

One Energy Place
Pensacola, Florida 32520

Tel 850.444.6111



February 12, 2002

Ms. Blanca S. Bayo, Director
Division of the Commission Clerk and Administrative Services
Florida Public Service Commission
2540 Shumard Oak Boulevard
Tallahassee FL 32399-0870

Dear Ms. Bayo:

RE: Docket No. 010949-EI

Enclosed are an original and fifteen copies of Gulf Power Company's Request for Confidential Classification for portions of Gulf Power's response to Staff's Seventh Set of Interrogatories, Nos. 235-238, to be filed in the above docket.

Sincerely,

A handwritten signature in cursive script that reads "Susan D. Ritenour".

Susan D. Ritenour
Assistant Secretary and Assistant Treasurer

lw

Enclosure

cc: Beggs and Lane
Jeffrey A. Stone, Esquire

DOCUMENT NUMBER DATE

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FPSC-COMMISSION CLERK

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

IN RE: Request for Rate Increase by Gulf
Power Company

Docket No.: 010949-EI
Date: February 12, 2002

_____)
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 ("Commission", or "FPSC") enter an order protecting from public disclosure certain specified portions of Gulf Power's responses to Staff's Seventh set of Interrogatories to Gulf Power Company (Nos. 235-238). As grounds for this request, the Gulf Power Company states:


1. On February 1, 2002, Gulf filed a Notice of Intent to Request Confidential Classification for the Company's responses to items 235-238 of Staff's Seventh set of Interrogatories to Gulf Power Company.
2. Gulf Power Company's response to requests numbered 235-238 contain proprietary and commercially sensitive information which, if disclosed publically, would cause irreparable harm to the business interests of Gulf power Company. Gulf asserts that this information meets the requirements of §366.093(3)(c), Florida Statutes. The information being provided contains details regarding Gulf's security costs, measures and procedures that are considered confidential by the Company. Public disclosure of this information may compromise the security efforts undertaken by Gulf as a result of the September 11, 2001, terrorist attacks.
3. Submitted as Exhibit "A" is a copy of the Company's responses to items 235-238 of Staff's Seventh Set of Interrogatories, 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 Company's responses to items 235-238 of Staff's Seventh set of Interrogatories, which may be made available for public review and inspection. Attached as Exhibit "C" to this request is a 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 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 12th day of February, 2002.


JEFFREY A. STONE
Florida Bar No. 325953
RUSSELL A. BADDERS
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(850) 432-2451
Attorneys for Gulf Power Company

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

IN RE: Request for Rate Increase by Gulf
Power Company
_____)

Docket No.: 010949-EI
Date: February 13, 2002

EXHIBIT "A"

REQUEST FOR CONFIDENTIAL CLASSIFICATION

The information provided herein should be maintained as proprietary confidential business information pursuant to Section 366.093 and Rule 25-22.006, F.A.C.

EXHIBIT "A"

Provided to the Division of Records and Reporting
under separate cover as confidential information

EXHIBIT "B"

235. Please provide the annual expenses incurred for anti-terrorism security measures at Gulf's power plants for calendar years 1997, 1998, 1999, 2000 and 2001 year to date. Include in your response, both the annual amount included in rate base and the annual amount included in O & M.

ANSWER:

1
2
3
4
5
6
7
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9



236. Please provide the annual expenses incurred for anti-terrorism security measures at Gulf's transmission facilities for calendar years 1997, 1998, 1999, 2000 and 2001 year to date. Include in your response, both the annual amount included in rate base and the annual amount included in O & M.

ANSWER:

1
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237. Please provide the annual system and jurisdictional expenses incurred for anti-terrorism security measures for calendar years 1997, 1998, 1999, 2000 and 2001 year to date. Include in your response, both the annual amount included in rate base and the annual amount included in C & M.

ANSWER:

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]

238. What is the projected test year system and jurisdictional amounts for anti-terrorism security that Gulf included in its MFRs?

ANSWER:

1 [REDACTED]
2 [REDACTED]
3 [REDACTED]
4 [REDACTED]
5 [REDACTED]
6 [REDACTED]
7 [REDACTED]
8 [REDACTED]
9 [REDACTED]
10 [REDACTED]

- 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]
- 21 [REDACTED]
- 22 [REDACTED]

EXHIBIT "C"

Field/Line

Justification

Interrogatory 235
Lines 1 - 9

Gulf asserts that this information meets the requirements of §366.093(3)(c), Florida Statutes. The information being provided contains details regarding Gulf's security procedures, costs and measures. The security of Gulf's facilities would be undermined if this information was made available to the public. The basis for confidentiality is more fully set forth in paragraph 2 of this Request.

Interrogatory 236
Lines 1 - 7

Interrogatory 237
Lines 1 - 12

Interrogatory 238
Page 1 of 2, lines 1 - 12
Page 2 of 2, lines 1 - 22

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Request for rate increase by)
Gulf Power Company)
_____)

Docket No. 010949-EI

Certificate of Service

I HEREBY CERTIFY that a copy of the foregoing has been furnished
this 12th day of February 2002 by U.S. Mail to the following:

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