

BEGGS & LANE

ATTORNEYS AND COUNSELLORS AT LAW
POST OFFICE BOX 12950
PENSACOLA, FLORIDA 32576-2950

SEVENTH FLOOR BLOUNT BUILDING
3 WEST GARDEN STREET
PENSACOLA, FLORIDA 32501
TELEPHONE (904) 432-2451
TELECOPIER (904) 469-3330

ROBERT R. GAINES
WILLIAM GUY DAVIS, JR.
W. SPENCER MITCHEM
JAMES M. WEBER
ROBERT L. CRONGEYER
JOHN F. WINDHAM
J. NIXON DANIEL, III
G. EDISON HOLLAND, JR.
RALPH A. PETERSON
GARY B. LEUCHTMAN
JOHN R. DANIEL
JEFFREY A. STONE
JAMES S. CAMPBELL
TERESA E. LILES
RUSSELL F. VAN SICKLE

E. DIXIE BEGGS
Retired
BERT H. LANE
1917-1981

September 15, 1994

Ms. Blanca S. Bayo
Division of Records and Reporting
Florida Public Service Commission
101 East Gaines Street
Tallahassee, Florida 32301

ORIGINAL
FILE COPY

Re: Docket No. 931044-EI

Dear Ms. Bayo:

The original and fifteen (15) copies of Gulf Power Company's Request for Confidential Classification are submitted for filing in the above docket. Exhibit "A" to the Request is submitted concurrently herewith under separate cover, and should be maintained as confidential pursuant to Section 366.093, Fla. Stat. and Rule 25-22.006, F.A.C. Also enclosed is a double sided high density 3.5 inch floppy disk containing this document in WordPerfect 5.1 format as prepared on a MS-DOS based computer.

Please mark the enclosed extra copy of this letter with the date and time the material was accepted in your office for filing, and return same to the undersigned. Thank you for your assistance in this matter.

Very truly yours,

Teresa E. Liles

Teresa E. Liles
For the Firm

RECEIVED & FILED
mas
FPSC-BUREAU OF RECORDS

(xrf 08193-94, 08920-94)

DOCUMENT NUMBER-DATE

09553 SEP 16 94

FPSC-RECORDS/REPORTING

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

IN RE: Petition for authority to)
implement replacement rate)
schedule for standby)
electric service by Gulf)
Power Company.)

Docket No.: 931044-EI
Filed: Sept. 16, 1994

GULF POWER COMPANY'S REQUEST FOR CONFIDENTIAL CLASSIFICATION

Gulf Power Company, by and through its undersigned attorney and pursuant to Rule 25-22.006, Florida Administrative Code, and Order No. PSC-94-0727-PCO-EI, hereby requests that the Florida Public Service Commission enter an order protecting certain information, submitted in response to a data request from Commission Staff following the hearings in this docket, from public disclosure. As grounds for this motion, the Company states:

1. On August 11, 1994, the Company submitted Late Filed Exhibit No. 14, as requested by Commission Staff during the hearings in this docket which were held on August 1-2, 1994. Certain portions of that exhibit were submitted under a Notice of Intent to Request Confidential Classification. Pursuant to Rule 25-22.006(3)(a), upon the filing of said notice of intent, the information is entitled to confidential treatment for 21 days from the date Staff obtained possession thereof; subsequently, on August 30, 1994, Gulf filed a formal Request for Confidential Classification of the material.

2. Following the submission of Late Filed Exhibit No. 14, Commission Staff requested that the information contained within that exhibit be recalculated utilizing a different data component. Other than that single difference, the information

DOCUMENT NUMBER-DATE

09553 SEP 16 1994

FPSC-RECORDS/REPORTING

requested by Staff is identical to that provided in Late Filed Exhibit No. 14. That information consists of data for a very small class of customers, which, if disclosed, would harm the competitive interests of those customers in that their competitors would gain information heretofore unavailable concerning the customer's costs and patterns of production. The information is therefore entitled to confidential classification pursuant to Section 366.093(3)(e), Florida Statutes. The customers themselves have indicated their strong opposition to public disclosure of this information.

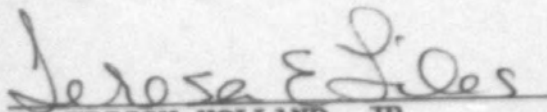
3. Submitted under separate cover as Exhibit "A" to this motion is a copy of page four of Gulf's response to Staff's request, on which is highlighted the information for which confidential classification is requested. Exhibit "A" should be treated as confidential pending a ruling on this request. Attached as Exhibit "B" to this motion are two (2) edited copies of the Late Filed Exhibit, which may be made available for public review and inspection. Attached as Exhibit "C" to this motion is a line-by-line justification for the request for confidential classification.

4. The material for which confidential classification is requested is intended to be, and is treated as, confidential by the Company and has not been otherwise publicly disclosed.

WHEREFORE, Gulf Power Company respectfully requests that the Commission enter an order protecting the information highlighted on Exhibit "A" to this motion from public disclosure as proprietary confidential business information.

Dated this 15th day of September, 1994.

Respectfully submitted,



G. EDISON HOLLAND, JR.

Florida Bar No. 261599

JEFFREY A. STONE

Florida Bar No. 325953

TERESA E. LILES

Florida Bar No. 510998

Beggs & Lane

Post Office Box 12950

Pensacola, Florida 32576-2950

(904) 432-2451

Counsel for Gulf Power Company

EXHIBIT "A"

Provided to the Division of Records and Reporting
under separate cover as confidential information

EXHIBIT "B"

Page 4 is submitted as confidential material pursuant to a notice of intent to seek confidential classification.

	<u>Increase \$/(Decrease \$)</u>	<u>Increase %/(Decrease %)</u>
1		
2	Customer 1	
3	Customer 2	
4	Customer 3	
5	Customer 4	
6	Customer 5	

Any difference between the above numbers and total numbers on the second and third pages is due to rounding.

Page 4 is submitted as confidential material pursuant to a notice of intent to seek confidential classification.

	<u>Increase \$/(Decrease \$)</u>	<u>Increase %/(Decrease %)</u>
1		
2	Customer 1	
3	Customer 2	
4	Customer 3	
5	Customer 4	
6	Customer 5	

Any difference between the above numbers and total numbers on the second and third pages is due to rounding.

EXHIBIT "C"

Line-by-Line Justification

<u>Page</u>	<u>Line(s)¹</u>	<u>Column(s)</u>	<u>Justification</u>
1	2-6	2-3	This information represents actual data regarding Gulf Power Company's customers which, if disclosed, would impair the competitive interests of those customers and which is therefore entitled to c o n f i d e n t i a l classification pursuant to Section 366.093(3)(e), F.S.

¹Line numbers refer to the typewritten numbers inserted at the left margin of the page.

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

IN RE: Petition for authority to)
implement replacement rate)
schedule for standby)
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Power Company.)

Docket No.: 931044-EI
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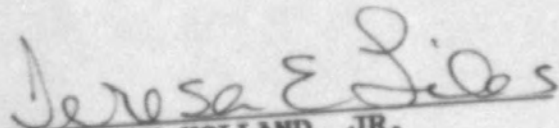
CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing has been furnished by U.S. Mail or hand delivery to the following parties to this docket, this 15th day of September, 1994.

Sheila Erstling, Esq.
Division of Legal Services
Florida Public Service
Commission
101 E. Gaines St.
Tallahassee, FL 32399

Jack Shreve, Esq.
Office of Public Counsel
111 West Madison Street
Suite 812
Tallahassee, FL 32399-1400

Joseph A. McGlothlin, Esq.
Vicki Gordon Kaufman, Esq.
McWhirter, Reeves & McGlothlin
315 S. Calhoun St., Ste. 716
Tallahassee, FL 32301


G. EDISON HOLLAND, JR.
Florida Bar No. 261599
JEFFREY A. STONE
Florida Bar No. 325956
TERESA E. LILES
Florida Bar No. 510998
Beggs & Lane
Post Office Box 12950
Pensacola, Florida 32576-2950
(904) 432-2451
Attorneys for Gulf Power Company

MEMORANDUM

September 20, 1994

TO: DIVISION OF APPEALS
 DIVISION OF AUDITING AND FINANCIAL ANALYSIS
 DIVISION OF COMMUNICATIONS
 DIVISION OF ELECTRIC AND GAS
 DIVISION OF RESEARCH
 DIVISION OF WATER AND WASTEWATER
 DIVISION OF LEGAL SERVICES

FROM: DIVISION OF RECORDS AND REPORTING (FLYNN)

RE: CONFIDENTIALITY OF CERTAIN INFORMATION

DOCUMENT NO. 09554-94

DESCRIPTION: Recalculated Page 4 of 4 of late-filed
Exhibit 14.

(Cross-reference 08193-94, 08920-94)

SOURCE: Gulf Power Company

DOCKET NO. 931044-EI

The above material was received with a request for confidentiality (attached). Please prepare a recommendation for the attorney assigned to the case by completing the section below and forwarding a copy of this memorandum, together with a brief memorandum supporting your recommendation, to the attorney. Copies of your recommendation should also be provided to the Division of Records and Reporting and to the Division of Appeals.

Please read each of the following and check if applicable.

The document(s) is (are), in fact, what the utility asserts it (them) to be.

The utility has provided enough details to perform a