

State of Florida



# Public Service Commission

CAPITAL CIRCLE OFFICE CENTER • 2540 SHUMARD OAK BOULEVARD  
TALLAHASSEE, FLORIDA 32399-0850

**-M-E-M-O-R-A-N-D-U-M-**

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**DATE:** October 23, 2020

**TO:** Division of Economics, Office of Primary Responsibility

**FROM:** OFFICE OF COMMISSION CLERK

**RE:** CONFIDENTIALITY OF CERTAIN INFORMATION  
DOCKET NO: 20200051-GU, 20200166-GU DOCUMENT NO: 11338-2020  
DESCRIPTION: PGS (Brown) - (CONFIDENTIAL) Highlighted response to staff's 10th set of interrogatories (Nos. 90 and 91).  
  
SOURCE: Peoples Gas System

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The above confidential material was filed along with a request for confidential classification. Please complete the following form by checking all applicable information and forward it to the attorney assigned to the docket, along with a brief memorandum supporting your recommendation.

- The document(s) is (are), in fact, what the utility asserts it (them) to be.
- The utility has provided enough details to perform a reasoned analysis of its request.
- The material has been received incident to an inquiry.
- The material is confidential business information because it includes:
- (a) Trade secrets;
  - (b) Internal auditing controls and reports of internal auditors;
  - (c) Security measures, systems, or procedures;
  - (d) Information concerning bids or other contractual data, the disclosure of which would impair the efforts of the public utility or its affiliates to contract for goods or services on favorable terms;
  - (e) Information relating to competitive interests, the disclosure of which would impair the competitive business of the provider of information;
  - (f) Employee personnel information unrelated to compensation, duties, qualifications, or responsibilities;
- The material appears to be confidential in nature and harm to the company or its ratepayers will result from public disclosure.
- The material appears not to be confidential in nature.
- The material is a periodic or recurring filing and each filing contains confidential information.

This response was prepared by Andrew Kunkler on 10/23/2020, a copy of which has been sent to the Office of Commission Clerk and the Office of General Counsel.

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**DATE:** October 23, 2020

**TO:** Kurt Schrader, Senior Attorney, Office of the General Counsel

**FROM:** Andrew Kunkler, Public Utility Analyst I, Division of Economics

**RE:** Peoples' Gas System - Docket No. 20200051-GU, 20200166-GU - Confidentiality Request - Document No. 11338-2020

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Pursuant to Section 366.093, Florida Statutes (F.S.), and Rule 25-22.006, Florida Administrative Code, Peoples Gas System (PGS or Company) requests confidential classification for certain highlighted responses to Staff's 10th Set of Interrogatories (Nos. 90 and 91).

The Company is claiming confidentiality for certain highlighted information appearing in Document No. 11338-2020 under Section 366.093(3)(e), F.S. Per the Statute, propriety of confidential business information includes, but is not limited to: Subsection (e) "Information relating to competitive interests, the disclosure of which would impair the competitive business of the provider of information." The information provided in Document No. 11338-2020 for which confidential treatment is being sought includes commercially sensitive confidential information concerning future revenue projections, specific customer information, and internal budgeting figures. Furthermore, PGS maintains that the information provided in Document No. 11338-2020 has not been publicly disclosed.

Staff has reviewed the information provided in the highlighted portions of the Company's response to staff's 10th set of interrogatories (Nos. 90 and 91), as well as the Company's confidentiality request (Document No. 11277-2020). In staff's opinion, the information that is the subject of the confidentiality request does meet the criteria for confidentiality contained in Section 366.093(3)(e), F.S. Therefore, staff recommends that the request for confidentiality of information included in Document No. 11338-2020 be approved.