

Shawna Senko

From: Darnes, Melissa Ann <MADARNES@SOUTHERNCO.COM>
Sent: Friday, May 09, 2014 10:45 AM
To: Filings@psc.state.fl.us
Subject: Gulf Power Company's Request for Extended Confidential Classification - Customer Payment Arrangement Programs; Docket No. 120200-EI
Attachments: 5.9.14 Req for Ext Conf Class Customer Pymt Arr Programs.pdf; Request for Extended Confidential Classification.doc

A. s/Robert L. McGee

Gulf Power Company

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B. Docket No. 120200-EI

C. Gulf Power Company

D. Document consists of 4 pages.

E. The attached document is Gulf Power Company's Request for Extended Confidential Classification – Customer Payment Arrangement Programs.

Melissa Darnes

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Stay connected with Gulf Power



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May 9, 2014

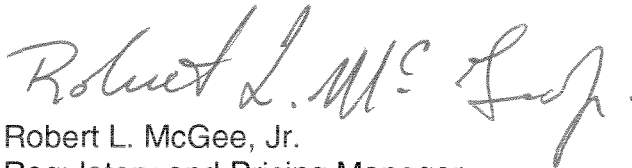
Ms. Carlotta Stauffer, Commission Clerk
Florida Public Service Commission
2540 Shumard Oak Boulevard
Tallahassee, FL 32399-0850

RE: Docket No.: 120200 - EI

Dear Ms. Stauffer:

Attached for official filing is Gulf Power Company's Request for Extended Confidential Classification pertaining to portions of the Commission's Review of Customer Payment Arrangement Programs. Also attached is Gulf's Request for Extended Confidential Classification in Microsoft Word format.

Sincerely,


Robert L. McGee, Jr.
Regulatory and Pricing Manager

md

Attachments

cc: Beggs and Lane
Jeffrey A. Stone, Esq

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

IN RE: Review of Investor-Owned Utilities'
Payment Arrangement Programs
_____)

Docket No.: 120200-EI
Date: May 9, 2014

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 information contained in Commission Staff's workpapers generated during an audit of Gulf's customer payment arrangement programs. As grounds for this request, the Company states:

1. On September 19, 2012, Gulf Power filed a request for confidential classification of certain information contained in Commission Staff's workpapers generated during an audit of Gulf's customer payment arrangement programs. (Document No. 06291-12)

2. On November 15, 2012, the Commission entered Order No. PSC-12-0610-CFO-EI granting Gulf's request for confidential classification.

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 comprise proprietary confidential business information. The 18-month extension period expires on May 25, 2014.

4. Gulf hereby requests that the Commission enter an order extending the confidential classification of the information highlighted on Exhibit "A" of Gulf's original

request and identified in line/by line format on Exhibit “C” of Gulf’s original request for an additional 18-month period.

5. The information highlighted on Exhibit “A” to Gulf’s original request is entitled to continued confidential classification for the same reasons that it was initially classified. As stated in Gulf’s original request, Staff’s workpapers provide details on Gulf’s internal policies and procedures concerning late payment arrangements. Among other things, these procedures outline the maximum timeframes for which payments may be extended and the criteria which the Company will use in determining whether late payment arrangements will be made. While Gulf continually works in good faith with all of its customers who are experiencing difficulties paying their bills, the Company must also work to ensure that its payment arrangement process is not abused. Public disclosure of the criteria used in determining whether customers qualify for late payment arrangements and the maximum periods of time for which payments may be extended would enable customers to abuse or “game” the system, resulting in unnecessary delays in bill payment and increased delinquencies and write-offs. Delinquencies and write-offs adversely affect the financial integrity of the Company and ultimately work to the detriment of Gulf’s general body of customers.

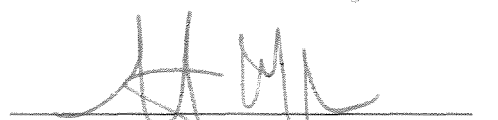
Staff’s workpapers also detail recommendations for process improvements within Gulf’s Interactive Voice Response Unit (“IVRU”). These recommendations are the product of a confidential review of Gulf’s IVRU performed by IVR Doctors –a paid consultant. Public disclosure of this information will provide Gulf’s competitors with access to valuable recommendations for which they have not paid. Gulf’s competitors could, in turn, utilize this information to optimize their own practices at Gulf Power’s expense. Consequently, the subject

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 protecting the information highlighted on Exhibit "A" from public disclosure as proprietary confidential business information.

Respectfully submitted this 9th day of May, 2014.



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