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July 20, 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:

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.

AB/plb

Attachment

 cc: J.R. Kelly/Mireille Fall-Fry (<u>kelly.jr@leg.state.fl.us;fall-fry.mireille@leg.state.fl.us</u>) Kurt Schrader/Jennifer S. Crawford/Walter Trierweiler (<u>kschrade@psc.state.fl.us;</u> jcrawfor@psc.state.fl.us; wtrierwe@psc.state.fl.us) Jon C. Moyle, Jr., Esq./Karen A. Putnal, Esq. (<u>jmoyle@moylelaw.com</u>; <u>kputnal@moylelaw.com</u>; <u>mqualls@moylelaw.com</u>) 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

In re: Petition for approval of 2020 depreciation study by Peoples Gas System.

Docket No. 20200166-GU

Submitted for Filing: July 20, 2020

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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 Interrogatories 1-4 of Peoples' July 20, 2020 Response to Staff's First Set of Interrogatories (Nos. 1-8) dated June 30, 2020 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 documents bates numbered 1-360 contain confidential information of the manner in which Peoples evaluates capital projects, and the costs and budgeting for those projects. It is necessary to redact the entire documents 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, and contains proprietary confidential business information as defined under Section 366.093(2), and (3)(d), and 3(e), *Florida Statutes*. 3. Peoples gives notice that the documents 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 the manner in which Peoples evaluates capital projects, and the costs and budgeting for those projects. 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 Interrogatories 1-4 of Peoples' July 20, 2020 Response to Staff's First Set of Interrogatories (Nos. 1-8) dated June 30, 2020.

Respectfully submitted,

<u>/s/ Andrew M. Brown, Esq.</u> 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 20th 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

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

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

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

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 imoyle@moylelaw.com kputnal@moylelaw.com mgualls@moylelaw.com

<u>/s/ Andrew M. Brown, Esq.</u> Andrew M. Brown