

Gulf Power Company
500 Bayfront Parkway
Post Office Box 1151
Pensacola, FL 32520-0751
Telephone 904 444-6231

**ORIGINAL
FILE COPY**

Susan D. Cranmer
Assistant Secretary and
Assistant Treasurer

The southern electric system

January 8, 1997

Ms. Blanca S. Bayo, Director
Division of Records and Reporting
Florida Public Service Commission
2540 Shumard Oak Boulevard
Tallahassee FL 32399-0870

Dear Ms. Bayo:

RE: Docket No. 960835-EI
Request for Confidential Classification
The Southern Company and Southern Communications Services, Inc.
Certificate of Notification - File Nos. 70-8233

Enclosed for filing in the matter referred to above is the Request for Confidential Classification by Gulf Power Company. This request covers information for the period ending September 30, 1996.

ACK _____ If you or your staff have any questions regarding this filing, please contact me.

AFA _____

APP _____ Please mark the enclosed extra copy of this letter with the date and time the material was
CAF _____ accepted in your office for filing and return same to the undersigned.

CMU _____ Sincerely,

CTR _____
EAG _____ *Susan D. Cranmer*

LEG _____
LIN _____ lw

OPC _____ Enclosure

ROH _____
SEC _____ cc: Beggs and Lane
WAS _____ Russell A. Badders, Esquire

OTH _____

RECEIVED & FILED

CS

FPSC-BUREAU OF RECORDS

"Our business is customer satisfaction"

DOCUMENT NUMBER-DATE

00210 JAN-95

FPSC-RECORDS/REPORTING

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

FILE COPY

IN RE: The Southern Company and
Southern Communications Services,
Inc., Certificate of Notification
File No. 70-8233 for the period ending
September 30, 1996

Docket No.: 960835-EI
Filed: January 9, 1997

REQUEST FOR CONFIDENTIAL CLASSIFICATION

The Southern Company and Southern Communications Services, Inc., ("the Companies"), by and through their undersigned attorney 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, hereafter the Certificate, hereby submitted to the Florida Public Service Commission pursuant to the Securities and Exchange Commission Rule 53(a)(4), C.F.R. §250.53(a)(4). As grounds for this request, the Companies state:

1. The Companies hereby submit to the Florida Public Service Commission the Certificate as required by Securities and Exchange Commission Rule 53(a)(4), C.F.R. §250.53(a)(4).
2. The Companies claim that the information contained in the Certificate is entitled to confidential classification pursuant to §366.093(3)(e), Florida Statutes, as information, the public disclosure of which would cause irreparable harm to the competitive interests of the Companies. The Certificate contains proprietary and commercially sensitive information that is not otherwise publicly available.

DOCUMENT NUMBER-DATE

00210 JAN-96

FPSC-RECORDS/REPORTING

3. The Public disclosure of the financial information and the business planning information contained in the Certificate would cause irreparable harm to the Companies ability to compete in the increasingly competitive telecommunications market. The public disclosure of the financial information would allow the competitors of the Companies to have access to information about the financial stability and resources of the Companies. Such information would permit those competitors to determine which markets the Companies are capable of entering into and the extent of their ability to develop new markets and projects. Public disclosure of information about the Companies finances and the ability to obtain financing would unfairly permit the competitors of the Companies to determine the business plans and resource allocation of the Companies. Such information is proprietary and extremely commercially sensitive in the competitive markets in which the Companies operate. Thus, the Companies request that this information be granted confidential classification pursuant to Section 366.093(3)(e), Florida Statutes.

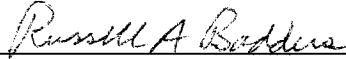
4. Submitted as Exhibit "A" is a copy of the Certificate, on which is highlighted the information for which confidential classification is requested. Exhibit "A" should be treated as confidential pending a ruling on this request. Attached as Exhibit "B" are two (2) edited copies of the Certificate, which may be made available for public review and inspection. Attached as Exhibit "C" to this request is a line-by-line justification for the request for confidential classification.

5. The material for which confidential classification is requested is intended to be, and is treated as, confidential by the Companies and has not been otherwise publicly disclosed.

WHEREFORE, the Southern Company and Southern Communications Services, Inc. respectfully requests that the Commission enter an order protecting the information highlighted on Exhibit "A" from public disclosure as proprietary confidential business information.

Dated this 8th day of January, 1997.

Respectfully submitted,



RUSSELL A. BADDERS

Florida Bar No. 7455

Beggs & Lane

Post Office Box 12950

Pensacola, Florida 32576-2950

(904) 432-2451

Attorney for The Southern Company
and Southern Communications Services, Inc.

EXHIBIT "B"

Southern Company Services, Inc.
64 Perimeter Center East
Atlanta, Georgia 30346-6401
Telephone (770) 821-3574

Wayne Boston
Assistant Comptroller
and Assistant Secretary



**FREEDOM OF INFORMATION ACT
CONFIDENTIAL TREATMENT REQUESTED**

November 14, 1996

Securities and Exchange Commission
Washington, DC 20549

Re: *The Southern Company and
Southern Communications Services, Inc.
Certificate of Notification - File No. 70-8233
Request for Confidential Treatment*

Ladies and Gentlemen:

Pursuant to Rule 104 under the Public Utility Holding Company Act of 1935, as amended, The Southern Company (SOUTHERN), a registered holding company, and Southern Communications Services, Inc. (SOUTHERN COMMUNICATIONS), hereby request confidential treatment of the attached certificate of notification for the quarter ended September 30, 1996. This certificate contains information which is proprietary and competitively sensitive. The public disclosure thereof would materially harm SOUTHERN and SOUTHERN COMMUNICATIONS.

As permitted by Rule 101(c)(1) of the General Rules and Regulations for Electronic Filings, 17 CFR 232.101(c)(1) the aforementioned confidential information is filed herewith in paper format only.

SOUTHERN hereby requests a hearing before any part thereof is made public to third parties requesting its disclosure.

Yours very truly,



Wayne Boston
WB/or

Enclosures

cc: Freedom of Information Act Officer (w/enc.)
Robert Wason, Chief Financial Analyst (w/enc.)

CERTIFICATE OF NOTIFICATION

CONFIDENTIAL

filed by

SOUTHERN COMMUNICATIONS SERVICES, INC.

Pursuant to order of the Securities and Exchange Commission dated December 30, 1994, in the matter of File No. 70-8233.

Southern Communications Services, Inc. (Southern Communications), pursuant to Rule 24, hereby provides the following information as required by the above-mentioned order:

CONFIDENTIAL

Requested Response to IV.3:

1 A. A statement of revenues, distinguishing and setting forth non-associate revenues and
2 revenues derived from each associate company for the year-to-date period ended
3 September 30, 1996.

4 REVENUES:

CONFIDENTIAL

5 [REDACTED]
6 [REDACTED]
7 [REDACTED]

8 B. The price charged to associates for each type of service rendered to associates.

9 [REDACTED]
10 [REDACTED]
11 [REDACTED]
12 [REDACTED]
13 [REDACTED]

14 C. A statement as to whether the prices charged to associates were based upon market or cost.

15 [REDACTED]
16 [REDACTED]

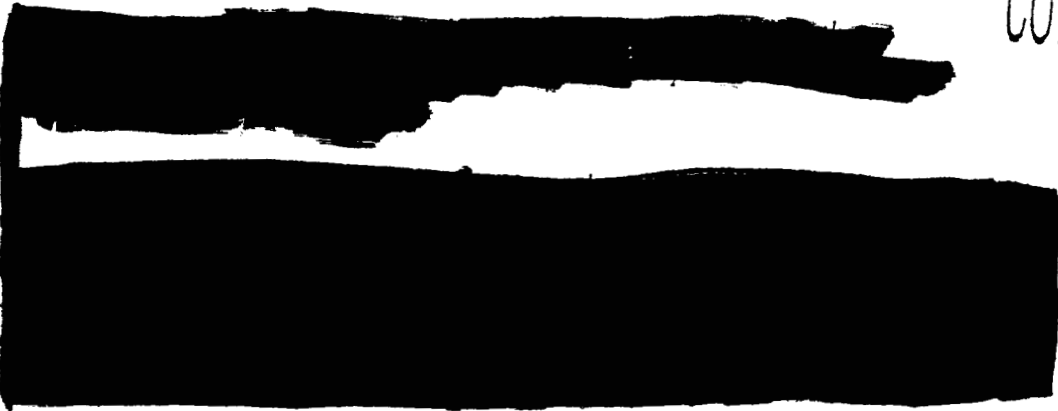
17 D. An explanation of how the market or cost pricing utilized was derived.

CONFIDENTIAL

18 [REDACTED]
19 [REDACTED]
20 [REDACTED]
21 [REDACTED]
22 [REDACTED]
23 [REDACTED]

CONFIDENTIAL

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SIGNATURE

Pursuant to the requirements of the Public Utility Holding Company Act of 1935, the undersigned company has duly caused this certificate to be signed on its behalf by the undersigned thereunto duly authorized.

Dated: November 14, 1996

SOUTHERN COMMUNICATIONS SERVICES, INC.

By: *R Craig Elder*
R. Craig Elder
Vice President & Treasurer

Southern Company Services, Inc.
64 Perimeter Center East
Atlanta, Georgia 30346-6401
Telephone (770) 821-3574



Southern Company Services
a subsidiary of The Southern Company

Wayne Boston
Assistant Comptroller
and Assistant Secretary

**FREEDOM OF INFORMATION ACT
CONFIDENTIAL TREATMENT REQUESTED**

November 14, 1996

Securities and Exchange Commission
Washington, DC 20549

Re: *The Southern Company and
Southern Communications Services, Inc.
Certificate of Notification - File No. 70-8233
Request for Confidential Treatment*

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SOUTHERN hereby requests a hearing before any part thereof is made public to third parties requesting its disclosure.

Yours very truly,

Wayne Boston
WB/or

Enclosures

cc: Freedom of Information Act Officer (w/enc.)
Robert Wason, Chief Financial Analyst (w/enc.)

CERTIFICATE OF NOTIFICATION

CONFIDENTIAL

filed by

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2 revenues derived from each associate company for the year-to-date period ended
3 September 30, 1996.

4 REVENUES:

5 [REDACTED]
6 [REDACTED]
7 [REDACTED]

CONFIDENTIAL

8 B. The price charged to associates for each type of service rendered to associates.

9 [REDACTED]
10 [REDACTED]
11 [REDACTED]
12 [REDACTED]
13 [REDACTED]

14 C. A statement as to whether the prices charged to associates were based upon market or cost.

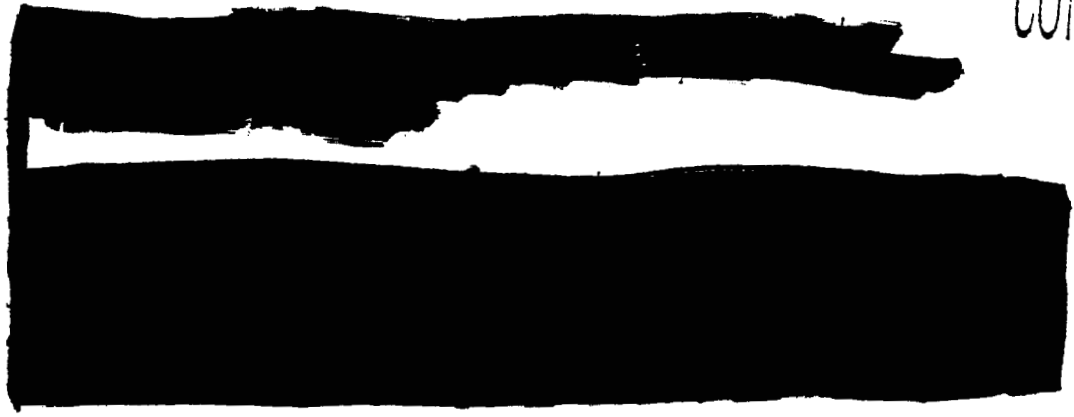
15 [REDACTED]
16 [REDACTED]

17 D. An explanation of how the market or cost pricing utilized was derived.

18 [REDACTED]
19 [REDACTED]
20 [REDACTED]
21 [REDACTED]
22 [REDACTED]
23 [REDACTED]

CONFIDENTIAL

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SIGNATURE

Pursuant to the requirements of the Public Utility Holding Company Act of 1935, the undersigned company has duly caused this certificate to be signed on its behalf by the undersigned thereunto duly authorized.

Dated: November 14, 1996

SOUTHERN COMMUNICATIONS SERVICES, INC.

By: R Craig Elder
R. Craig Elder
Vice President & Treasurer

EXHIBIT "C"

Line-by-Line Justification

Page/ line:	Column:	Justification:
Page 2 Lines: 5-7, 9-12, 15-16, 18-23	N/A	The information identified as confidential by Southern Communications Services, Inc., is intended to be and is treated by Southern Communications as private in that the disclosure of the information would impair Southern Communication's competitive interests. <u>See</u> Fla. Stat. § 366.093(3)(e). The information provided in the specified lines includes financial information about Southern Communication's operations. This information is proprietary and competitively sensitive in that it reveals Southern Communications economic viability and its financial ability to enter into the various aspects of the telecommunication markets. Moreover, the telecommunication market is increasingly competitive and this information could be utilized by Southern Communication's competitors to determine Southern Communication's market strength and whether or not it is financially able to pursue new markets and technologies.
Page 3 Lines: 1-10	N/A	The information identified as confidential by Southern Communications Services, Inc., is intended to be and is treated by Southern Communications as private in that the disclosure of the information would impair Southern Communication's competitive interests. <u>See</u> Fla. Stat. § 366.093(3)(e). The information provided in the specified lines includes financial information about Southern Communication's operations. This information is proprietary and competitively sensitive in that it reveals Southern Communications economic viability and its financial ability to enter into the various aspects of the telecommunication markets. Moreover, the telecommunication market is increasingly competitive and this information could be utilized by Southern Communication's competitors to determine Southern Communication's market strength and whether or not it is financially able to pursue new markets and technologies.

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

IN RE: The Southern Company and Southern)
Communications Services, Inc. Certificate of)
Notification File No. 70-8233 for the period)
ending September 30, 1996)
_____)

Docket No. 960835-EI

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing was furnished without exhibit "A" by U.S. Mail on the 8th day of January, 1997 on the following:

Cindy Miller, Esquire
Florida Public Service Commission
2540 Shumard Oak Blvd.
Tallahassee FL 32399-0863

Jack Shreve, Esquire
Office of Public Counsel
c/o The Florida Legislature
111 W. Madison St., Room 812
Tallahassee FL 32399-1400



RUSSELL A. BADDERS
Florida Bar No. 0007455
Beggs & Lane
P.O. Box 12950
Pensacola FL 32576
904 432-2451
Attorneys for The Southern Company