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May 5, 2025

VIA HAND DELIVERY

Mr. Adam J. Teitzman
Commission Clerk
Florida Public Service Commission
2540 Shumard Oak Boulevard
Tallahassee, FL 32399-0850

REDACTED

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2025 MAY -5 PM 1:01
COMMISSION
CLERK

In re: Petition for Rate Increase by Peoples Gas System, Inc.

DOCKET NO. 20250029-GU

Dear Mr. Teitzman:

Attached for filing in the above docket is Peoples Gas System, Inc.'s Request for Confidential Classification and Request for Temporary Protective Order of certain information contained in the company's response to the Office of Public Counsel's Third Set of Interrogatories, Second Request for Production of Documents and Third Request for Production of Documents, propounded on April 4, 2025.

Thank you for your assistance in connection with this matter.

Sincerely,

Malcolm N. Means

MNM/dh
Attachment

cc: All parties of record

COM ____
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ENG 1 ____
GCL ____
IDM ____
CLK ____

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BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Petition for Rate Increase by Peoples
Gas System, Inc.

DOCKET NO. 20250029-GU

FILED: May 5, 2025

**PEOPLES GAS SYSTEM, INC.'S
REQUEST FOR CONFIDENTIAL CLASSIFICATION
AND REQUEST FOR TEMPORARY PROTECTIVE ORDER**

Peoples Gas System, Inc. ("Peoples" or the "company"), pursuant to Section 366.093, Florida Statutes, and Rule 25-22.006, Florida Administrative Code, hereby requests confidential classification of the yellow highlighted information contained in the following described document(s) ("the Document(s)") stamped "CONFIDENTIAL" and all information that is or may be printed on yellow paper stock stamped "CONFIDENTIAL" within the Document(s), all of said confidential information being hereinafter referred to as "Confidential Information."

Description of the Document(s)

On this date, Peoples serves its responses to the Office of Public Counsel's ("OPC") Second Request for Production of Documents (Nos. 42-46), OPC's Third Request for Production of Documents (Nos. 47-52), and its answers to OPC's Third Set of Interrogatories (Nos. 118-124). The company believes that portions of its answers and responses, as specified on Exhibit "A," constitute Confidential Information and has designated it as such by highlighting. Contemporaneously with the filing of this request, Peoples submitted the Confidential Information to the Commission Clerk under a separate, confidential cover letter. Peoples requests confidential classification for this information such that it will be entitled to protection against public disclosure pursuant to Section 366.093, Florida Statutes. In support of this request, the company states:

1. Subsection 366.093(1), Florida Statutes, provides that any records "found by the Commission to be proprietary confidential business information shall be kept confidential and

shall be exempt from s. 119.07(1), Florida Statutes [requiring disclosure under the Public Records Act].” Proprietary confidential business information includes but is not limited to: (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 the information; and (f) employee personnel information unrelated to compensation, duties, qualifications, or responsibilities. §366.093(3)(a)-(f), Fla. Stat. The Confidential Information that is the subject of this request and motion falls within one or more of these statutory categories and, thus, constitutes proprietary confidential business information entitled to protection under Section 366.093, Florida Statutes, and Rule 25-22.006, Florida Administrative Code.

2. Attached hereto as Exhibit "A" is a justification for confidential treatment of the Confidential Information contained in the Documents.

3. Exhibit “B” contains the public versions of the Documents with the Confidential Information.

4. The Confidential Information contained in the Documents is intended to be and is treated by Peoples as private and has not been publicly disclosed.

5. For the same reasons set forth herein in support of its request for confidential classification, Peoples also moves the Commission for entry of a Temporary Protective Order pursuant to Rule 25-22.006(6)(a) of the Florida Administrative Code.

Requested Duration of Confidential Classification

6. Pursuant to Rule 25-22.006(9)(a), Peoples requests that the Confidential Information be treated by the Commission as confidential proprietary business information for 18 months. If, and to the extent that the company is in need of confidential classification of the Confidential Information beyond the 18-month period set forth in the Commission rule, the justification and grounds for such extended confidential treatment are set forth in Exhibit "C" to this request and motion.

WHEREFORE, Peoples Gas System, Inc. respectfully requests that the Confidential Information that is the subject of this request and motion be accorded confidential classification for the reasons set forth herein and for 18 months.

DATED this 5th day of May 2025.

Respectfully submitted,



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ATTORNEYS FOR PEOPLES GAS SYSTEM, INC.

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that copies of the foregoing Request have been served by electronic mail on this 5th day of May, 2025 to the following:

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EXHIBIT A
JUSTIFICATION FOR CONFIDENTIAL TREATMENT

OPC's 2nd Request for Production of Documents (Nos. 42-46)			
Bates Page Nos.	Document Description	Description of Information	Justification
17546-17555 and 17557- 17561	Documents identified in OPC's 2 nd IRR No. 101, provided in Peoples Response to OPC's 2 nd Request for Production of Documents, Number 43.	The Highlighted Information	(5)
17562	Documents identified in OPC's 2 nd IRR No. 110, provided in Peoples Response to OPC's 2 nd Request for Production of Documents, Number 46.	<u>Sheet1</u> : Column(s): B through D; Row(s) 4 and 5.	(4) & (5)

OPC's 3rd Request for Production of Documents (Nos. 47-50)			
Bates Page Nos.	Document Description	Description of Information	Justification
17563-17681	Copies of the most current security analysts reports, provided in Peoples Response to OPC's 3 rd Request for Production of Documents, Number 50.	The Highlighted Information	(5) & (7)

OPC's 3rd Set of Interrogatories (Nos. 118-124)			
Bates Page Nos.	Document Description	Description of Information	Justification
17715	Forecasted growth rate data, provided in Peoples Answer to OPC's 3 rd Set of Interrogatories, Number 119.	IRR No. 119 CONF: Column(s): D through F; Row(s): 13 through 16.	(5)

Justification

- (1) The highlighted information relates to trade secrets, and is protected under section 366.093(3)(a), Florida Statutes.
- (2) The highlighted information relates to internal auditing controls and reports of internal auditors, and is protected under section 366.093(3)(b), Florida Statutes.
- (3) The highlighted information pertains to security measures, systems or procedures and is protected under section 366.093(3)(c), Florida Statutes.
- (4) The highlighted information concerns bids or other contractual data, the disclosure of which would impair the efforts of the company or its affiliates to contract for goods or services on favorable terms and is protected under Section 366.093(d), Florida Statutes.
- (5) The highlighted information relates to competitive interests, the disclosure of which would impair the competitive business of the provider of the information. This information is protected by section 366.093(3)(e), Florida Statutes.
- (6) The highlighted information relates to employee personnel information unrelated to compensation, duties, qualifications, or responsibilities. This information is protected under section 366.093(f), Florida Statutes.
- (7) The highlighted information consists of the proprietary work product of certain third parties, disclosure of this information would allow duplication of this entity's work without compensation for their efforts. This information is in the nature of a trade secret owned by such entities and disclosure of this information would impair competitive business interests by revealing competitive pricing related information. This information is protected Section 366.093(3)(a) and (e), Florida Statutes.

EXHIBIT B
PUBLIC VERSION(S) OF THE DOCUMENT(S)

Attached hereto (unless previously filed as may be noted below) are two public versions of the Document(s) with the Confidential Information redacted.

Public Version(s) of the Document(s) attached	<u> </u>
Public Version(s) of the Document(s) attached via USB	<u> X </u>

EXHIBIT C
JUSTIFICATION FOR EXTENSION OF CONFIDENTIALITY PERIOD

N/A