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October 10, 2008

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

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COMMISSION
CLERK

Dear Ms. Cole:

RE: Docket No. 080001-EI

Enclosed is an original and 15 copies of Gulf Power Company's Request for Confidential Classification regarding certain information submitted by Gulf Power in response to Commission Staff's Fourth Set of Interrogatories to Gulf Power Company (Nos. 15-18).

Sincerely,

Susan D. Ritenour (ew)

- COM
- ECR 1
- GCL 2
- OPC
- RCP
- SSC
- SGA
- ADM
- CLK 1

mv

Enclosures

cc w/encl.: Beggs & Lane
Jeffrey A. Stone, Esq.

DOCUMENT NUMBER-DATE

09695 OCT 13 08

FPSC-COMMISSION CLERK

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

IN RE: **Fuel and Purchased Power Cost**)
Recovery Clause with Generating)
Performance Incentive Factor)

Docket No.: **080001-EI**

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true copy of the foregoing was furnished by U. S. mail this 10th day of October, 2008, on the following:

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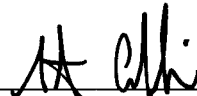
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Attorneys for Gulf Power Company

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

IN RE: Fuel and purchased power cost
recovery clause and generating performance
incentive factor

Docket No.: 080001-EI
Date: October 10, 2008

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 submitted by Gulf Power in response to Commission Staff's Fourth Set of Interrogatories to Gulf Power Company (Nos. 15-18). As grounds for this request, the Company states:

1. The information submitted by Gulf Power in response to Interrogatory Number 16 of Commission Staff's Fourth Set of Interrogatories is proprietary confidential business information regarding contractual matters which could cause irreparable harm to Gulf Power, the entities with whom it has entered into contracts and most importantly to Gulf's customers if such information was disclosed to the general public. The information is entitled to confidential classification pursuant to section 366.093(3) (d) and (e), Florida Statutes. Specifically, the confidential information consists of the pricing escalation methodology contained in Gulf Power's waterborne coal transportation contract with Ingram Barge Company. The waterborne coal transportation contract contains a confidentiality provision and the terms of the contract, including the pricing escalation clause, are considered and treated as confidential by the parties. Disclosure of this information would negatively impact Gulf's ability to negotiate contract terms favorable to its customers in the future. In addition, potential counterparties may refuse to enter into contracts with Gulf or would charge higher prices if the contract terms were made public.

2. The information filed pursuant to this Request is intended to be, and is treated as,

DOCUMENT NUMBER-DATE

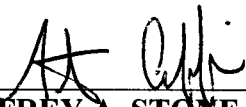
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FPSC-COMMISSION CLERK

confidential by the Gulf Power and, to this attorney's knowledge, has not been otherwise publicly disclosed.

3. Submitted as Exhibit "A" are copies of the subject documents, 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 subject documents, 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.



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BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

IN RE: Fuel and purchased power cost
recovery clause and generating performance
incentive factor

Docket No.: 080001-EI
Date: October 10, 2008

REQUEST FOR CONFIDENTIAL CLASSIFICATION

EXHIBIT "A"

Provided to the Commission Clerk
under separate cover as confidential information

EXHIBIT "B"

16. If the answer to question 15 is yes, does the waterborne coal transportation contract contain an escalation clause?
- (a). If the contract contains an escalation clause, please explain the clause in detail, including cost information.
- (b). If the contract contains an escalation clause, please explain in detail what cost indexes are used to determine the escalation?

ANSWER:

- (a) 1 [REDACTED]
2 [REDACTED]
3 [REDACTED]
4 [REDACTED]
5 [REDACTED]
6 [REDACTED]
7 [REDACTED]
8 [REDACTED]
9 [REDACTED]
10 [REDACTED]
11 [REDACTED]
12 [REDACTED]
13 [REDACTED]
14 [REDACTED]
15 [REDACTED]
16 [REDACTED]
17 [REDACTED]
18 [REDACTED]

(b)	A	B	C	D
1	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
2	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
3	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
4	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]

16. If the answer to question 15 is yes, does the waterborne coal transportation contract contain an escalation clause?
- (a). If the contract contains an escalation clause, please explain the clause in detail, including cost information.
 - (b). If the contract contains an escalation clause, please explain in detail what cost indexes are used to determine the escalation?

ANSWER:

- (a) 1 [REDACTED]
2 [REDACTED]
3 [REDACTED]
4 [REDACTED]
5 [REDACTED]
6 [REDACTED]
7 [REDACTED]
8 [REDACTED]
9 [REDACTED]
10 [REDACTED]
11 [REDACTED]
12 [REDACTED]
13 [REDACTED]
14 [REDACTED]
15 [REDACTED]
16 [REDACTED]
17 [REDACTED]
18 [REDACTED]

(b)	A	B	C	D
1	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
2	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
3	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
4	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]

EXHIBIT "C"

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

Line(s)/Field(s)

Justification

Response to Interrogatory # 16

Page 1 of 2, Lines 1-18, in their entirety

Page 2 of 2, Lines 1-4, Columns A-D

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.

STATE OF FLORIDA

COMMISSIONERS:
MATTHEW M. CARTER II, CHAIRMAN
LISA POLAK EDGAR
KATRINA J. McMURRIAN
NANCY ARGENZIANO
NATHAN A. SKOP



OFFICE OF COMMISSION CLERK
ANN COLE
COMMISSION CLERK
(850) 413-6770

CONFIDENTIAL

Public Service Commission

ACKNOWLEDGEMENT

*R.V.N.
Ritenour.*

DATE: October 13, 2008

TO: Susan S. Masterton, Gulf Power Company

FROM: Ruth Nettles, Office of Commission Clerk

RE: Acknowledgement of Receipt of Confidential Filing

This will acknowledge receipt of a **CONFIDENTIAL DOCUMENT** filed in Docket Number 080001 or, if filed in an undocketed matter, concerning certain information provided in response to staff's 4th set of interrogatories, and filed on behalf of Gulf Power Company. The document will be maintained in locked storage.

If you have any questions regarding this document, please contact Marguerite Lockard, Deputy Clerk, at (850) 413-6770.

DOCUMENT NO. DATE
0919608 10/13/08
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