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April 30, 2025

VIA HAND DELIVERY

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

REDACTED

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2025 APR 30 PM 2:59
COMMISSION
CLERK

Re: Docket No. 20250029-GU, Petition for Rate Increase by Peoples Gas System, Inc.

Dear Mr. Teitzman:

Attached for filing in the above docket is Peoples Gas System Inc.'s Request for Confidential Classification pertaining to certain information contained in Peoples Gas System, Inc.'s response to Office of Public Counsel's First Request for Production (Nos. 1-41) and First Set of Interrogatories (Nos. 1-94).

Thank you for your assistance in connection with this matter.

Sincerely,

Malcolm N. Means

MNM/bml
Attachment

cc: All parties of record

COM ____
AFD ____
APA ____
ECO ____
ENG ____
GCL ____
IDM ____
CLK ____

2 redacted USBs

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

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

DOCKET NO. 20250029-GU

FILED: April 30, 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 serves its answers to the Office of Public Counsel's ("OPC") First Set of Interrogatories (Nos. 1-94) and its responses to OPC's First Request for Production of Documents (Nos. 1-41). The company believes that portions of its answers and responses, as specified on Exhibit "A," constitute Confidential Information and has designated it as such by highlighting. Contemporaneously 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 30th day of April 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 has been served by electronic mail on this 30th day of April, 2025 to the following:

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EXHIBIT A
JUSTIFICATION FOR CONFIDENTIAL TREATMENT

OPC's First Set of Interrogatories (Nos. 1-94)			
Bates Page Nos.	Document Description	Description of Information	Justification
17099	Forecasted growth rate details, provided in Peoples Answer to OPC's First Set of Interrogatories, Number 5.	<u>IRR No. 5 CONF:</u> Column(s): D through F; Row(s): 13 through 16.	(5)
17124	The Company's current salary structure, provided in Peoples Answer to OPC's First Set of Interrogatories, Number 18.	<u>Non-union Salary Structure:</u> Column(s): D through I; Row(s): 8 through 18 and 22 through 29.	(5)
17127	Wage rate increases details, provided in Peoples Answer to OPC's First Set of Interrogatories, Number 19.	<u>Sheet1:</u> Column(s): H and I; Row(s): 9.	(4)
17141	Officer compensation details, provided in Peoples Answer to OPC's First Set of Interrogatories, Number 25.	<u>IRR 25 (Highlighted):</u> Column(s): C through H; Row(s): 3 through 6, 13, 18 through 21, 28, 34, 36, 38, 41, 43, 48 through 50, 58, 63 through 66, 73, 78 through 81, 83 through 85, 88, 93, 94, 98, 99, 103, 108 through 111, 113, 116, 118, 123 through 126, 131, 133, 138 through 141, 143, 145, 148, 153 through 156, 158, 160, 163, 168 through 171, 178, 184, 186, 191, and 193.	(5)
17145	Employee compensation details, provided in Peoples Answer to OPC's First Set of Interrogatories, Number 27.	<u>2025 PGS RC - OPC IRR 27:</u> Column(s): D through H; Row(s): 7 through 835	(5)

17164-17170	Amounts of legal settlements, provided in Peoples Answer to OPC's First Set of Interrogatories, Number 42.	The Highlighted Information	(4)
17452-17453	Non-regulated revenues, provided in Peoples Answer to OPC's First Set of Interrogatories, Number 67.	The Highlighted Information	(5)
17455	Shared officer and directors compensation information, provided in Peoples Answer to OPC's First Set of Interrogatories, Number 68.	<u>IRR 68 (Highlight):</u> Column(s): C through H; Row(s): 7 through 13, 15, 18, 21, and 25.	(5)
17459	Executive compensation details, provided in Peoples Answer to OPC's First Set of Interrogatories, Number 69.	<u>IRR 69 (Highlighted):</u> Column(s): C through H; Row(s): 3 through 6, 13, 15, 16, 23 through 26, 33, 35, 36, 43, 44, 46, 53, 55, 56, 63 through 66, 73, 75, 76, 84, 86, 88, 91, 93, 95, 96, 103, 104, 106, 108 through 110, 113, 115, 116, 123 through 125, 133, 135, 136, 143 through 146, 153, 155, 156, 163 through 165, 173, 175, 176, 183 through 186, 188, 190, 193, 195, 196, 203 through 206, 213, 215, 216, 223 through 226, 233, 235, 236, 243 through 246, 248 through 250, 253, 255, 256, 263, 264, 268, 269, 273, 275, 276, 283 through 286, 288, 291, 293, 295, 296, 303 through 306, 311, 313, 315, 316, 323 through 326, 328, 333, 335, 336, 343 through	(5)

		346, 353, 355, 356, 363 through 366, 373, 375, 376, 383 through 386, 388, 390, 393, 395, 396, 403 through 406, 408, 410, 413, 415, 416, 423 through 426, 433, 435, 436, 444, 446, 451, 453, 455, and 456.	
17510, 17515-17517, and 17519-17521	Cost savings program details, provided in Peoples Answer to OPC's First Set of Interrogatories, Number 85.	The Highlighted Information	(4)
17524	Same as above.	<u>Overview:</u> Column(s): A; Row(s): 2 and 11. Chart 1: TextBox 1 and Rectangle 1 Chart 3: TextBox 1 and Rectangle 2 <u>Assumptions:</u> Column(s): B; Row(s): 2 <u>Confidential Tab:</u> Tab name and Column(s): A and E through I; Row(s): 1, 3, and 4. <u>Meter Reading Only</u> <u>Comparison:</u> Column(s): A and M; Row(s): 3. <u>Confidential Tab:</u> Tab name	Same as above.

OPC's First Request for Production of Documents (Nos. 1-41)			
Bates Page Nos.	Document Description	Description of Information	Justification
2-64	Copies of the most recent actuarial reports, provided in Peoples Response to OPC's First Request for Production of Documents, Number 1.	The Highlighted Information	(4) & (5)

90, 104-106, 134, 135	Copies of contracts with consultants or other 3 rd parties, provided in Peoples Response to OPC's First Request for Production of Documents, Number 2.	The Highlighted Information	(4) & (5)
310	Copies of exhibits provided in Peoples Response to OPC's First Request for Production of Documents, Number 5.	Column: G; Rows: 2 through 5.	(5)
590	Copies of workpapers provided in Peoples Response to OPC's First Request for Production of Documents, Number 7.	<p><u>Active TMs 1.1.2024:</u> Column(s): A through G, J, K, P, X, and AA; Row(s) 2 through 764.</p> <p><u>Active TMs 12.31.2024:</u> Column(s): A through G, J, K, P, X, and AA; Row(s): 2 through 813.</p> <p><u>2024 Ext Hires at year end (IN):</u> Column(s): A through G, J, K, P, X, and AA; Row(s): 2 through 105.</p> <p><u>2024 Transfer In:</u> Column(s): A through G, J, K, P, X, and AA; Row(s): 2 through 5.</p> <p><u>2024 Transfers Out:</u> Column(s): A through G, J, K, P, X, and AA; Row(s) 2 through 5.</p> <p><u>Terms Active 1.1.2024 (OUT):</u> Column(s): A through G, J, K, P, X, and AA; Row(s): 2 through 56.</p> <p><u>Active TMs 1.1.2023:</u> Column(s): A through G, J, K, P, X, and AA; Row(s): 2 through 707.</p> <p><u>Active TMs 12.31.2023:</u> Column(s): A through G, J, K, P, X, and AA;</p>	(6) & (7)

		<p>Row(s): 2 through 764. <u>2023 Ext Hires at year end (IN):</u> Column(s): A through G, J, K, P, X, and AA; Row(s): 2 through 115. <u>2023 Transfers In:</u> Column(s): A through G, J, K, P, X, and AA; Row(s) 2 through 15. <u>2023 Return from LOA:</u> Column(s): A through G, J, K, P, X, and AA; Row(s): 2 <u>2023 Transfers Out:</u> Column(s): A through G, J, K, P, X, and AA; Row(s): 2 through 16. <u>Team Active 1.1.2023 (OUT):</u> Column(s): A through G, J, K, P, X, And AA; Row(s): 2 through 58.</p>	
591	Same as above.	<p><u>PGS:</u> Column(s): D through G, K, L, N, Q, Y, AB, AE, and AI; Row(s): 2 through 815. <u>Seconded:</u> Column(s): L, N, P, Y, AB, and AE; Row(s): 10 and 11.</p>	Same as above.
2690	Same as above.	<p><u>monthly data:</u> Column(s): D; Row(s): 687 through 1046, 1109 through 2055, 1197 through 1226; and 1240 through 1245. Chart1</p>	Same as above.
2691	Same as above.	<p><u>monthly data:</u> Column(s): D and E; Row(s): 686 through 1021, 1084 through 1111, 1170 through 1197, 1211 through 1216.</p>	Same as above.

2778	Copies of PGS' detailed general ledger, provided in Peoples Response to OPC's First Request for Production of Documents, Number 9.	<u>Sheet1</u> : Column(s): A through J; Row(s): 2 through 141	(5)
2803	Copies of PGS' trial balances, provided in Peoples Response to OPC's First Request for Production of Documents, Number 10.	<u>Sheet1</u> : Column(s): A through J; Row(s): 2 through 136.	(5)
2804	Same as above.	<u>Sheet1</u> : Column(s): A through J; Row(s): 2 through 141.	Same as above.
2805	Same as above.	<u>Sheet1</u> : Column(s): A through J; Row(s): 2 through 141.	Same as above.
2870, 2877, and 2880	Copies of PGS' incentive compensation/bonus/at-risk plans, provided in Peoples Response to OPC's First Request for Production of Documents, Number 11.	The Highlighted Information	(5)
2881-3241	Copies of reports by investor's services, provided in Peoples Response to OPC's First Request for Production of Documents, Number 12.	The Highlighted Information	(5) & (7)
3242-3556	Copies of presentations made to financial institutions, rating agencies, institutional investors, and investment firms, provided in Peoples Response to OPC's First Request for Production of Documents, Number 13.	The Highlighted Information	(1) & (5)
3557-3783	Copies of all prospectuses for any security issuances, private placement	The Highlighted Information	(5)

	documents, or loan agreements, provided in Peoples Response to OPC's First Request for Production of Documents, Number 14.		
3784 and 3785	Copies of expected return on pension plan assets, provided in Peoples Response to OPC's First Request for Production of Documents, Number 17.	The Highlighted Information	(5)
3787-3802, 3804-3829, 3831-3850	Copies of supporting documents used to project pension costs and expense and OPEB costs and expense, provided in Peoples Response to OPC's First Request for Production of Documents, Number 18.	The Highlighted Information	(7)
3851-3853 and 3861-3869	Copies of accounting entries and journal entry workpapers related to tax accounting method changes, provided in Peoples Response to OPC's First Request for Production of Documents, Number 19.	The Highlighted Information	(5)
3879, 3883, 3884, 3887, and 3892	Incentive Compensation studies, analyses, and workpapers, provided in Peoples Response to OPC's First Request for Production of Documents, Number 20.	The Highlighted Information	(5)
3893-6106	Copies of the two most recent State of Florida and federal consolidated income tax returns, provided in Peoples Response to OPC's First Request for Production	The Highlighted Information	(5)

	of Documents, Number 21.		
6138-6486	Copies of requests for private letter rulings and responses, provided in Peoples Response to OPC's First Request for Production of Documents, Number 24.	The Highlighted Information	(5)
8623	Copies of email correspondence and transfer forms, provided in Peoples Response to OPC's First Request for Production of Documents, Number 28.	<u>Debt & Interest:</u> Column(s): C through O; Row(s): 7 through 9, 12 through 14, 17 through 19, 22 through 24, 26 through 28, 30, 33 through 35, 37 through 39, 41, 44 through 46, 48 through 52, 55 through 57, and 59 through 61. <u>Blended Rates:</u> Column(s): B through M; Row(s): 6 through 62	(5)
8624	Same as above.	<u>Short-term debt:</u> Column(s): A through P; Row(s): 2, 4, 6, 8, 9, 16 through 19, 21, 27, 28, 30, 34, 35, 38, 39, 43, 44, 47, 48, 51, 52, 55, 56, 66, 67, and 70.	Same as above.
8625	Same as above.	<u>Debt Parameters:</u> Column(s): B through AD; Row(s): 2 through 6, 8 through 12, 14 through 19, 22 through 27, 29, and 39.	Same as above.
8626	Same as above.	<u>Debt & Interest:</u> Column(s): C through P; Row(s): 7 through 9, 12 through 14, 17 through 19, 22 through 24, 26 through 28, 30, 33 through 35, 37 through 39, 41, 44 through 46, 48 through 50, 52, 55 through 57, 59 through 61, 64, and 65.	Same as above.

		<u>Blended Rates:</u> Column(s): B through M; Row(s): 6 through 37, 39, 40, 43, 44, 46, 47, 49, 50, 52, 53, 55, 56, 58, 59, and 62.	
8795-8808	Copies of budget variance reports, provided in Peoples Response to OPC's First Request for Production of Documents, Number 29.	The Highlighted Information	(5)
8809-8905	Copies of budget analysis plans, provided in Peoples Response to OPC's First Request for Production of Documents, Number 30.	The Highlighted Information	(5)
8906, 8907, 8909-8928, 8930-8941, 8943-8965, 8967-9026	Copies of all internal audit reports, provided in Peoples Response to OPC's First Request for Production of Documents, Number 31.	The Highlighted Information	(2) & (5)
9054-16493	Copies of business analysis plans, project authorization plans, and associated presentations, provided in Peoples Response to OPC's First Request for Production of Documents, Number 36.	The Highlighted Information	(5)
16496, 16497, and 16499-16524	Copies of the income sharing agreements between Peoples and its affiliates, provided in Peoples Response to OPC's First Request for Production of Documents, Number 40.	The Highlighted Information	(4) & (5)

Justifications

- (1) The highlighted information relates to trade secrets, and is protected under section 366.093(3)(a), Florida Statutes.
- (2) The highlighted information relates to internal auditing controls and reports of internal auditors, and is protected under section 366.093(3)(b), Florida Statutes.
- (3) The highlighted information pertains to security measures, systems or procedures and is protected under section 366.093(3)(c), Florida Statutes.
- (4) 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 and is protected under Section 366.093(d), Florida Statutes.
- (5) The highlighted information relates 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)(e), Florida Statutes.
- (6) The highlighted information relates to employee personnel information unrelated to compensation, duties, qualifications, or responsibilities. This information is protected under section 366.093(f), Florida Statutes.
- (7) The highlighted information consists of the proprietary work product of certain third parties, disclosure of this information would allow duplication of this entity's 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 competitive business interests by revealing competitive pricing related information. This information is protected Section 366.093(3)(a) and (e), 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 via USB X

EXHIBIT C
JUSTIFICATION FOR EXTENSION OF CONFIDENTIALITY PERIOD

N/A