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October 15, 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:

Enclosed for filing on behalf of Peoples Gas System ("Peoples") is an Amended Request for Confidential Treatment of certain portions of Peoples' Response to Staff's Seventh Request for Production of Documents No. 15. This request is intended to replace Document 09442-2020 and therefore should be filed concurrently with the withdraw of such documents from this docket. This request includes Exhibits A through C.

Exhibit A is being provided under separate cover and consists of the confidential documents, and all information that Peoples asserts is entitled to confidential treatment has been highlighted. Exhibit B is an edited version of Exhibit A, in which the information Peoples asserts is confidential has been redacted. Exhibit C consists of Peoples' justification table supporting its Request for Confidential Treatment.

Your assistance in this matter is greatly appreciated.

Sincerely,

AB/plb Andrew M. Brown Attachment

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

Mr. Adam J. Teitzman Commission Clerk October 15, 2020 Page 2

Kurt Schrader/Jennifer S. Crawford/Bianca Lherisson (<u>kschrade@psc.state.fl.us</u>; <u>jcrawfor@psc.state.fl.us</u>; <u>blheriss@psc.state.fl.us</u>)
Jon C. Moyle, Jr., Esq./Karen A. Putnal, Esq. (<u>jmoyle@moylelaw.com</u>;

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

In re: Petition for approval of 2020 Depreciation study by Peoples Gas

System.

Docket No. 20200166-GU

Submitted for Filing: October 15, 2020

PEOPLES GAS SYSTEM'S AMENDED REQUEST FOR CONFIDENTIAL TREATMENT

Pursuant to Section 366.093 and 1190.07, *Florida Statutes*, and Rule 25-22.006, *Florida Administrative Code*, Peoples Gas System ("Peoples") requests confidential treatment to Peoples' Response to the Staff's Seventh Request for Production of Documents No. 15 and in support of its request states:

- Peoples confidential treatment of portions of document BS 16756 16766 provided in response to Staff's Seventh Request for Production of Documents No.
 15.
 - 2. The following exhibits are included with and made a part of this request:
 - a. Exhibit A consists of the following documents are a copy of the confidential pages on which information that Peoples asserts to be entitled to confidential treatment has been highlighted.
 - b. Exhibit B consists of a copy of the confidential pages on which all information that Peoples asserts is entitled to confidential treatment has been redacted.
 - c. Exhibit C is a table containing an identification of the information

highlighted in Exhibit A, together with references to the specific statutory basis or bases for the claim of confidentiality and to the affidavit in support of the requested classification.

- 3. Peoples submits that the highlighted information in Exhibit A is proprietary confidential business information within the meaning of Section 366.093(3), *Florida Statutes*. Section 366.093(3), *Florida Statutes*, defines confidential information as information that is intended to be and is treated by the company as private in that disclosure of the information would cause harm to the company's business operations or its customers, and has not been disclosed publicly. The confidential information is intended to be and has been treated by Peoples as private, its confidentiality has been maintained, and its disclosure would cause harm to Peoples and its customers. Pursuant to Section 366.093(3)(2), such information is entitled to confidential treatment and it is exempt from the disclosure provisions of the public records law. Thus, once the Commission determines that the information in question is proprietary confidential business information, the Commission is not required to engage in any further analysis or review such as weighing the harm of disclosure against the public interest in access to the information.
- 4. Upon a finding by the Commission that the information highlighted in Exhibit A, and referenced in Exhibit C, is proprietary confidential business information, the information should not be declassified for a period of at least eighteen (18) months and should be returned to Peoples as soon as the information is no longer necessary for the Commission to conduct its business. See § 366.093(4), Fla. Stat.

WHEREFORE, Peoples respectfully requests confidential classification of the material described herein.

Respectfully submitted,

Andrew M. Brown, Esq. Thomas R. Farrior, Esq.

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 Request for Confidential Treatment of Peoples Gas System has been furnished via electronic mail to the following, this 15th day of October, 2020:

J.R. Kelly, Esq.
Office of Public Counsel
c/o The Florida Legislature
111 West Madison St., Room 812
Tallahassee, FL 32399-1400
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Jennifer S. Crawford, Esq. Kurt Schrader, Esq. Bianca Lherisson, Esq. Office of General Counsel Florida Public Service Commission 2540 Shumard Oak Boulevard Paula K. Brown
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Andrew M. Brown, Esq.

EXHIBIT A CONFIDENTIAL FILED UNDER SEPARATE COVER

EXHIBIT B REDACTED COPIES

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RE-07860		6/30/2020	525,000	2,000,000	4/30/2021 12/31/2022						
PRE-08240 PRE-08241		12/31//021 12/31//021		1,000,000	12/31/2022	2					
PRE-08247		12/31/2023		250,000	12/31/2024						
RE-08500 RE-06481		12/31/2020	2,000,000		9/30/2020 in service						
KE-09300 RE-09380					12/31/2022 5/15/2021						
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EL-05340					2/28/2021						
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CP-10682		2/15/2020	1,007,033		3/30/2021						
CP-11245		7/31/2022		669,000	12/31/2021	E-15					
ICP-11246 ICP-13627		12/31/7020 12/31/7021	5,000,000		17/31/2020 12/31/2021						
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W-07885		9/30/2020	4,389,111	1,824	12/31/2020	1 TO 1					
N-07003		5/30/2020		1,024	LIGHTZOAU						
W-12123		12/31/2020	29 517 557	77,694							
V-12210		8/30/2020 4/30/2020	1,715 215 1,623 #13	-	12/31/2020 12/31/2020	1070					
W-12211		4/30/2020	1,023,813		12/31/2020						
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V-136		6/30/2021	9,498,632	11,080,466	6/30/2022						
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PEOPLES GAS SYSTEM
DOCKET NO. 20200051-GU
DOCKET NO. 20200166-GU
STAFF'S SEVENTH REQUEST FOR
PRODUCTION OF DOCUMENTS
REQUEST NO. 15
FILED: 09/21/2020

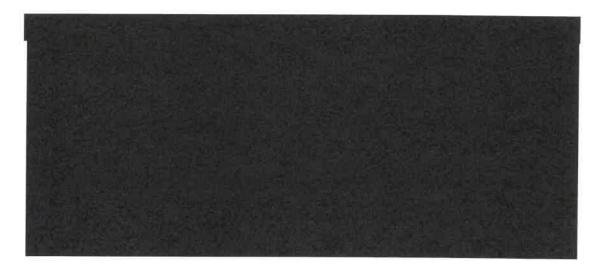
CAPITAL LEADERSHIP TEAM PROJECT REVIEW June 24, 2020

CLT Review Policy:
Project:
Background:

Figure A: Customer Experience Strategy

PEOPLES GAS SYSTEM
DOCKET NO. 20200051-GU
DOCKET NO. 20200166-GU
STAFF'S SEVENTH REQUEST FOR
PRODUCTION OF DOCUMENTS
REQUEST NO. 15
FILED: 09/21/2020

Figure B: Best Practice IVR Self-Service for top performers

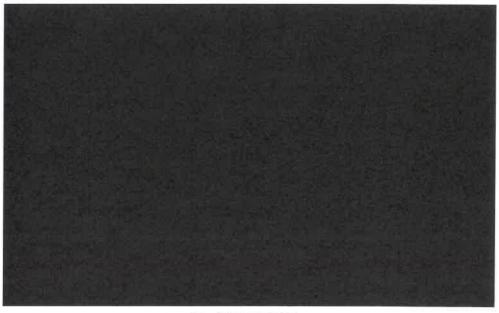


Project Description:

PEOPLES GAS SYSTEM
DOCKET NO. 20200051-GU
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DOCKET NO. 20200166-GU
STAFF'S SEVENTH REQUEST FOR
PRODUCTION OF DOCUMENTS
REQUEST NO. 15

FILED: 09/21/2020

Contribution of Project to Corporate Objectives:
Availability of Capital:
Recommendation:
VALUE OF THE PARTY

PEOPLES GAS SYSTEM
DOCKET NO. 20200051-GU
DOCKET NO. 20200166-GU
STAFF'S SEVENTH REQUEST FOR
PRODUCTION OF DOCUMENTS
REQUEST NO. 15
FILED: 09/21/2020

E-Signed: 07/16/2020 01:47 PM EDT Nancy Jover ntower@teccenergy.com IP: 12.171.196.205 Sertif Electronic Signature DocID: 20200701145549600	Nancy Tower President & CEO – Tampa Electric Company President & CEO – TECO Energy
	Greg Blunden SVP Finance & Accounting and CFO TECO Energy
	TJ Szelistowski President Peoples Gas System

PEOPLES GAS SYSTEM
DOCKET NO. 20200051-GU
DOCKET NO. 20200166-GU
STAFF'S SEVENTH REQUEST FOR
PRODUCTION OF DOCUMENTS
REQUEST NO. 15
FILED: 09/21/2020

We recommen million for this	
	Nancy Tower
	President & CEO – Tampa Electric Company President & CEO – TECO Energy
	Greg Blunden
	SVP Finance & Accounting and CFO TECO Energy
T	TJ Szelistowski
	President
	Peoples Gas System

Nancy Tower President & CEO – Tampa Electric Company President & CEO – TECO Energy

Greg Blunden SVP Finance & Accounting and CFO TECO Energy

TJ Szelistowski President Peoples Gas System

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EXHIBIT C JUSTIFICATION TABLE

EXHIBIT C

Company: Peoples Gas System

Title: List of Confidential Documents Included in Peoples' Request for Confidential

Treatment

Docket Nos.: 20200051-GU & 20200166-GU

Document	Description	No. of Pages		Line No./Col. No.	Florida Statute 366.093(3) Subsecti on
1	Peoples' Response to Staff's Seventh Request for Production of Documents No. 15 (BS 16766)		Y	Column Project, Column 2020 and 2021 under Updated Forecast and Columns 2020 and 2021 under Variance and Column Explanation	(e)
2	Peoples' Response to Staff's Seventh Request for Production of Documents No. 15 (BS 16756)	1	Y	Everything other than headings;	(e)
3	Peoples' Response to Staff's Seventh Request for Production of Documents No. 15 (BS 16757)	1	Y	Everything other than headings	(e)
4	Peoples' Response to Staff's Seventh Request for Production of Documents No. 15 (BS 16758)	1	Y	Everything other than headings	(e)
5	Peoples' Response to Staff's Seventh Request for Production of Documents No. 15 (BS 16759)	1	Y	Everything other than headings	(e)

6	Peoples' Response to Staff's Seventh Request for Production of Documents No. 15 (BS 16760)	1	Y	Signature page – lines 1 and 2	(e)
7	Peoples' Response to Staff's Seventh Request for Production of Documents No. 15 (BS 16761)	1	Y	Signature page – lines 1 and 2	(e)
8	Peoples' Response to Staff's Seventh Request for Production of Documents No. 15 (BS 16762)	1	Υ	Signature page – lines 1 and 2	(e)
9	Peoples' Response to Staff's Seventh Request for Production of Documents No. 15 (BS 16763)			Everything other than headings	(e)
10	Peoples' Response to Staff's Seventh Request for Production of Documents No. 15 (BS 16764)		V	Everything other than headings	(e)
11	Peoples' Response to Staff's Seventh Request for Production of Documents No. 15 (BS 16765)			Columns 2-24 below line 1	(e)