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December 19, 2005

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

050927-EI

Dear Ms. Bayo:

Re: Audit Control No. 03-099-1-1

Enclosed are an original and fifteen copies of Gulf Power Company's Request for Confidential Classification in regards to the investigation of "Trouble Vision" Software.

Sincerely,

*Susan D. Ritenour*

lw

cc: Beggs and Lane  
Jeffrey A. Stone, Esquire

DOCUMENT NUMBER-DATE

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FPSC-COMMISSION CLERK

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

IN RE: Gulf Power Company, Inc. )  
Investigation of "Trouble Vision" Software ) Docket No. Undocketed  
Audit Control No.: 03-099-1-1 ) Date: December 19, 2005  
)  
)

**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 the documents produced by Gulf in response to certain specified audit requests of the Commission Staff to Gulf Power Company. As grounds for this request, the Company states:

1. The responses to Audit Request Numbers Three, Five and Seven were submitted to the Commission's staff in connection with an audit of Gulf's sale of its "Trouble Vision" software. The Commission staff has indicated that it intends to retain these documents.
2. The documents provided in response to Audit Request Number Three are entitled to confidential classification pursuant to Florida Statute section 366.093(3)(d). The documents contain proprietary confidential business information regarding contractual matters which would cause irreparable harm to Gulf Power Company and the entities with whom it has entered into contracts if such information is disclosed to the general public. Specifically, among other things, the documents contain the terms on which Gulf agreed to sell its Trouble Vision Software to CES International, Inc.
3. The documents provided in response to Audit Request Number Five are entitled to confidential classification pursuant to Florida Statute section 366.093(3)(e). The documents

contain competitively sensitive business information regarding the personnel and associated skill sets used by Gulf to develop its Trouble Vision software. The specific mix and type of skill sets which combined to develop the Trouble Vision software is sensitive because competitors could use such information to facilitate development of their own competing trouble shooting programs.

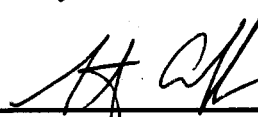
4. The documents provided in response to Audit Request Number Seven and the Commission staff's summary thereof, are entitled to confidential classification pursuant to Section 366.093(3)(e) and (f). The documents contain competitively sensitive business information regarding the time and costs expended by Gulf to develop its Trouble Vision software. The documents also contain personnel information unrelated to compensation, duties, qualifications or responsibilities. Records reflecting the amount of time devoted by Gulf to the development of the Trouble Vision software are sensitive because competitors could use such information to facilitate development of their own competing trouble shooting programs.

5. Submitted as Exhibit "A" are copies of Gulf's responses to Audit Request Numbers Three, Five and Seven on which is highlighted the information for which confidential classification is requested. Composite Exhibit "A" should be treated as confidential pending a ruling on this request. Attached as Exhibit "B" are two (2) edited copies of the response to Audit Request Numbers Three, Five and Seven which may be made available for public review and inspection. Attached as Exhibit "C" to this request is a line-by-line/field-by-field justification for the request for confidential classification as it relates to Composite Exhibit "A."

6. The documents filed pursuant to this Request are intended to be, and are treated as, confidential by the Gulf Power and have not been otherwise publicly disclosed.

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

Respectfully submitted this 19<sup>th</sup> day of December, 2005.



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**EXHIBIT "A"**

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