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March 31, 2025

VIA HAND DELIVERY

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

REDACTED

In re: Petition for Rate Increase by Peoples Gas System, Inc.

DOCKET NO. 20250029-GU

Dear Mr. Teitzman:

Attached for filing in the above docket is Peoples Gas System, Inc.'s Request for Confidential Classification and Request for Temporary Protective Order of certain information contained in exhibit DB-1, Document No. 4 to the prepared direct testimony of Donna Bluestone.

Thank you for your assistance in connection with this matter.

Sincerely,

Virginia L. Ponder

VLP/  
Attachment

cc: All parties of record

COM \_\_\_\_  
AFD \_\_\_\_  
APA \_\_\_\_  
ECO \_\_\_\_  
ENG 1 \_\_\_\_  
GCL \_\_\_\_  
IDM \_\_\_\_  
CLK \_\_\_\_

Exh "DB-1"  
redacted

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BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Petition for Rate Increase by Peoples  
Gas System, Inc.

DOCKET NO. 20250029-GU

FILED: March 31, 2025

**PEOPLES GAS SYSTEM, INC.'S  
REQUEST FOR CONFIDENTIAL CLASSIFICATION  
AND REQUEST FOR TEMPORARY PROTECTIVE ORDER**

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 this date, Peoples filed its petition for rate increase, direct testimony and exhibits, and the required accompanying Minimum Filing Requirements. The company believes that portions of exhibit DB-1, Document No. 4 to the prepared direct testimony of Donna Bluestone, as specified on Exhibit "A," constitute Confidential Information and has designated it as such by highlighting. Contemporaneous with the filing of this request, Peoples submitted the Confidential Information 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. Exhibit “B” contains the public versions of the Documents with the Confidential Information.

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.

5. For the same reasons set forth herein in support of its request for confidential classification, Peoples also moves the Commission for entry of a Temporary Protective Order pursuant to Rule 25-22.006(6)(a) of the Florida Administrative Code.

**Requested Duration of Confidential Classification**

6. 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 and motion be accorded confidential classification for the reasons set forth herein and for 18 months.

DATED this 31<sup>st</sup> day of March 2025.

Respectfully submitted,



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ATTORNEYS FOR PEOPLES GAS SYSTEM, INC.

**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that copies of the foregoing Request have been served by electronic mail on this 31<sup>st</sup> day of March, 2025 to the following:

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Carlos Marquez  
Timothy Sparks  
Daniel Dose  
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ATTORNEY

**EXHIBIT A**  
**JUSTIFICATION FOR CONFIDENTIAL TREATMENT**

| Document No. 4 of the Exhibit to the Direct Testimony of Donna Bluestone |  |  |               |
|--|--|--|---------------|
| Bates Page Nos.  | Document Description   | Description of Information                 | Justification |
| 77   | Document No. 4 of the Exhibit to the Direct Testimony of Donna Bluestone, entitled "Base Wage Adjustments for Union Members 2020-2025" | The Highlighted Information – Column 2025. | (1)           |

**Justification**

- (1) The highlighted information concerns bids or other contractual data, the disclosure of which would impair the efforts of the company or its affiliates to contract for goods or services on favorable terms.

**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         | <u>X</u> |
| Public Version(s) of the Document(s) attached via USB | <u>—</u> |

| Union   | 2020  | 2021  | 2022  | 2023   | 2024                       | 2025                       |
|---|---|---|---|--|----------------------------|----------------------------|
|   |   |   |   |  |                            |                            |
| IBEW (International Brotherhood of Electrical Workers) 108 Sarasota                   | *A Member with: Current straight-time hourly wages above applicable step of PGS Wage and Skill Progression Program. Lump sum equal to 1.375% of current straight-time annual wages plus a 1.375% BWI from current straight time base wage rate. *Wages less than 3% below applicable step receive incremental BWI from current rate up to applicable step. *Current straight-time hourly wage between 3% - applicable step and the applicable step will receive incremental BWI from current rate up to applicable step and the difference between 3% and their BWI in a lump sum payment.  | *A Member with: Current straight-time hourly wages above applicable step of PGS Wage and Skill Progression Program. Lump sum equal to 1.5% of current straight-time annual wages plus a 1.5% BWI from current straight time base wage rate. *Wages less than 3% below applicable step receive incremental BWI from current rate up to applicable step. *Current straight-time hourly wage between 3% - applicable step and the applicable step will receive incremental BWI from current rate up to applicable step and the difference between 3% and their BWI in a lump sum payment.  | *For all classifications, except Apprentices, Apprentice, Level 1: 2.2% Increase<br>Apprentice, Level 2: 1.5% Increase<br>Apprentice, Level 3: 10% Increase   | 3% for all classifications   | 3% for all classifications | 3% for all classifications |
| UPCW Local 1025 (United Food and Commercial Workers International Union) Orlando      | *Members with current straight-time hourly wages above the applicable step of the PGS Wage and Skill Progression Program will receive a 2.0% base wage increase above their current base wage and a lump sum equal to 1.0% of current straight-time annual wages. *Members with current straight-time hourly wages between 3.0% below the applicable step of the PGS Wage and Skill Progression Program and the applicable step of the PGS Wage and Skill Progression Program will receive an incremental base wage increase from their current rate of 3.0%. *Wages less than 3.0% below the applicable step of the PGS Wage and Skill Progression Program will receive an incremental base wage increase from their current rate up to the applicable step as published in the PGS Wage & Skill Progression Program.  | *Members with current straight-time hourly wages at 3.0% below the applicable step of the PGS Wage and Skill Progression Program will receive an incremental base wage increase from their current rate up to the applicable step as published in the PGS Wage & Skill Progression Program. *Members with current straight-time hourly wages between 3.0% and the applicable step of the PGS Wage and Skill Progression Program will receive an incremental base wage increase from their current rate up to the applicable step as published in the PGS Wage & Skill Progression Program.  | 1. Apprentice, Level 1: 15% Increase<br>Apprentice, Level 2: 10% Increase<br>2. Utility Technician: 8% Increase<br>3. Senior Utility Technician: 8% Increase<br>4. Utility Coordinator: 15% Increase<br>5. Corrosion Apprentice: 8% Increase<br>6. Corrosion Technician: 10% Increase<br>7. Senior Corrosion Technician: 14% Increase   | 3% for all classifications   | 3% for all classifications | 3% for all classifications |
| IBEW 2072 (International Brotherhood of Electrical Workers) Lakeland, Daytona, Eustis | *Members with current straight-time hourly wages above the applicable step of the PGS Wage and Skill Progression Program will receive a lump sum (1) equal to 1% of current straight-time annual wages plus a 2% base wage increase from their current straight-time base wage rate. *Member with a current straight-time hourly wage less than 3% below the applicable step of the PGS Wage and Skill Progression Program will receive an incremental base wage increase from their current rate up to the applicable step. *Member with a current straight-time hourly wage between 3% below the applicable step of the PGS Wage and Skill Progression Program and the applicable step will receive an incremental base wage increase from their current rate up to the applicable step and the difference between 3% and their base wage increase in a lump sum (1) payment. | *Members with current straight-time hourly wages above the applicable step of the PGS Wage and Skill Progression Program will receive a lump sum (1) equal to 1% of current straight-time annual wages plus a 2% base wage increase from their current straight-time base wage rate. *Member with a current straight-time hourly wage less than 3% below the applicable step of the PGS Wage and Skill Progression Program will receive an incremental base wage increase from their current rate up to the applicable step. *Member with a current straight-time hourly wage between 3% below the applicable step of the PGS Wage and Skill Progression Program and the applicable step will receive an incremental base wage increase from their current rate up to the applicable step and the difference between 3% and their base wage increase in a lump sum (1) payment. | *Members with current straight-time hourly wages above the applicable step of the PGS Wage and Skill Progression Program will receive a lump sum (1) equal to 1% of current straight-time annual wages plus a 2% base wage increase from their current straight-time base wage rate. *Member with a current straight-time hourly wage less than 3% below the applicable step of the PGS Wage and Skill Progression Program will receive an incremental base wage increase from their current rate up to the applicable step. *Member with a current straight-time hourly wage between 3% below the applicable step of the PGS Wage and Skill Progression Program and the applicable step will receive an incremental base wage increase from their current rate up to the applicable step and the difference between 3% and their base wage increase in a lump sum (1) payment. | 1. Apprentice: 7.75% - 13.81% Increase<br>2. Utility Technician: 5.25% - 5.47% Increase<br>3. Senior Utility Technician: 6.07% - 6.08% Increase<br>4. Utility Coordinator: 7.30% - 12.99% Increase<br>5. Corrosion Apprentice: 6.07% - 6.09% Increase<br>6. Corrosion Technician: 7.77% - 9.84% Increase<br>7. Senior Corrosion Technician: 8.16% - 8.17% Increase | 3% for all classifications | 3% for all classifications |
| OPEU (Office and Professional Employees International Union) TTC & Peoples Gas        | 3.25%   | 3%  | 2.75%   | 2.75%  | 3%                         | 3%                         |



**EXHIBIT C**  
**JUSTIFICATION FOR EXTENSION OF CONFIDENTIALITY PERIOD**

**N/A**