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September 1, 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 Request for Confidential Treatment in the above case.

Your assistance in this matter is greatly appreciated.

AB/plb

Attachment

J.R. Kelly/Mireille Fall-Fry (kelly.jr@leg.state.fl.us;fall-fry.mireille@leg.state.fl.us)

Singerely,

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BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Petition for rate increase by Peoples | DOCKET NO. 20200051-GU Gas System.

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

DOCKET NO. 20200166-GU

Submitted for Filing: September 1, 2020

PEOPLES GAS SYSTEM'S REQUEST FOR 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 testimony by witnesses for the Office of Public Counsel ("OPC") who reviewed documents produced in response to Interrogatory No. 109 of Citizen's Second Set of Interrogatories.

- 1. Based on conversations with counsel for OPC, Peoples has become aware that OPC witness Andrea Crane and/or other OPC witnesses have offered testimony regarding the documents produced in response to OPC's Interrogatory No. 109.
 - 2. Peoples hereby seeks confidential treatment with regard to that testimony.
- 3. The documents and the testimony referencing them, contain confidential proprietary business information primarily in the form of load and growth projections, net revenues and Peoples' cost information, and the revenue both projected and received from doing business.
- 4. The material for which confidential classification is sought is intended to be and is treated as private by Peoples and has not been otherwise disclosed.
- 5. Peoples is seeking confidential status under Section 366.093(2), (3)(b), (3)(c) and (3)(d), (3)(e), Florida Statutes.

6. 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 Peoples and compensation schedules and benefits from Peoples. The period of time requested will ultimately protect Peoples, Tampa Electric Company, and Emera and their customers.

7. 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 interests of Peoples regarding the financial information, the disclosure of which would impair their competitive interests. 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 testimony described above.

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 Request for Confidential Treatment of Peoples Gas System has been furnished via electronic mail to the following, this 1st day of September, 2020:

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