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ORIGINAL



January 20, 1998

~~97116A-PT~~

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: 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,

Warren E. Tate
Secretary and Treasurer

lw

Enclosure

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

RECEIVED & FILED

AC
FPSC-BUREAU OF RECORDS

DOCUMENT NUMBER-DATE

~~01129~~ JAN 21 88

FPSC-RECORDS/REPORTING

ORIGINAL

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 20, 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)(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.

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01123 JAN 21 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. Submitted as Exhibit "A" are copies of the Staff work papers and Gulf Power Company's responses to Staff audit requests, on which is highlighted the information for which confidential classification is requested. In instances where confidential classification is sought for an entire report, study or document, a cover sheet indicating such accompanies the document and a line-by-line highlighting is not provided. Exhibit "A" should be treated as confidential pending a ruling on this request. Attached as Exhibit "B" are two (2) edited copies of the information for which confidential classification is sought, which may be made available for public review and inspection. A cover page indicating that confidential classification is sought for an entire report, study or document is substituted for the two (2) edited copies where applicable. Attached as Exhibit "C" to this request is a line-by-line/field-by-field 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 identified on Exhibit "A" from public disclosure as proprietary confidential business information.

Respectfully submitted this 20th day of January 1998,



JEFFREY A. STONE
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Attorneys for Gulf Power Company

EXHIBIT "C"

Justification

**The justification for confidential classification will be done by audit request number and audit response number with each audit response being individually numbered within the response beginning with page 1. Line-by-line justification will be made where possible, however, where the information for which confidential classification is sought contains tables and/or graphs with accompanying text, a field-by field justification will be performed. A field will be in many instances an entire page or document.

<u>Audit Request Number</u> <u>Page(s)/Line(s)</u>	<u>Justification</u>
ESQ-1 Item 6 Pages 2 - 6 (includes all tables and accompanying text)	Gulf Power and the Southern Company assert 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 maintenance. 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 allows a competitor to target its efforts to maximize its competitive position versus Gulf Power Company and the Southern Company. 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.

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Justification

ESQ-1
Item 26
Pages 1 - 190 (includes all
tables and accompanying
text)

Item 28

Pages 1 - 2 in their
entirety

Gulf Power and the Southern Company assert 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 are the actual survey instruments utilized in customer satisfaction surveys during the last five years by Gulf Power. The survey instruments are proprietary and confidential to both the survey organization who conducted the survey and to Gulf Power Company. The design and presentation of the survey documents as well as the results from the survey indicate what areas are important to Gulf Power and its customers. The survey instruments can be utilized by a competitor to determine what areas Gulf Power views as important to customer satisfaction. The survey instruments are a proprietary tool used to develop information on the strengths and weaknesses of Gulf Power and the Southern Company in the area of distribution reliability and service quality relative to other energy service providers. A competitor could utilize the survey design to gather information for its own operations and thereby benefit from Gulf Power's survey design without expending the costs of developing a survey. A competitor could utilize the information to garner a superior competitive position relative to Gulf Power Company and the Southern Company. 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.

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ESQ-1

Item 27

Pages 1 the table
including all rows and
columns

Justification

Gulf Power and the Southern Company assert 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 customer satisfaction with Gulf Power over the last five years. 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, especially customer satisfaction trends, would allow a competitor to target its efforts to maximize its competitive position versus Gulf Power Company and the Southern Company. 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

Audit Request Number

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ESQ-2

Item 1

Pages 1 - 181 (includes all tables and accompanying text)

Item 2

Page 2 Rows 0-6,
Columns AA-N

Item 3

Page 2 Rows 1-9
Columns A-O

Item 4

Page 2 Rows 1-8
Columns A-O

Justification

Gulf Power and the Southern Company assert 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 Gulf Power's research and solutions to improve system reliability and efficiency. The solutions it has found and implemented to become more efficient and competitive in the area of distribution reliability and efficiency are detailed within the charts graphs and accompanying text of these documents. 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, including issues dealing with system reliability and efficiency, would allow a competitor to target its efforts to maximize its competitive position versus Gulf Power Company and the Southern Company. Additionally, a competitor could utilize the experiences and solutions formulated by Gulf Power to make its product more efficient and reliable thereby placing itself in a superior competitive position relative to Gulf Power Company and the Southern Company. 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. Gulf Power Company and the Southern Company generated this information for internal use at significant expenditure of resources and placing this in the public domain would be giving the competitors of Gulf Power Company and the Southern Company the benefit of the study efforts without expenditure of any resources. 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.

Audit Request Number

Page(s)/Line(s) _____

ESQ-2

Item 7

Pages (includes all tables
and accompanying text)

Justification

Gulf Power and the Southern Company assert 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 is the property of Southern Company. The two volumes contain detailed information about maintenance of substations that was developed for internal use on the Southern Company system. The details and specifications were developed based on experience and research within the Southern Company. The methods and specifications were developed in part to increase efficiency of the Southern Company in a competitive environment. This information could be used by other energy providers to compete with Gulf Power and the Southern Company. A competitor could utilize the experiences and solutions formulated by Southern Company to make its operations more efficient and reliable thereby placing itself in a superior competitive position relative to Gulf Power Company and the Southern Company. 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.

Audit Request Number	Justification
<u>Page(s)/Line(s)</u> ESQ-2 Item 28 Page 2 Lines 1-12 Column B	<p>Gulf Power and the Southern Company assert 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 Gulf Power's efforts to centralize its Distribution Control Center to maximize the use of its resources. The information has specific details about staffing utilization and resource allocation. These details along with the solutions Gulf Power has found and implemented to become more efficient and competitive in this area could be used by other energy providers to compete with Gulf Power and the Southern Company. A competitor could utilize the experiences and solutions formulated by Gulf Power to make its operations more economic and efficient thereby placing itself in a superior competitive position relative to Gulf Power Company and the Southern Company. 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.</p>
13, 15, 17, 19-20, 24-25 Column A-B	
14, 16, 22, 25-29 Column B	
Page 7 Lines 1-24	
Page 8-11 All lines of each page	
13-23 All lines of each page [Detailed staffing and resource usage from survey obtained by permission from survey respondents. Information may be proprietary to the survey respondents.]	

Audit Request Number**Page(s)/Line(s)**

ESQ-3

Item 1**Attachment 5**

Pages 1 - 50 (includes all tables and accompanying text)

Justification

Gulf Power and the Southern Company assert 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, 1996 System Benchmark Study: Gulf Power, discusses the strengths and weaknesses of Gulf Power and the Southern Company in the area of distribution reliability and service quality relative to other energy service providers. Specific details regarding research design, survey design, objective formulation and the results of the study are contained in this report. 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 versus Gulf Power Company and the Southern Company. A competitor could utilize this information to garner a superior competitive position relative to Gulf Power Company and the Southern Company. 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.

Audit Request Number**Page(s)/Line(s)**

ESQ-3

Item 1

Attachment 1A

Pages 1 - 8 (includes all tables and accompanying text)

Attachment 2B

Pages 1 - 8 (includes all tables and accompanying text)

Item 2

Attachment 2A

Pages 1 - 8 (includes all tables and accompanying text)

Justification

Gulf Power and the Southern Company assert 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 are the actual survey instruments utilized in the 1996 and 1997 system benchmark studies by Gulf Power. The survey instrument are proprietary and confidential to both the survey organization who conducted the survey and to Gulf Power Company. The design and presentation of the survey documents as well as the results from the survey indicate what areas are important to Gulf Power and its customers. The survey instruments are a proprietary tool used to develop information on the strengths and weaknesses of Gulf Power and the Southern Company in the area of distribution reliability and service quality relative to other energy service providers. A competitor could utilize the survey design to gather information for its own operations and thereby benefit from Gulf Power's survey design without expending the costs of developing a survey. A competitor could utilize this information to garner a superior competitive position relative to Gulf Power Company and the Southern Company. 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.

Audit Request Number**Page(s)/Line(s)**

ESQ-5

Item 1

Pages 1 - 3, the tables
including all rows and
columns

Justification

Gulf Power and the Southern Company assert 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 are the results of customer satisfaction surveys. 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, especially customer satisfaction trends, would allow a competitor to target its efforts to maximize its competitive position versus Gulf Power Company and the Southern Company. 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

Staff Work Papers

Page(s)/Line(s)

Page 35
paragraph No. 5, all
except last sentence

Page No. 38
paragraph 4, all

Page 60
paragraph 3, all

Page 61
paragraph 3, all

Page 63
paragraph 4, all

Page 64
paragraph 4, all

Justification

Gulf Power and the Southern Company assert 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, 1996 System Benchmark Study: Gulf Power, discusses the strengths and weaknesses of Gulf Power and the Southern Company in the area of distribution reliability and service quality relative to other energy service providers. Specific details regarding research design, survey design, objective formulation and the results of the study are contained in this report. 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 versus Gulf Power Company and the Southern Company. A competitor could utilize this information to garner a superior competitive position relative to Gulf Power Company and the Southern Company. 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.

Staff Work Papers

Page(s)/Line(s)

Pages 55 - 56

Justification

Gulf Power and the Southern Company assert that this information is entitled to confidential classification pursuant to §366.093(3)(d), Florida Statutes, as information, the public disclosure of which would impair the efforts of Gulf Power and the Southern Company to contract for similar services on favorable terms in the future. The information for which confidential classification is sought discusses contractual terms, including price, reached between Gulf Power Company and its provider of tree trimming services. Public disclosure of contractual terms, such as price, may lead to price convergence in the market for tree trimming service. This may have a detrimental economic impact on the ratepayers of Gulf Power 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