

One Energy Place
Pensacola, Florida 32520

Tel 850.444.6111



January 25, 2002

Ms. Blanca S. Bayo, Director
Division of the Commission Clerk and Administrative Services
Florida Public Service Commission
2540 Shumard Oak Boulevard
Tallahassee FL 32399-0870

Dear Ms. Bayo:

RE: Docket No. 010949-EI

Enclosed are an original and fifteen copies of Gulf Power Company's Notice of Intent to Request Confidential Classification for portions of Gulf's response to Staff's Sixth Request for Production of Documents, Nos. 50-57, to be filed in the above docket.

Sincerely,

A handwritten signature in cursive script that reads "Susan D. Ritenour".

Susan D. Ritenour
Assistant Secretary and Assistant Treasurer

lw

Enclosure

cc: Beggs and Lane
Jeffrey A. Stone, Esquire

DOCUMENT NUMBER-DATE
01012 JAN 28 2002
FPSC-COMMISSION CLERK

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

IN RE: Request for Rate Increase by Gulf)
Power Company)
_____)

Docket No. 010949-EI
Date: January 25, 2002

NOTICE OF INTENT TO REQUEST CONFIDENTIAL CLASSIFICATION

1. Notices and communications with respect to this Notice should be addressed to:

Jeffrey A. Stone, Esquire
Russell A. Badders, Esquire
Beggs & Lane
P. O. Box 12950
Pensacola FL 32576-2950

Susan D. Ritenour
Assistant Secretary and Assistant Treasurer
Gulf Power Company
One Energy Place
Pensacola LF 32520-0780

2. Gulf Power Company ["Gulf Power", "Gulf", or "the Company"], by and through its undersigned attorney's and pursuant to Rule 25-22.006, Florida Administrative Code, hereby gives notice that it intends to request confidential classification for portions of Gulf Power's response to Staff's Sixth Request for Production of Documents to Gulf Power Company (Nos. 50-57). A copy of the request is attached hereto as exhibit "A".

3. Gulf Power Company's response to request numbered 50 contains proprietary and commercially sensitive information which, if disclosed publicly, would cause irreparable harm to the business interests of Gulf Power Company. Gulf asserts that this information meets the requirements of §366.093(3)(a) and (e), Florida Statutes. Specifically, the information being provided relates to compensation levels and compensation plans at Gulf Power Company. A formal request for confidential classification will be filed within the time period specified in Rule 25-22.006(3)(a), Florida Administrative Code, if the Staff determines that the information will be retained by the Commission and not returned to Gulf Power

Company within the specified time period. In the event the Staff determines that it will retain this information, Gulf Power Company requests to be notified, through the undersigned counsel, prior to the expiration of the period specified in Rule 25-22.006(3)(A).

Respectfully submitted,



JEFFREY A. STONE

Florida Bar No. 325953

RUSSELL A. BADDERS

Florida Bar No. 007455

Begg & Lane

P. O. Box 12950

(700 Blount Building)

Pensacola FL 32576-2950

(850) 432-2451

Attorneys for Gulf Power Company

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Request for rate increase
by Gulf Power Company.

DOCKET NO. 010949-EI
DATED: DECEMBER 21, 2001

STAFF'S SIXTH REQUEST FOR PRODUCTION OF DOCUMENTS TO
GULF POWER COMPANY (NOS. 50 - 57)

Pursuant to Rule 25-22.034, Florida Administrative Code, and Rule 1.350, Florida Rules of Civil Procedure, the Staff of the Florida Public Service Commission, by and through its undersigned attorney, hereby serves the following Request for Production of Documents upon Gulf Power Company.

Please produce the following documents at the Florida Public Service Commission, 2540 Shumard Oak Boulevard, Gerald L. Gunter Building, Tallahassee, Florida 32399-0850, no later than thirty days after service of this request for the purpose of inspection and copying:

DEFINITION

As used herein, the word "documents" shall mean the original and any non-identical copies of any writing or record, including but not limited to a book, pamphlet, periodical, letter, memorandum, telegram, report, study, interoffice or intraoffice memorandum, memorandum reflecting an oral communication, handwritten or other notes, working paper, draft, application, permit, chart, paper, graph, survey, index, tape, disc, data sheet

STAFF'S SIXTH REQUEST FOR PRODUCTION OF DOCUMENTS TO GULF POWER
COMPANY (NOS. 50 - 57)
DOCKET NO. 010949-EI

or data processing card, computer printout, or any other written, recorded, transcribed, filed or graphic matter, however produced or reproduced.

REQUEST FOR DOCUMENTS

50. Please provide copies of all actuarial reports used to determine Gulf's pension expense and other post-retirement benefits (OPEB) expense for the historical years ended December 31, 1998 through 2000, and projected years ended December 31, 2001, May 31, 2002 and the test year ended May 31, 2003. (Kyle)

STAFF'S SIXTH REQUEST FOR PRODUCTION OF DOCUMENTS TO GULF POWER
COMPANY (NOS. 50 - 57)
DOCKET NO. 010949-EI

51. With respect to the actuarial reports provided in POD No. 50, please provide copies of all documents provided by or for the company to the actuary or actuaries for their use in calculating pension and OPEB expense. Also, please provide copies of all internal workpapers used in deriving assumptions included in the documents provided to the actuary or actuaries. This request includes, but is not limited to, assumptions regarding funds growth rates, salary progression rates, employee turnover rates, and expected plan changes.

(Kyle)

STAFF'S SIXTH REQUEST FOR PRODUCTION OF DOCUMENTS TO GULF POWER
COMPANY (NOS. 50 - 57)
DOCKET NO. 010949-EI

52. Please provide copies of all marketing materials in regard to Gulf's activities in marketing high efficiency electric technologies and water heating in the new home and business markets? (Futrell)

53. Please provide copies of all studies showing Smith Unit 3 is the most cost-effective alternative to Gulf's ratepayers. (Futrell)

STAFF'S SIXTH REQUEST FOR PRODUCTION OF DOCUMENTS TO GULF POWER
COMPANY (NOS. 50 - 57)
DOCKET NO. 010949-EI

54. Please provide complete copies of all textbook cites and journal articles relied upon by witness C.A. Benore that support the normalization of the 30-year Treasury bond yield as presented on pages 3 through 5 of Schedule 8 of Benore's testimony and page 12 of Schedule 8 of Benore's testimony.
(Lester)

55. Please provide an update of witness Benore's DCF results, equity risk premium analysis, CAPM model and comparable earnings model using the most recent information (e.g., the most recent stock prices, bond yields, Value Line information, earnings and dividend projections and data). Please provide this information as updated Schedules 1a, 7, 8, 9, and 10 to witness Benore's testimony. (Lester)

STAFF'S SIXTH REQUEST FOR PRODUCTION OF DOCUMENTS TO GULF POWER
COMPANY (NOS. 50 - 57)
DOCKET NO. 010949-EI

56. Please provide complete copies of all textbook references and journal articles that support adjusting or transforming the results of a capital asset pricing model (CAPM) when the price-to-book value ratio differs from 1.0. (Lester)

STAFF'S SIXTH REQUEST FOR PRODUCTION OF DOCUMENTS TO GULF POWER
COMPANY (NOS. 50 - 57)
DOCKET NO. 010949-EI

57. Please provide complete copies of the most recent Value Line
projection of the consumer price index for 2001, 2002, and
2004-06. This is referenced on page 7, lines 10 through 18,
of the testimony of C.A. Benore. (Lester)



MARLENE K. STERN, Senior Attorney
KATHERINE N. ECHTERNACHT
Staff Counsel

FLORIDA PUBLIC SERVICE COMMISSION
2540 Shumard Oak Blvd.
Tallahassee, Florida 32399-0850
(850) 413-6230

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Request for rate increase
by Gulf Power Company.

DOCKET NO. 010949-EI
FILED: DECEMBER 21, 2001

CERTIFICATE OF SERVICE


I HEREBY CERTIFY that the original and one copy of Staff's Sixth Request for Production of Documents (Nos. 50 - 57), have been served via U.S. MAIL upon Ms. Susan D. Ritenour, One Energy Place, Pensacola, Florida 32520-0780, on behalf of Gulf Power Company, and that a true and correct copy thereof has been furnished by U.S. Mail, this 21st day of December, 2001, to the following:

Office of Public Counsel
Charles Beck/Jack Shreve/Rob
Vandiver
c/o The Florida Legislature
111 W. Madison St., #812
Tallahassee, FL 32399-1400

Florida Cable Telecommunications
Assoc., Inc.
Michael A. Gross
246 East 6th Avenue, Suite 100
Tallahassee, FL 32303

Florida Industrial Power
Users Group
c/o McWhirter Law Firm
Vicki Gordon Kaufman, Esq.
117 South Gadsden Street
Tallahassee, FL 32301

Federal Executive Agencies
c/o AFCESA/Utility Litigation
Team
Douglas Shropshire/Al
Erickson
139 Barnes Drive
Tyndall Air Force Base, FL
32403


MARLENE K. STERN, Senior Attorney
KATHERINE N. ECHTERNACHT
Staff Counsel

FLORIDA PUBLIC SERVICE COMMISSION
2540 Shumard Oak Blvd.
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(850) 413-6230

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Request for rate increase by)
Gulf Power Company)
_____)

Docket No. 010949-EI

Certificate of Service

I HEREBY CERTIFY that a copy of the foregoing has been furnished
this 25th day of January 2002 by U.S. Mail to the following:

Marlene Stern, Esquire
Staff Counsel
FL Public Service Commission
2540 Shumard Oak Boulevard
Tallahassee FL 32399-0863


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

Vicki Kaufman, Esquire
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117 S. Gadsden Street
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