FILED 10/16/2020 DOCUMENT NO. 11291-2020 FPSC - COMMISSION CLERK



ATTORNEYS & COUNSELORS AT LAW EST. 1884

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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 <u>ab@macfar.com</u>

October 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 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 a Request for Confidential Treatment of certain portions of Peoples' Responses to Nos. 23, 25, 28 and 29 of Staff's Ninth Request for Production of Documents. 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.

incerely.

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)

Mr. Adam J. Teitzman Commission Clerk October 16, 2020 Page 2

> Kurt Schrader/Jennifer S. Crawford/Bianca Lherisson (<u>kschrade@psc.state.fl.us;</u> jcrawfor@psc.state.fl.us; <u>blheriss@psc.state.fl.us</u>) Jon C. Moyle, Jr., Esq./Karen A. Putnal, Esq. (<u>imoyle@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: October 16, 2020

PEOPLES GAS SYSTEM'S 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 testimony by witnesses for the Office of Public Counsel ("OPC") who reviewed documents produced in response to Staff's Ninth Request for Production of Documents Nos. 23, 25, 28 and 29. In support of its request, Peoples states:

1. Peoples has previously filed a Notice of Intent to Request Confidential Treatment of these documents on October 9, 2020.

2. Peoples response to Staff's Ninth Request for Production of Documents Nos. 23, 25, 28 and 29 include certain financial information, the disclosure of which would impair Peoples competitive business.

3. The following exhibits are included with and made a part of this request:

a. Exhibit A consists of a copy of the confidential pages on which all information that Peoples asserts is 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.

4. 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.

5. 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. Browh, 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 16th 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 kelly.jr@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 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 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 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 mqualls@moylelaw.com

Andrew M. Brown, Esq.

EXHIBIT A

CONFIDENTIAL

FILED UNDER SEPARATE COVER

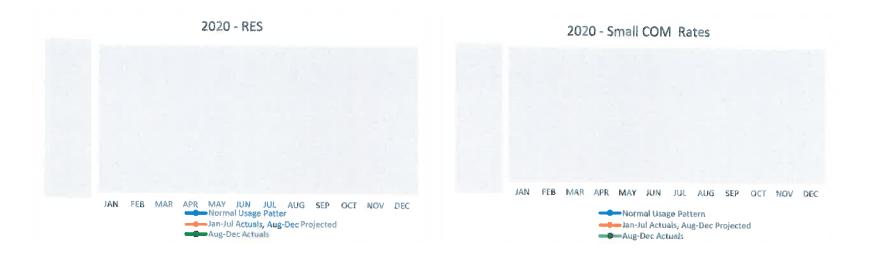
EXHIBIT B

REDACTED COPIES

(BS 17142)

Actuals	4	Reside	ntial COVID-19 Imp	acts (Therms)	Small Com	nercial Rates COVID-	19 impacts (T	herms)			
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COVID-19 binary variable coefficents (therms/customer) from Customer models. These binaries are used to isolate the impacts of COVID-19 in each month. Models were ran with actuals thru July 2020. Also input customer counts for same period so therms can be estimated.

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Model results (therms) applying the COVID-19 multipliers for August 2020 forward.

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Model results (therms) NOT applying the COVID-19 multipliers for August 2020 forward. (Represents normal usage petterns, absent of COVID-19)

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Tracking of actuals to see how they compare to forecasts

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PEOPLES GAS SYSTEM DOCKET NO. 20200051-GU STAFF'S NINTH REQUEST FOR PRODUCTION OF DOCUMENTS REQUEST NO. 25 FILED: OCTOBER 9, 2020

HEALTH WEALTH CAREER

COMPENSATION STRUCTURE DEVELOPMENT - PEOPLES GAS SYSTEM



03 SEPTEMBER 2019

Preliminary Draft

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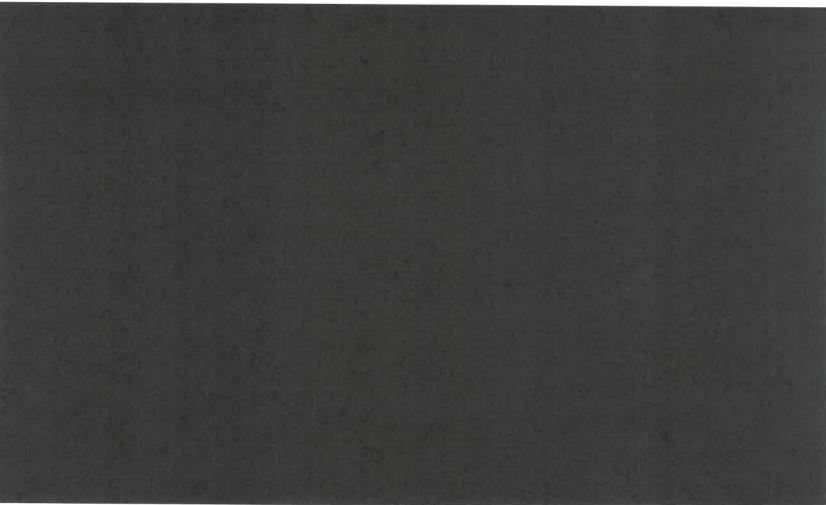
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Market Benchmarking	7
Proposed Compensation Structure (Base salary, STI, LTI)	11
Penetration Analysis and Costing	14

PEOPLES GAS SYSTEM DOCKET NO. 20200051-GU STAFF'S NINTH REQUEST FOR PRODUCTION OF DOCUMENTS REQUEST NO. 25 FILED: OCTOBER 9, 2020

INTRODUCTION

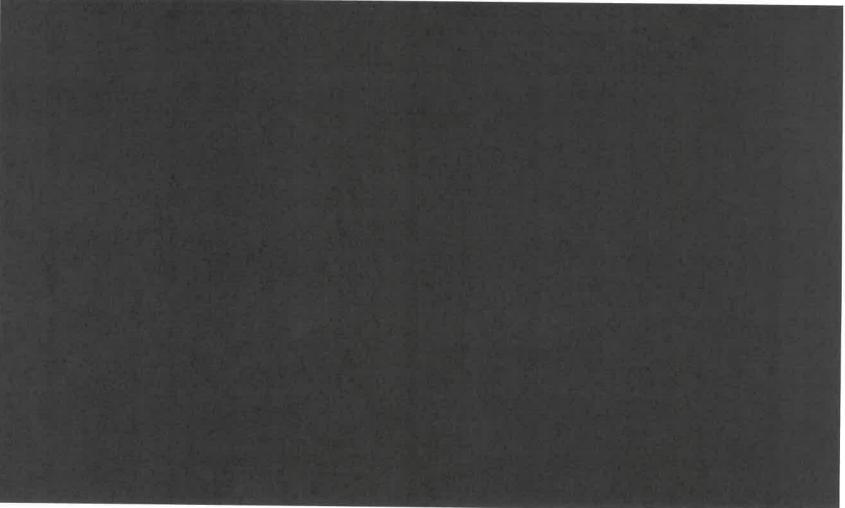


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EXECUTIVE SUMMARY © 2019 MERCER

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EXECUTIVE SUMMARY BY THE NUMBERS



PEOPLES GAS SYSTEM DOCKET NO. 20200051-GU STAFF'S NINTH REQUEST FOR PRODUCTION OF DOCUMENTS REQUEST NO. 25 FILED: OCTOBER 9, 2020

CURRENT STATE OVERVIEW

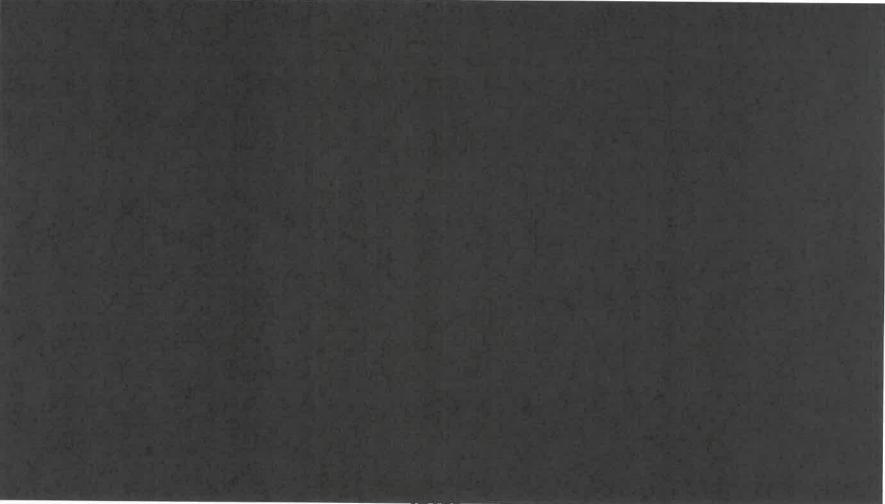


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CURRENT STATE OVERVIEW PAY LEVEL DISTRIBUTION TARGET TOTAL DIRECT



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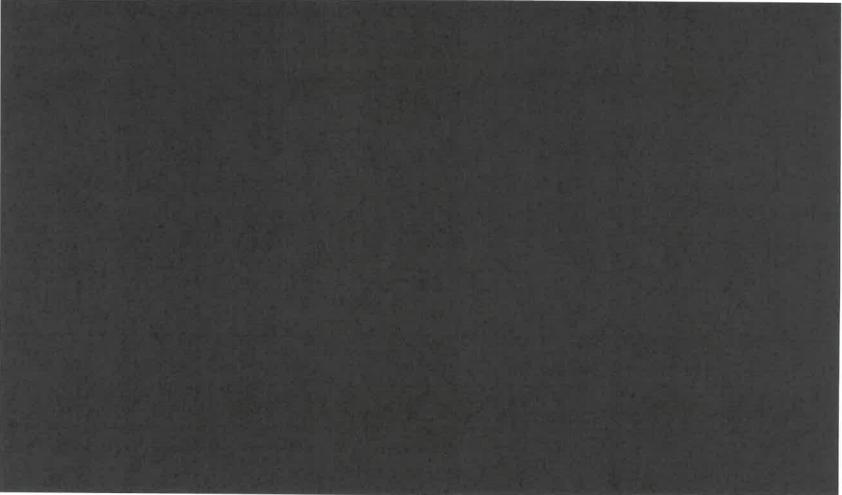
MARKET BENCHMARKING

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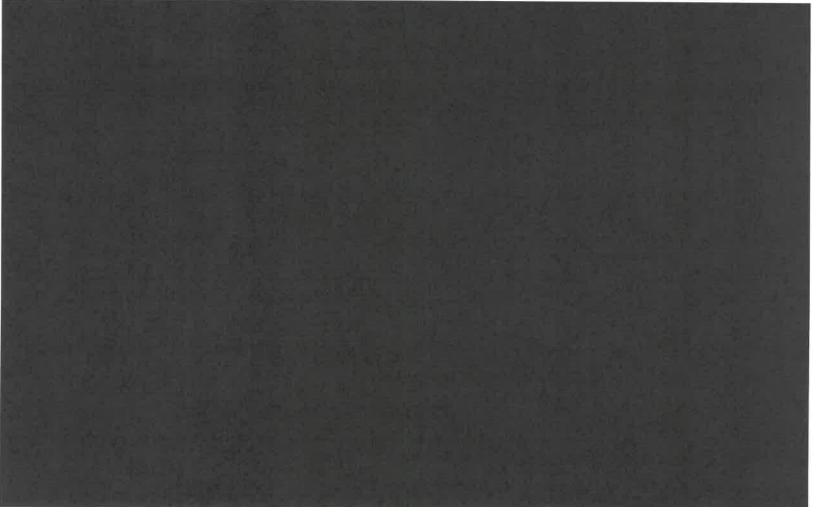
MARKET BENCHMARKING METHODOLOGY



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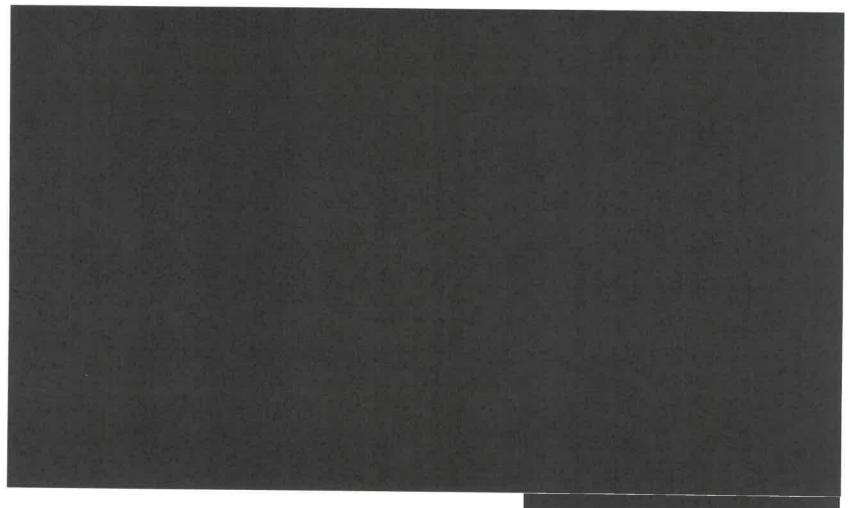
PEOPLES GAS SYSTEM DOCKET NO. 20200051-GU STAFF'S NINTH REQUEST FOR PRODUCTION OF DOCUMENTS REQUEST NO. 25 FILED: OCTOBER 9, 2020

MARKET BENCHMARKING BASE SALARY PAYLINE



PEOPLES GAS SYSTEM DOCKET NO. 20200051-GU STAFF'S NINTH REQUEST FOR PRODUCTION OF DOCUMENTS REQUEST NO. 25 FILED: OCTOBER 9, 2020

MARKET BENCHMARKING TARGET TOTAL DIRECT PAYLINE



PEOPLES GAS SYSTEM DOCKET NO. 20200051-GU STAFF'S NINTH REQUEST FOR PRODUCTION OF DOCUMENTS REQUEST NO. 25 FILED: OCTOBER 9, 2020

PROPOSED COMPENSATION STRUCTURE

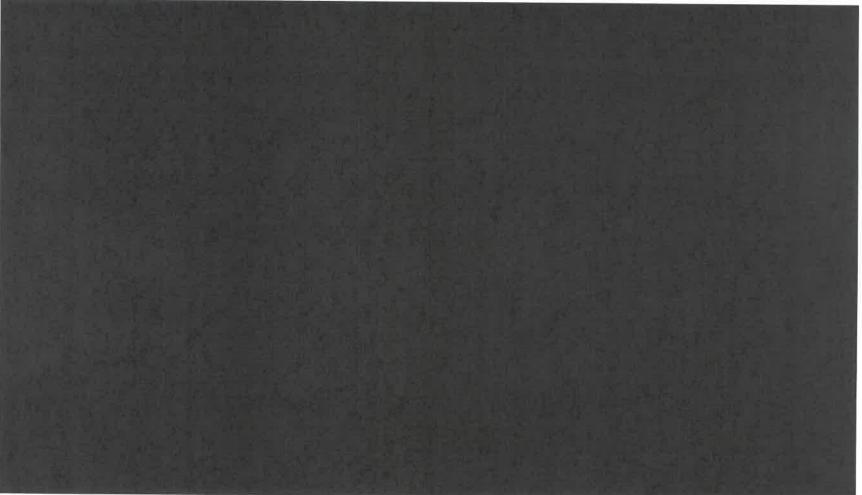


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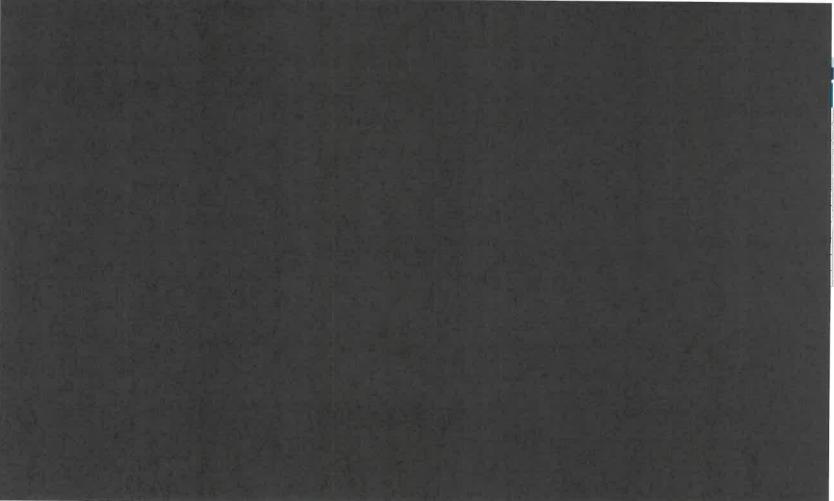
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PROPOSED COMPENSATION STRUCTURE PROPOSED STRUCTURE



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PROPOSED COMPENSATION STRUCTURE SHORT-TERM AND LONG-TERM INCENTIVES



PEOPLES GAS SYSTEM DOCKET NO. 20200051-GU STAFF'S NINTH REQUEST FOR PRODUCTION OF DOCUMENTS REQUEST NO. 25 FILED: OCTOBER 9, 2020

PENETRATION ANALYSIS AND COSTING

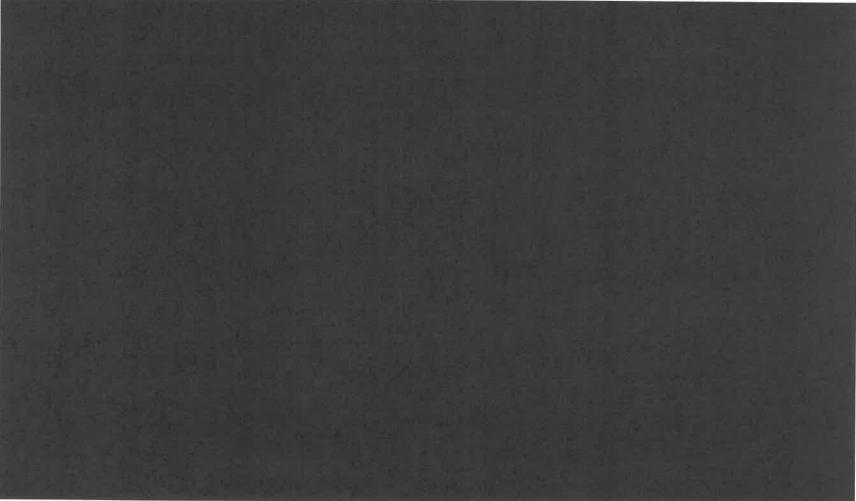


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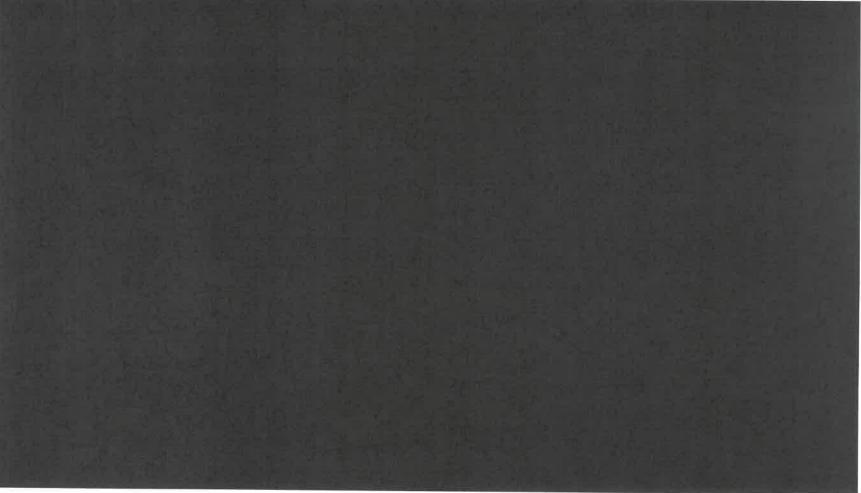
PEOPLES GAS SYSTEM DOCKET NO. 20200051-GU STAFF'S NINTH REQUEST FOR PRODUCTION OF DOCUMENTS REQUEST NO. 25 FILED: OCTOBER 9, 2020

PENETRATION ANALYSIS, COSTING AND PEOPLE IMPACT BASE SALARY - PENETRATION AND COSTING ANALYSIS



PEOPLES GAS SYSTEM DOCKET NO. 20200051-GU STAFF'S NINTH REQUEST FOR PRODUCTION OF DOCUMENTS REQUEST NO. 25 FILED: OCTOBER 9, 2020

PENETRATION ANALYSIS, COSTING AND PEOPLE IMPACT TARGET TOTAL DIRECT COMPENSATION - PENETRATION AND COSTING ANALYSIS



PEOPLES GAS SYSTEM DOCKET NO. 20200051-GU STAFF'S NINTH REQUEST FOR PRODUCTION OF DOCUMENTS REQUEST NO. 25 FILED: OCTOBER 9, 2020



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Consumer Price Index-All Urban Consumers Series Catalog: Series ID : CUUR0000SA0 Not Seasonally Adjusted

Area : U.S. city average Item : All items Base Period : 1982-84=100

Source for History: http://stats.bis.gov/cpihome.htm; Most Requested Series: http://146.142.4.24/cgi-bin/surveymost?cu; U.S. All items, 1982-84=100 - CUUR0000SA0, not seasonally adjusted

Source for Forecast: Moody's Analytics; CPI - All Urban Consumers, Not Seasonally Adjusted

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PEOPLES GAS SYSTEM DOCKET NO. 20200051-GU DOCKET NO. 20200166-GU STAFF'S NINTH REQUEST FOR PRODUCTION OF DOCUMENTS REQUEST NO. 28 FILED: 10/9/2020

Consumer Price Index-All Urban Consumers

Series Catalog: Series ID : CUUR0000SA0 Not Seasonally Adjusted Area : U.S. city average Item : All items Base Period : 1982-84=100

Source for History: http://stats.bls.gov/cpihome.htm; Most Requested Series: http://146.142.4.24/cgl-bin/surveymost?cu; U.S. All items, 1982-84=100 - CUUR0000SA0, not seasonally adjusted

Source for Forecast: Moody's Analytics; CPI - All Urban Consumers, Not Seasonally Adjusted

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PEOPLES GAS SYSTEM DOCKET NO. 20200051-GU DOCKET NO. 20200166-GU STAFF'S NINTH REQUEST FOR PRODUCTION OF DOCUMENTS REQUEST NO. 29 FILED: 10/9/2020

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	Y/N	Line No./Col. No.	Florida Statute 366.093(3) Subsection
1	Response to Staff's 23		Y	 Line 33, Column F and K. Graphs associated with data 	(e)
2	Response to Staff's 25; p. 17146	1	Y	Everything except title	(e)
3	Response to Staff's 25, p. 17148	1	Y	Everything except title	(e)
4	Response to Staffs 25, p. 17150	1	Y	Everything except title	(e)
5	Response to Staff's 25, p. 17152	1	Y	Everything except title	(e)
6	Response to Staff's 25, p. 17153	1	Y	Everything except title	(e)
7	Response to Staff's 25, p. 17154	1	Y	Everything except title	(e)
8	Response to Staff's 25, p. 17156	1	Y	Everything except title	(e)
9	Response to Staff's 25, p. 17157	1	Y	Everything except title	(e)
10.	Response to Staff's 25, p. 17159	1	Y	Everything except title	(e)

11.	Response to Staff's 25, p. 17160	1	Y	Everything except title	(e)
12.	Response to Staff's 28; p. 17162	1	Y	Columns 2-15 except for headers	(d), (e)
13.	Response to Staff's 29; p. 17163	1	Y	Columns 2-15 except for headers	(d), (e)