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

For DN 03940-12, which
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June 15, 2012

RECEIVED-FPSC
12 JUN 18 AM 11:24
COMMISSION
CLERK

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

Re: Undocketed

Dear Ms. Cole:

Enclosed is Gulf Power Company's Request for Confidential Classification
pertaining to Gulf Power's response to Staff's First Data Request related
to smart meters.

Sincerely,

wb

COM _____
APA _____
ECR 1+CD
GCL _____
RAD _____
SRC _____
ADM _____
OPC _____
CLK 1

Enclosures

cc: Beggs & Lane
Jeffrey A. Stone, Esq.

DOCUMENT NUMBER DATE

03939 JUN 18 2012

FPSC-COMMISSION CLERK

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

IN RE: Request for Information Concerning
Smart Meters

Docket No.: Undocketed
Date: June 18, 2012

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 First Smart Meter Data Request . As grounds for this request, the Company states:

1. A portion of the information submitted by Gulf Power in response to question number three of Commission Staff's First Data Request constitutes proprietary confidential business information. Specifically, the confidential information consists of the per-meter installation cost charged by Gulf Power's contractor. This cost is the product of contractual negotiations between Gulf and its contractor. Public disclosure of this information would impair the contractor's ability to negotiate pricing with other purchasers of its services on a going-forward basis. Similarly, disclosure would harm Gulf's efforts to contract for goods and/or services on favorable terms insofar as Gulf's contractor --and other vendors in the marketplace-- may charge higher prices or refuse to do business with the Company out of concern that their pricing information will become public. Consequently, the information is entitled to confidential classification pursuant to section 366.093(3)(d) and (e), Florida Statutes.

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

3. Submitted as Exhibit "A" is one copy of Gulf's response to question number three. The confidential information has been highlighted in yellow. Exhibit "A" should be

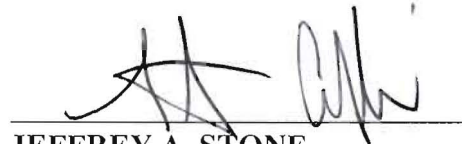
03939 JUN 18 2012

FPSC-COMMISSION CLERK

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.

Respectfully submitted this 15th day of June, 2012.



JEFFREY A. STONE

Florida Bar No. 325953

RUSSELL A. BADDERS

Florida Bar No. 007455

STEVEN R. GRIFFIN

Florida Bar No. 0627569

Beggs & Lane

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(850) 432-2451

Attorneys for Gulf Power Company

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

IN RE: Request for Information Concerning
Smart Meters
_____)

Docket No.: Undocketed
Date: June 18, 2012

REQUEST FOR CONFIDENTIAL CLASSIFICATION

EXHIBIT "A"

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

EXHIBIT "B"

REDACTED

COM _____
APA _____
ECR _____
GCL _____
RAD _____
SRC _____
ADM _____
OPC _____
CLK _____

DOCUMENT NUMBER-DATE

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FPSC-COMMISSION CLERK

A

REDACTED

Total installation time is typically 8-10 minutes per meter, but the customer only experiences an outage lasting only 5-10 seconds. For a discussion of unsafe conditions see the responses to questions 25 and 26. The vast majority of installs are performed by a contractor with pricing on a per-meter basis. Installation pricing is proprietary business information of the contractor. The installation cost is approximately [REDACTED] per meter.

4. What new tariffs or programs is the company planning to offer to customers as smart meters are installed throughout the utility service territory?

RESPONSE:

There are no new tariffs or programs that the Company is currently planning to offer, however, Gulf Power currently offers one DSM program, Energy Select, which provides residential customers the opportunity to purchase electricity at variable prices throughout the day. The availability of smart meter installations has increased the availability of this program to customers by eliminating the requirement that the customer maintain landline telephone service in order to make monthly meter readings. Gulf will continue to explore additional benefits for customers which could impact such areas as new rate offerings, customer service features and data presentment.

5. Please explain if smart meters are currently being used for purposes other than billing, outage reporting, and remote connect/disconnect? Please state the other purposes.

RESPONSE:

Yes. Other than billing and general outage reporting, the following are current uses of smart meters (or their associated alerts/data):

- a) Outage confirmation prior to dispatch of a distribution repair crew for single outage calls generated by the customer or otherwise reported.
- b) Notification of previously unknown installations of customer-based generating equipment such as photovoltaic systems.
- c) Identification of faulty or failing distribution transformers and distribution voltage regulators.
- d) Identification of electricity theft or other unauthorized tampering with the meter.
- e) Monitoring of time-synched load data for all services from an individual transformer to proactively diagnose transformer loading issues.
- f) Identification of hazardous or dangerous conditions on the distribution system, such as an improperly connected emergency generator which represents a danger to restoration crews.
- g) Confirmation of restoration activities following an extended widespread outage. (the absence of radio communication from a smart meter indicates that the work is not quite finished and repair resources can be dispatched accordingly before being released)

EXHIBIT "C"

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

Line(s)/Field(s)

Response to Question # 3

Page 3 of 15
Column A, Line 1

Justification

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