

State of Florida



# Public Service Commission

CAPITAL CIRCLE OFFICE CENTER • 2540 SHUMARD OAK BOULEVARD  
TALLAHASSEE, FLORIDA 32399-0850

**-M-E-M-O-R-A-N-D-U-M-**

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**DATE:** March 9, 2016

**TO:** Kathryn Gale Winter Cowdery, Senior Attorney, Office of the General Counsel

**FROM:** Kelley F. Corbari, Senior Attorney, Office of the General Counsel *KFC*  
Bianca Y. Lherisson, Attorney, Office of the General Counsel

**RE:** CONFIDENTIALITY OF CERTAIN INFORMATION  
DOCKET NO: 150259-GU DOCUMENT NO: 01261-16  
DESCRIPTION: PGS (Watson) - (CONFIDENTIAL) Portions of answer to  
Citizens' 2nd set of interrogatories (No. 4).  
SOURCE: Peoples Gas System

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Pursuant to Section 366.093, Florida Statutes (F.S.), and Rule 25-22.006, Florida Administrative Code, Peoples Gas System (PGS or the Company) requests confidential classification and motion for protective order of portions of the Company's response to the Office of Public Counsel's (OPC) Second Set of Interrogatories, No. 4 (Document No. 01261-16). Staff notes that the Company's request related to its response to OPC's Second Interrogatories (No. 4) pertains only to the names of the employees listed in the Company's response.

Staff has reviewed the documents, in staff's opinion, the request meets the criteria for confidentiality contained in Sections 366.093(3)(f). Therefore, staff recommends that the Company's request for confidential classification and motion for protective order for portions of its response to OPC's Second Set of Interrogatories (No. 4) be granted.

KFC

cc: Commission Clerk (Docket 150259-GU)



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**-M-E-M-O-R-A-N-D-U-M-**

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**DATE:** March 9, 2016

**TO:** Division of General Counsel, Office of Primary Responsibility

**FROM:** OFFICE OF COMMISSION CLERK

**RE:** CONFIDENTIALITY OF CERTAIN INFORMATION  
DOCKET NO: 150259-GU DOCUMENT NO: 01261-16  
DESCRIPTION: PGS (Watson) - (CONFIDENTIAL) Portions of answer to  
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The above confidential material was filed along with a request for confidential treatment and motion for temporary protective order. Please complete the following form by checking all applicable information and forward it to the attorney assigned to the docket, along with a brief memorandum supporting your recommendation.

- The document(s) is (are), in fact, what the utility asserts it (them) to be.
- The utility has provided enough details to perform a reasoned analysis of its request.
- The material has been received incident to an inquiry.
- The material is confidential business information because it includes:
- (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 information;
  - (f) Employee personnel information unrelated to compensation, duties, qualifications, or responsibilities;
- The material appears to be confidential in nature and harm to the company or its ratepayers will result from public disclosure.
- The material appears not to be confidential in nature.
- The material is a periodic or recurring filing and each filing contains confidential information.

This response was prepared by Kelley Corbari (GCL), on 03/09/16 a copy of which has been sent to the Office of Commission Clerk and the Office of General Counsel.