

One Energy Place
Pensacola, Florida 32520

Tel 850 444 6000



January 5, 1998

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

971668-EI

Dear Ms. Bayo:

RE: Florida Public Service Commission Review of Electric Service Quality and Reliability

Enclosed for official filing are an original and fifteen copies of Gulf Power Company's Request for Confidential Classification in the above referenced undocketed audit.

Sincerely,

A handwritten signature in cursive script that reads "Linda G. Malone".

Linda G. Malone
Assistant Secretary and Assistant Treasurer

lw

Enclosure

cc: Beggs and Lane
Jeffrey A. Stone, Esquire
Gulf Power Company
Susan D. Cranmer

DOCUMENT NUMBER-DATE

00144 JAN-6 88

FPSC-RECORDS/REPORTING

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

IN RE: Florida Public Service Commission
Review of Electric Service Quality and
Reliability

Docket No.: Undocketed Audit
Date: January 5, 1998

REQUEST FOR CONFIDENTIAL CLASSIFICATION

GULF POWER COMPANY ["Gulf Power", "Gulf", or "the Company"] and the Southern Company, 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 information obtained by the Commission Staff in its review of Gulf Power Company's electric service quality and reliability. A review of distribution service quality and reliability of Florida's four major electric companies, including Gulf Power, was conducted by the Commission Staff. In this review, Gulf provided extensive information about the service quality and reliability of Gulf Power and the Southern Company to the Commission Staff. Certain of this information is regarded as confidential by Gulf Power and the Southern Company. As grounds for this request, Gulf Power Company and the Southern Company state:

1. Gulf Power and the Southern Company assert that certain of the information provided to the Commission Staff during its audit of Gulf Power Company's electric service quality and reliability is entitled to confidential classification pursuant to §366.093(3)(c), Florida Statutes, as information, the public disclosure of which would cause irreparable harm to the competitive interests of Gulf Power and the Southern Company.

DOCUMENT NUMBER-DATE

00144 JAN-5 88

FPSC-RECORDS/REPORTING

2. Information was provided to the Commission Staff in the form of responses to document requests and in interviews between the Commission Staff and employees of Gulf Power. The Commission Staff has prepared a report, hereafter the Report, based on the information it obtained from Gulf Power. The public disclosure of certain portions of the Report and the information provided in the document responses and interviews would cause irreparable harm to the competitive interests of Gulf Power and the Southern Company. The information for which confidential classification is sought discusses the strengths and weaknesses of Gulf Power and the Southern Company in the area of distribution quality and reliability. This information could be used by other energy providers to compete with Gulf Power and the Southern Company.

3. This request covers only the information contained in the Report. A similar request will be made regarding the work papers and document request responses once that information has been reviewed. The submission of a request for confidential classification for the work papers and document request responses is the subject of a request for extension of time.

4. Submitted as Exhibit "A" is a copy of the portions of the Report, 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 Report, 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 Gulf Power Company and the Southern Company and has not been otherwise publicly disclosed.

WHEREFORE, Gulf Power Company and the Southern Company respectfully request that the Commission enter an order protecting the information highlighted on Exhibit "A" from public disclosure as proprietary confidential business information..

Respectfully submitted this 5th day of January 1998,



JEFFREY A. STONE
Florida Bar No. 325953
RUSSELL A. BADDERS
Florida Bar No. 007455
Beggs & Lane
P. O. Box 12950
(700 Blount Building)
Pensacola, FL 32576-2950
(850) 432-2451
Attorneys for Gulf Power Company

EXHIBIT "C"
Line-by-Line Justification

Page(s)/Line(s)

Page 101
Lines 26 - 32 and 34 - 37 and 39 - 43

Page 102
Lines 1 - 8

Justification

Gulf Power and the Southern Company asserts that this information 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 Gulf Power and the Southern Company. The information for which confidential classification is sought discusses the strengths and weaknesses of Gulf Power and the Southern Company in the area of distribution quality and reliability. This information could be used by other energy providers to compete with Gulf Power and the Southern Company. Knowledge of an entity's strengths and weaknesses would allow a competitor to target its efforts to maximize its competitive position. The potential competitors of Gulf Power and the Southern Company do not disclose such information which places Gulf Power and the Southern Company at a distinct disadvantage. Thus the public disclosure of this information would harm the competitive interests of Gulf Power as well as of the Southern Company and give an unfair advantage to energy service providers who seek to compete with either company. Gulf Power and the Southern Company regard this information to be confidential and competitively sensitive. No public disclosure of this information has been made.