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August 28, 2020

VIA E-PORTAL FILING

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

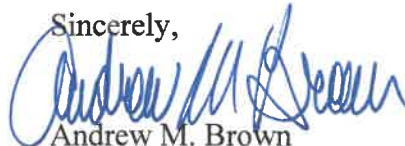
Re: Docket No. 20200051-GU – Petition for rate increase by Peoples Gas System

Dear Mr. Teitzman:

Attached for electronic filing in the above docket on behalf of Peoples Gas System, please find its Request for Confidential Treatment in the above case.

Your assistance in this matter is greatly appreciated.

Sincerely,


Andrew M. Brown

AB/plb
Attachment

cc: J.R. Kelly/Mireille Fall-Fry (kelly.jr@leg.state.fl.us;fall-fry.mireille@leg.state.fl.us)
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BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Petition for rate increase by Peoples Gas System.

DOCKET NO. 20200051-GU

In re: Petition for approval of 2020 depreciation study by Peoples Gas System.

DOCKET NO. 20200166-GU

Submitted for Filing: August 28, 2020

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 portions of documents produced in response to Interrogatory Number 24 of Staff’s Third Set of Interrogatories (Nos. 23-31), (the “Response”). The Response to those Interrogatories has previously been filed.

1. Attached hereto as Exhibit A is a detailed justification for the requested confidential treatment.
2. The documents contain confidential proprietary business information primarily in the form of the numbers of customers that Peoples has in each county or municipality where it operates.
3. The material for which confidential classification is sought is intended to be and is treated as private by Peoples and has not been otherwise disclosed. The information for which Peoples seeks confidential treatment relates to competitive interests, the disclosure of which would impair the competitive business of Peoples Gas.
4. Peoples is seeking confidential status under Section 366.093(2),(3)(e), *Florida Statutes*.
5. 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 number of customers Peoples has in a given municipality or county throughout the state which is information that is of potential benefit to Peoples' competitors and the period of time requested will ultimately protect Peoples and its customers.

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.
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Attorneys for Peoples Gas System

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing Request for Confidential Treatment of Peoples Gas System has been furnished via electronic mail to the following, this 28th day of August, 2020:

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/s/ Andrew M. Brown, Esq.
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EXHIBIT A
PEOPLES' SUPPLEMENTAL RESPONSE TO STAFF'S THIRD
SET OF INTERROGATORIES (No. 24)

JUSTIFICATION FOR CONFIDENTIAL TREATMENT OF CERTAIN DOCUMENTS.

Peoples has specified confidential treatment, and non-disclosure pursuant to Sections 119.07 and 366.093, *Florida Statutes*, and 25-22.006, *Florida Administrative Code*, of the documents produced in response to Number:

Peoples' Response to Staff's Third Set of Interrogatories (No. 24):

1 – The information of how many customers Peoples has in a given municipality or a given county would be of benefit to competitors and its disclosure would impair the competitive business of Peoples Gas because it would give insight to competitors as to Peoples market penetration in a given area.