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September 25, 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.

Sincerely,

AB/plb

Andrew M. Brown

Attachment

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

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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: September 25, 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 supplement to its response to Request for Production No. 1 of Peoples' September 25, 2020 Supplemental Response to OPC's First Request for Production of Documents 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 responsive material in question because Peoples is asserting confidential treatment for the entire document. The documents bates numbered BS 12674 12683 contain confidential information about the details of Peoples current and future capital projects. A line by line redaction of the responsive material would make 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 Peoples current and future capital projects which includes Peoples future expansion plans. 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 to supplement its response to Request for Production No. 1 of Peoples' September 25, 2020 Supplemental Response to OPC's First Request for Production of Documents.

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 25th day of September, 2020:

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