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October 16, 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 a Request for Confidential Treatment of certain portions of Peoples’ Responses to Nos. 30 and 33 of Staff’s Tenth Request for Production of Documents. 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 16, 2020
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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: October 15, 2020

PEOPLES GAS SYSTEM'S REQUEST FOR CONFIDENTIAL TREATMENT

Pursuant to Section 366.093 and 119.07, *Florida Statutes*, and Rule 25-22.006, *Florida Administrative Code*, Peoples Gas System ("Peoples") requests confidential Treatment to testimony by witnesses for the Office of Public Counsel ("OPC") who reviewed documents produced in response to Nos. 30 and 33 of Staff's Tenth Request for Production of Documents. In support of its request, Peoples states:

1. Peoples has previously filed a Notice of Intent to Request Confidential Treatment of these documents on October 9, 2020.
2. Peoples provided certain documents in response to Nos. 30 and 33 of Staff's Tenth Request for Production of Documents.
3. The following exhibits are included with and made a part of this request:
 - a. Exhibit A consists of a copy of the confidential pages on which all information that Peoples asserts is 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.


4. 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.

5. 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,



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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 16th day of October, 2020:

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Andrew M. Brown, Esq.

EXHIBIT A

CONFIDENTIAL

FILED UNDER SEPARATE COVER

EXHIBIT B

REDACTED COPIES

AutoSave (BS 1717) Staff's 10th PDD Feb. 21, Apr. 20, CONFIDENTIAL - REDACTED - Excel Term Khalid bin

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Year	Month	Model Income
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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	# of Pgs	Conf. Y/N	Line No./Col. No.	Florida Statute 366.093(3) Subsection
1	Directors' Meeting; Response to Staff's 10 th POD No. 30	9	Y	Page 3	(e)
2	Response to Staff's 10 th POD No. 33, BS_17177		Y	<u>Quarterly Data:</u> Lines 9-328, Columns B-E <u>Monthly Data:</u> Lines 14-1158; Columns A-FR <u>Model Income Variable:</u> Lines 2-1141, Column C	(d), (e)