyrights.com); on this 3rd day of June, 2020.

/s/ Andrew M. Brown, Esq.
Andrew M. Brown

EXHIBIT A

A description of the information of the way that Peoples would calculate a hypothetical \$25,000,000.00 investment in an LNG facility. The information contains data on Peoples' revenue, expenses, operating income, liabilities and equity, as well as debt for such a facility.