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September 24, 2013

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. 130140-EI

Enclosed for filing in the above referenced docket is Gulf Power Company's Request for Confidential Classification pertaining to certain portions of Gulf's response to Citizens' Fourth Request to Produce Documents (Nos. 74-89) and Citizens' Fourth Set of Interrogatories to Gulf Power (Nos. 116-162). Enclosed is a copy of Gulf Power's Request for Confidential Classification and Exhibit "A" which is a justification for confidential treatment of the Confidential Information in Microsoft Word format as prepared on a Windows based system. Exhibit "B" which contains a public version of the documents with the Confidential Information redacted is included on a separate DVD. A copy of the confidential documents are provided on a separate DVD labeled "Confidential."

Sincerely,

Robert L. McGee, Jr.
Robert L. McGee, Jr.

md

Enclosures

- COM
- AFD +ICD
- APA
- ECO
- ENG
- GCL
- IDM
- TEL
- CLK

cc: Beggs & Lane
Jeffrey A. Stone, Esq.
Gunster Law Firm
Charles A. Guyton, Esq.
Richard A. Melson, Esq.

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In Re: Petition for increase in rates
by Gulf Power Company

Docket No.: 130140-EI
Date: September 25, 2013

**GULF POWER COMPANY'S
REQUEST FOR CONFIDENTIAL CLASSIFICATION
AND MOTION FOR TEMPORARY PROTECTIVE ORDER**

Gulf Power Company ("Gulf Power" or "the Company"), pursuant to Section 366.093, Florida Statutes, and Rule 25-22.006, Florida Administrative Code, hereby requests confidential classification of certain documents and information produced in Response to Citizens' Fourth Request to Produce Documents to Gulf Power (Nos. 74-89) and Citizens' Fourth Interrogatories to Gulf Power (Nos. 116-162) (collectively, "OPC's Discovery"). Confidential information submitted in response to OPC's Discovery has been segregated and placed upon the enclosed DVD bearing the label "CONFIDENTIAL" ("Confidential Information"). This DVD should be treated as confidential in its entirety.

Description of the Document(s)

The Confidential Information consists of multiple Excel and PDF files produced in response to Document Request Nos. 76 and 77 and information supplied in response to Interrogatory Nos. 121, 125, 127, 128, 129, 131, 132, 134, 135, 136, 137, 138, 139, 149, 152 and 153. These documents are identified with specificity on Exhibit "A" to this Request. In support of this request, the Company states:

1. Subsection 366.093(1), Florida Statutes, provides that any records "found by the Commission to be propriety confidential business information shall be kept confidential and shall be exempt from s. 119.07(1), Florida Statutes [requiring disclosure under the Public Records

Act].” Proprietary confidential business information includes, but is not limited to “[i]nformation concerning . . . contractual data, the disclosure of which would impair the efforts of the public utility or its affiliates to contract for goods or services on favorable terms.” Subsection 366.093(3)(d), Florida Statutes. Proprietary confidential business information also includes and “[s]ecurity measures, systems or procedures.” and “[i]nformation relating to competitive interests, the disclosure of which would impair the competitive business of the provider of the information” Section 366.093(3)(c) and (e), Florida Statutes. The Confidential Information that is the subject of this request and motion falls within the statutory categories and, thus, constitutes propriety confidential business information entitled to protection under Section 366.093, Florida Statutes, and Rule 25-22.006, Florida Administrative Code.

2. Attached hereto as Exhibit "A" is a justification for confidential treatment of the Confidential Information.

3. Attached hereto as Exhibit "B" are public versions of the Document(s) with the Confidential Information redacted, unless previously filed as indicated.

4. The Confidential Information is intended to be and is treated by Gulf Power as private and, to this attorney’s knowledge, has not been publicly disclosed.

5. For the same reasons set forth herein in support of its request for confidential classification, Gulf Power also moves the Commission for entry of a temporary protective order pursuant to Rule 25-22.006(6)(c), Florida Administrative Code, protecting the Confidential Information from public disclosure.

Requested Duration of Confidential Classification

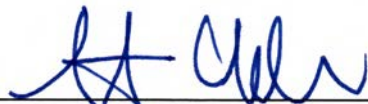
6. Gulf Power requests that the Confidential Information be treated by the Commission as confidential proprietary business information for at least the 18 month period

prescribed in Rule 25-22.006(9)(a), Florida Administrative Code. If, and to the extent that the Company is in need of confidential classification of the Confidential Information beyond the 18 month period set forth in the Commission rule, the justification and grounds for such extended confidential treatment are set forth in Exhibit "C" to this request and motion.

WHEREFORE, Gulf Power Company respectfully requests that the Confidential Information that is the subject of this request and motion be accorded confidential classification for the reasons set forth herein and for a minimum period of 18 months, subject to any request for a longer period of confidential classification as may be set forth in Exhibit "C" to this request and motion. The company further moves for the entry of a temporary protective order pursuant to Rule 25-22.006(6)(c), Florida Administrative Code, protecting the Confidential Information from public disclosure.

DATED this 24th day of September, 2013.

Respectfully submitted,



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EXHIBIT "A"

**JUSTIFICATION FOR CONFIDENTIAL TREATMENT OF
HIGHLIGHTED PORTIONS OF GULF POWER'S RESPONSES
TO OPC'S FOURTH REQUEST TO PRODUCE DOCUMENTS (NOS. 74-89) AND
FOURTH INTERROGATORIES (NOS. 116-162)**

<u>POD Request No.</u>	<u>Bates Pages or File Names</u>	<u>Detailed Description</u>	<u>Rationale</u>
76	Gulf Must-Run Requirements-CONF (1-2)	All highlighted information	(9)
77	REVENU~1	Confidential in its entirety	(1)
	Options 1-4 Cost Summary for Crist (ECO Filing input) (2 nd DR)_Updated_091213_F entirety	Confidential in its entirety	(2)
	rvrq2012 v1_AssetValuation_Gulf.xlsx	Confidential in its entirety	(3)
	rvrq2012 v1_transmission_Gulf.xlsx	Confidential in its entirety	(3)
	Crist 4-7 FT Costs.xlsx	Confidential in its entirety	(4)
	GenVal Coal Economic and Must Run\ (including sub-files)	Confidential in its entirety	(5)
	GenVal Gas Must Run\ (including sub-files)	Confidential in its entirety	(5)
	Original GenVal Gas Must Run ERROR\ (including sub-files)	Confidential in its entirety	(5)
	GenVal_2.1_B2013_11.08.12_REV_Economic Dispatch.xlsm	Confidential in its entirety	(6)
	GenVal_2.1_B2013_11.08.12_REV_MustRun.xlsm	Confidential in its entirety	(6)
	List of RR for all Smith Options_rev1_B2013_EcoFiling.xlsx	Confidential in its entirety	(7)
	GenVal Input Files\ (including sub-files)	Confidential in its entirety	(5)
	OUTPUT_Economic.xlsx	Confidential in its entirety	(5)
	OUTPUT_Smith 1and3 MustRun.xlsx	Confidential in its entirety	(5)
	OUTPUT_Smith 2 MustRun.xlsx	Confidential in its entirety	(5)
	Genval_2.1_B2013_Smith1and3MustRun.xlsm	Confidential in its entirety	(6)
	Genval_2.1_B2013_Smith2MustRun.xlsm	Confidential in its entirety	(6)
	Genval_2.1_B2013_SmithEconomic.xlsm	Confidential in its entirety	(6)
	Smith AV Model_Enviro&TransRRUpdate_rev3_B2013Final.xlsm	Confidential in its entirety	(10)
	All files beginning with "AC_Intraday_B2013 Final_ "	Confidential in its entirety	(8)

<u>ROG No.</u>	<u>Pages or File Names</u>	<u>Detailed Description</u>	<u>Rationale</u>
121	Page 2	All highlighted information	(23)
125	Page 1	All highlighted information	(13)
127	Attached Excel Spreadsheet	All highlighted information	(12)
128	Attached Excel Spreadsheet	All highlighted information	(14)
129	Page 2	All highlighted information	(11)
131	Attached Excel Spreadsheet	All highlighted information	(12)
132	Page 1	All highlighted information	(15)
134	Attached Excel Spreadsheet	All highlighted information	(13) (16)

135	Attached Excel Spreadsheet	All highlighted information	(13) (16)
136	Page 2	All highlighted information	(17)
137	Pages 1-2	All highlighted information	(17) (18)
138	Page 1	All highlighted information	(19)
139	Page 1	All highlighted information	(20)
149	Attached Excel Spreadsheet	All highlighted information	(21)
152	Attached Excel Spreadsheet	All highlighted information	(22)
153	Attached Excel Spreadsheet	All highlighted information	(22)

- (1) This file contains detailed transmission capital expenditure projections by project and revenue requirements and net present value of these costs. Disclosure of this cost 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 these compliance options. Additionally, this file contains detailed components and results of an economic viability analysis performed by Southern Company Services for Gulf Power of various options for achieving compliance with the EPA's Mercury and Air Toxics Standards (MATS) rule at Gulf Power's Plant Crist, including cost projections for four compliance alternatives including projected fuel, transmission, production and emission controls costs. 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. This information is confidential pursuant to section 366.093(3)(e), Florida Statutes.
- (2) This file contains components and results and the net present value summary of revenue requirements which are the result of an extensive economic viability analysis performed by Southern Company Services for Gulf Power of various options for achieving compliance with the EPA's Mercury and Air Toxics Standards (MATS) rule at Gulf Power's Plants Crist and Smith, using cost projections for four compliance alternatives including projected fuel, transmission, production and emission controls costs. 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. Disclosure of this cost information could also 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 these compliance options. This information is confidential pursuant to section 366.093(3)(e), Florida Statutes.
- (3) This file consists of a revenue requirement calculation tool that has been developed by the Company and reflects the Company's accumulated expertise and is the product of significant expenditures on the part of the Company. Granting competitors access to such

a tool would put the Company at a competitive disadvantage because such competitors would have access to the tool without similarly expending resources to develop such expertise. Such disclosure would also allow competitors and suppliers to tailor their proposals according to the Company's expected costs to the detriment of customers. Additionally, this tool contains normalized revenue requirement components and total projections for various capital investment types as well as affiliate financial information and evaluation methodologies. Disclosure of this cost 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 these compliance options. If the information was revealed to the public, equipment and fuel vendors could use the information to tailor proposals according to the Company's expected costs to the detriment of customers. Data contained in the file are also components of an economic viability analysis performed by Southern Company Services for Gulf Power of various options for achieving compliance with the EPA's Mercury and Air Toxics Standards (MATS) rule at Gulf Power's Plant Crist and Plant Smith. 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. This information is confidential pursuant to section 366.093(3)(e), Florida Statutes.

- (4) This file contains projected natural gas firm transportation costs, annual revenue requirements and net present value of these costs. Disclosure of this cost information could negatively impact Gulf's ability to negotiate pricing favorable to its customers when contracting with vendors of goods and services needed by Gulf. Additionally, this file contains detailed components and preliminary results of an economic viability analysis performed by Southern Company Services for Gulf Power of various options for achieving compliance with the EPA's Mercury and Air Toxics Standards (MATS) rule at Gulf Power's Plant Crist, including cost projections for four compliance alternatives including projected fuel, transmission, production and emission controls costs. 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. This information is confidential pursuant to section 366.093(3)(e), Florida Statutes.
- (5) This file contains projections of fuel costs, emissions costs, unit operating costs and characteristics and energy value and operating profile outputs for all nine scenarios across various Plant Crist and Smith MATS compliance options. 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 these compliance options. 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. Additionally, with regard to emissions and fuel data and the developed scenarios, these pricing scenarios were developed by Gulf, the Southern Company, and their consultant, Charles Rivers Associates, using an extensive

proprietary modeling analysis. These forecasts are based on non-public data, were developed at significant cost to the Company, and are considered proprietary by Gulf Power, the Southern Company, and their consultant. This information reveals key inputs into the Company's decision-making process and is subject to extensive efforts to maintain its secrecy. Only select Company personnel with a "need to know" are granted access. Public disclosure of this information would enable competitors to access and utilize Gulf's forecasts without incurring costs to obtain similar information, thus bestowing an economic advantage upon such competitors at the cost of Gulf and its customers. Additionally, public disclosure of this information would enable vendors of commodities and services to tailor their pricing proposals to the Company's projections, resulting in higher costs for the Company and its customers. For example, if prospective fuel suppliers have access to such information, those suppliers will view the forecasted prices as the lower limit of what Gulf expects to pay and will offer to supply fuel at higher prices. Finally, the base forecast underlying the subject information is used in developing future generation strategies for Gulf. Generation wholesalers, power marketers or other competitors could utilize this information to tailor proposals with the intention of pricing products that could undermine the Company's market position. This information derives economic value from not being generally known to, and being readily ascertainable by proper means to, other persons who can obtain economic value from its disclosure or use. This information is confidential pursuant to section 366.093(3)(e), Florida Statutes.

- (6) This file consists of a complex production cost analysis model that has been developed by the Southern Company through the expenditure of significant resources and reflects certain accumulated expertise of the Southern Company and thus has significant economic value to the Company and to others who could utilize the model for planning purposes. The model produces a key component of the economic viability analysis performed by Southern Company Services for Gulf Power of various options for achieving compliance with the EPA's Mercury and Air Toxics Standards (MATS) rule at Gulf Power's Plant Crist, including production cost impact projections for four compliance alternatives based on inputs of fuel costs, emissions costs, unit operating costs and characteristics Southern Company hourly avoided commitment and energy costs and outputs of unit operation profiles and production cost projections. 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. The information derives economic value from not being generally known to and not being readily ascertainable by proper means by other persons who can obtain economic value from its disclosure or use. Specifically, if the information was revealed to the public, equipment and fuel vendors could use the information to tailor proposals according to the Company's expected costs to the detriment of customers. Gulf's ability to negotiate the optimum price and contract terms and conditions would be undermined if competitors and suppliers had access to the projections and analysis contained in the information. Also, a generation wholesaler, power marketer, or other competitor could use the information to tailor proposals with the intention of pricing products that could undermine the Company's market position. Access to the information would also bestow

an unfair economic advantage on the Company's competitors and potential vendors who would thus have insight into possible future generation resource decisions of the Company. The Company's competitors are not required to disclose similar information and to require the Company to do so would put it an economic disadvantage.

Also contained within this version of the model (excluding GenVal economic dispatch files) are specific must run requirement details for Plants Smith and/or Plant Crist. This information is considered Critical Energy Infrastructure Information by Gulf. Disclosure of this non-public information could pose a security risk to Gulf's system and to the bulk electric system as a whole whether through cyber-attack, physical attack or some combination thereof. The information is confidential pursuant to section 366.093(3)(c) and (e), Florida Statutes.

- (7) This file contains Plant Smith must run costs, preliminary environmental capital costs, projected revenue requirements and net present values of those costs as well as projected transmission capital expenditures by project, revenue requirements and net present value of those costs for various MATS compliance options. The file also contains annual capacity price forecasts and Plant Smith capacity values from preliminary stages of the analysis. Disclosure of this cost 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 these compliance options. Additionally, 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. This information is confidential pursuant to section 366.093(3)(e), Florida Statutes.
- (8) These files contain highly sensitive forward looking system avoided cost data. This information derives economic value from not being generally known to, and being readily ascertainable by proper means to, other persons who can obtain economic value from its disclosure or use. This information is considered proprietary by Gulf Power and the Southern Company. This information reveals key inputs into the Company's decision-making process and is subject to extensive efforts to maintain its secrecy. Only select Company personnel with a "need to know" are granted access. Public disclosure of this information would enable competitors to access and utilize Gulf's forecasts without incurring costs to obtain similar information, thus bestowing an economic advantage upon such competitors at the cost of Gulf and its customers. Additionally, public disclosure of this information would enable vendors of commodities and services to tailor their pricing proposals to the Company's projections, resulting in higher costs for the Company and its customers. For example, if prospective fuel or wholesale power suppliers have access to such information, those suppliers will view the forecasted prices as the lower limit of what Gulf expects to pay for fuel or power and will offer to supply those commodities at higher prices. Finally, the subject information is used in developing future generation strategies for Gulf. Generation wholesalers, power marketers or other competitors could utilize this information to tailor proposals with the intention of pricing products that could undermine the Company's market position. This

information derives economic value from not being generally known to, and being readily ascertainable by proper means to, other persons who can obtain economic value from its disclosure or use. This information is confidential pursuant to section 366.093(3)(e), Florida Statutes.

- (9) This file contains discussion of system reliability risks and requirements at Plants Crist and Smith. This information is considered Critical Energy Infrastructure Information by Gulf. Disclosure of this non-public information could pose a security risk to Gulf's system and to the bulk electric system as a whole whether through cyber-attack, physical attack or some combination thereof. This information is confidential pursuant to section 366.093(3)(c), Florida Statutes.
- (10) This file consists of an asset valuation modeling tool that has been developed by the Company and reflects the Company's accumulated expertise and is the product of significant expenditures on the part of the Company. Granting competitors access to such a tool would put the Company at a competitive disadvantage because such competitors would have access to the tool without similarly expending resources to develop such expertise. Such disclosure would also allow competitors and suppliers to tailor their proposals according to the Company's expected costs to the detriment of customers. Contained in this file are detailed production, VOM, environmental equipment, and maintenance costs, revenue requirements, transmission costs, capacity price forecasts and a preliminary economic viability analysis for the MATS options, including early stages of an inconclusive Smith retirement analysis. Disclosure of this cost 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 these compliance options. 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. This information is confidential pursuant to section 366.093(3)(e), Florida Statutes.
- (11) These tables identify in detail Gulf Power's projected annual and net present value revenue requirements for environmental equipment for Plant Crist, by unit and by project, associated with the Compliance Program. Disclosure of this cost 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 these compliance options. This information is confidential pursuant to section 366.093(3)(e), Florida Statutes.
- (12) Contains projected capital expenditures by project, the projected revenue requirements and net present value of costs for those projects. Disclosure of this cost 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 these

compliance options. This information is confidential pursuant to section 366.093(3)(e), Florida Statutes.

- (13) Contains tables depicting projected natural gas and CO2 pricing under nine different scenarios. These pricing scenarios were developed by Gulf, the Southern Company, and their consultant, Charles Rivers Associates, using an extensive proprietary modeling analysis. These forecasts are based on non-public data, were developed at significant cost to the Company, and are considered proprietary by Gulf Power, the Southern Company, and their consultant. This information reveals key inputs into the Company's decision-making process and is subject to extensive efforts to maintain its secrecy. Only select Company personnel with a "need to know" are granted access. Public disclosure of this information would enable competitors to access and utilize Gulf's forecasts without incurring costs to obtain similar information, thus bestowing an economic advantage upon such competitors at the cost of Gulf and its customers. Additionally, public disclosure of this information would enable vendors of commodities and services to tailor their pricing proposals to the Company's projections, resulting in higher costs for the Company and its customers. For example, if prospective fuel suppliers have access to such information, those suppliers will view the forecasted prices as the lower limit of what Gulf expects to pay and will offer to supply fuel at higher prices. Finally, the subject information is used in developing future generation strategies for Gulf. Generation wholesalers, power marketers or other competitors could utilize this information to tailor proposals with the intention of pricing products that could undermine the Company's market position. This information derives economic value from not being generally known to, and being readily ascertainable by proper means to, other persons who can obtain economic value from its disclosure or use. This information is confidential pursuant to section 366.093(3)(e), Florida Statutes.
- (14) Contains key components of an economic viability analysis of various options for achieving compliance with the EPA's Mercury and Air Toxics Standards (MATS) rule at Gulf Power's Plant Crist. This file provides annual cost projections, revenue requirements, and net present value of fuel and must run production costs for three of the four compliance alternatives for Plant Crist. 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. This information is confidential pursuant to section 366.093(3)(e), Florida Statutes.
- (15) Contains key components of an economic viability analysis of various options for achieving compliance with the EPA's Mercury and Air Toxics Standards (MATS) rule at Gulf Power's Plant Smith. This table provides annual must run production cost projections for one of the two compliance options for Plant Smith. 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. This information is confidential pursuant to section 366.093(3)(e), Florida Statutes.

- (16) Contains results of an economic viability analysis of various options for achieving compliance with the EPA's Mercury and Air Toxics Standards (MATS) rule at Gulf Power's Plant Crist. 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. This information is confidential pursuant to section 366.093(3)(e), Florida Statutes.
- (17) Contains discussion of system reliability risks and requirements at Plant Crist. This information is considered Critical Energy Infrastructure Information by Gulf. Disclosure of this non-public information could pose a security risk to Gulf's system and to the bulk electric system as a whole whether through cyber-attack, physical attack, or some combination thereof. This information is confidential pursuant to section 366.093(3)(e), Florida Statutes.
- (18) Contains MWh differences of projected operation of Plant Crist across various options for achieving compliance with the EPA's Mercury and Air Toxics Standards (MATS) rule which are the result of an extensive production cost model analysis effort. 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. This information is confidential pursuant to section 366.093(3)(e), Florida Statutes.
- (19) These tables identify in detail Gulf Power's projected operation and maintenance expenses for sorbent additives, by plant and by project, associated with the Compliance Program. Disclosure of this cost 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 these compliance options. This information is confidential pursuant to section 366.093(3)(e), Florida Statutes.
- (20) Contains the forecasted delivered price of premium low sulfur/low chloride coal used in the Smith 1-2 MATS analysis. 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. This information is confidential pursuant to section 366.093(3)(e), Florida Statutes.

- (21) Contains annual system commitment and energy value across nine scenarios of operating Plant Crist and Plant Smith under various options for achieving compliance with the EPA's Mercury and Air Toxics Standards (MATS) rule which are the result of an extensive production cost model and economic viability analysis effort. 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. This information is confidential pursuant to section 366.093(3)(e), Florida Statutes.
- (22) The information identified on the listed pages/files contains confidential employee compensation data, including positions and corresponding salaries. Public disclosure of this information could provide Gulf's competitors with an advantage in acquiring and obtaining qualified employees, increase Gulf's employee turnover and associated training costs, and give existing and prospective employees an advantage in negotiating compensation packages, leading to increases in the overall amount paid to employees. This information is confidential pursuant to section 366.093(3)(e), Florida Statutes. See Florida Power & Light v. Florida Public Service Commission, 31 So.3d 860 (Fla. 1st DCA 2010). This information is confidential pursuant to section 366.093(3)(e), Florida Statutes.
- (23) Contains Gulf's current long-term base case natural gas and/or coal price forecasts. These forecasts are based on non-public data, were developed at significant cost to the Company, and are considered proprietary by Gulf Power, the Southern Company, and their consultant. This information reveals key inputs into the Company's decision-making process and is subject to extensive efforts to maintain its secrecy. Only select Company personnel with a "need to know" are granted access. Public disclosure of this information would enable competitors to access and utilize Gulf's forecasts without incurring costs to obtain similar information, thus bestowing an economic advantage upon such competitors at the cost of Gulf and its customers. Additionally, public disclosure of this information would enable vendors of commodities and services to tailor their pricing proposals to the Company's projections, resulting in higher costs for the Company and its customers. For example, if prospective fuel suppliers have access to such information, those suppliers will view the forecasted prices as the lower limit of what Gulf expects to pay and will offer to supply fuel at higher prices. Finally, the subject information is used in developing future generation strategies for Gulf. Generation wholesalers, power marketers or other competitors could utilize this information to tailor proposals with the intention of pricing products that could undermine the Company's market position. This information derives economic value from not being generally known to, and being readily ascertainable by proper means to, other persons who can obtain economic value from its disclosure or use. This information is confidential pursuant to section 366.093(3)(e), Florida Statutes.

EXHIBIT "B"

PUBLIC VERSION(S) OF THE DOCUMENT(S)

Attached hereto (unless previously filed as may be noted below) are two public versions of the Document(s) with the Confidential Information redacted.

Public Version(s) of the Document(s) attached X

Public Version(s) of the Document(s) previously filed on _____

EXHIBIT "C"

REQUESTED DURATION OF CONFIDENTIAL CLASSIFICATION

Gulf Power requests that the Confidential Information that is the subject of this request be treated as proprietary confidential business information exempt from the Public Records Law for a minimum of 18 months from the date of the order granting such classification. To the extent the company needs confidential protection of the Confidential Information for a period longer than 18 months, the company's justification therefor is set forth below:

n/a

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

IN RE: Petition for Increase in Rates)
By Gulf Power Company)
)

Docket No.: 130140-EI

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true copy of the foregoing has been furnished by overnight mail this 24th day of September, 2013:

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