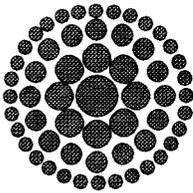


ORIGINAL



Florida Power
CORPORATION

JAMES A. MCGEE
SENIOR COUNSEL

October 11, 1999

Ms. Blanca S. Bayó, Director
Division of Records and Reporting
Florida Public Service Commission
2540 Shumard Oak Boulevard
Tallahassee, Florida 32399-0850

991544-ET

Re: Request of Florida Power Corporation for Confidential Classification of certain information in workpapers to Staff audit report regardings earnings and surveillance.

Dear Ms. Bayó:

Enclosed for filing in the subject matter is Florida Power Corporation's Request for Confidential Classification accompanied by a sealed envelope containing the document subject to the Request with the confidential information highlighted. Also enclosed are two copies of the document with the confidential information redacted. **The highlighted portions of the unredacted version should be held as Confidential Information in accordance with Rule 25-22.006, F.A.C.**

Please acknowledge your receipt of the above filing on the enclosed copy of this letter and return to the undersigned. Thank you for your assistance in this matter.

Very truly yours,

James A. McGee

JAM/ams
Enclosures

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BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Request of Florida Power Corporation for confidential classification of certain information in workpapers to Staff audit report regarding earnings surveillance.

Docket No. _____

Submitted for filing:
October 11, 1999

REQUEST FOR CONFIDENTIAL CLASSIFICATION

Florida Power Corporation (Florida Power), pursuant to Section 366.093, F.S., and Rule 25-22.006, F.A.C., requests confidential classification of the highlighted information on the Staff audit report workpaper contained in the sealed envelope enclosed with this request, which consists of Florida Power's response to Staff Document Request No. 4. In support of this request for confidential classification, Florida Power states as follows:

Background

1. During the course of the Staff audit regarding 1998 earnings surveillance of Florida Power (Audit Control No. 99-081-2-1), the Staff auditors requested, and Florida Power provided, numerous documents for review. In particular, Florida Power provided a document concerning "non-regulatory/non-utility services" in response to Staff Document Request No. 4 (Response No. 4), which was identified by Florida Power as confidential on the document request form (Commission Form PSC/AFA 6 (2/95)).

2. By letter dated September 20, 1999, the date the audit exit conference would have taken place, Staff provided Florida Power with a list of audit workpapers that included Response No. 4. Accordingly, Florida Power submits this request in order to maintain the confidentiality of the highlighted information

DOCUMENT NUMBER-DATE

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on Response No. 4, the single-page audit workpaper contained in the enclosed envelope. Two public copies of Response No. 4, with the confidential information redacted, are also enclosed. Florida Power waives any claim of confidentiality with respect to all other documents identified as confidential on the above-referenced document request form.

Justification for Confidential Classification

3. The highlighted portion (rows 7 and 8) of Response No. 4, the audit workpaper entitled *Non-regulatory/non-utility services*, contains information in the columns listing the account name and description for two particular non-utility competitive activities. These two activities are currently in a developmental stage and, for this reason, Florida Power has taken great care to guard against premature disclosure of its plans to enter into these competitive business markets. This descriptive information is therefore highly sensitive proprietary, confidential, trade secret information, the disclosure of which could subject Florida Power to a competitive disadvantage by revealing its business plans to others currently or prospectively engaged in these competitive activities.

4. This sensitive information and the justification for according it confidential treatment are virtually identical to that provided in Florida Power's Request For Confidential Classification filed May 8, 1998 in Docket No. 980643-EI and approved by Order No. PSC-98-0997-CFO-EI, issued July 22, 1998. (*See*, Section IIB, "Development of Nonutility Activities," beginning on page 5 of the Order.)

5. The highlighted information in Response No. 4 is intended to be and is treated by Florida Power as private and has not been publicly disclosed.

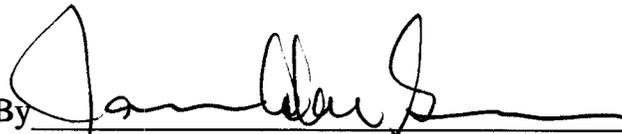
Duration of Confidential Classification

6. Florida Power requests an 18-month confidentiality period, consistent with Rule 25-22.006 (9)(a), F.A.C. In addition, Florida Power asks that Response No. 4 be returned to Florida Power when the Commission no longer needs the information to conduct its business, in accordance with Rule 25-22.006 (9)(b), F.A.C.

WHEREFORE, Florida Power Corporation requests that the highlighted information on Response No. 4, the audit workpaper contained in the sealed envelope enclosed with this request, be classified confidential.

Respectfully submitted,

**OFFICE OF THE GENERAL COUNSEL
FLORIDA POWER CORPORATION**

By 

James A. McGee
Post Office Box 14042
St. Petersburg, FL 33733-4042
Telephone: (813) 866-5184
Facsimile: (813) 866-4931