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July 31, 1996

960835-EI

ORIGINAL
FILE COPY

Ms. Blanca S. Bayo, Director
Division of Records and Reporting
Florida Public Service Commission
2540 Shumard Oak Boulevard
Tallahassee FL 32399-0870

Dear Ms. Bayo:

RE: Request for Confidential Classification
The Southern Company and Southern Communications Services, Inc.
Certificate of Notification - File Nos. 70-8233

Enclosed for filing in the matter referred to above is the Request for Confidential Classification by Gulf Power Company. This request covers information submitted to the Florida Public Service Commission on July 10, 1996.

If you or your staff have any questions regarding this filing, please contact me.

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.

ACK _____
AFA _____
APP _____
CAF _____
CML _____
CTR _____
EAS _____
LES _____
LJI _____
CPS _____
RCH _____
SAC _____
WAS _____
OTH _____

Very truly yours,
Russell A. Badders
Russell A. Badders
For the Firm
lw
Enclosure
cc: Susan D. Cranmer
Gulf Power Company

Request
DOCUMENT NO.
08059-96

Confidential
DOCUMENT NUMBER-DATE
08060 AUG-1 96
FPSC-RECORDS/REPORTING

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

IN RE: The Southern Company and
Southern Communications Services,
Inc., Certificate of Notification
File No. 70-8233

Docket No.: Undocketed
Filed: July 31, 1996

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FILE COPY

REQUEST FOR CONFIDENTIAL CLASSIFICATION

The Southern Company and Southern Communications Services, Inc., ("the Companies"), by and through their undersigned attorney and pursuant to Rule 25-22.006, Florida Administrative Code hereby files a request that the Florida Public Service Commission enter an order protecting from public disclosure certain information, hereafter the Certificate, submitted to the Florida Public Service Commission pursuant to the Securities and Exchange Commission Rule 53(a)(4), C.F.R. §250.53(a)(4). As grounds for this request, the Companies state:

1. On July 10, 1996, the Companies submitted the Certificate as required by Securities and Exchange Commission Rule 53(a)(4), C.F.R. §250.53(a)(4).
2. On July 10, 1996, the Company filed a Notice of Intent to Request Confidential Classification with regard to certain portions of the submitted Certificate. The Companies claim that the information contained in the Certificate is entitled to confidential classification pursuant to §366.093(3)(e), Florida Statutes, as information, the public disclosure of which would cause irreparable harm to the competitive interests of the Companies. The Certificate contains proprietary and commercially sensitive information that is not otherwise publicly available.

DOCUMENT #
08059-96

3. The Public disclosure of the financial information and the business planning information contained in the Certificate would cause irreparable harm to the Company's ability to compete in the increasingly competitive telecommunications market. The public disclosure of the financial information would allow the competitors of the Companies to have access to information about the financial stability and resources of the Companies. Such information would permit those competitors to determine which markets the Companies are capable of entering into and the extent of their ability to develop new markets and projects. Public disclosure of information about the Companies finances and the ability to obtain financing would unfairly permit the competitors of the Companies to determine the business plans and resource allocation of the Companies. Such information is proprietary and extremely commercially sensitive in the competitive markets in which the Companies operate. Thus, the Companies request that this information be granted confidential classification pursuant to Section 366.093(3)(e), Florida Statutes.

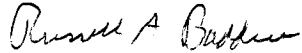
4. Submitted as Exhibit "A" is a copy of the Certificate, on which is highlighted the information for which confidential classification is requested. Exhibit "A" should be treated as confidential pending a ruling on this request. Attached as Exhibit "B" are two (2) edited copies of the Certificate, which may be made available for public review and inspection. Attached as Exhibit "C" to this request is a line-by-line justification for the request for confidential classification.

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

WHEREFORE, the Southern Company and Southern Communications Services, Inc. respectfully requests that the Commission enter an order protecting the information highlighted on Exhibit "A" from public disclosure as proprietary confidential business information.

Dated this 31st day of July, 1996.

Respectfully submitted,



RUSSELL A. BADDERS

Florida Bar No. 7455

Beggs & Lane

Post Office Box 12950

Pensacola, Florida 32576-2950

(904) 432-2451

Attorney for The Southern Company
and Southern Communications Services, Inc.

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

IN RE: The Southern Company and
Southern Communication Services, Inc.,
Certificate of Notification
File No. 70-8173

Docket No.: Undocketed
Filed: July 31, 1996

EXHIBIT "A"
REQUEST FOR CONFIDENTIAL CLASSIFICATION

The information provided herein should be maintained as proprietary confidential business information pursuant to Section 366.093 and Rule 25-22.006, F.A.C.

EXHIBIT "A"

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

EXHIBIT "B"

CERTIFICATE OF NOTIFICATION

CONFIDENTIAL

filed by

SOUTHERN COMMUNICATIONS SERVICES, INC.

Pursuant to order of the Securities and Exchange Commission dated December 30, 1994, in the matter of File No. 70-8233.

Southern Communications Services, Inc. (Southern Communications), pursuant to Rule 24, hereby provides the following information as required by the above-mentioned order:

Requested Response to IV.3:

- A. A statement of revenues, distinguishing and setting forth non-associate revenues and revenues derived from each associate company.

REVENUES:

1
2
3

[REDACTED]

- B. The price charged to associates for each type of service rendered to associates.

4
5
6

[REDACTED]

- C. A statement as to whether the prices charged to associates were based upon market or cost.

7
8

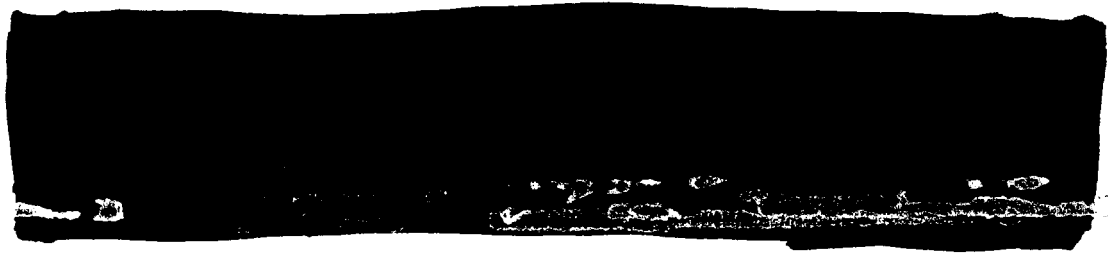
[REDACTED]

- D. An explanation of how the market or cost pricing utilized was derived.

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17

[REDACTED]

65FWP-1




SIGNATURE

Pursuant to the requirements of the Public Utility Holding Company Act of 1935, the undersigned company has duly caused this certificate to be signed on its behalf by the undersigned thereunto duly authorized.

Dated: May 15, 1996

SOUTHERN COMMUNICATIONS SERVICES, INC.

By: 
Robert G. Dawson
President & CEO

CERTIFICATE OF NOTIFICATION

CONFIDENTIAL

filed by

SOUTHERN COMMUNICATIONS SERVICES, INC.

Pursuant to order of the Securities and Exchange Commission dated December 30, 1994, in the matter of File No. 70-8233.


Southern Communications Services, Inc. (Southern Communications), pursuant to Rule 24, hereby provides the following information as required by the above-mentioned order:

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- C. A statement as to whether the prices charged to associates were based upon market or cost.

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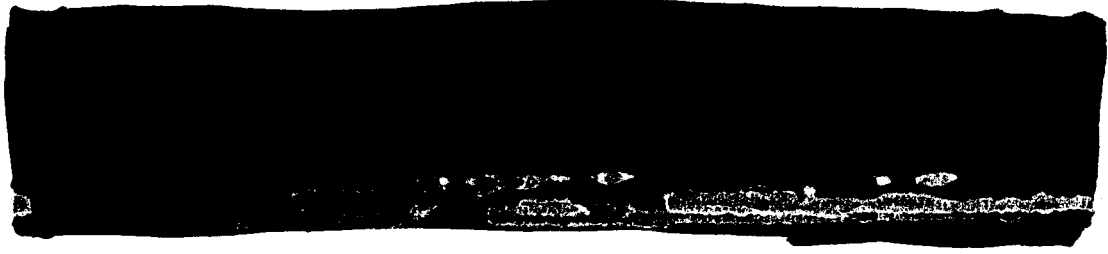


- D. An explanation of how the market or cost pricing utilized was derived.

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65F2-1



SIGNATURE

Pursuant to the requirements of the Public Utility Holding Company Act of 1935, the undersigned company has duly caused this certificate to be signed on its behalf by the undersigned thereunto duly authorized.

Dated: May 15, 1996

SOUTHERN COMMUNICATIONS SERVICES, INC.

By: Robert G. Dawson
Robert G. Dawson
President & CEO

EXHIBIT "C"

Line-by-Line Justification

Page/ line:	Column:	Justification:
Page 1 Lines: 1-3	N/A	The information identified as confidential by Southern Communications Services, Inc., is intended to be and is treated by Southern Communications as private in that the disclosure of the information would impair Southern Communication's competitive interests. <u>See</u> Fla. Stat. § 366.093(3)(e). The information provided in the specified lines includes financial information about Southern Communication's operations, specifically revenues from each associate company. This information is proprietary and competitively sensitive in that it reveals Southern Communication's economic viability and its financial ability to enter into the various aspects of the telecommunication markets. Moreover, the telecommunication market is increasingly competitive and this information could be utilized by Southern Communication's competitors to determine Southern Communication's market strength and whether or not it is financially able to pursue new markets and technologies.
Page 1 Lines: 4-17 and Page 2 Lines: 1-6	N/A	The information identified as confidential by Southern Communications Services, Inc., is intended to be and is treated by Southern Communications as private in that the disclosure of the information would impair Southern Communication's competitive interests. <u>See</u> Fla. Stat. § 366.093(3)(e). The information provided in the specified lines reveals pricing information that is a key component in a competitive market. Public disclosure of such information may affect the price that Southern Communications is able to garner for its services in a competitive market. Knowledge of Southern Communications's pricing levels would enable a competitor to offer a price that is only slightly lower than that offered by Southern Communications in order to secure business that would have otherwise utilized the services of Southern Communications. Moreover, the telecommunication market is increasingly competitive and disclosure of this information would give to Southern Communication's competitors information that Southern Communications is unable to obtain about those competitors.

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing was furnished without exhibit "A" by U.S. Mail on the 31st day of July, 1996 on the following:

Cindy Miller, Esquire
Florida Public Service Commission
2540 Shumard Oak Blvd.
Tallahassee FL 32399-0863

Jack Shreve, Esquire
Office of Public Counsel
c/o The Florida Legislature
111 W. Madison St., Room 812
Tallahassee FL 32399-1400

Russell A Badders

RUSSELL A. BADDERS
Florida Bar No. 0007455
Beggs & Lane
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904 432-2451
Attorneys for The Southern Company