

**Shawna Senko**

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**From:** Darnes, Melissa Ann <MADARNES@SOUTHERNCO.COM>  
**Sent:** Wednesday, September 25, 2013 4:53 PM  
**To:** Filings@psc.state.fl.us  
**Cc:** 'Cyoung@fpuc.com' (Cyoung@fpuc.com); 'jbrew@bbrslaw.com' (jbrew@bbrslaw.com); john.burnett@duke-energy.com; 'John.Butler@fpl.com' (John.Butler@fpl.com); 'ken.Hoffman@fpl.com' (ken.Hoffman@fpl.com); 'jbeasley@ausley.com' (jbeasley@ausley.com); 'bkeating@gunster.com' (bkeating@gunster.com); 'Christensen.patty@leg.state.fl.us' (Christensen.patty@leg.state.fl.us); jmoyle@moylelaw.com; 'Regdept@tecoenergy.com' (Regdept@tecoenergy.com); Martha Barrera; 'schef@gbwlegal.com' (schef@gbwlegal.com); jlavvia@gbwlegal.com; Julia Gilcher; Theresa Farley; Stone, Jeff A.; Griffin, Steven R. (Beggs & Lane); Badders, Russell A. (Beggs & Lane)  
**Subject:** Gulf Power Company's Request for Extended Confidential Classification; Docket No. 130001-EI  
**Attachments:** Request for Extended Conf Class\_2011 Fuel & Capacity Audit.docx; 9.25.13 Req for Ext Conf Classification - Fuel & capacity audit.pdf

A. s/Robert L. McGee

Gulf Power Company

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B. Docket No. 130001-EI

C. Gulf Power Company

D. Document consists of 5 pages.

E. The attached document is Gulf Power Company's Request for Extended Confidential Classification of Commission Staff's Fuel & Capacity audit work papers. Also attached is Gulf Power Company's Request in Microsoft Word format.

Melissa Darnes

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Stay connected with Gulf Power



BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

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

Docket No.: 130001-EI  
Date: September 25, 2013

**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 documents produced by Gulf Power in connection with a review of Gulf Power’s 2010 fuel and capacity expenditures in Docket No. 110001-EI (ACN 11-006-1-2 & ACN 11-006-1-1) (the “Review”). As grounds for this request, the Company states:

1. On June 29, 2011, Gulf Power filed a request for confidential classification of certain information submitted by Gulf pursuant to the Review (the “Original Request”). (Document No. 04474-11). The subject information is contained within Document Nos. 04475-11, 03957-11 and 03959-11 (the “Confidential Information”).
2. On March 29, 2012, the Commission entered Order No. PSC-12-0155-CFO-EI granting Gulf’s Original Request.
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 Confidential Information continues to constitute proprietary confidential business information. The 18-month extension period expires on September 29, 2013.
4. Gulf hereby requests that the Commission enter an order extending the confidential classification of the Confidential Information for an additional 18-month period.

5. The Confidential Information is entitled to continued confidential classification for the same reasons that it was initially classified. As stated in Gulf's Original Request, a portion of the information submitted by Gulf Power in connection with the Review constitutes proprietary confidential business information concerning bids and other contractual data, the disclosure of which would impair the efforts of Gulf Power to contract for goods and services on favorable terms. The information is entitled to confidential classification pursuant to section 366.093(3)(d) and (e), Florida Statutes. Specifically, the Confidential Information consists of pricing and bank routing information for fuel, energy and capacity purchases between Gulf Power and various counterparties. Contracts forming the basis for this pricing data are still in effect. This information is regarded by both Gulf and the counterparties as confidential. The pricing, which resulted from negotiations with Gulf and the counterparties, is specific to individual contracts and is not publicly known. Disclosure of this information would negatively impact Gulf's ability to negotiate pricing favorable to its customers in future contracts. In addition, potential counterparties may refuse to enter into contracts with Gulf, or may charge higher prices, if the price terms were made public. The bank routing information consists of private account numbers for various counterparties. Disclosure of this information would impair the parties' ability to protect themselves from fraudulent actions and could subject Gulf to potential litigation over the wrongful disclosure of private information. The information is entitled to confidential classification pursuant to section 366.093(3)(e), Florida Statutes.

6. 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.

**WHEREFORE**, Gulf Power Company respectfully requests that the Commission enter an order extending confidential classification of the Confidential Information for an additional 18-month period.

Respectfully submitted this 25<sup>th</sup> day of September, 2013.

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**JEFFREY A. STONE**

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September 25, 2013

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

RE: Docket No. 130001-EI

Dear Ms. Cole:

Enclosed is Gulf Power Company's Request for Extended Confidential Classification regarding certain information submitted by Gulf Power in connection with Commission Staff's audit in the above referenced docket (ACN 11-006-1-2 & ACN11-006-1-1).

Regards,

A handwritten signature in black ink that reads "Robert L. McGee, Jr." The signature is written in a cursive, flowing style.

Robert L. McGee, Jr.  
Regulatory and Pricing Manager

md

Enclosures

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

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

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

Docket No.: 130001-EI

Date: September 25, 2013

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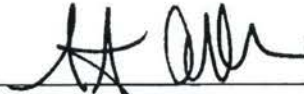
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Respectfully submitted this 25<sup>th</sup> day of September, 2013.



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BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

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

Docket No.: **130001-EI**

**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that a true copy of the foregoing was furnished by electronic mail this 25th day of September, 2013 to the following:

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