

McWHIRTER REEVES

ATTORNEYS AT LAW

TAMPA OFFICE:
400 NORTH TAMPA STREET, SUITE 2450
TAMPA, FLORIDA 33602
P. O. BOX 3350 TAMPA, FL 33601-3350
(813) 224-0866 (813) 221-1854 FAX

PLEASE REPLY TO:

TALLAHASSEE

TALLAHASSEE OFFICE:
117 SOUTH GADSDEN
TALLAHASSEE, FLORIDA 32301
(850) 222-2525
(850) 222-5606 FAX

June 4, 1999

VIA HAND DELIVERY

Blanca S. Bayo, Director
Division of Records and Reporting
Betty Easley Conference Center
4075 Esplanade Way
Tallahassee, Florida 32399-0870

Re: Docket No. 990697-EI

Dear Ms. Bayo:

Enclosed for filing and distribution are the original and seven copies of the Florida Industrial Power Users Group's Response to Florida Power Corporation's Request for Confidential Classification in the above docket.

Please acknowledge receipt of the above on the extra copy enclosed herein and return it to me. Thank you for your assistance.

Sincerely,

Vicki Gordon Kaufman
Vicki Gordon Kaufman

VGK/pr
Enclosures

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[Signature]
FPSC-BUREAU OF RECORDS

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RECORDS AND REPORTING

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Done 6/10/99

McWHIRTER, REEVES, MCGLOTHLIN, DAVIDSON, DECKER, KAUFMAN, ARNOLD & STEEN, P.A.

DOCUMENT NUMBER - DATE

~~15011~~ JUN -4 99

FPSC-RECORDS/REPORTING

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In Re: Request for Confidential)
Classification of Annual Status Report)
and Related Schedules for Year Ended)
1998, Submitted Pursuant to Rules)
25-6.135, 25-6.1351(4), and)
25-6.0436(9), Florida Administrative)
Code, by Florida Power Corporation.)
_____)

Docket No. 990697-EI

Filed: June 4, 1999

**THE FLORIDA INDUSTRIAL POWER USERS GROUP'S
RESPONSE TO FLORIDA POWER CORPORATION'S
REQUEST FOR CONFIDENTIAL CLASSIFICATION**

The Florida Industrial Power Users Group (FIPUG), pursuant to rule 25-22.006(3)(b),¹ Florida Administrative Code, files its response to Florida Power Corporation's (FPC) Request for Confidential Classification. Such request should be denied outright and in its entirety. As grounds therefor, FIPUG states:

Introduction

1. FIPUG is a group of large industrial consumers, some of whom are FPC customers. The price of electricity represents one of the largest variable costs incurred by FIPUG's members. Therefore, FIPUG closely monitors data related to FPC's cost to produce electricity as well as the prices FPC pays for wholesale power and fuel in order to ensure that FPC gets the lowest possible price. The only way that FIPUG can monitor FPC's costs and

¹ Rule 25-22.006(3)(b) gives a party 14 days *after service* to respond to a confidentiality request. FIPUG was not served with FPC's request but rather obtained one from the Clerk's office after learning of FPC's filing through a review of new dockets opened. On June 3, FIPUG filed a petition to intervene and an objection. FIPUG files now files this detailed response within 14 days of the time it received and reviewed FPC's request.

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FPSC-RECORDS/REPORTING

prices is through the information filed at the Commission, including FPC's annual status report, which is required by Commission rule², and the related schedules.

2. On May 28, 1999, FPC filed a request with the Commission seeking to conceal from the public a wide array of diverse information about its operations. FPC seeks to shield the following information from the public from its FERC Form 1:

- a. Electric plant in service;³
- b. Electric plant held for future use;⁴
- c. Construction work in progress;⁵
- d. Accumulated depreciation;⁶
- e. Allowances;⁷
- f. Sales of electricity;⁸
- g. Sales for resale;⁹
- h. O & M expenses;¹⁰

² Rule 25-6.135, Florida Administrative Code.

³ FERC Form 1, pp. 204-207.

⁴ FERC Form 1, p. 214.

⁵ FERC Form 1, p. 216.

⁶ FERC Form 1, p. 219.

⁷ FERC Form 1, pp. 228-229.

⁸ FERC Form 1, p. 304.

⁹ FERC Form 1, p. 310-311.

¹⁰ FERC Form 1, pp. 320-323.

- i. Purchased power;¹¹
- j. Transmission of electricity for others;¹²
- l. Transmission of electricity by others;¹³
- m. Depreciation;¹⁴
- n. Research and development;¹⁵
- o. Salaries and wages;¹⁶
- p. Electric energy account and monthly peaks;¹⁷
- q. Steam electric generating plant statistics;¹⁸
- r. Transmission line statistics;¹⁹
- s. Transmission lines added;²⁰
- t. Substations;²¹

¹¹ FERC Form 1, pp. 326-327.

¹² FERC Form 1, pp. 328-330.

¹³ FERC Form 1, p. 332.

¹⁴ FERC Form 1, p. 336-337.

¹⁵ FERC Form 1, pp. 352-353.

¹⁶ FERC Form 1, pp. 354-355.

¹⁷ FERC Form 1, p. 401.

¹⁸ FERC Form 1, pp. 402-403.

¹⁹ FERC Form 1, pp. 422-423.

²⁰ FERC Form 1, pp. 424-425.

²¹ FERC Form 1, pp. 426-427.