



ATTORNEYS & COUNSELORS AT LAW EST. 1884

One Tampa City Center, Suite 2000
201 N. Franklin Street
P.O. Box 1531 (33601)
Tampa, FL 33602
813.273.4200 Fax: 813.273.4396

WWW.MFMLEGAL.COM
EMAIL: INFO@MFMLEGAL.COM

625 Court Street, Suite 200
P.O. Box 1669 (33757)
Clearwater, FL 33756
727.441.8966 Fax: 727.442.8470

In Reply Refer to:
Tampa
ab@macfar.com

October 5, 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
Docket No. 20200166-GU-Petition for approval of 2020 depreciation study
by Peoples Gas System**

Dear Mr. Teitzman:

Attached for electronic filing in the above docket on behalf of Peoples Gas System, please find its Notice of Intent to Request 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)
Kurt Schrader/Jennifer S. Crawford/Bianca Lherisson (kschrade@psc.state.fl.us;
jcrawfor@psc.state.fl.us; blheriss@psc.state.fl.us)
Jon C. Moyle, Jr., Esq./Karen A. Putnal, Esq. (jmoyle@moylelaw.com;
kputnal@moylelaw.com; mqualls@moylelaw.com)
Paula K. Brown
Kandi Floyd
Karen Bramley
Thomas F. Farrior, Esq.

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: October 5, 2020

**PEOPLES GAS SYSTEM's NOTICE OF INTENT TO
REQUEST 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 to documents, produced in its response to Interrogatory Nos. 148 and 156 of OPC's Fifth Set of Interrogatories which response is submitted for filing concurrently herewith or has heretofore been filed:

1. Peoples has not attached a line by line redaction of the responsive material in question regarding response to Interrogatory No. 148 because Peoples is asserting confidential treatment for the entire document. The document bates numbered BS 17136 contains information concerning the Company's projections of increased growth in their usage that would be of benefit to competitors and could hamper the Company's ability to contract with third parties on favorable terms. A line by line redaction of the responsive material would make it is necessary to redact the entire documents and there would be no purpose served in attaching blank pieces of paper corresponding to the number of documents at issue.

2. In its Response to Interrogatory No. 156, Peoples includes a table which contains certain information regarding the revenue projection updates and the reasons for the changes in the revenue forecast which would affect Peoples competitive business operations.

3. The material for which confidential classification is sought is intended to be and is treated as private by Peoples, and contains proprietary confidential business information as defined under Section 366.093(2), and (3)(d), and 3(e), *Florida Statutes*.

4. Peoples gives notice that the documents 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 Peoples projected changes in therm usage and revenue for 2021. 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 of the documents to be produced in its response to Interrogatory Nos. 148 and 156 of OPC's Fifth Set of Interrogatories.

Respectfully submitted,

/s/ Andrew M. Brown, Esq.
Andrew M. Brown, Esq.
Thomas R. Farrior, Esq.
Macfarlane Ferguson & McMullen
Post Office Box 1531
Tampa, Florida 33601
(813) 273-4300
ab@macfar.com
trf@macfar.com

Attorneys for Peoples Gas System

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing Notice of Intent to Request Confidential Treatment of Peoples Gas System has been furnished via electronic mail to the following, this 5th day of October, 2020:

J.R. Kelly, Esq.
Office of Public Counsel
c/o The Florida Legislature
111 West Madison St., Room 812
Tallahassee, FL 32399-1400
kellyjr@leg.state.fl.us

Jennifer S. Crawford, Esq.
Kurt Schrader, Esq.
Bianca Lherisson, Esq.
Office of General Counsel
Florida Public Service Commission
2540 Shumard Oak Boulevard
Tallahassee, FL 32399-0850
jcrawfor@psc.state.fl.us
kschrade@psc.state.fl.us
blheriss@psc.state.fl.us

Mireille Fall-Fry, Esq.
Associate Public Counsel
Office of Public Counsel
c/o The Florida Legislature
111 West Madison Street, Room 812
Tallahassee, FL 32399-1400
fall-fry.mireille@leg.state.fl.us

Paula K. Brown
Regulatory Department
TECO Energy, Inc.
P.O. Box 111
Tampa, FL 33601-0111
regdept@tecoenergy.com

Kandi M. Floyd
Peoples Gas System
P.O. Box 111
Tampa, FL 33601-0111
kfloyd@tecoenergy.com

Florida Industrial Power Users Group
c/o Jon C. Moyle, Jr.
Karen A. Putnal
Moyle Law Firm, P.A.
118 North Gadsden Street
Tallahassee, FL 32301
jmoyle@moylelaw.com
kputnal@moylelaw.com
mqualls@moylelaw.com

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