



ATTORNEYS & COUNSELORS AT LAW EST. 1884

One Tampa City Center, Suite 2000
201 N. Franklin Street
P.O. Box 1531 (33601)
Tampa, FL 33602
813.273.4200 Fax: 813.273.4396

WWW.MFMLEGAL.COM
EMAIL: INFO@MFMLEGAL.COM

625 Court Street, Suite 200
P.O. Box 1669 (33757)
Clearwater, FL 33756
727.441.8966 Fax: 727.442.8470

In Reply Refer to:
Tampa
ab@macfar.com

July 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

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,

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)
Kurt Schrader/Jennifer S. Crawford/Walter Trierweiler (kschrade@psc.state.fl.us;
jcrawfor@psc.state.fl.us; wtrierwe@psc.state.fl.us)
Jon C. Moyle, Jr., Esq./Karen A. Putnal, Esq. (jmoyle@moylelaw.com;
kputnal@moylelaw.com; mqualls@moylelaw.com)
Paula K. Brown
Kandi Floyd
Karen Bramley
Thomas F. Farrior, Esq.

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Petition for rate increase by
Peoples Gas System.

Docket No. 20200051-GU
Submitted for Filing: July 16, 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 to documents produced in response to requests 49, 50 and 51 of Peoples' July 16, 2020 Response to Citizen's Second Request to Produce Documents (Nos. 46-51) and Interrogatory Answers 79 and 109 to Citizen's Second Set of Interrogatories (Nos. 76-113) dated June 16, 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 Peoples projections of future load, customers, revenue and income and other documents related to financial analysis and work papers showing certain financial and business calculations. The period of time requested will ultimately protect Peoples 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 requests 49, 50 and 51 of Peoples' July 16, 2020 Response to Citizen's Second Request to Produce Documents (Nos. 46-51) and Interrogatory Answers 79 and 109 to Citizen's Second Set of Interrogatories (Nos. 76-113) dated June 16, 2020.

Respectfully submitted,

/s/ Andrew M. Brown, Esq.

Andrew M. Brown
Thomas R. Farrior
Macfarlane Ferguson & McMullen
Post Office Box 1531
Tampa, Florida 33601
(813) 273-4300
ab@macfar.com
trf@macfar.com

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 16th day of July, 2020:

J.R. Kelly, Esq.
Office of Public Counsel
c/o The Florida Legislature
111 West Madison St., Room 812
Tallahassee, FL 32399-1400
kellyjr@leg.state.fl.us

Paula K. Brown
Regulatory Department
TECO Energy, Inc.
P.O. Box 111
Tampa, FL 33601-0111
regdept@tecoenergy.com

Jennifer S. Crawford, Esq.
Kurt Schrader, Esq.
Bianca Lherisson, Esq.
Office of General Counsel
Florida Public Service Commission
2540 Shumard Oak Boulevard
Tallahassee, FL 32399-0850
jcrawfor@psc.state.fl.us
kschrade@psc.state.fl.us
blheriss@psc.state.fl.us

Kandi M. Floyd
Peoples Gas System
P.O. Box 111
Tampa, FL 33601-0111
kfloyd@tecoenergy.com

Mireille Fall-Fry, Esq.
Associate Public Counsel
Office of Public Counsel
c/o The Florida Legislature
111 West Madison Street, Room 812
Tallahassee, FL 32399-1400
fall-fry.mireille@leg.state.fl.us

Florida Industrial Power Users Group
c/o Jon C. Moyle, Jr.
Karen A. Putnal
Moyle Law Firm, P.A.
118 North Gadsden Street
Tallahassee, FL 32301
jmoyle@moylelaw.com
kputnal@moylelaw.com
mqualls@moylelaw.com

/s/ Andrew M. Brown, Esq.
Andrew M. Brown