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Pensacola, FL 32520

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FILE COPY



September 3, 1997

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  
Quarterly CISR Report for the Second Quarter 1997

960789-EI

Enclosed are an original and fifteen copies of Gulf Power Company's Request for Confidential Classification for the Quarterly CISR Report for the Second Quarter 1997.

Sincerely,

Susan D. Cranmer  
Assistant Secretary and Assistant Treasurer

- CK
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- JPP \_\_\_\_\_
- MAF \_\_\_\_\_
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- LEF \_\_\_\_\_
- UTL \_\_\_\_\_
- WAS \_\_\_\_\_
- OTH \_\_\_\_\_

cc: Beggs and Lane  
Russell A. Badders

8259

RECEIVED & FILED

EPSC BUREAU OF RECORDS

DOCUMENT NUMBER-DATE

08891 SEP-45

FPSC-RECORDS/REPORTING

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

IN RE: Gulf Power Company  
Quarterly CISR Report for  
the Second Quarter 1997

Docket No.: Undocketed  
Date: September 3, 1997

**REQUEST FOR CONFIDENTIAL CLASSIFICATION**

GULF POWER COMPANY ["Gulf Power", "Gulf", or "the Company"], by and through its 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 Gulf Power Company's Quarterly CISR Report for the Second Quarter 1997, hereafter the Quarterly CISR Report, submitted to the Florida Public Service Commission pursuant to Order No. PSC-96-1219-FOF-EI. As grounds for this request, the Gulf Power Company states:

1. On or about August 14, 1997, Gulf Power Company submitted to the Florida Public Service Commission Gulf Power Company's Quarterly CISR Report for the Second Quarter of 1997 as required by Order No. PSC-96-1219-FOF-EI.
2. On or about August 14, 1997, Gulf Power Company filed a Notice of Intent to Request Confidential Classification with regard to the Quarterly CISR Report. Gulf Power asserts that the information contained in the Quarterly CISR Report 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 Gulf Power and the entity with whom it has negotiated a CSA contract under the CIS rider approved in Order No. PSC-96-1219-FOF-EI. The Quarterly CISR Report contains proprietary and commercially sensitive information that is not otherwise publicly available.

DOCUMENT NUMBER-DATE  
08891 SEP-4 5  
FPSC-RECORDS/REPORTING

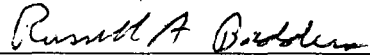
3. The Public disclosure of the information contained in the Quarterly CISR Report would cause irreparable harm to Gulf Power Company and the entity with whom it has entered a CSA contract. The Quarterly CISR Report contains proprietary confidential business information regarding contractual terms and pricing. Public disclosure of this information would impair the ability of Gulf Power Company to negotiate terms and conditions in future CSAs that are the most favorable to Gulf and its general body of customers. Moreover, the public disclosure of this information may prevent Gulf from successfully negotiating CSAs with customers. The information is regarded as sensitive and confidential by the CIS rider customer because its public disclosure would impact the customers' ability to compete in their native markets. In the event such information is made public, future potential CIS rider customers may avoid the risk of public disclosure of their confidential information by refusing to negotiate with Gulf Power. This may lead to uneconomic bypass of Gulf's facilities. 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 Quarterly CISR Report, 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 Quarterly CISR Report, 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 Gulf Power Company and the entity with whom it has entered a CSA contract 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" from public disclosure as proprietary confidential business information.

Respectfully submitted this 3 rd day of September 1997,



Russell A. Badders  
Florida Bar No. 7455  
Beggs & Lane  
Post Office Box 12950  
Pensacola, Florida 32576-2950  
(904) 432-2451  
Counsel for Gulf Power Company

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

IN RE: Gulf Power Company  
Quarterly CISR Report for  
the Second Quarter 1997

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Docket No.: Undocketed  
Date: September 3, 1997

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"

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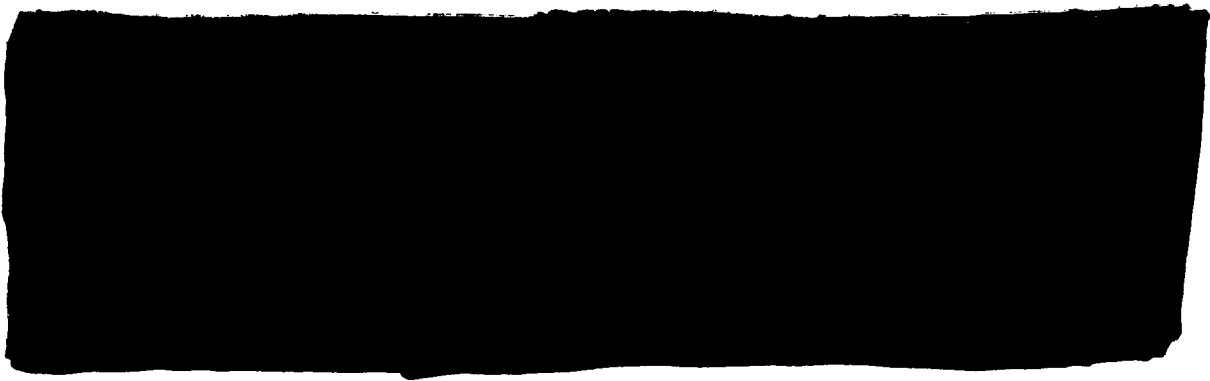
GULF POWER COMPANY

Quarterly CISR Report

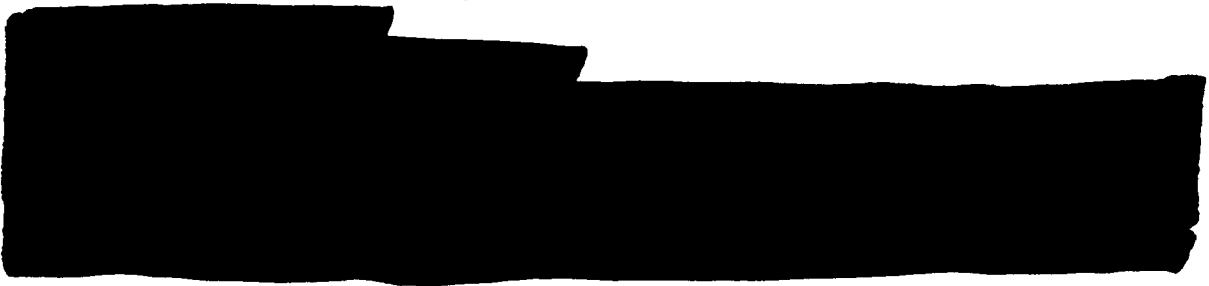
Initial Report

Report Period: Second Quarter 1997

Gulf has entered into a CISR during the second quarter of 1997. The CSA was signed by Gulf and a qualified candidate under the terms and conditions set forth in Order No. PSC-96-1219-FOF-E1 in Docket No. 960789-E1. Gulf offered and signed the CISR based on extensive analysis and customer specific research.



The CSA contains the following:



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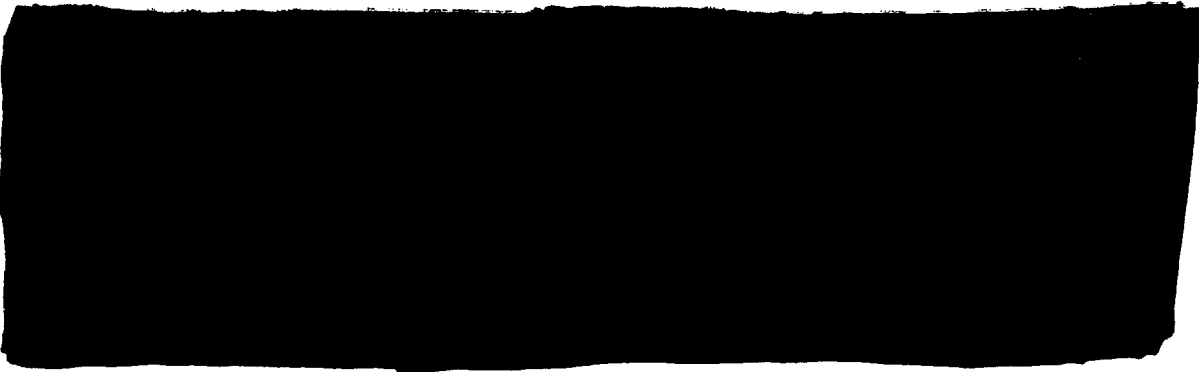
GULF POWER COMPANY

Quarterly CISR Report

Initial Report

Report Period: Second Quarter 1997

Gulf has entered into a CISR during the second quarter of 1997. The CSA was signed by Gulf and a qualified candidate under the terms and conditions set forth in Order No. PSC-96-1219-FOF-EI in Docket No. 960789-EI. Gulf offered and signed the CISR based on extensive analysis and customer specific research.



The CSA contains the following:





EXHIBIT "C"

**Line-by-Line Justification**

**Line(s)** \_\_\_\_\_

**Justification**

Lines 17 thru 25

This information is proprietary confidential business information regarding contractual terms and pricing. Public disclosure of this information would impair the ability of Gulf Power Company to negotiate terms and conditions in future CSAs that are the most favorable to Gulf and its general body of customers. This information is customer specific. The information is regarded as sensitive and confidential by the CIS rider customer because its public disclosure would impact the customers' ability to compete in their native markets. In the event such information is made public, future potential CIS rider customers may avoid the risk of public disclosure of their confidential information by refusing to negotiate with Gulf Power. This may lead to uneconomic bypass of Gulf's facilities.

Lines 28 thru 34

This information is proprietary confidential business information regarding contractual terms and pricing. Public disclosure of this information would impair the ability of Gulf Power Company to negotiate terms and conditions in future CSAs that are the most favorable to Gulf and its general body of customers. The result of public disclosure of the pricing information would be price convergence in future CSAs. Moreover, the public disclosure of this information may prevent Gulf from successfully negotiating CSAs with customers. The information is regarded as sensitive and confidential by the CIS rider customer because its public disclosure would impact the customers' ability to compete in their native markets. In the event such information is made public, future potential CIS rider customers may avoid the risk of public disclosure of their confidential information by refusing to negotiate with Gulf Power. This may lead to uneconomic bypass of Gulf's facilities.