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July 6, 2023

VIA HAND DELIVERY

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

REDACTED

Re: Docket No. 20230023-GU; Petition for Rate Increase by Peoples Gas System, Inc.

Docket No. 20220219-GU; Peoples Gas System's Petition for Rate Approval of 2022 Depreciation Study

Docket No. 20220212-GU; Peoples Gas System's Petition for Approval of Depreciation Rate and Subaccount for Renewable Natural Gas Facilities Leased to Others

Dear Mr. Teitzman:

Enclosed for filing in the above docket is Peoples Gas System, Inc.'s Request for Confidential Classification of certain information contained in the May 23, 2023 deposition exhibits of Helen Wesley and the Panel. Also enclosed in CD format are the public (redacted) version of these documents.

Thank you for your assistance in connection with this matter.

Sincerely,

Virginia Ponder

VLP/ne
Attachment

cc: All parties of record (w/att.)

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BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

Petition for Rate Increase by Peoples Gas System, Inc.	DOCKET NO. 20230023-GU
Peoples Gas System's Petition for Rate Approval of 2022 Depreciation Study	DOCKET NO. 20220219-GU
Peoples Gas System's Petition for Approval of Depreciation Rate and Subaccount for Renewable Natural Gas Facilities Leased to Others	DOCKET NO. 20220212-GU FILED: July 6, 2023

**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 May 22, 2023, Peoples filed a Notice of Intent to Request Confidential Classification for materials that the Office of Public Counsel planned to utilize in the May 23, 2023 depositions of Peoples' witnesses Helen J. Wesley, Rachel B. Parsons, Kenneth D. McOnie, and Peoples team member Valerie Strickland. *See* DN 03326-2023. Consistent with that Notice of Intent, the company hereby designates the portions of the exhibits utilized in these depositions, as specified on Exhibit "A," that constitute confidential information ("Confidential Information"). Contemporaneous with the filing of this request, Peoples submitted the confidential versions of these deposition exhibits 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 and motion 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. The public version of the documents with the Confidential Information is included as Exhibit B.

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 and motion.

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 6th day of July 2023.

Respectfully submitted,



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ATTORNEYS FOR PEOPLES GAS SYSTEM, INC.

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing Request for Confidential Classification, filed on behalf of Peoples Gas System, Inc., has been furnished by electronic mail on this 6th day of July, 2023 to the following:

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ATTORNEY

EXHIBIT A
DEPOSITIONS OF WESLEY, PARSONS, MCONIE, AND STRICKLAND
JUSTIFICATION FOR CONFIDENTIAL TREATMENT

Deposition of Helen J. Wesley				
<u>Exhibit No.</u>	<u>Document Description</u>	<u>Bates Pages</u>	<u>Description of Information</u>	<u>Justification</u>
2	Document containing confidential employee compensation information previously produced in response to OPC IRR 70	BS 324-03	The Highlighted Information	(1)
5	August 6, 2020 board meeting minutes previously produced in response to OPC's First Request for Production	BS 015921	The Highlighted Information	(1)
6	August 6, 2020 board meeting Item 12 previously produced in response to OPC's First Request for Production	BS 016177-016185	The Highlighted Information	(1)

Panel Deposition of Wesley, Parsons, McOnie, and Strickland

Exhibit No.	Document Description	Bates Pages	Description of Information	Justification
1	Confidential legal memorandum originally produced in response to OPC's 1 st Request for Production No. 46	024951-024963	The Highlighted Text	(1)
3	IRS Private Letter Ruling and Request originally produced in response to OPC's 1 st Request for Production No. 25	13349-13543	The Highlighted Text	(1)
4	April 28, 2022 board presentation originally produced in response to OPC's 1 st Request for Production No. 37	018719-018732	The Highlighted Text	(1)
5	June 9-10, 2020 board presentation excerpt originally produced in response to OPC's 1 st Request for Production No. 37	016477	The Highlighted Text	(1)
8	Moody's Investors Service and Fitch credit reports originally produced in response to OPC's 1 st Request for Production No. 55	009437-009805	The Highlighted Text	(2)

9	2023 PGS integrated plan materials setting out internal business strategy, originally produced in response to OPC's 3 rd Request for Production No. 63	2933-3212	The Highlighted Text	(1)
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- (1) The highlighted information consists of "information relating to competitive interests, the disclosure of which would impair the competitive business of the provider of the information." This information is protected by Section 366.093(3)(d) and (e) of the Florida Statutes.
- (2) The confidential information contained in this column consists of the proprietary work product of credit rating agencies. Public disclosure of this information would allow duplication of these entities' work without compensation for their efforts. This information is in the nature of a trade secret owned by such entities and disclosure of this information would impair their competitive business interests by revealing their proprietary work product. This information is protected by Section 366.093(3)(a) and (e) of the 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 X