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COMMISSION
CLERK



May 20, 2014

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

RE: Docket No. 140001-EI

Dear Ms. Stauffer:

Enclosed is Gulf Power Company's Request for Confidential Classification regarding certain information submitted by Gulf Power in connection with Commission Staff's audit in the above referenced docket (ACN14-027-1-1). Also enclosed is a CD containing Gulf's Request for Confidential Classification as well as Exhibit C in Microsoft Word as prepared on a Windows based computer.

Regards,

Robert L. McGee, Jr.
Regulatory and Pricing Manager

md

Enclosures

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

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AFD + ICD _____
APA _____
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BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

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

Docket No.: 140001-EI
Date: May 21, 2014

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 this request that the Florida Public Service Commission enter an order protecting from public disclosure certain documents produced by Gulf Power in connection with a review of Gulf Power’s 2013 fuel and purchased power transactions in the above-referenced docket (ACN 14-027-1-1) (the “Review”). As grounds for this request, the Company states:

1. 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.¹ The information is entitled to confidential classification pursuant to section 366.093(3)(d) and (e), Florida Statutes. Specifically, the confidential information relates to pricing data for negotiated purchase power agreements, coal, oil and natural gas transportation/storage. This pricing data is the product of contractual negotiations between Gulf and various counterparties. This information is specific to individual contracts and is regarded by both Gulf and the counterparties as confidential. Disclosure of this information would negatively impact Gulf’s ability to negotiate pricing favorable to its customers in future

¹ The confidential materials addressed in this request represent a subset of Commission Staff’s audit working papers. Pages containing confidential information are identified in Exhibit “C” of this request. Any pages not identified on Exhibit “C” are not considered confidential by the Company.

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.

2. In addition, a portion of the confidential information includes customer-specific data and pricing under confidential Contract Services Arrangements (“CSAs”) which were executed under the authority of Gulf’s Commercial/Industrial Service Rider (“CISR”). According to Gulf’s Retail Tariff, the terms of these CSAs are confidential. Public disclosure of this information would impair the ability of Gulf Power Company to negotiate terms and conditions in future CSAs that are the most favorable to Gulf and its general body of customers. The information is regarded as sensitive and confidential by the CISR customers because its public disclosure would impact the customers’ ability to compete in their native markets. In the event such information is made public, future potential CISR customers may avoid the risk of public disclosure of their confidential information by refusing to negotiate with Gulf Power. This may lead to uneconomic bypass of Gulf’s facilities. Thus, the Company requests that this information be granted confidential classification pursuant to Section 366.093(3)(d)-(e), Florida Statutes.

3. Finally, a portion of the confidential information includes copies of commercial/industrial customer billing statements reflecting account-specific information such as account numbers, customer names and energy consumption. The disclosure of this information could allow other customers to gain a competitive advantage over the identified customers by analyzing such data. As such, public disclosure of the information contained on these pages would adversely affect the competitive interests of the listed accounts and their ability to contract for goods and services on favorable terms. This information is competitively sensitive and confidential pursuant to section 366.093(3)(e), Florida Statutes.

4. 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.

5. Submitted as Exhibit "A" are copies of the subject documents, on which are highlighted the information for which confidential classification is requested. Exhibit "A" should be 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 20th day of May, 2014.



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EXHIBIT "A"

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