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Pensacola, Florida 32520

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ORIGINAL



February 19, 1998

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

960789-EI

Dear Ms. Bayo:

Re: Gulf Power Company Commercial/Industrial Service Rider ("CISR") Audit Report

Enclosed are an original and fifteen copies of the Gulf Power Company's Request for Confidential Classification.

Sincerely,

Susan D. Cranmer

- ACK _____ Susan D. Cranmer
- AFA _____ Assistant Secretary and Assistant Treasurer
- APP _____
- CAF _____ lw
- CMU _____ Enclosures
- CTR _____
- EAG _____ cc: Beggs and Lane
- LEG _____ Jeffrey A. Stone, Esquire
- LIN _____
- OPC _____
- RCH _____
- SEC _____
- WAS _____
- OTH _____

RECEIVED & FILED
[Signature]
FPSC BUREAU OF RECORDS

DOCUMENT NUMBER-DATE

02444 FEB 20 1998

FPSC-RECORDS/REPORTING

IN RE: Gulf Power Company
Commercial/Industrial Service Rider
("CISR") Audit Report

Docket No.: Undocketed Audit
Date: February 20, 1998

REQUEST FOR CONFIDENTIAL CLASSIFICATION

GULF POWER COMPANY ["Gulf Power", "Gulf", or "the Company"], by and through its 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 portions of the Commission Staff's work papers associated with Gulf Power Company's Commercial/Industrial Service Rider Audit Report, hereafter also referred to as the CIS Rider Audit Report. As grounds for this request, Gulf Power Company states:

1. The Florida Public Service Commission Staff audited Gulf Power Company's activities with regard to Gulf Power Company's Commercial/Industrial Service Rider. During this audit, Gulf Power Company provided detailed information to the Commission Staff about the contracts entered into by Gulf Power pursuant to the Commercial/Industrial Service Rider. Gulf Power asserts that portions of the information provided during the audit 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 entity with whom it has negotiated a CSA contract under the CIS rider approved in Order No. PSC-96-1219-FOF-EI. The information provided to and retained by the Commission Staff contains proprietary and commercially sensitive information that is not otherwise publicly available. The information for which Gulf Power is requesting confidential treatment is

DOCUMENT NUMBER-DATE

02444 FEB 20 98

FPSC-RECORDS/REPORTING

, contained in the Commission Staff's work papers.

2. The public disclosure of certain portions of the information provided to and retained by the Commission Staff would cause irreparable harm to Gulf Power Company and the entity with whom it has entered a CSA contract. The information contains proprietary confidential business information regarding contractual terms and pricing. 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. Moreover, the public disclosure of this information may prevent Gulf from successfully negotiating CSAs with customers. The information is regarded as sensitive and confidential by the CIS rider customer 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 CIS rider 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)(e), Florida Statutes.


3. Submitted as Exhibit "A" is a copy of audit work papers, 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 Commission Staff work papers, 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.

4. The material for which confidential classification is requested is intended to be, and is treated as, confidential by Gulf Power Company and the entity with whom it has entered a CSA

, contract and 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 19 th day of February 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"

Working Paper Standard Index No.	Field/Document Identification	Justification
2; pages 10-14	Surveillance Report Supplements for the Months June through October 1997	Each of these documents is the subject of a Florida Public Service Commission Order granting to it confidential classification. These documents should be handled pursuant to those Commission orders.
7C; Page: Lead Lines: 11-14, 16-18	CISR Implementation Plan	This information is entitled to confidential classification pursuant to Section 366.093(3)(e). This information is proprietary confidential business information regarding contractual terms, including the names with whom Gulf has entered into a contractual relationship. 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. Moreover, the public disclosure of this information may prevent Gulf from successfully negotiating CSAs with customers. The information is regarded as sensitive and confidential by the CIS rider customer 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 CIS rider 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.
Page: 1 Lines: 1-8	CSA Contracts	

10; Item 3 Document Request No. 3
Page 2
Lines 1-7, 9-15, 17-18
Page 4
ALL
Pages 5
Lines 1-4

This information is entitled to confidential classification pursuant to Section 366.093(3)(e). This information is proprietary confidential business information regarding contractual terms and customer specific information. 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. Moreover, the public disclosure of this information may prevent Gulf from successfully negotiating CSAs with customers. The customer specific information is regarded as sensitive and confidential by the CIS rider customer 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 CIS rider 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.

10; Item 4 CISR Contract 1
Pages 1 - 28

This information is entitled to confidential classification pursuant to Section 366.093(3)(e). This information is proprietary confidential business information regarding contractual terms and pricing. 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 result of public disclosure of the pricing information would be price convergence in future CSAs. Moreover, the public disclosure of this information may prevent Gulf from successfully negotiating CSAs with customers. The information is regarded as sensitive and confidential by the CIS rider customer 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 CIS rider 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.

10; Item 4
Pages 1 -
225

CISR
Contract 2

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41;
Page A
Lines 4-24

CISR
Lead Schedule

Page B
Lines 1-18

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41-1
Lines 1-20
Columns
A-M

Net Revenue
Calculation

This information is entitled to confidential classification pursuant to Section 366.093(3)(e). This information is proprietary confidential business information regarding contractual terms and pricing. 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 result of public disclosure of the pricing information would be price convergence in future CSAs. Moreover, the public disclosure of this information may prevent Gulf from successfully negotiating CSAs with customers. The information is regarded as sensitive and confidential by the CIS rider customer 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 CIS rider 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.

41-1-1
Lines 1-20
Columns
A-P

Net Revenue
Calculation

This information is entitled to confidential classification pursuant to Section 366.093(3)(e). This information is proprietary confidential business information regarding contractual terms and pricing. 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 result of public disclosure of the pricing information would be price convergence in future CSAs. Moreover, the public disclosure of this information may prevent Gulf from successfully negotiating CSAs with customers. The information is regarded as sensitive and confidential by the CIS rider customer 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 CIS rider 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.

41-2 FPSC Summary This information is entitled to confidential classification
Lines 1-20 Response on pursuant to Section 366.093(3)(e). This information is
CSA no. 1 proprietary confidential business information regarding
contractual terms and pricing. 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 result of public disclosure of the pricing information
would be price convergence in future CSAs. Moreover, the
public disclosure of this information may prevent Gulf from
successfully negotiating CSAs with customers. The
information is regarded as sensitive and confidential by the
CIS rider customer 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 CIS rider 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.

41-4 Revenue This information is entitled to confidential classification
Page 41-4.0 Variance pursuant to Section 366.093(3)(e). This information is
Lines 1-11 Schedule proprietary confidential business information regarding
Columns A- contractual terms and pricing. Public disclosure of this
D 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 result of public disclosure of the pricing information
would be price convergence in future CSAs. Moreover, the
public disclosure of this information may prevent Gulf from
successfully negotiating CSAs with customers. The
information is regarded as sensitive and confidential by the
CIS rider customer 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 CIS rider 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.

Page 41-4.1
Lines 1-11
Columns A-
D

Page 41-4.2
Lines 1-11
Columns A-
D

Page 41-4.3
Lines 1-11
Columns A-
D

Page 41-4.4
Lines 1-11
Columns A-
D

<p>41-5</p> <p>Title of Schedule</p> <p>Line 2</p> <p>Line 3-8 Columns A-H</p> <p>Line 9 Column H</p> <p>Lines 10-12</p>	<p>Schedule</p>	<p>This information is entitled to confidential classification pursuant to Section 366.093(3)(e). The title of this document as well as the information within the document contains contractual terms and customer information. This information is proprietary confidential business information regarding contractual terms and pricing. 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 result of public disclosure of the pricing information would be price convergence in future CSAs. Moreover, the public disclosure of this information may prevent Gulf from successfully negotiating CSAs with customers. The information is regarded as sensitive and confidential by the CIS rider customer 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 CIS rider 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.</p>
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<p>41-8</p> <p>Lines 1-5 Columns B-C</p>	<p>Kilowatt Hour Schedule</p>	<p>This information is entitled to confidential classification pursuant to Section 366.093(3)(e). This information is proprietary confidential business information regarding contractual terms and customer specific information. 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. Moreover, the public disclosure of this information may prevent Gulf from successfully negotiating CSAs with customers. The customer specific information is regarded as sensitive and confidential by the CIS rider customer 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 CIS rider 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.</p>
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•	41-20.1 thru 41-20.6	Billing Statement	<p>This information is entitled to confidential classification pursuant to Section 366.093(3)(e). This information is the actual customer bill to one of the CIS rider customers. This information is proprietary confidential business information regarding contractual terms and specific customer information, including the name of the customer with whom a CSA was signed. 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. Moreover, the public disclosure of this information may prevent Gulf from successfully negotiating CSAs with customers. The customer specific information is regarded as sensitive and confidential by the CIS rider customer 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 CIS rider 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.</p>
	ALL		
	Title of Schedule		
	41-20-1	Billing Statement for October	<p>This information is entitled to confidential classification pursuant to Section 366.093(3)(e). This information is the actual customer bill to one of the CIS rider customers. This information is proprietary confidential business information regarding contractual terms and specific customer information, including the name of the customer with whom a CSA was signed. 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. Moreover, the public disclosure of this information may prevent Gulf from successfully negotiating CSAs with customers. The customer specific information is regarded as sensitive and confidential by the CIS rider customer 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 CIS rider 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.</p>
	ALL		
	Title of Schedule		

• 41-30.1 thru Clause
41-30.16 Revenue
6/97 thru 9/97
ALL

This information is entitled to confidential classification pursuant to Section 366.093(3)(e). Public disclosure of line item CISR would permit a competitor to calculate the pricing terms of the CSA and the customers energy usage. This information is proprietary confidential business information as it relates to contractual terms and pricing. 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 result of public disclosure of the pricing information would be price convergence in future CSAs. Moreover, the public disclosure of this information may prevent Gulf from successfully negotiating CSAs with customers. The customer specific information is regarded as sensitive and confidential by the CIS rider customer 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 CIS rider 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.

41-30-1.1 Clause
thru 41-30- Revenue
1.4 10/97
ALL

This information is entitled to confidential classification pursuant to Section 366.093(3)(e). Public disclosure of line items CISR(1) and CISR (2) would permit a competitor to calculate the pricing terms of the CSAs and the customer energy usage. This information is proprietary confidential business information as it relates to contractual terms and pricing. 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 result of public disclosure of the pricing information would be price convergence in future CSAs. Moreover, the public disclosure of this information may prevent Gulf from successfully negotiating CSAs with customers. The customer specific information is regarded as sensitive and confidential by the CIS rider customer 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 CIS rider 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.

<p>10; Item 5 Page 10-5 Item Description</p> <p>Page 10-5.1 Item Description</p> <p>Page 10-5.2 Lines 1-12</p>	<p>Document Request No. 5</p>	<p>This information is entitled to confidential classification pursuant to Section 366.093(3)(e). The item description and the response thereto contain customer specific and CSA specific information. This information is proprietary confidential business information regarding contractual terms and pricing. 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 result of public disclosure of the pricing information would be price convergence in future CSAs. Moreover, the public disclosure of this information may prevent Gulf from successfully negotiating CSAs with customers. The information is regarded as sensitive and confidential by the CIS rider customer 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 CIS rider 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.</p>
<p>10; Item 6 Page 10-6 Item Description</p> <p>Page 10-6.1 Item Description</p> <p>Page 10-6.2 Lines 1-18</p> <p>Page 10-6.3 Lines 1- 4</p> <p>Lines 5 - 17 Columns A - G</p> <p>Lines 18-19</p>	<p>Document Request No. 6</p>	<p>This information is entitled to confidential classification pursuant to Section 366.093(3)(e). The item description and the response thereto contain customer specific and CSA specific information. This information is proprietary confidential business information regarding contractual terms and pricing. 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 result of public disclosure of the pricing information would be price convergence in future CSAs. Moreover, the public disclosure of this information may prevent Gulf from successfully negotiating CSAs with customers. The information is regarded as sensitive and confidential by the CIS rider customer 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 CIS rider 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.</p>

<p>10; Item 7 Page 10-7 Item Description</p> <p>Page 10-7.1 Item Description</p> <p>Page 10-7.2 Lines 1-9</p>	<p>Document Request No. 7</p>	<p>This information is entitled to confidential classification pursuant to Section 366.093(3)(e). The item description and the response thereto contain customer specific and CSA specific information. This information is proprietary confidential business information regarding contractual terms and pricing. 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 result of public disclosure of the pricing information would be price convergence in future CSAs. Moreover, the public disclosure of this information may prevent Gulf from successfully negotiating CSAs with customers. The information is regarded as sensitive and confidential by the CIS rider customer 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 CIS rider 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.</p>
<p>10; Item 8 Page 10-8.2 Lines 4-10</p>	<p>Document Request No. 8</p>	<p>This information is entitled to confidential classification pursuant to Section 366.093(3)(e). This information is proprietary confidential business information regarding contractual terms and pricing. 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 result of public disclosure of the pricing information would be price convergence in future CSAs. Moreover, the public disclosure of this information may prevent Gulf from successfully negotiating CSAs with customers. The information is regarded as sensitive and confidential by the CIS rider customer 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 CIS rider 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.</p>

EXHIBIT "C"

Working Paper Standard Index No.	<u>Field/Document Identification</u>	<u>Justification</u>
2; pages 10-14	Surveillance Report Supplements for the Months June through October 1997	Each of these documents is the subject of a Florida Public Service Commission Order granting to it confidential classification. These documents should be handled pursuant to those Commission orders.
7C; Page: Lead Lines: 11-14, 16-18	CISR Implementation Plan	This information is entitled to confidential classification pursuant to Section 366.093(3)(e). This information is proprietary confidential business information regarding contractual terms, including the names with whom Gulf has entered into a contractual relationship. 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. Moreover, the public disclosure of this information may prevent Gulf from successfully negotiating CSAs with customers. The information is regarded as sensitive and confidential by the CIS rider customer 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 CIS rider 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.
Page: 1 Lines: 1-8	CSA Contracts	

10; Item 3

Document
Request No. 3

Page 2
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18

Page 4
ALL

Pages 5
Lines 1-4

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10; Item 4
Pages 1 -
28

CISR
Contract 1

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10; Item 4
Pages 1 -
225

CISR
Contract 2

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41;
Page A
Lines 4-24

Page B
Lines 1-18

CISR
Lead Schedule

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41-1
Lines 1-20
Columns
A-M

Net Revenue
Calculation

This information is entitled to confidential classification pursuant to Section 366.093(3)(e). This information is proprietary confidential business information regarding contractual terms and pricing. 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 result of public disclosure of the pricing information would be price convergence in future CSAs. Moreover, the public disclosure of this information may prevent Gulf from successfully negotiating CSAs with customers. The information is regarded as sensitive and confidential by the CIS rider customer 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 CIS rider 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.

41-1-1
Lines 1-20
Columns
A-P

Net Revenue
Calculation

This information is entitled to confidential classification pursuant to Section 366.093(3)(e). This information is proprietary confidential business information regarding contractual terms and pricing. 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 result of public disclosure of the pricing information would be price convergence in future CSAs. Moreover, the public disclosure of this information may prevent Gulf from successfully negotiating CSAs with customers. The information is regarded as sensitive and confidential by the CIS rider customer 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 CIS rider 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.

41-2
Lines 1-20

FPSC Summary
Response on
CSA no. 1

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41-4
Page 41-4.0
Lines 1-11
Columns A-
D

Revenue
Variance
Schedule

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Columns A-
D

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Lines 1-11
Columns A-
D

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Lines 1-11
Columns A-
D

41-5 Schedule

Title of
Schedule

Line 2

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Line 9
Column H

Lines 10-
12

This information is entitled to confidential classification pursuant to Section 366.093(3)(e). The title of this document as well as the information within the document contains contractual terms and customer information. This information is proprietary confidential business information regarding contractual terms and pricing. 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 result of public disclosure of the pricing information would be price convergence in future CSAs. Moreover, the public disclosure of this information may prevent Gulf from successfully negotiating CSAs with customers. The information is regarded as sensitive and confidential by the CIS rider customer 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 CIS rider 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.

41-8 Kilowatt Hour
Lines 1-5 Schedule
Columns B-
C

This information is entitled to confidential classification pursuant to Section 366.093(3)(e). This information is proprietary confidential business information regarding contractual terms and customer specific information. 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. Moreover, the public disclosure of this information may prevent Gulf from successfully negotiating CSAs with customers. The customer specific information is regarded as sensitive and confidential by the CIS rider customer 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 CIS rider 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.

41-20.1 thru 41-20.6 Billing Statement

ALL

Title of Schedule

This information is entitled to confidential classification pursuant to Section 366.093(3)(e). This information is the actual customer bill to one of the CIS rider customers. This information is proprietary confidential business information regarding contractual terms and specific customer information, including the name of the customer with whom a CSA was signed. 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. Moreover, the public disclosure of this information may prevent Gulf from successfully negotiating CSAs with customers. The customer specific information is regarded as sensitive and confidential by the CIS rider customer 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 CIS rider 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.

41-20-1 Billing Statement for October

ALL

Title of Schedule

This information is entitled to confidential classification pursuant to Section 366.093(3)(e). This information is the actual customer bill to one of the CIS rider customers. This information is proprietary confidential business information regarding contractual terms and specific customer information, including the name of the customer with whom a CSA was signed. 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. Moreover, the public disclosure of this information may prevent Gulf from successfully negotiating CSAs with customers. The customer specific information is regarded as sensitive and confidential by the CIS rider customer 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 CIS rider 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.

41-30.1 thru
41-30.16
ALL

Clause
Revenue
6/97 thru 9/97

This information is entitled to confidential classification pursuant to Section 366.093(3)(e). Public disclosure of line item CISR would permit a competitor to calculate the pricing terms of the CSA and the customers energy usage. This information is proprietary confidential business information as it relates to contractual terms and pricing. 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 result of public disclosure of the pricing information would be price convergence in future CSAs. Moreover, the public disclosure of this information may prevent Gulf from successfully negotiating CSAs with customers. The customer specific information is regarded as sensitive and confidential by the CIS rider customer 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 CIS rider 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.

41-30-1.1
thru 41-30-
1.4
ALL

Clause
Revenue
10/97

This information is entitled to confidential classification pursuant to Section 366.093(3)(e). Public disclosure of line items CISR(1) and CISR (2) would permit a competitor to calculate the pricing terms of the CSAs and the customer energy usage. This information is proprietary confidential business information as it relates to contractual terms and pricing. 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 result of public disclosure of the pricing information would be price convergence in future CSAs. Moreover, the public disclosure of this information may prevent Gulf from successfully negotiating CSAs with customers. The customer specific information is regarded as sensitive and confidential by the CIS rider customer 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 CIS rider 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.

10; Item 5 Document Request No. 5
Page 10-5 Item Description
Page 10-5.1 Item Description
Page 10-5.2 Lines 1-12

This information is entitled to confidential classification pursuant to Section 366.093(3)(e). The item description and the response thereto contain customer specific and CSA specific information. This information is proprietary confidential business information regarding contractual terms and pricing. 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 result of public disclosure of the pricing information would be price convergence in future CSAs. Moreover, the public disclosure of this information may prevent Gulf from successfully negotiating CSAs with customers. The information is regarded as sensitive and confidential by the CIS rider customer 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 CIS rider 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.

10; Item 6 Document Request No. 6
Page 10-6 Item Description
Page 10-6.1 Item Description
Page 10-6.2 Lines 1-18
Page 10-6.3 Lines 1- 4
Lines 5 - 17 Columns A - G
Lines 18-19

This information is entitled to confidential classification pursuant to Section 366.093(3)(e). The item description and the response thereto contain customer specific and CSA specific information. This information is proprietary confidential business information regarding contractual terms and pricing. 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 result of public disclosure of the pricing information would be price convergence in future CSAs. Moreover, the public disclosure of this information may prevent Gulf from successfully negotiating CSAs with customers. The information is regarded as sensitive and confidential by the CIS rider customer 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 CIS rider 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.

10; Item 7 Document
Page 10-7 Request No. 7
Item
Description
Page 10-7.1
Item
Description
Page 10-7.2
Lines 1-9

This information is entitled to confidential classification pursuant to Section 366.093(3)(e). The item description and the response thereto contain customer specific and CSA specific information. This information is proprietary confidential business information regarding contractual terms and pricing. 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 result of public disclosure of the pricing information would be price convergence in future CSAs. Moreover, the public disclosure of this information may prevent Gulf from successfully negotiating CSAs with customers. The information is regarded as sensitive and confidential by the CIS rider customer 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 CIS rider 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.

10; Item 8 Document
Page 10-8.2 Request No. 8
Lines 4-10

This information is entitled to confidential classification pursuant to Section 366.093(3)(e). This information is proprietary confidential business information regarding contractual terms and pricing. 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 result of public disclosure of the pricing information would be price convergence in future CSAs. Moreover, the public disclosure of this information may prevent Gulf from successfully negotiating CSAs with customers. The information is regarded as sensitive and confidential by the CIS rider customer 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 CIS rider 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.

EXHIBIT "B"

GULF POWER COMPANY
SUPPLEMENTAL SURVEILLANCE REPORT INFORMATION
COMMERCIAL/INDUSTRIAL SERVICE RIDER
OCTOBER 1997

-CONFIDENTIAL-

The information listed below is presented to comply with FPSC Order No. PSC-96-1219-FOF-EI and Page 2 of 2 of the Commercial/Industrial Service Rider Pilot Study Implementation Plan. This supplemental information is to be treated as confidential.

For all executed CSAs, it is estimated that the twelve months to date net revenues that would have been produced by the application of Gulf Power's otherwise applicable standard tariff rates to the affected load would have been

[REDACTED]

[REDACTED]

PBC

10

GULF POWER COMPANY
SUPPLEMENTAL SURVEILLANCE REPORT INFORMATION
COMMERCIAL/INDUSTRIAL SERVICE RIDER
SEPTEMBER 1997

-CONFIDENTIAL-

The information listed below is presented to comply with FPSC Order No. PSC-96-1219-FOF-EI and Page 2 of 2 of the Commercial/Industrial Service Rider Pilot Study Implementation Plan. This supplemental information is to be treated as confidential.

For all executed CSAs, it is estimated that the twelve months to date net revenues that would have been produced by the application of Gulf Power's otherwise applicable standard tariff rates to the affected load would have been

[REDACTED]

[REDACTED]

*auditor's data!
cumulative total
only referenced
to work papers.*

PBC

GULF POWER COMPANY
SUPPLEMENTAL SURVEILLANCE REPORT INFORMATION
COMMERCIAL/INDUSTRIAL SERVICE RIDER
AUGUST 1997

-CONFIDENTIAL-

The information listed below is presented to comply with FPSC Order No. PSC-96-1219-FOF-EI and Page 2 of 2 of the Commercial/Industrial Service Rider Pilot Study Implementation Plan. This supplemental information is to be treated as confidential.

For all executed CSAs, it is estimated that the twelve months to date net revenues that would have been produced by the application of Gulf Power's otherwise applicable standard tariff rates to the affected load would have been

[REDACTED]

405 2.3

145,000
(1) 61,000
84,000 41-1

[REDACTED]

PBC

12

GULF POWER COMPANY
SUPPLEMENTAL SURVEILLANCE REPORT INFORMATION
COMMERCIAL/INDUSTRIAL SERVICE RIDER
- JULY 1997

-CONFIDENTIAL-

The information listed below is presented to comply with FPSC Order No. PSC-96-1219-FOF-EI and Page 2 of 2 of the Commercial/Industrial Service Rider Pilot Study Implementation Plan. This supplemental information is to be treated as confidential.

For all executed CSAs, it is estimated that the twelve months to date net revenues that would have been produced by the application of Gulf Power's otherwise applicable standard tariff rates to the affected load would have been

[REDACTED]

130,000 2.4
272,500 4.1

[REDACTED]



GULF POWER COMPANY
SUPPLEMENTAL SURVEILLANCE REPORT INFORMATION
COMMERCIAL/INDUSTRIAL SERVICE RIDER
JUNE 1997

-CONFIDENTIAL-

The information listed below is presented to comply with FPSC Order No. PSC-96-1219-FOF-EI and Page 2 of 2 of the Commercial/Industrial Service Rider Pilot Study Implementation Plan. This supplemental information is to be treated as confidential.

For all executed CSAs, it is estimated that the twelve months to date net revenues that would have been produced by the application of Gulf Power's otherwise applicable standard tariff rates to the affected load would have been

[REDACTED]

2.3
41-1

[REDACTED]

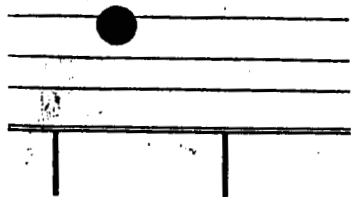


4

Handwritten signature

1 CONTRACT NO. 1
 2 CONTRACT NO. 2
 3 CONTRACT NO. 1
 4 CONTRACT NO. 2
 5
 6 BEFORE CONTRACT 1
 7 BEFORE CONTRACT 2
 8

10-21
 4
 10-21
 4.1
 10-21
 5-201
 41-20.6
 41-20.6
 10-21
 2



10-11
10-11
5

1 CONTRACT NO. 1 [redacted] $\frac{10-11}{4}$
2 CONTRACT NO. 2 [redacted] $\frac{10-11}{5}$
3 CONTRACT NO. 1 [redacted] $\frac{10-11}{4-1}$
4 CONTRACT NO. 2 [redacted] $\frac{10-11}{5-201}$
5 [redacted] $\frac{10-11}{41-20.5}$
6 BEFORE CONTRACT 1 [redacted] $\frac{10-11}{41-20.6}$
7 BEFORE CONTRACT 2 [redacted] $\frac{10-11}{2}$
8

Impaired by auditor

FLORIDA PUBLIC SERVICE COMMISSION
AUDIT DOCUMENT/RECORD REQUEST
NOTICE OF INTENT

TO: SUSAN CRANMER AND DENNIS ECHOLS
UTILITY: GULF POWER COMPANY
FROM: CHRIS HOLMAN (AUDIT MANAGER) (AUDITOR PREPARING REQUEST)
REQUEST NUMBER: 3 DATE OF REQUEST: OCTOBER 20, 1997
AUDIT PURPOSE: CISR AUDIT

REQUEST THE FOLLOWING ITEM(S) BE PROVIDED BY: OCTOBER 27, 1997 (DATE)
REFERENCE RULE 25-22.006, F.A.C.. THIS REQUEST IS MADE: INCIDENT TO AN INQUIRY
 OUTSIDE OF AN INQUIRY

ITEM DESCRIPTION:

SEE ATTACHED SHEET.

TO: AUDIT MANAGER CHRIS HOLMAN DATE: 10/27/97

THE REQUESTED RECORD OR DOCUMENTATION:

- (1) HAS BEEN PROVIDED TODAY
- (2) CANNOT BE PROVIDED BY THE REQUESTED DATE BUT WILL BE MADE AVAILABLE BY _____
- (3) AND IN MY OPINION, ITEM(S) 1,2,3,4, & 5 IS(ARE) PROPRIETARY AND CONFIDENTIAL BUSINESS INFORMATION AS DEFINED IN 364.183, 366.093, OR 367.156, F.S. TO MAINTAIN CONTINUED CONFIDENTIAL HANDLING OF THIS MATERIAL, THE UTILITY OR OTHER PERSON MUST, WITHIN 21 DAYS AFTER THE AUDIT EXIT CONFERENCE, FILE A REQUEST FOR CONFIDENTIAL CLASSIFICATION WITH THE DIVISION OF RECORDS AND REPORTING. REFER TO RULE 25-22.006, F.A.C.
- (4) THE ITEM WILL NOT BE PROVIDED. (SEE ATTACHED MEMORANDUM)

Dennis A. Echols AUDITOR
(SIGNATURE AND TITLE OF RESPONDENT)

Distribution: Original: Utility (for completion and return to Auditor)
Copy: Audit File and FPSC Analyst

DOCUMENT REQUEST 3

1. List the Kw demand and usage for each CSA customer from inception to the present.
2. What is the customer charge for each CSA customer?
3. Have available the revenue that would have been produced under standard tariffed rates and the revenues that are produced by the CSA from inception to the present.
4. Have available evidence, including journal, general ledger entries etc. that the revenue from CSA are allocated to the clauses at the rate which the customer would have been charged under normal prevailing rates.
 - A. Fuel and Purchased Power Cost Recovery Clause
 - B. Purchased Power Capacity Cost Recovery Clause
 - C. Environmental Cost Recovery Clause
 - D. Energy Conservation Cost Recovery Clause
5. Provide a schedule showing the components of the calculation of net revenue that would have been produced through the application of the standard rate schedule.

Gulf Power Company
FPSC CISR Audit

Document Request 3

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[REDACTED]

1. List the Kw demand and usage for each CSA customer from inception to the present.

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[REDACTED]

16 2. What is the customer charge for each CSA customer?

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[REDACTED]

19 3. Have available the revenue that would have been produced under standard tariffed
20 rates and the revenues that are produced by the CSA from inception to the present.

21 The analysis and base case are available for review at any time.

22 4. Have available evidence, including journal, general ledger entries etc. that the
23 revenue from CSA are allocated to the clauses at the rate which the customer would
24 have been charged under normal prevailing rates.

- 25 A. Fuel and Purchased Power Cost Recovery Clause
- 26 B. Purchased Power Capacity Cost Recovery Clause
- 27 C. Environmental Cost Recovery Clause
- 28 D. Energy Conservation Cost Recovery Clause



10/3

The journal, general ledger entries etc. that document that revenue from CSA's are allocated to the clauses at the rate which the customer was charged under their previous prevailing rate are available for review.

5. Provide a schedule showing the components of the calculation of net revenues that would have been produced through the application of the standard rate schedule.

A schedule is attached that provides the components of the calculation of net revenues.

PBC

103
3

Gulf Power Company
FPSC Document Request 3
Item 5

[REDACTED]

[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]

[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	41-2 [REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]

[REDACTED]

PBC

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PBC

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FLORIDA PUBLIC SERVICE COMMISSION
 AUDIT DOCUMENT/RECORD REQUEST
 NOTICE OF INTENT

TO: SUSAN CRANMER AND DENNIS ECHOLS
 UTILITY: GULF POWER COMPANY
 FROM: CHRIS HOLMAN
(AUDIT MANAGER)

(AUDITOR PREPARING REQUEST)

REQUEST NUMBER: 4
 AUDIT PURPOSE: CISR AUDIT

DATE OF REQUEST: 11/21/97

REQUEST THE FOLLOWING ITEM(S) BE PROVIDED BY: 11/24/97
(DATE)

REFERENCE RULE 25-22.006, F.A.C., THIS REQUEST IS MADE: INCIDENT TO AN INQUIRY
 OUTSIDE OF AN INQUIRY

ITEM DESCRIPTION:

1. In the response to Document Request 2 you stated that the dates the CSAs were executed were June 1, 1997 and October 1, 1997. What are the dates that the CSA is terminated?

2. In the same response you stated that the actual electric load served by the Company is different than it would have been in the absence of the CSA? Explain why is this different.
 CONT 1 ¹⁰⁻⁴/₄₋₁ CONT 2 ¹⁰⁻⁴/₅₋₂₀₂

3. Also stated was that the actual terms and conditions of the service arrangements for each customer are not available under any current existing standard tariff. How did you calculate the amounts for the surveillance report?
 41-2

4. Please have the two CISR contracts available for review the week of November 24, 1997.

Contract 1 ¹⁰⁻⁴/₄₋₁ ; Contract 2 ¹⁰⁻⁴/₅₋₁
 To
¹⁰⁻⁴/₄₋₂₈
 To

TO: AUDIT MANAGER CHRIS HOLMAN

DATE: 11/24/97

THE REQUESTED RECORD OR DOCUMENTATION:

- (1) HAS BEEN PROVIDED TODAY
- (2) CANNOT BE PROVIDED BY THE REQUESTED DATE BUT WILL BE MADE AVAILABLE BY _____
- (3) AND IN MY OPINION, ITEM(S) 1-4 IS(ARE) PROPRIETARY AND CONFIDENTIAL BUSINESS INFORMATION AS DEFINED IN 364.183, 366.093, OR 367.156, F.S. TO MAINTAIN CONTINUED CONFIDENTIAL HANDLING OF THIS MATERIAL, THE UTILITY OR OTHER PERSON MUST, WITHIN 21 DAYS AFTER THE AUDIT EXIT CONFERENCE, FILE A REQUEST FOR CONFIDENTIAL CLASSIFICATION WITH THE DIVISION OF RECORDS AND REPORTING. REFER TO RULE 25-22.006, F.A.C.
- (4) THE ITEM WILL NOT BE PROVIDED. (SEE ATTACHED MEMORANDUM)

Dennis J. Echols
(SIGNATURE AND TITLE OF RESPONDENT)

Distribution: Original: Utility (for completion and return to Auditor)
 Copy: Audit File and FPSC Analyst

CISR CONTRACT 1

This document consisting of 28 pages is confidential in its entirety.

CISR CONTRACT 2

This document consisting of 225 pages is confidential in its entirety.

GULF POWER COMPANY

CISR AUDIT

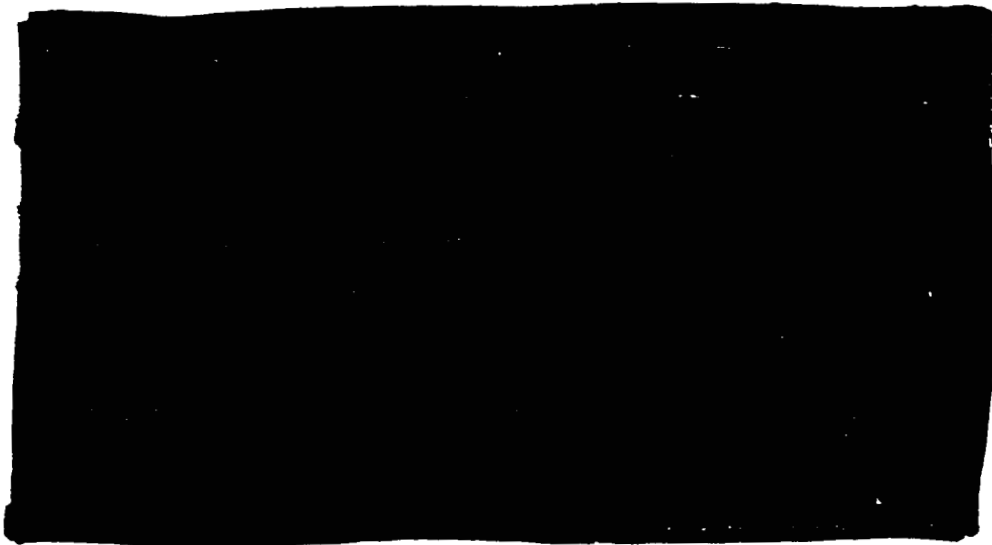
FOR THE FIVE MONTHS PERIOD ENDING 10/31/97

AUDITOR: CHRIS HOLMAN

1 SUBJECT: CISR LEAD SCHEDULE

2 PURPOSE: To determine how "net revenue" is calculated, and determine if the amount is
3 calculated correctly.

4 SUMMARY:



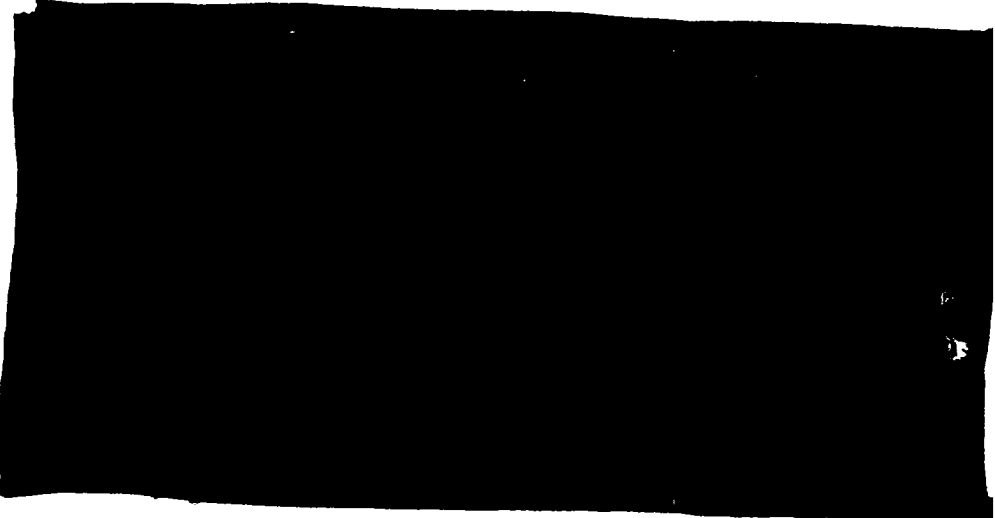
11

GULF POWER COMPANY
CISR AUDIT
PERIOD 6/1/97 TO 10/31/97

CISR LEAD

12/1/97
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14 CONCLUSION:

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41-5

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A B C D E F G H I J K L M

DESCRIPTION	JUNE			JULY			AUGUST			SEPTEMBER		
	BASE	CISR	DIFFERENCE	BASE	CISR	DIFFERENCE	BASE	CISR	DIFFERENCE	BASE	CISR	DIFFERENCE
[REDACTED]												
[REDACTED]	41-20	41-4	4	41-4	41-4	0-3	41-4	41-4	0-1	41-4	41-4	0-1
[REDACTED]	42-60											
[REDACTED]												
[REDACTED]												
[REDACTED]												
[REDACTED]	41-4			41-4			41-4	41-4	0-2	41-4		0-1
[REDACTED]												
[REDACTED]												
[REDACTED]		41-30			41-30			41-30			41-30	
[REDACTED]												
[REDACTED]												
[REDACTED]												
[REDACTED]												
[REDACTED]												
[REDACTED]			2.4			2.3			2.2			
[REDACTED]			41-4.4			41-4.3			41-4.2			
[REDACTED]												
[REDACTED]												
[REDACTED]												
[REDACTED]												
[REDACTED]												

41-

2.1

auditor note: agreed CISR AMOUNTS TO G/L
agreed BASE AMOUNTS TO COMPANY STUDY

Prepared by Auditor

GULF POWER COMPANY
CISR AUDIT
PERIOD 6/1/97 TO 10/31/97

1/16/98
[Signature]

NET REVENUE CALCULATION

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JUNE THROUGH SEPTEMBER 1997
REFERENCE TO WP 41-1

41-1-1

BASE ENERGY CHARGE

[Handwritten initials]
12/52
@

DEC-02-1997 14:52 FROM UF-322 (NFM)U1.35 512K TO

918504136490 P.02

CONFIDENTIAL

FPSC Summary Response on CSA no.1

1	[REDACTED]
2	[REDACTED]
3	[REDACTED]
4	[REDACTED]
5	[REDACTED]
6	[REDACTED]
7	[REDACTED]
8	[REDACTED]
9	[REDACTED]
10	[REDACTED]
11	[REDACTED]
12	[REDACTED]
13	[REDACTED]
14	[REDACTED]
15	[REDACTED]
16	[REDACTED]
17	[REDACTED]
18	[REDACTED]
19	[REDACTED]
20	[REDACTED]

10-3
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154-1
174-1
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TOTAL P.0

41	audit notes
42	Details Reviewed for months of June, July, Aug
43	and B.T.P. Batts for analysis.

GULF POWER COMPANY
CISR COMPARISON

	A	B	C	D
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11				4-1-1



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GULF POWER COMPANY
CISR COMPARISON

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[REDACTED]

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[REDACTED]
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1/

GULF POWER COMPANY
CISR COMPARISON

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[Redacted]

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[Redacted]

[Redacted]

[Redacted]

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2

GULF POWER COMPANY
CISR COMPARISON

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11				4-1-1



10/22/97

04:00 PM

CISURV7.WK41

GULF POWER COMPANY
CISR COMPARISON

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A B C D E F G

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6 August 97

7 September 97

8 October 97

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CUMULATIVE TO: 8/1

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b. [REDACTED]

CUMULATIVE

EXPLANATORY BY WORKPAPER
ADDITIONS DOTE: EXAMPLE ON WORK PAPER

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GULF POWER COMPANY
CISR AUDIT
PERIOD 6/1/97 TO 10/31/97

11/28
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41-5

GULF POWER COMPANY
CISR AUDIT
PERIOD 6/1/97 TO 10/31/97

K I L O W A T T H O U R S

m/24/97
ca/10

GULF POWER COMPANY
CISR AUDIT
KILOWATT HOUR SCHEDULE
AUDITOR: CHRIS HOLMAN

	A	B	C
	DATE	KILOWATTS	KILOWATT HOURS
1	6/1997	[REDACTED] 41-204	[REDACTED] 41-204, 41-
2	7/1997	[REDACTED] 41-203	[REDACTED] 41-203, 41-
3	8/1997	[REDACTED] 41-202	[REDACTED] 41-202, 41-
4	9/1997	[REDACTED] 41-201	[REDACTED] 41-201, 41-
5	10/1997	[REDACTED] 41-20-1	[REDACTED] 41-20-1, 41-

Prepared By Auditor

BILLING STATEMENT

This document consisting of 7 pages is confidential in its entirety.

BILLING STATEMENT FOR OCTOBER

This document consisting of 1 page is confidential in its entirety.

Clause Revenue June - September 1997

This document consisting of 16 pages is confidential in its entirety.

Clause Revenue October1997

This document consisting of 4 pages is confidential in its entirety.

NOTICE OF INTENT

TO: DENNIS ECHOLS
UTILITY: GULF POWER COMPANY
FROM: CHRIS HOLMAN
(AUDIT MANAGER)

(AUDITOR PREPARING REQUEST)

REQUEST NUMBER: 5
AUDIT PURPOSE: CISR AUDIT

DATE OF REQUEST: JANUARY 2, 1998

REQUEST THE FOLLOWING ITEM(S) BE PROVIDED BY: JANUARY 6, 1998
(DATE)

REFERENCE RULE 25-22.006, F.A.C., THIS REQUEST IS MADE: INCIDENT TO AN INQUIRY
 OUTSIDE OF AN INQUIRY

ITEM DESCRIPTION:

1. [REDACTED]

14-2

(Item Description Continues On Back)

TO: AUDIT MANAGER CHRIS HOLMAN

DATE: _____

THE REQUESTED RECORD OR DOCUMENTATION:

- (1) HAS BEEN PROVIDED TODAY
- (2) CANNOT BE PROVIDED BY THE REQUESTED DATE BUT WILL BE MADE AVAILABLE BY _____
- (3) AND IN MY OPINION, ITEM(S) _____ IS(ARE) PROPRIETARY AND CONFIDENTIAL BUSINESS INFORMATION AS DEFINED IN 364.183, 366.093, OR 367.156, F.S. TO MAINTAIN CONTINUED CONFIDENTIAL HANDLING OF THIS MATERIAL, THE UTILITY OR OTHER PERSON MUST, WITHIN 21 DAYS AFTER THE AUDIT EXIT CONFERENCE, FILE A REQUEST FOR CONFIDENTIAL CLASSIFICATION WITH THE DIVISION OF RECORDS AND REPORTING. REFER TO RULE 25-22.006, F.A.C.
- (4) THE ITEM WILL NOT BE PROVIDED. (SEE ATTACHED MEMORANDUM)

(SIGNATURE AND TITLE OF RESPONDENT)

Distribution: Original: Utility (for completion and return to Auditor)
Copy: Audit File and FPSC Analyst

10-5

FLORIDA PUBLIC SERVICE COMMISSION
AUDIT DOCUMENT/RECORD REQUEST
NOTICE OF INTENT

TO: OLNNIS ECKHOLS
UTILITY: GULF POWER COMPANY
FROM: CHRIS HOLMAN
(AUDIT MANAGER)

(AUDITOR PREPARING REQUEST)
DATE OF REQUEST: JANUARY 2, 1998

REQUEST NUMBER: 5
AUDIT PURPOSE: CISR AUDIT

REQUEST THE FOLLOWING ITEM(S) BE PROVIDED BY: JANUARY 6, 1998
(DATE)

REFERENCE RULE 25-22.006, F.A.C., THIS REQUEST IS MADE: INCIDENT TO AN INQUIRY
 OUTSIDE OF AN INQUIRY

ITEM DESCRIPTION:

1 [REDACTED]

(Item Description Continued On Back)

TO: AUDIT MANAGER CHRIS HOLMAN

DATE: 1/14/98

THE REQUESTED RECORD OR DOCUMENTATION:

- (1) HAS BEEN PROVIDED TODAY
- (2) CANNOT BE PROVIDED BY THE REQUESTED DATE BUT WILL BE MADE AVAILABLE BY _____
- (3) AND IN MY OPINION, ITEM(S) Req. 5 IS(ARE) PROPRIETARY AND CONFIDENTIAL BUSINESS INFORMATION AS DEFINED IN 76A.083, 366.083, OR 367.066, F.S. TO MAINTAIN CONFIDENTIALITY UNDER THIS PROVISION, THE UTILITY OR OTHER PERSON MUST, WITHIN 21 DAYS AFTER THE AUDIT EXIT CONFERENCE, FILE A REQUEST FOR CONFIDENTIAL CLASSIFICATION WITH THE DIVISION OF RECORDS AND REPORTING. REFER TO RULE 25-22.006, F.A.C.
- (4) THE ITEM WILL NOT BE PROVIDED. (SEE ATTACHED MEMORANDUM)

Mark D. Davis, Sr. Marketing Specialist
(SIGNATURE AND TITLE OF RESPONDENT)

DISTRIBUTION: Original: UTILITY (for completion and return to Auditor)
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10-5
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CONFIDENTIAL

Gulf Power Company
FPSC CISR Audit

Document Request 5

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[REDACTED]



10-5
3

AUDIT DOCUMENT/RECORD REQUEST
NOTICE OF INTENT

TO: DENNIS ECHOLS
UTILITY: GULF POWER COMPANY
FROM: CHRIS HOLMAN
(AUDIT MANAGER)

(AUDITOR PREPARING REQUEST)
DATE OF REQUEST: JANUARY 2, 1998

REQUEST NUMBER: 6
AUDIT PURPOSE: CISR AUDIT

REQUEST THE FOLLOWING ITEM(S) BE PROVIDED BY: JANUARY 6, 1998
(DATE)

REFERENCE RULE 25-22.006, F.A.C., THIS REQUEST IS MADE: INCIDENT TO AN INQUIRY
 OUTSIDE OF AN INQUIRY

ITEM DESCRIPTION:



(Item Description Continued On Back)

14-2

TO: AUDIT MANAGER CHRIS HOLMAN

DATE: _____

THE REQUESTED RECORD OR DOCUMENTATION:

- (1) HAS BEEN PROVIDED TODAY
- (2) CANNOT BE PROVIDED BY THE REQUESTED DATE BUT WILL BE MADE AVAILABLE BY _____
- (3) AND IN MY OPINION, ITEM(S) _____ IS(ARE) PROPRIETARY AND CONFIDENTIAL BUSINESS INFORMATION AS DEFINED IN 364.183, 366.093, OR 367.156, F.S. TO MAINTAIN CONTINUED CONFIDENTIAL HANDLING OF THIS MATERIAL, THE UTILITY OR OTHER PERSON MUST, WITHIN 21 DAYS AFTER THE AUDIT EXIT CONFERENCE, FILE A REQUEST FOR CONFIDENTIAL CLASSIFICATION WITH THE DIVISION OF RECORDS AND REPORTING. REFER TO RULE 25-22.006, F.A.C.
- (4) THE ITEM WILL NOT BE PROVIDED. (SEE ATTACHED MEMORANDUM)

(SIGNATURE AND TITLE OF RESPONDENT)

Distribution: Original: Utility (for completion and return to Auditor)
Copy: Audit File and FPSC Analyst

10-6

AUDIT DOCUMENT/RECORD REQUEST
NOTICE OF INTENT

TO: DENNIS EDWARDS
UTILITY: GULF POWER COMPANY
FROM: CHRIS HOLMAN
(AUDIT PARAGRAPHS)

(AUDITOR PREPARING REQUEST)
DATE OF REQUEST: JANUARY 2, 1998

REQUEST NUMBER: 6
AUDIT PURPOSE: CISR AUDIT

REQUEST THE FOLLOWING ITEM(S) BE PROVIDED BY: JANUARY 6, 1998
(DATE)

REFERENCE RULE 25-22.006, F.A.C., THIS REQUEST IS MADE: INCIDENT TO AN INQUIRY
 OUTSIDE OF AN INQUIRY

ITEM DESCRIPTION:



(Item Description Continued On Back)

TO: AUDIT MANAGER CHRIS HOLMAN

DATE: 1/14/98

THE REQUESTED RECORD OR DOCUMENTATION:

- (1) HAS BEEN PROVIDED TODAY
- (2) CANNOT BE PROVIDED BY THE REQUESTED DATE BUT WILL BE MADE AVAILABLE BY _____
- (3) AND IN MY OPINION, ITEM(S) Reg 6 IS(ARE) PROPRIETARY AND CONFIDENTIAL BUSINESS INFORMATION AS DEFINED IN 304.180, 306.040, OR 307.150, F.S. TO MAINTAIN CONTINUED CONFIDENTIAL HANDLING OF THIS MATERIAL, THE UTILITY OR OTHER PERSON MUST, WITHIN 21 DAYS AFTER THE AUDIT EXIT CONFERENCE, FILE A REQUEST FOR CONFIDENTIAL CLASSIFICATION WITH THE DIVISION OF RECORDS AND REPORTING. REFER TO RULE 25-22.006, F.A.C.
- (4) THE ITEM WILL NOT BE PROVIDED. (SEE ATTACHED MEMORANDUM)

Chris Holman

(SIGNATURE AND TITLE OF RESPONDENT)

Distribution: Original: Utility (for completion and return to Auditor)
Copy: Audit File and FPSC Analyst

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AUDIT DOCUMENT/RECORD REQUEST
NOTICE OF INTENT

TO: DENNIS ECHOLS
UTILITY: GULF POWER COMPANY
FROM: CHRIS HOLMAN
(AUDIT MANAGER)

(AUDITOR PREPARING REQUEST)
DATE OF REQUEST: JANUARY 2, 1998

REQUEST NUMBER: 7
AUDIT PURPOSE: CISR AUDIT

REQUEST THE FOLLOWING ITEM(S) BE PROVIDED BY: JANUARY 6, 1998
(DATE)

REFERENCE RULE 25-22.006, F.A.C., THIS REQUEST IS MADE: INCIDENT TO AN INQUIRY
 OUTSIDE OF AN INQUIRY

ITEM DESCRIPTION:



(Item Description Continued On Back)

14-2

TO: AUDIT MANAGER CHRIS HOLMAN

DATE: _____

THE REQUESTED RECORD OR DOCUMENTATION:

- (1) HAS BEEN PROVIDED TODAY
- (2) CANNOT BE PROVIDED BY THE REQUESTED DATE BUT WILL BE MADE AVAILABLE BY _____
- (3) AND IN MY OPINION, ITEM(S) _____ IS(ARE) PROPRIETARY AND CONFIDENTIAL BUSINESS INFORMATION AS DEFINED IN 364.183, 366.093, OR 367.156, F.S. TO MAINTAIN CONTINUED CONFIDENTIAL HANDLING OF THIS MATERIAL, THE UTILITY OR OTHER PERSON MUST, WITHIN 21 DAYS AFTER THE AUDIT EXIT CONFERENCE, FILE A REQUEST FOR CONFIDENTIAL CLASSIFICATION WITH THE DIVISION OF RECORDS AND REPORTING. REFER TO RULE 25-22.006, F.A.C.
- (4) THE ITEM WILL NOT BE PROVIDED. (SEE ATTACHED MEMORANDUM)

(SIGNATURE AND TITLE OF RESPONDENT)

Distribution: Original: Utility (for completion and return to Auditor)
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10-7

FLORIDA PUBLIC SERVICE COMMISSION
AUDIT DOCUMENT/RECORD REQUEST
NOTICE OF INTENT

TO: DENNIS COOLY
UTILITY: GULF POWER COMPANY
FROM: CHRIS HOLMAN
(AUDIT MANAGER)

CREDITOR PENDING REQUEST

REQUEST NUMBER: 7
AUDIT PURPOSE: CISR AUDIT

DATE OF REQUEST: JANUARY 2, 1998

REQUEST THE FOLLOWING ITEM(S) BE PROVIDED BY: JANUARY 6, 1998
(DATE)

REFERENCE RULE 25-22.006, F.A.C., THIS REQUEST IS MADE: INCIDENT TO AN INQUIRY
 OUTSIDE OF AN INQUIRY

ITEM DESCRIPTION:



(Item Description Continued On Back)

TO: AUDIT MANAGER CHRIS HOLMAN

DATE: 1/14/98

THE REQUESTED RECORD OR DOCUMENTATION:

- (1) HAS BEEN PROVIDED TODAY
- (2) CANNOT BE PROVIDED BY THE REQUESTED DATE BUT WILL BE MADE AVAILABLE BY _____
- (3) AND IN MY OPINION, ITEM(S) Req 7 IS/ARE PROPRIETARY AND CONFIDENTIAL BUSINESS INFORMATION AS DEFINED IN 354.189, 356.050, OR 357.196, F.S. TO MAINTAIN CONTINUED CONFIDENTIAL HANDLING OF THIS MATERIAL, THE UTILITY OR OTHER PERSON MUST, WITHIN 21 DAYS AFTER THE AUDIT FINAL CONFERENCE, FILE A REQUEST FOR CONFIDENTIAL CLASSIFICATION WITH THE DIVISION OF RECORDS AND REPORTING. REFER TO RULE 25-22.006, F.A.C.
- (4) THE ITEM WILL NOT BE PROVIDED. (SEE ATTACHED MEMORANDUM)

Robert Daniel Sr. Marketing Specialist
(SIGNATURE AND TITLE OF RESPONDENT)

Distribution: Original: Utility (for completion and return to Auditor)
Copy: Audit File and FPSC Analyst

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Gulf Power Company
FPSC CISR Audit

Document Request 7

1 [REDACTED]
2 [REDACTED]
3 [REDACTED]
4 [REDACTED]

5 [REDACTED]
7 [REDACTED]
8 [REDACTED]
9 [REDACTED]

PBC

10-7
3

FLORIDA PUBLIC SERVICE COMMISSION
AUDIT DOCUMENT/RECORD REQUEST
NOTICE OF INTENT

TO: DENNIS ECHOLS
UTILITY: GULF POWER COMPANY
FROM: CHRIS HOLMAN
(AUDIT MANAGER)

(AUDITOR PREPARING REQUEST)

REQUEST NUMBER: 8
AUDIT PURPOSE: CISR AUDIT

DATE OF REQUEST: JANUARY 2, 1998

REQUEST THE FOLLOWING ITEM(S) BE PROVIDED BY: JANUARY 6, 1998
(DATE)

REFERENCE RULE 25-22.006, F.A.C., THIS REQUEST IS MADE: INCIDENT TO AN INQUIRY
 OUTSIDE OF AN INQUIRY

ITEM DESCRIPTION:

PLEASE PLEASE STATE IF THE CUSTOMER IN EACH CSA IS A NEW OR EXISTING CUSTOMER PRIOR TO THE EXECUTION OF EACH CSA. IF THESE ARE PREVIOUS CUSTOMERS STATE WHICH RATE SCHEDULE EACH USED PRIOR TO THE IMPLEMENTATION OF THE CISR RATES.

1A-2

(Item Description Continued On Back)

TO: AUDIT MANAGER CHRIS HOLMAN

DATE:

THE REQUESTED RECORD OR DOCUMENTATION:

- (1) HAS BEEN PROVIDED TODAY
- (2) CANNOT BE PROVIDED BY THE REQUESTED DATE BUT WILL BE MADE AVAILABLE BY _____
- (3) AND IN MY OPINION, ITEM(S) _____ IS(ARE) PROPRIETARY AND CONFIDENTIAL BUSINESS INFORMATION AS DEFINED IN 364.183, 366.093, OR 367.156, F.S. TO MAINTAIN CONTINUED CONFIDENTIAL HANDLING OF THIS MATERIAL, THE UTILITY OR OTHER PERSON MUST, WITHIN 21 DAYS AFTER THE AUDIT EXIT CONFERENCE, FILE A REQUEST FOR CONFIDENTIAL CLASSIFICATION WITH THE DIVISION OF RECORDS AND REPORTING. REFER TO RULE 25-22.006, F.A.C.
- (4) THE ITEM WILL NOT BE PROVIDED. (SEE ATTACHED MEMORANDUM)

(SIGNATURE AND TITLE OF RESPONDENT)

Distribution: Original: Utility (for completion and return to Auditor)
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10-8

FLORIDA PUBLIC SERVICE COMMISSION
AUDIT DOCUMENT/RECORD REQUEST
NOTICE OF INTENT

TO: ULYNIS ECHOLS
UTILITY: GULF POWER COMPANY
FROM: CHRIS HOLMAN (AUDIT MANAGER) (AUDITOR PREPARING REQUEST)
REQUEST NUMBER: 8 DATE OF REQUEST: JANUARY 2, 1998
AUDIT PURPOSE: CISR AUDIT

REQUEST THE FOLLOWING ITEM(S) BE PROVIDED BY: JANUARY 6, 1998
REFERENCE RULE 25-22.006, F.A.C., THIS REQUEST IS MADE: INCIDENT TO AN INQUIRY
 OUTSIDE OF AN INQUIRY

ITEM DESCRIPTION:

PLEASE STATE IF THE CUSTOMER IN EACH CSA IS A NEW OR EXISTING CUSTOMER PRIOR TO THE EXECUTION OF EACH CSA. IF THESE ARE PREVIOUS CUSTOMERS STATE WHICH RATE SCHEDULE EACH USED PRIOR TO THE IMPLEMENTATION OF THE CISR RATES.

(Item Description Continued On Back)

TO: AUDIT MANAGER CHRIS HOLMAN DATE: 1/14/98

THE REQUESTED RECORD OR DOCUMENTATION:

- (1) HAS BEEN PROVIDED TODAY
- (2) CANNOT BE PROVIDED BY THE REQUESTED DATE BUT WILL BE MADE AVAILABLE BY _____
- (3) AND IN MY OPINION, ITEM(S) Req. 8 IS(ARE) PROPRIETARY AND CONFIDENTIAL BUSINESS INFORMATION AS DEFINED IN 364.280, 366.050, OR 367.156, F.S. TO MAINTAIN CONTINUED CONFIDENTIAL HANDLING OF THIS MATERIAL, THE UTILITY OR OTHER PERSON MUST, WITHIN 21 DAYS AFTER THE AUDIT EXIT CONFERENCE, FILE A REQUEST FOR CONFIDENTIAL CLASSIFICATION WITH THE DIVISION OF RECORDS AND REPORTING. REFER TO RULE 25-22.006, F.A.C.
- (4) THE ITEM WILL NOT BE PROVIDED. (SEE ATTACHED MEMORANDUM)

[Signature]
(SIGNATURE AND TITLE OF RESPONDENT)

Distribution: Original: Utility (for completion and return to Auditor)
Copy: Audit File and FPSC Analyst

10-2
1

CONFIDENTIAL

Gulf Power Company
FPSC CISR Audit

Document Request 8

1
2 Please state if the customer in each CSA is a new or existing customer prior to the
3 execution of each CSA. If these are previous customers state which rate schedule each
used prior to the implementation of the CISR rates.

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