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> In Reply Refer to: Tampa ab@macfar.com

July 10, 2020

VIA E-PORTAL FILING

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

Docket No. 202000051-GU - Petition for rate increase by Peoples Gas System Re:

Dear Mr. Teitzman:

Attached for electronic filing in the above docket on behalf of Peoples Gas System, please find its Notice of Intent to Request Confidential Treatment in the above case.

Your assistance in this matter is greatly appreciated.

Sincerely,

AB/plb

cc:

Attachment

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BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Petition for rate increase by

Peoples Gas System.

Docket No. 20200051-GU Submitted for Filing: July 10, 2020

PEOPLES GAS SYSTEM'S NOTICE OF INTENT TO REQUEST CONFIDENTIAL TREATMENT

Pursuant to Sections 366.093 and 119.07, *Florida Statutes* and 25-22.006, *Florida Administrative Code*, Peoples Gas System ("Peoples") submits the following Request for Confidential Treatment of Response Numbers 12, 16, 18, 19, 21, 22, 25, 26, 27, 28, 33, 34, 35, 39 and 43 of Peoples' Response of July 10, 2020 to Citizen's First Request to Produce Documents (Nos. 1-45) dated June 10, 2020 (the "Response"), and Interrogatory Answers 7, 13, 50, 64, 65 to Citizen's First Set of Interrogatories (Nos. 1-75) dated June 10, 2020 (the "Response") which response is submitted for filing concurrently herewith or has heretofore been filed:

- 1. Peoples has not attached a line by line redaction of the materials in question because Peoples is asserting confidential treatment for the entire documents. The identities of the entities with which Peoples is having discussion is in and of itself confidential and it is necessary to redact the entire document and there would be no purpose served in attaching blank pieces of paper corresponding to the number of documents at issue.
- 2. The material for which confidential classification is sought is intended to be and is treated as private by Peoples, Tampa Electric Company and Emera and contains proprietary confidential business information under Section 366.093(2), and (3)(d), and 3(e), Florida Statutes.

3. Peoples requests that the information for which it seeks confidential classification not be declassified until 18 months after the date of the Commission's order granting this request (see Section 366.093(4), *Florida Statutes*). The time period requested is necessary to protect the competitive information regarding cost of doing business, the tax and financing information for all three companies and compensation schedules and benefits from all three companies. The period of time requested will ultimately protect Peoples, Tampa Electric Company, and Emera and its customers.

WHEREFORE, Peoples submits the foregoing as its request for confidential treatment of the information of the documents to be produced in response to Numbers 12, 16, 18, 19, 21, 22, 25, 26, 27, 28, 33, 34, 35, 39 and 43 of Peoples' Response of July 10, 2020 to Citizen's First Request to Produce Documents (Nos. 1-45) dated June 10, 2020 (the "Response"), and Interrogatory Answers 7, 13, 50, 64 and 65 to Citizen's First Set of Interrogatories (Nos. 1-75) dated June 10, 2020 dated June 10, 2020.

Respectfully submitted,

/s/ Andrew M. Brown, Esq.
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Attorneys for Peoples Gas System

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing Notice of Intent to Request Confidential Treatment of Peoples Gas System has been furnished via electronic mail to the following, this 10th day of July, 2020:

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c/o The Florida Legislature
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