



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.MFMLLEGAL.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 15, 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:

Enclosed for filing on behalf of Peoples Gas System (“Peoples”) is an Amended Request for Confidential Treatment of certain portions of Peoples’ Response to Staff’s Seventh Request for Production of Documents No. 15. This request is intended to replace Document 09442-2020 and therefore should be filed concurrently with the withdraw of such documents from this docket. This request includes Exhibits A through C.

Exhibit A is being provided under separate cover and consists of the confidential documents, and all information that Peoples asserts is entitled to confidential treatment has been highlighted. Exhibit B is an edited version of Exhibit A, in which the information Peoples asserts is confidential has been redacted. Exhibit C consists of Peoples’ justification table supporting its Request for Confidential Treatment.

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)

Mr. Adam J. Teitzman
Commission Clerk
October 15, 2020
Page 2

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 15, 2020

**PEOPLES GAS SYSTEM'S AMENDED REQUEST
FOR CONFIDENTIAL TREATMENT**

Pursuant to Section 366.093 and 1190.07, *Florida Statutes*, and Rule 25-22.006, *Florida Administrative Code*, Peoples Gas System ("Peoples") requests confidential treatment to Peoples' Response to the Staff's Seventh Request for Production of Documents No. 15 and in support of its request states:

1. Peoples confidential treatment of portions of document BS 16756 - 16766 provided in response to Staff's Seventh Request for Production of Documents No. 15.
2. The following exhibits are included with and made a part of this request:
 - a. Exhibit A consists of the following documents are a copy of the confidential pages on which information that Peoples asserts to be entitled to confidential treatment has been highlighted.
 - b. Exhibit B consists of a copy of the confidential pages on which all information that Peoples asserts is entitled to confidential treatment has been redacted.
 - c. Exhibit C is a table containing an identification of the information

highlighted in Exhibit A, together with references to the specific statutory basis or bases for the claim of confidentiality and to the affidavit in support of the requested classification.

3. Peoples submits that the highlighted information in Exhibit A is proprietary confidential business information within the meaning of Section 366.093(3), *Florida Statutes*. Section 366.093(3), *Florida Statutes*, defines confidential information as information that is intended to be and is treated by the company as private in that disclosure of the information would cause harm to the company's business operations or its customers, and has not been disclosed publicly. The confidential information is intended to be and has been treated by Peoples as private, its confidentiality has been maintained, and its disclosure would cause harm to Peoples and its customers. Pursuant to Section 366.093(3)(2), such information is entitled to confidential treatment and it is exempt from the disclosure provisions of the public records law. Thus, once the Commission determines that the information in question is proprietary confidential business information, the Commission is not required to engage in any further analysis or review such as weighing the harm of disclosure against the public interest in access to the information.

4. Upon a finding by the Commission that the information highlighted in Exhibit A, and referenced in Exhibit C, is proprietary confidential business information, the information should not be declassified for a period of at least eighteen (18) months and should be returned to Peoples as soon as the information is no longer necessary for the Commission to conduct its business. See § 366.093(4), Fla. Stat.

WHEREFORE, Peoples respectfully requests confidential classification of the material described herein.

Respectfully submitted,



Andrew M. Brown, Esq.
Thomas R. Fariior, 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 Request for Confidential Treatment of Peoples Gas System has been furnished via electronic mail to the following, this 15th 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
kelly.jr@leg.state.fl.us

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

Jennifer S. Crawford, Esq.
Kurt Schrader, Esq.
Bianca Lherisson, Esq.
Office of General Counsel
Florida Public Service Commission
2540 Shumard Oak Boulevard

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

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

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



Andrew M. Brown, Esq.

EXHIBIT A

CONFIDENTIAL

FILED UNDER SEPARATE COVER

EXHIBIT B

REDACTED COPIES

PEOPLES GAS SYSTEM 2020 AND 2021 CAPITAL BUDGET STAFF'S PRODUCTION OF DOCUMENTS REQUEST NO 15 a.									
Project Number	Project	Rate Case Budget Filing			Updated Forecast		Variance		Explanation
		Estimated In-Service Date	2020	2021	Estimated In-Service Date	2020	2021	2020	
GROWTH									
	Blanket Measuring and Regulation Station Equipments		1,979,853	2,023,512					
NEW-09385		In service	100,000	-	In service				
NEW-09387		6/30/2020	834,500	-	11/30/2020				
NEW-11963		7/31/2019	5,000	-	In service				
NEW-12208		3/31/2020	986,499	-	In service				
NEW-12209		8/31/2021	202,798	961,388	8/31/2022				
NEW-12930		10/30/2021	-	3,708,448	10/30/2021				
NEW-12931		7/30/2020	1,370,000	-	9/15/2020				
NEW-12932		11/30/2021	-	2,966,147	11/30/2021				
NEW-12933		10/31/2020	610,149	-	2/28/2021				
NEW-13544		10/31/2020	956,959	-	7/31/2021				
NEW-13583		10/31/2020	3,792,014	-	12/31/2020				
NEW-13584		12/31/2020	2,872,429	-	1/31/2021				
NEW-13603		3/31/2020	305,426	-	12/31/2020				
NEW-09024/ NEW-13707		11/30/2020	4,725,646	9,428	12/31/2020				
NEW-10876					In service				
NEW-10882					In service				
NEW-11923					In service				
NEW-15203					12/31/2020				
Blanket			3,620,088	3,699,730					
Blanket			4,748,544	4,853,012					
Blanket			4,928,153	5,034,529					
Blanket			802,977	820,642					
Blanket			24,379,026	24,915,365					
NEW-10343		In service	101,300	-	In service				
NEW-10643		2/28/2021	2,915,613	889,418	2/28/2021				
NEW-11003		11/30/2019	30,000	-	In service				
NEW-11430		12/31/2023	223,200	152,000	In service				
NEW-11803		1/31/2020	200,000	-	In service				
NEW-11804		8/30/2019	10,000	-	In service				
NEW-11805		7/31/2021	2,800,000	3,200,000	12/31/2021				
NEW-11943		11/30/2019	40,000	-	In service				
NEW-12125		1/31/2020	75,000	-	9/1/2020				
NEW-12163		6/30/2020	590,000	-	12/31/2020				
NEW-12283		5/30/2020	570,200	-	12/30/2020				
NEW-12284		12/30/2022	-	481,977	12/31/2020				
NEW-12523		5/30/2020	415,000	-	2/28/2021				
NEW-12524		7/31/2020	558,850	-	12/31/2020				
NEW-12843		8/30/2020	1,097,717	-	10/16/2020				
NEW-12849		12/31/2023	100,000	100,000	9/30/2023				
NEW-12954		12/31/2027	200,000	200,000	12/31/2022				
NEW-12955		11/31/2022	-	83,250	11/31/2023				
NEW-12957		12/31/2021	-	750,000	10/31/2021				
NEW-12959		12/31/2021	-	6,486,672	12/31/2022				
NEW-12960		12/31/2020	558,149	-	cancelled				
NEW-13123		9/30/2019	172,550	-	In service				
NEW-13124		7/1/2019	(172,550)	-	In service				
NEW-13184		11/30/2019	110,000	-	In service				
NEW-13303		7/1/2020	1,940,000	-	12/1/2020				
NEW-13323		6/30/2020	1,017,300	300,000	12/31/2020				
NEW-13643		9/30/2020	1,329,300	-	12/31/2020				
NEW-13803		10/31/2021	64,896	905,260	7/31/2022				
NEW-13825		10/31/2020	1,929,493	-	10/31/2020				
NEW-13826		4/30/2021	396,000	704,000	cancelled				
NEW-13943		9/30/2020	1,058,462	-	1/31/2021				
NEW-14023		7/31/2020	589,028	-	9/15/2020				
NEW-14063		2/28/2020	817,541	124,237	In service				
NEW-14323		4/1/2020	250,000	-	In service				
NEW-14345		5/15/2020	540,000	-	10/31/2020				
NEW-14347		5/15/2020	505,000	-	In service				
NEW-14365		8/1/2020	300,000	-	cancelled				
NEW-14364		8/31/2020	846,000	-	In service				
NEW-14403		8/30/2021	716,946	381,312	11/30/2020				
NEW-14443		3/31/2020	685,300	-	12/31/2020				
NEW-14444		6/30/2020	1,993,462	-	In service				
NEW-14544		12/31/2020	691,614	-	1/31/2020				
NEW-10863					In service				
NEW-10864					In service				
NEW-12204					8/31/2021				
NEW-12263					9/30/2020				
NEW-12709					In service				
NEW-13023					In service				
NEW-14863					In service				
NEW-14923					11/30/2020				

PEOPLES GAS SYSTEM 2020 AND 2021 CAPITAL BUDGET STAFF'S PRODUCTION OF DOCUMENTS REQUEST NO 15 a.										
Project Number	Project	Rate Case Budget Filing			Updated Forecast		Variance		Explanation	
		Estimated In-Service Date	2020	2021	Estimated In-Service Date	2020	2021	2020		2021
NEW-14943					5/1/2021					
NEW-14967					12/31/2021					
NEW-15003					12/31/2020					
NEW-15243					12/31/2020					
NEW-15405					4/30/2021					
NEW-15419					6/30/2021					
NEW-15475					12/31/2020					
NEW-15490					8/25/2021					
Blanket			30,339,279	31,005,744	various					
Blanket										
NEW-11704		12/31/2020	3,000,000	-	12/31/2022					
NEW-15103			205,000	210,125	3/31/2021					
Blanket										
NEW-12723 through NEW-12726		1/31/2021	500,000	500,000	12/31/2020					
			116,968,212	95,488,195						
SUSTAINING										
Blanket			1,001,611	1,023,646						
Blanket			11,025	11,268						
Blanket			959,798	980,913						
PRE-05482		12/31/2020	1,676,290	-	3/31/2021					
PRE-07260		6/30/2020	250,000	-	9/30/2021					
PRE-07261		9/30/2021	768,899	7,294,517	12/31/2022					
PRE-07269		12/31/2021	-	500,000	12/31/2021					
PRE-07524		7/31/2021	1,207,951	2,031,536	12/31/2021					
PRE-07527		5/31/2021	1,079,924	639,472	12/31/2022					
PRE-07860		6/30/2020	525,000	-	4/30/2021					
PRE-08240		12/31/2021	-	2,000,000	12/31/2022					
PRE-08241		12/31/2021	-	1,000,000	11/31/2022					
PRE-08247		12/31/2023	-	250,000	12/31/2024					
PRE-08500		12/31/2020	2,000,000	-	9/30/2020					
PRE-06481					in service					
PRE-09300					12/31/2022					
PRE-09380					5/15/2021					
Blanket			1,580,000	789,350						
NCP-11287		1/31/2021	-	8,000,000	1/31/2022					
NCP-14127		12/31/2021	288,000	192,000	1/31/2022					
Blanket			11,987,177	12,199,795						
CRB-10812		3/1/2020	621,000	-	10/31/2020					
CRB-11856		in service	200,000	-	in service					
CRB-12577		12/31/2021	300,000	300,000	in service					
CRB-12579		7/31/2024	-	1,468,459	12/31/2023					
CRB-12580		12/31/2023	-	1,000,000	12/31/2023					
CRB-13937		9/31/2020	455,000	-	12/31/2020					
CRB-14337		3/31/2020	494,680	-	10/31/2020					
CRB-11292					in service					
CRB-11778					7/31/2021					
CRB-13316					in service					
CRB-16116					12/31/2023					
CRB-16136					12/31/2023					
CRB-16801					9/30/2021					
CRB-16815					4/30/2021					
Blanket										
PRE-08040		6/30/2020	1,384,818	-	12/31/2020					
Blanket			5,840,669	5,969,164						
REL-05660		2/29/2020	450,000	-	in service					
REL-05720		8/1/2021	240,000	160,000	8/30/2021					
REL-05800		12/31/2020	785,000	-	3/31/2021					
REL-05340					2/28/2021					
Blanket			551,925	564,008						
NCP-10682		2/15/2020	1,007,033	-	3/30/2021					
NCP-11245		7/31/2022	-	669,000	12/31/2021					
NCP-11246		12/31/2020	5,000,000	-	11/31/2020					
NCP-13627		12/31/2021	-	900,000	1/31/2021					
NCP-13629		6/30/2020	500,000	-	10/31/2020					
NCP-13630		12/30/2020	100,000	-	12/30/2021					
NCP-13967		7/31/2020	400,000	-	9/30/2020					
NCP-12448					in service					
NCP-12431					in service					
NCP-15211					6/30/2021					
NCP-15605					12/31/2021					
NCP-15666					6/30/2021					
Blanket										
Blanket			247,500	327,900						
Blanket			3,894,919	3,980,508						

PEOPLES GAS SYSTEM 2020 AND 2021 CAPITAL BUDGET STAFF'S PRODUCTION OF DOCUMENTS REQUEST NO 15 a.										
Project Number	Project	Rate Case Budget Filing			Updated Forecast		Variance		Explanation	
		Estimated In-Service Date	2020	2021	Estimated In-Service Date	2020	2021	2020		2021
Blanket			999,300	168,486						
Blanket			559,800	436,076						
Blanket			5,393,371	3,085,020						
			\$2,210,686	\$5,941,278						
LEGACY										
Blanket		Various	18,438,693	20,920,140						
Blanket		Various	31,671,659	18,563,362						
			\$0,110,352	\$8,883,501						
AFUDC ELIGIBLE PROJECTS - GROWTH										
NEW-07885		9/30/2020	4,389,111	1,824	12/31/2020					
NEW-12123		1/31/2020	29,517,557	77,694	12/31/2020					
NEW-12210		8/30/2020	1,715,215	-	12/31/2020					
NEW-12211		4/30/2020	1,623,813	-	12/31/2020					
NEW-12743		1/31/2020	35,948,886	2,216,667	9/30/2020					
NEW-12783		1/31/2020	1,521,183	-	2/28/2021					
NEW-12784		1/31/2020	1,281,688	-	3/31/2021					
NEW-12785		1/31/2020	3,328,774	-	12/31/2020					
NEW-12786		1/31/2020	10,449,473	285,000	12/31/2020					
NEW-15437					1/31/2021					
NEW-12863		12/31/2020	18,344,078	1,709,188	3/11/2021					
NEW-13004		5/31/2022	2,040,357	30,118,891	12/31/2022					
NEW-13005		12/31/2023	-	2,570,000	12/31/2025					
NEW-13663		6/30/2021	9,498,632	11,080,466	6/30/2022					
NEW-13703		6/30/2021	14,340,000	13,460,000	6/15/2022					
NEW-14683					8/31/2021					
NEW-15003					5/31/2022					
NEW-15433					6/30/2022					
NEW-15435					6/30/2022					
TOTAL AFUDC ELIGIBLE PROJECTS - GROWTH PROJECTS			133,998,767	61,519,730						
AFUDC ELIGIBLE PROJECTS - SUSTAINING										
NCP-10481		2/15/2020	2,467,803	-	9/1/2020					
NCP-12429		12/31/2022	2,537,593	11,992,229	12/31/2022					
TOTAL AFUDC ELIGIBLE PROJECTS - SUSTAINING PROJECTS			5,005,396	11,992,229						
GRAND TOTAL			159,004,163	73,511,959						

CONFIDENTIAL

PEOPLES GAS SYSTEM
DOCKET NO. 20200051-GU
DOCKET NO. 20200166-GU
STAFF'S SEVENTH REQUEST FOR
PRODUCTION OF DOCUMENTS
REQUEST NO. 15
FILED: 09/21/2020

**CAPITAL LEADERSHIP TEAM
PROJECT REVIEW
June 24, 2020**

CLT Review Policy:



Project:



Background:

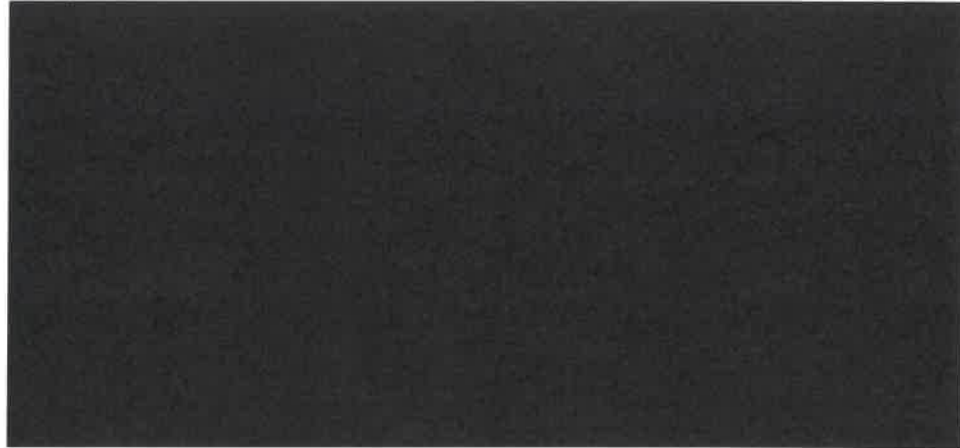


Figure A: Customer Experience Strategy

PEOPLES GAS SYSTEM
DOCKET NO. 20200051-GU
DOCKET NO. 20200166-GU
STAFF'S SEVENTH REQUEST FOR
PRODUCTION OF DOCUMENTS
REQUEST NO. 15
FILED: 09/21/2020

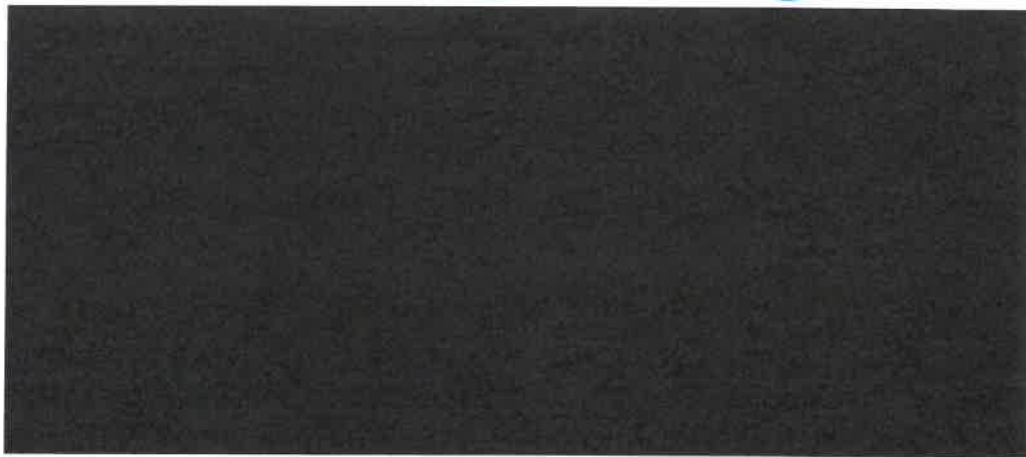
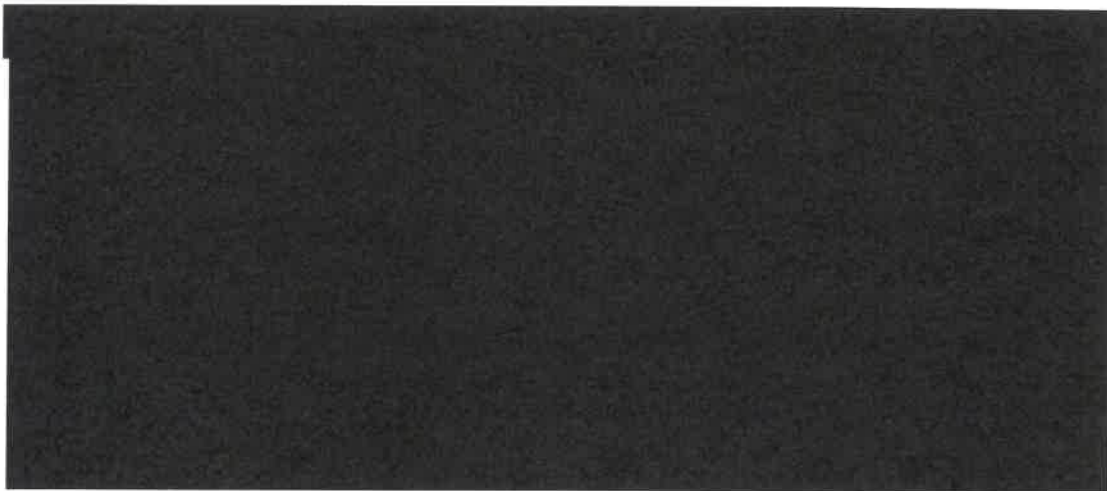


Figure B: Best Practice IVR Self-Service for top performers



Project Description:

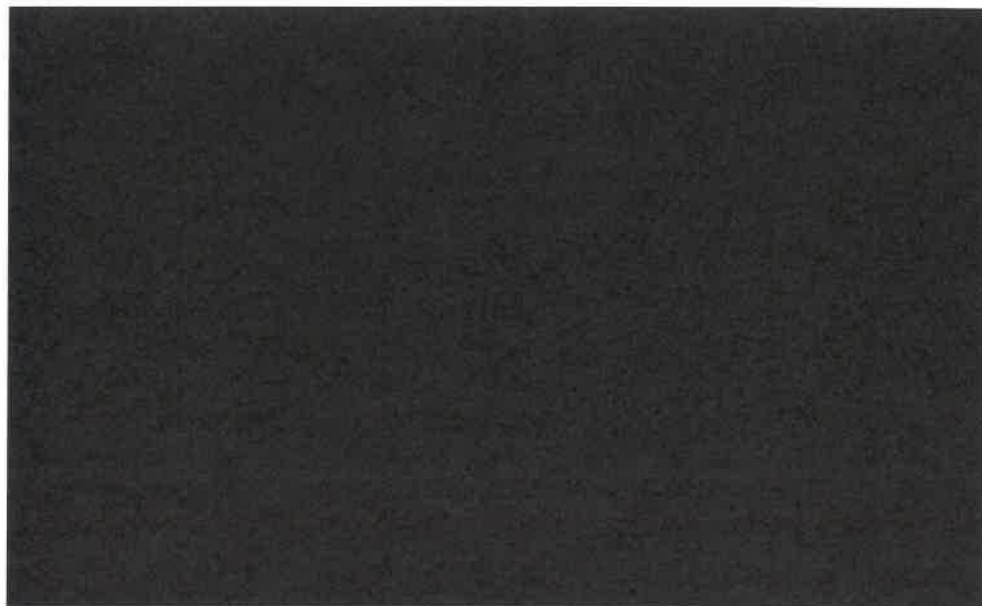


CONFIDENTIAL

PEOPLES GAS SYSTEM
DOCKET NO. 20200051-GU
DOCKET NO. 20200166-GU
STAFF'S SEVENTH REQUEST FOR
PRODUCTION OF DOCUMENTS
REQUEST NO. 15
FILED: 09/21/2020

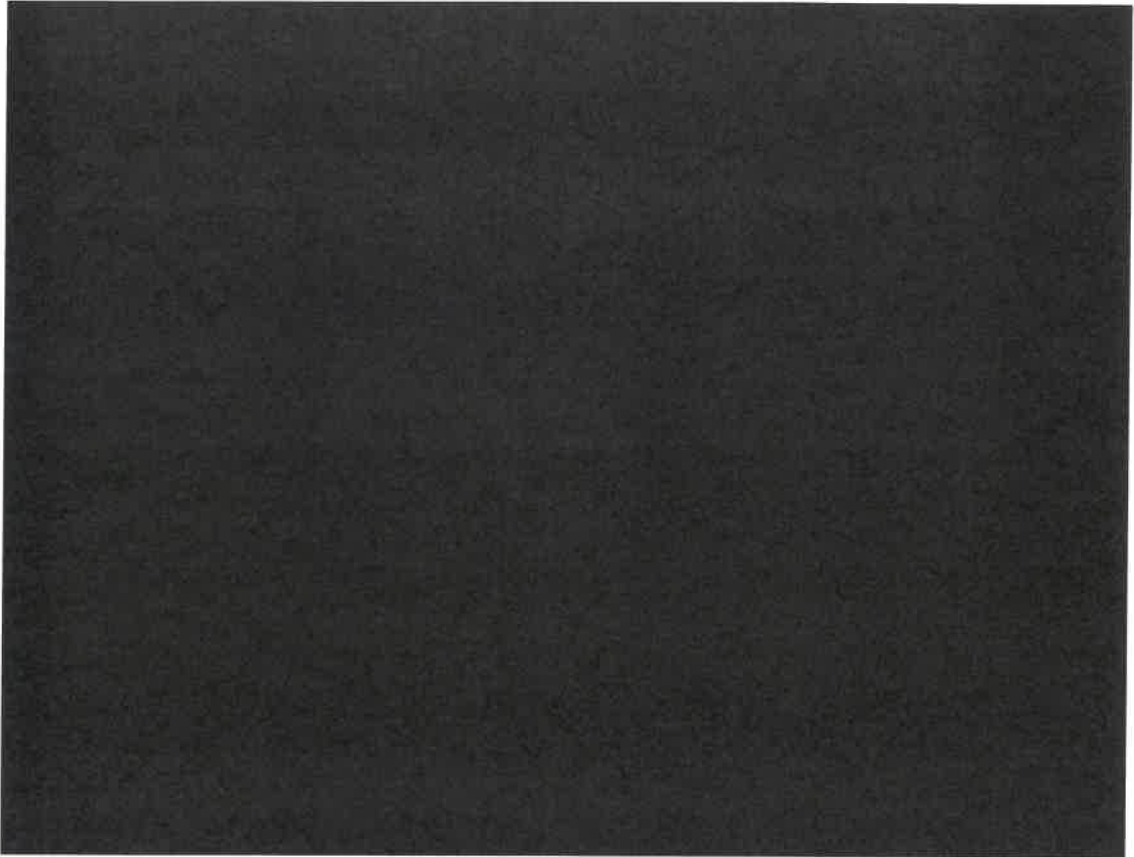


Project Characteristics and Project Risk Assessment:



CONFIDENTIAL

PEOPLES GAS SYSTEM
DOCKET NO. 20200051-GU
DOCKET NO. 20200166-GU
STAFF'S SEVENTH REQUEST FOR
PRODUCTION OF DOCUMENTS
REQUEST NO. 15
FILED: 09/21/2020



Contribution of Project to Corporate Objectives:



Availability of Capital:



Recommendation:





E-Signed: 07/16/2020 01:47 PM EDT
Nancy Tower
ntower@tecoenergy.com
IP: 12.171.196.205
Certifi Electronic Signature
DocID: 20200701145549600

Nancy Tower
President & CEO – Tampa Electric Company
President & CEO – TECO Energy

Greg Blunden
SVP Finance & Accounting and CFO
TECO Energy

TJ Szelistowski
President
Peoples Gas System

We recommend
million for this



Nancy Tower
President & CEO – Tampa Electric Company
President & CEO – TECO Energy

Greg Blunden
SVP Finance & Accounting and CFO
TECO Energy

TJ Szelistowski
President
Peoples Gas System

CONFIDENTIAL

Nancy Tower
President & CEO – Tampa Electric Company
President & CEO – TECO Energy

Greg Blunden
SVP Finance & Accounting and CFO
TECO Energy



TJ Szelistowski
President
Peoples Gas System

PK	CRA-16116	CRA-16136	CRA-16801	CRA-16815	REL-05340	New-15427	New-15435
Project Name							
Country							
Division							
Project Total Cost							
Project Score							
Project Status							
PWT							
Revenue Category							
Event FP Group							
Project Type							
Opac Info							
Numbers Info							
AD Info							
Strength							
Eng Area PDI							
Historical Analysis							
Year 1							
Project Start Date (Est)							
Eng Start Date							
MA Start Date							
Cons Start Date							
In Service Date							
Completion Date							
Estimate Confidence							
Eng Weeks							
MA Weeks							
Cons Weeks							
Requested By							
Engineer							
Project Manager							
2018							
2019							
2020							
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2049							
2050							
Year Indicators							
PCI Desc							
Project Description							
PI Desc							
PMI Desc							
PSI Desc							
Strategic Desc							
PSI Prob Status Value							
Indicators							
PCI Total Score							
PI Total Score							
PMI Total Score							
PSI Total Score							
PSN Total Score							
Total Strategic Score							
Revenue Impact Score							
PCI Desc							
Item Type							

EXHIBIT C

JUSTIFICATION TABLE

EXHIBIT C

Company: Peoples Gas System

Title: List of Confidential Documents Included in Peoples' Request for Confidential Treatment

Docket Nos.: 20200051-GU & 20200166-GU

Document	Description	No. of Pages	Conf . Y/N	Line No./Col. No.	Florida Statute 366.093(3) Subjecti on
1	Peoples' Response to Staff's Seventh Request for Production of Documents No. 15 (BS 16766)		Y	Column Project, Column 2020 and 2021 under Updated Forecast and Columns 2020 and 2021 under Variance and Column Explanation	(e)
2	Peoples' Response to Staff's Seventh Request for Production of Documents No. 15 (BS 16756)	1	Y	Everything other than headings;	(e)
3	Peoples' Response to Staff's Seventh Request for Production of Documents No. 15 (BS 16757)	1	Y	Everything other than headings	(e)
4	Peoples' Response to Staff's Seventh Request for Production of Documents No. 15 (BS 16758)	1	Y	Everything other than headings	(e)
5	Peoples' Response to Staff's Seventh Request for Production of Documents No. 15 (BS 16759)	1	Y	Everything other than headings	(e)

6	Peoples' Response to Staff's Seventh Request for Production of Documents No. 15 (BS 16760)	1	Y	Signature page – lines 1 and 2	(e)
7	Peoples' Response to Staff's Seventh Request for Production of Documents No. 15 (BS 16761)	1	Y	Signature page – lines 1 and 2	(e)
8	Peoples' Response to Staff's Seventh Request for Production of Documents No. 15 (BS 16762)	1	Y	Signature page – lines 1 and 2	(e)
9	Peoples' Response to Staff's Seventh Request for Production of Documents No. 15 (BS 16763)			Everything other than headings	(e)
10	Peoples' Response to Staff's Seventh Request for Production of Documents No. 15 (BS 16764)			Everything other than headings	(e)
11	Peoples' Response to Staff's Seventh Request for Production of Documents No. 15 (BS 16765)			Columns 2-24 below line 1	(e)