

**Susan D. Ritenour**  
Secretary and Treasurer  
and Regulatory Manager

One Energy Place  
Pensacola, Florida 32520-0781

Tel 850.444.6231  
Fax 850.444.6026  
SDRITENO@southernco.com

ORIGINAL



March 29, 2007

Ms. Ann Cole, Commission Clerk  
Florida Public Service Commission  
2540 Shumard Oak Boulevard  
Tallahassee FL 32399-0850

Dear Ms. Cole:

Re: Docket No. 070007-EI

Enclosed are an original and fifteen copies of Gulf Power's Request for Confidential Classification in regard to the Supplemental Petition of Gulf Power Company Regarding Its CAIR/CAMR/CAVR Environmental Compliance Program Pursuant to Stipulation of Parties, and Exhibit A to this supplemental petition entitled "Gulf Power Company Environmental Compliance Program for the Clean Air Interstate Rule, Clean Air Mercury Rule, and Clean Air Visibility Rule", to be filed in the above referenced docket.

Sincerely,

CMP \_\_\_\_\_  
COM \_\_\_\_\_  
CTR \_\_\_\_\_  
ECR 1  
GCL 1  
OPC \_\_\_\_\_  
RCA \_\_\_\_\_  
SCR \_\_\_\_\_  
SGA \_\_\_\_\_  
SEC \_\_\_\_\_  
OTH Levy records

*Susan D. Ritenour*  
*bah*

bh

Enclosures

cc: Squire, Sanders & Dempsey, LLP  
Charles A. Guyton, Esq.  
Beggs & Lane  
Jeffrey A. Stone, Esq.

*Confidential*  
DOCUMENT NUMBER - DATE

02755 MAR 30 5

FPSC-COMMISSION CLERK

*Request*  
DOCUMENT NUMBER - DATE

02754 MAR 30 5

FPSC-COMMISSION CLERK

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

IN RE: Environmental Cost  
Recovery Clause

Docket No.: 070007-EI  
Date: March 29, 2007

REQUEST FOR CONFIDENTIAL CLASSIFICATION

GULF POWER COMPANY ["Gulf Power", "Gulf", or the "Company"], by and through its undersigned attorneys 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 produced in connection with Gulf Power's Supplemental Petition Regarding its CAIR/CAMR/CAVR Environmental Compliance Program. As grounds for this request, the Company states:

1. On equal date herewith, Gulf Power is filing its Supplemental Petition Regarding its CAIR/CAMR/CAVR Environmental Compliance Program. Gulf Power seeks confidential classification for four tables included in Gulf Power's Environmental Compliance Program ("Compliance Program"). The information on the tables is information relating to competitive interests, the disclosure of which would impair the competitive business of Gulf Power and Gulf Power's ability to procure goods and services on a fair and reasonable basis. The information is entitled to confidential classification pursuant to §366.093(3)(d)-(e), Florida Statutes.

Table 4.3-2 provides the results of an economic viability study by Gulf Power of its generating assets. This shows detailed unit-specific cost data including fuel cost, O&M costs and capital expenditures for many years into the future as well as the near term. Wholesale competitors as well as suppliers of commodities and services could utilize this information to undermine Gulf's bargaining position in the markets where Gulf must compete to obtain such commodities and services or make purchases or sales of wholesale power. In addition, disclosure of this information could negatively impact Gulf's ability to negotiate pricing favorable to its customers in the event that Gulf determined to sell one or more of its generating

DOCUMENT NUMBER-DATE

02754 MAR 30 07

FPSC-COMMISSION CLERK

assets.

Table 5.1-1 identifies in detail Gulf Power's projected capital expenditures, by plant, for compliance with the CAIR, CAMR and CAVR. Disclosure of this information could negatively impact Gulf's ability to negotiate pricing favorable to its customers when contracting with vendors of materials needed by Gulf in order to implement its Compliance Program. Similarly, Table 5.1-2 identifies in detail Gulf Power's projected operation and maintenance expenses, by Plant, associated with the CAIR, CAMR and CAVR Compliance Plan. Disclosure of this information could negatively impact Gulf's ability to negotiate pricing favorable to its customers when contracting with vendors of services needed by Gulf in order to implement its Compliance Program.

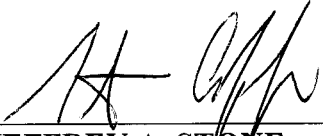
Finally, Table 5.5-1 identifies Gulf Power's projected allowance needs and costs between 2009 and 2017. Disclosure of this information could negatively impact Gulf's ability to negotiate pricing favorable to its customers when contracting for the purchase of allowances.

2. The information filed pursuant to this Request is intended to be, and is treated as, confidential by the Gulf Power and has not been otherwise publicly disclosed.

3. Submitted as Exhibit "A" are copies of Tables 4.3-2, 5.1-1, 5.1-2 and 5.5-1, on which are 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 Exhibit "A," 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.

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 29<sup>th</sup> day of March, 2007.



---

**JEFFREY A. STONE**  
Florida Bar No. 325953  
**RUSSELL A. BADDERS**  
Florida Bar No. 007455  
**STEVEN R. GRIFFIN**  
Florida Bar No. 0627569  
**Beggs & Lane**  
P. O. Box 12950  
Pensacola, FL 32591  
(850) 432-2451  
**Attorneys for Gulf Power Company**

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

IN RE: Environmental Cost  
Recovery Clause

\_\_\_\_\_)

Docket No.: 070007-EI  
Date: March 29, 2007

**REQUEST FOR CONFIDENTIAL CLASSIFICATION**

**EXHIBIT "A"**

Provided to the Commission Clerk  
under separate cover as confidential information.

EXHIBIT "B"

---

**Table 4.3-2 (Page 1 of 2)  
Economic Viability Study  
(In \$/kW)**



**TRADE SECRET – PROTECTED**

**Table 5.1-1  
Projected CAIR, CAMR and CAVR Capital Expenditures**

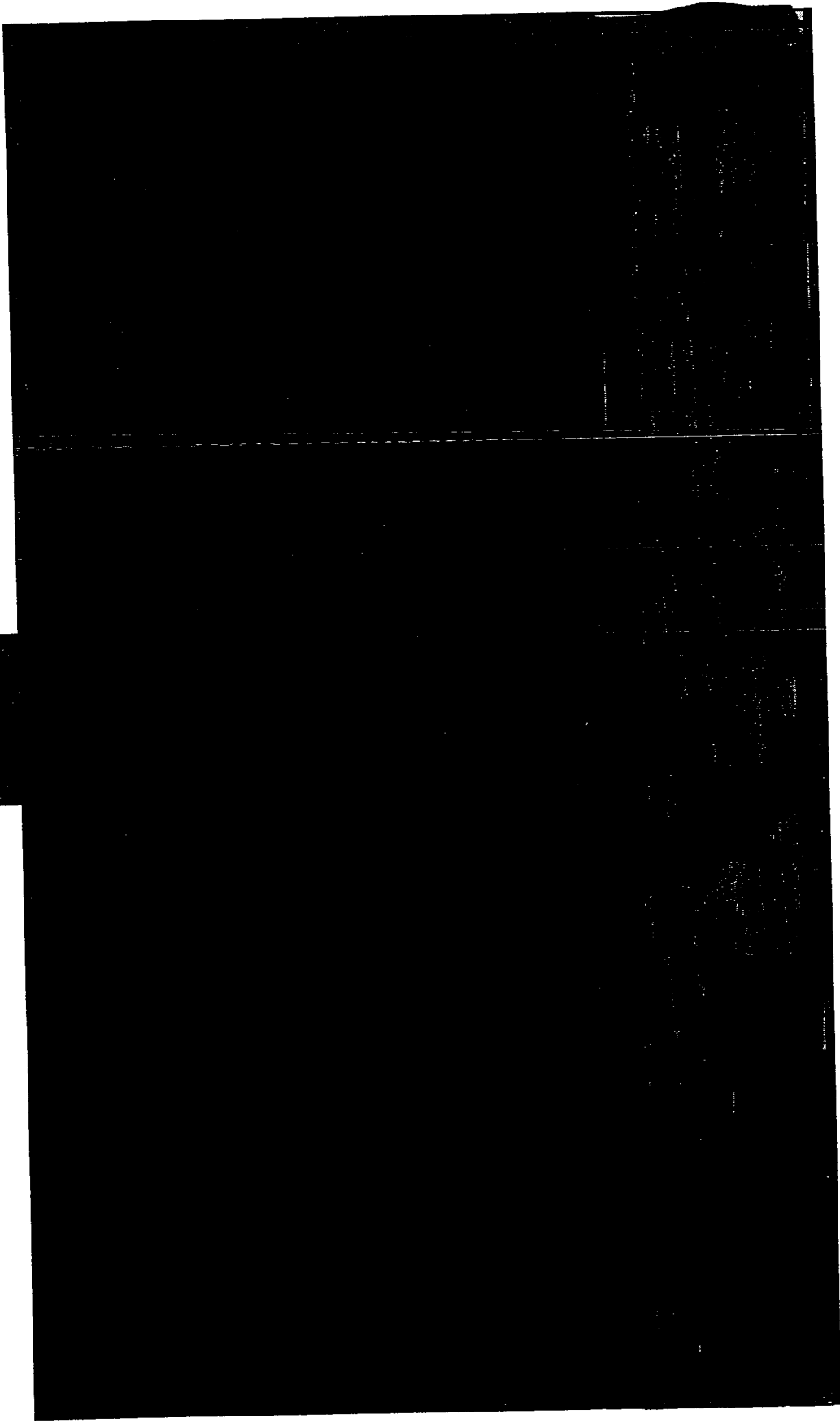
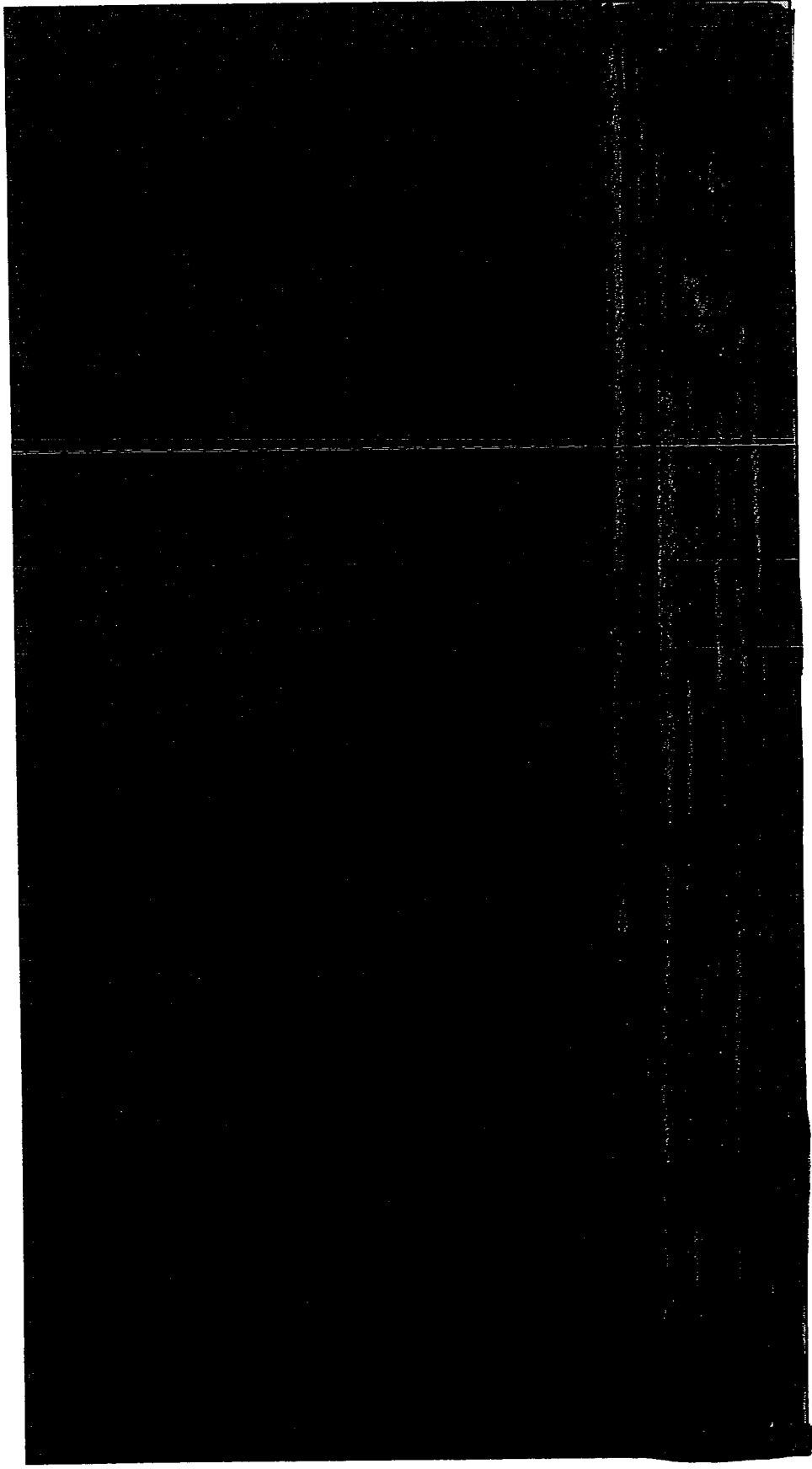




Table 5.1.1-2  
Projected CAIR, CAMR and CAVR Plant O&M Expenses



Clean Air Interstate Rule  
Clean Air Mercury Rule  
Clean Air Visibility Rule



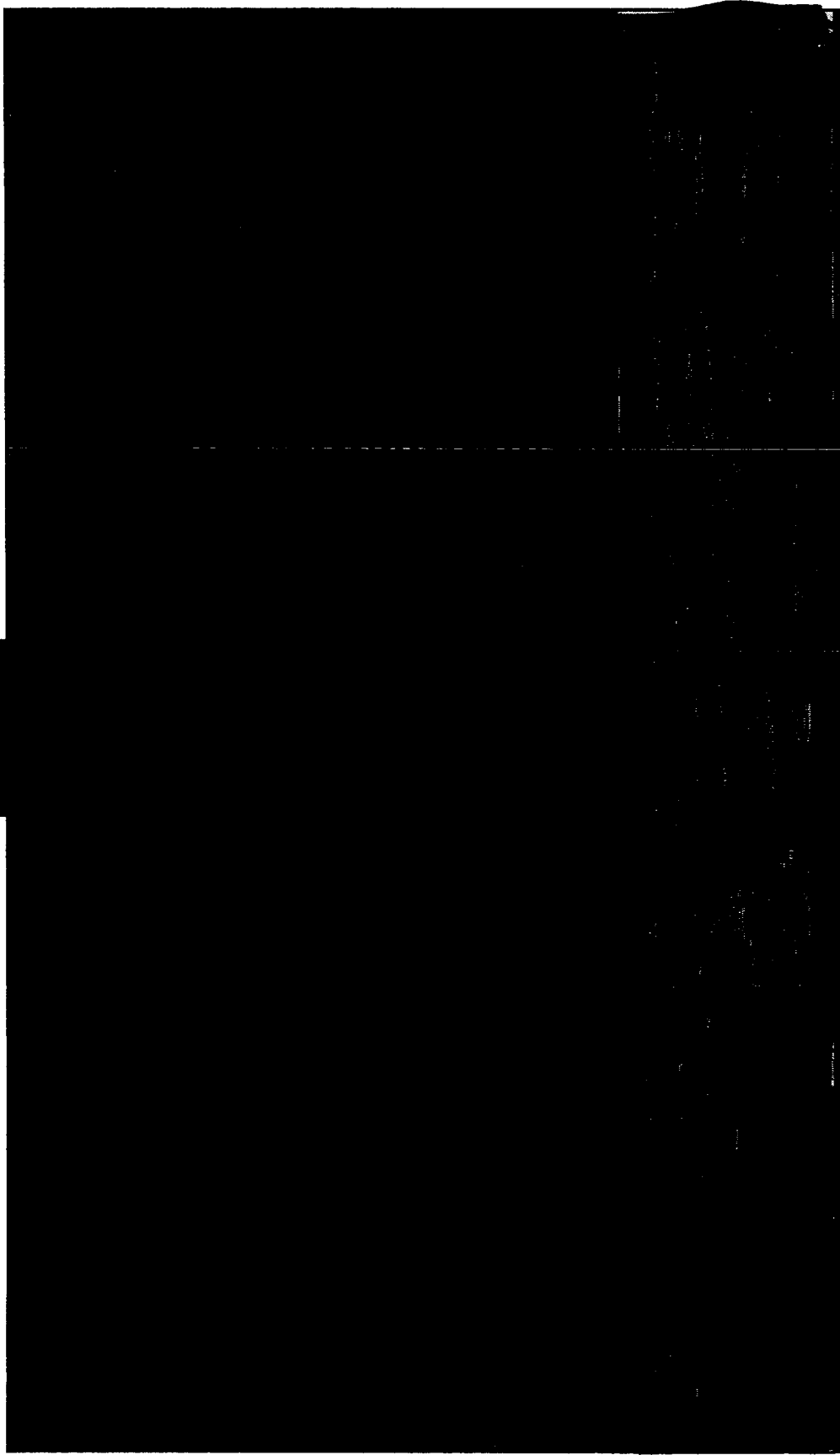
---

**Table 4.3-2 (Page 1 of 2)  
Economic Viability Study  
(In \$/kW)**



**TRADE SECRET – PROTECTED**

**Table 5.1-1  
Projected CAIR, CAMR and CAVR Capital Expenditures**



**Table 5.1-2  
Projected CAIR, CAMR and CAVR Plant O&M Expenses**

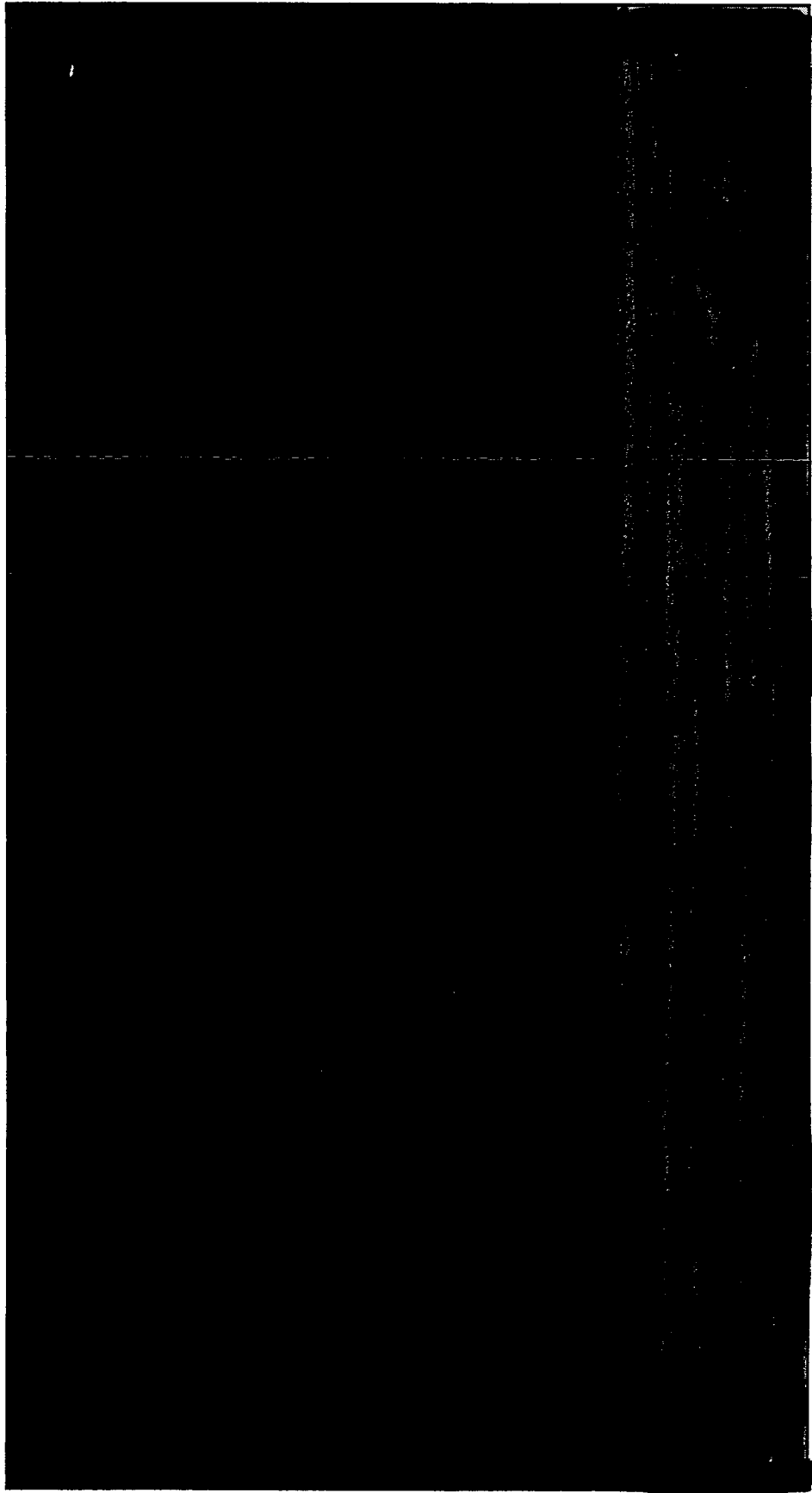




EXHIBIT "C"

**Line-by-Line/Field-by-Field Justification**

**Line(s)/Field(s)**

Table 4.3-2  
Page 1 of 2  
Confidential in its entirety

Table 5.1-1  
Page 1 of 1  
Confidential in its entirety

Table 5.1-2  
Page 1 of 1  
Confidential in its entirety

Table 5.5-1  
Page 1 of 1  
Confidential in its entirety

**Justification**

This information is entitled to confidential classification pursuant to §366.093(3) (d) and (e), Florida Statutes. The basis for this information being designated as confidential is more fully set forth in paragraph 1.

**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that this filing is being made by U.S. Mail to the following, except filing to those marked with an asterisk will be by Federal Express Mail this 29<sup>th</sup> day of MARCH, 2007:

Martha Carter Brown, Esq.  
Senior Counsel  
FL Public Service Comm.  
2540 Shumard Oak Blvd.  
Tallahassee FL 32399-0850

John W. McWhirter, Jr., Esq.  
McWhirter Reeves & Davidson  
400 N Tampa St., Suite 2450  
Tampa FL 33602

Paula K. Brown, Administrator  
Regulatory Coordination  
Tampa Electric Company  
P. O. Box 111  
Tampa FL 33601

John T. Butler, Esq.  
Florida Power & Light Company  
700 Universe Boulevard  
Juno Beach FL 33408-0420

Lee L. Willis, Esq.  
James D. Beasley, Esq.  
Ausley & McMullen  
P. O. Box 391  
Tallahassee FL 32302

Norman H. Horton, Jr., Esq.  
Messer, Caparello & Self, P.A.  
P. O. Box 15579  
Tallahassee FL 32317

\*Patricia Ann Christensen, Esq.  
Office of Public Counsel  
111 W. Madison St., Room 812  
Tallahassee FL 32399-1400

John T. Burnett, Esq.  
Progress Energy Service Co.  
P. O. Box 14042  
St. Petersburg FL 33733-4042

William G. Walker, III  
Florida Power & Light Co.  
215 South Monroe St., Suite 810  
Tallahassee FL 32301-1859

Paul Lewis, Jr.  
Progress Energy Florida, Inc.  
106 E. College Ave., Ste. 800  
Tallahassee FL 32301-7740

Gary V. Perko, Esq.  
Hopping Green & Sams  
P. O. Box 6526  
Tallahassee FL 32314

Cheryl Martin  
Florida Public Utilities Company  
P. O. Box 3395  
West Palm Beach FL 33402-3395

R. Wade Litchfield, Esq.  
Florida Power & Light Company  
700 Universe Boulevard  
Juno Beach FL 33408-0420



**JEFFREY A. STONE**

Florida Bar No. 325953

**RUSSELL A. BADDERS**

Florida Bar No. 007455

**STEVEN GRIFFIN**

Florida Bar No. 0627569

**BEGGS & LANE**

P. O. Box 12950

Pensacola FL 32591-2950

(850) 432-2451

Attorneys for Gulf Power Company



State of Florida



## Public Service Commission

CAPITAL CIRCLE OFFICE CENTER • 2540 SHUMARD OAK BOULEVARD  
TALLAHASSEE, FLORIDA 32399-0850

**-M-E-M-O-R-A-N-D-U-M-**

---

**DATE:** 3/30/07  
**TO:** S. Ritenour, Gulf Power Co.  
**FROM:** Putri Nettles, Division of the Commission Clerk &  
Administrative Services  
**RE:** **Acknowledgment of Receipt of Confidential Filing**

---

This will acknowledge receipt of a **CONFIDENTIAL DOCUMENT** filed in Docket No. 02755-07  
070007 or (if filed in an undocketed matter) concerning Exhibit A to Supplemental petition, and filed on behalf of Gulf Power. The document will be maintained in locked storage.

Any questions regarding this matter should be directed to Marguerite Lockard at (850) 413-6770.

I:\Confid\ackconf.doc