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COMMISSION
CLERK



December 30, 2011

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

claim of confidentiality
 notice of intent
 request for confidentiality
 filed by OPC

For DN 00017-12, which
is in locked storage. You must be
authorized to view this DN.-CLK

Dear Ms. Cole:

120007-EI

RE: Docket No. 110007-EI

Enclosed is Gulf Power Company's Request for Extended Confidential
Classification pertaining to Portions of Gulf Powers Environmental Compliance
Program Update for the Clean Air Interstate Rule and Clean Air Visibility Rule, to
be filed in the above referenced docket.

Sincerely,

Susan Ritenour (RLW)

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Enclosures

COM _____
APA _____
ECR _____
GCL _____
RAD _____
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ADM _____
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cc: Beggs & Lane
Jeffrey A. Stone, Esq.

DOCUMENT NUMBER-DATE
00016 JAN-3 2012
FPSC-COMMISSION CLERK

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

IN RE: Environmental Cost
Recovery Clause

Docket No.: 110007-EI
Date: December 30, 2011

REQUEST FOR EXTENDED 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 extending confidential classification for certain portions of its April 1, 2010 Environmental Compliance Program Update for the Clean Air Interstate Rule and Clean Air Visibility Rule (the "Compliance Program"). As grounds for this request, the Company states:

1. On April 1, 2010, Gulf Power filed its Request for Confidential Classification of certain information in the Compliance Plan. (Document No. 02374-10) Specifically, Gulf Power sought confidential classification of information contained in Tables 3.1-1, 3.1-2, 3.3-1, 3.3-2, and 4.5-1 and in text on pages 13-15 (the "Confidential Information").
2. On July 2, 2010, the Commission entered an order granting Gulf Power's request. See, Order No. PSC-10-0427-CFO-EI.
3. As provided in Section 366.093(4), Florida Statutes, and by the Commission's Order, the Confidential Information will be made public after a period of 18 months unless Gulf or another affected party shows, and the Commission finds, that the information continues to qualify as proprietary confidential business information.
4. Gulf hereby requests that the Commission enter an order extending the confidential classification of portions of the Confidential Information for an additional 18-month period. Due to passage of time, some of the information previously identified as being confidential is no longer considered confidential by the Company. Consequently, Gulf is

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submitting new highlighted and redacted versions of the Compliance Plan identifying the information that remains confidential.

5. The Confidential Information is entitled to continued confidential classification for the same reasons it was initially classified. In each case, the sensitive nature of the Confidential Information remains high, despite the passage of 18 months.

6. Table 3.1-1 identifies in detail Gulf Power's projected capital expenditures, by plant and by project, associated with the Compliance Plan. 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 Plan. Similarly, Table 3.1-2 identifies in detail Gulf Power's projected operation and maintenance expenses, by plant and by project, associated with the 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 Plan.

7. Tables 3.3-1 and 3.3-2 provide the results of an economic viability study by Gulf Power of its generating assets. These tables provide unit-specific cost projections for combined cycle generation for use as coal retirement replacements. 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 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 assets.

8. Table 4.5-1 identifies Gulf Power's estimated allowance costs between 2013 and 2018. Disclosure of this information could negatively impact Gulf's ability to negotiate pricing favorable to its customers when contracting for the purchase of allowances.

9. Finally, the text on pages 13-15 of the Compliance Plan contains certain transmission cost assumptions and study results which are specific to Gulf Power's generating plants. Competitors, as well as suppliers of commodities and services, could utilize this

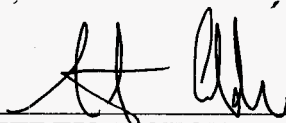
information to undermine Gulf's bargaining position in the markets. In addition, disclosure of this information could negatively impact Gulf's ability to negotiate pricing favorable to its customers in the event that Gulf determined to sell one or more of its generating assets.

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

11. Submitted as Exhibit "A" is a highlighted version of the Compliance Program. Exhibit "A" should be treated as confidential pending a ruling on this request. Attached as Exhibit "B" are two redacted 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 30th day of December, 2011.



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BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

IN RE: Environmental Cost
Recovery Clause
_____)

Docket No.: 110007-EI
Date: December 30, 2011

REQUEST FOR CONFIDENTIAL CLASSIFICATION

EXHIBIT "A"

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

EXHIBIT "B"

EXHIBIT "C"

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

<u>Line(s)/Field(s)</u>	Justification
<p>Table 3.1-1 Page 8 Columns A-I</p> <p>Table 3.1-2 Page 9 Columns A-G</p> <p>Table 3.3-1 Page 14 Confidential in its entirety</p> <p>Table 3.3-2 Page 16 Confidential in its entirety</p>	<p>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 6.</p> <p>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 7.</p>
<p>Table 4.5-1 Page 23 Columns A-F, Lines 1-3</p>	<p>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 8.</p>
<p>Page 13 Lines 1-5</p> <p>Page 14 Lines 1-2</p> <p>Page 15 Lines 1-7</p>	<p>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 9.</p>

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: **Environmental Cost
Recovery Clause**)
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)

Docket No. **110007-EI**

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a copy of the foregoing has been furnished by U.S. mail this 30th day of December, 2011 to the following:

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