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,

Jusan D. Roteneur

Susan D. Ritenour Assistant Secretary and Assistant Treasurer

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Enclosure

cc: Beggs and Lane Jeffrey A. Stone, Esquire

> DOCUMENT NUMBER DATE 01682 FEB 13 N 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

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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:

 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 12^{\pm} day of February, 2002.

MA

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

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"

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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"

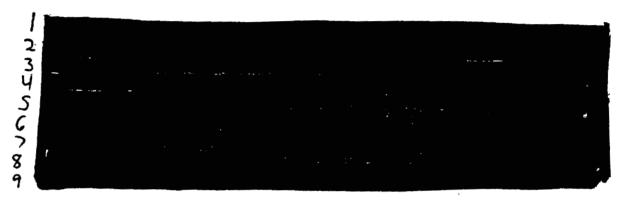
Provided to the Division of Records and Reporting under separate cover as confidential information EXHIBIT "B"

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STATT'S Seventh Set of Interrogatories Docket No. 010949-EI GULF POWER COMPANY February 1, 2002 Item No. 235 Page 1 of 1

235. Flease 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.



Gulf S Seventh Set of Interrogatories Docket No. 010949-EI GULF POWER COMPANY February 1, 2002 Item No. 236 Page 1 of 1

236. Flease 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.



Staff's Seventh Set of Interrogatories Docket No. 010949-EI GULF FOWER COMPANY February 1, 2002 Item No. 237 Fage 1 of 1

237. - Flease 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 lesponse, both the annual amount included in rate base and the annual amount included in C & M.



Cicli S Seventh Set of Interrogatories Docket No. 010949-EI GULF POWER COMPANY February 1, 2002 Item No. 238 Fage 1 of 2



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



Start's Seventh Set of Interrogatories Docket No. 010949-El GULF POWER COMPANY February 1, 2002 Item No. 238 Fage 2 of 2

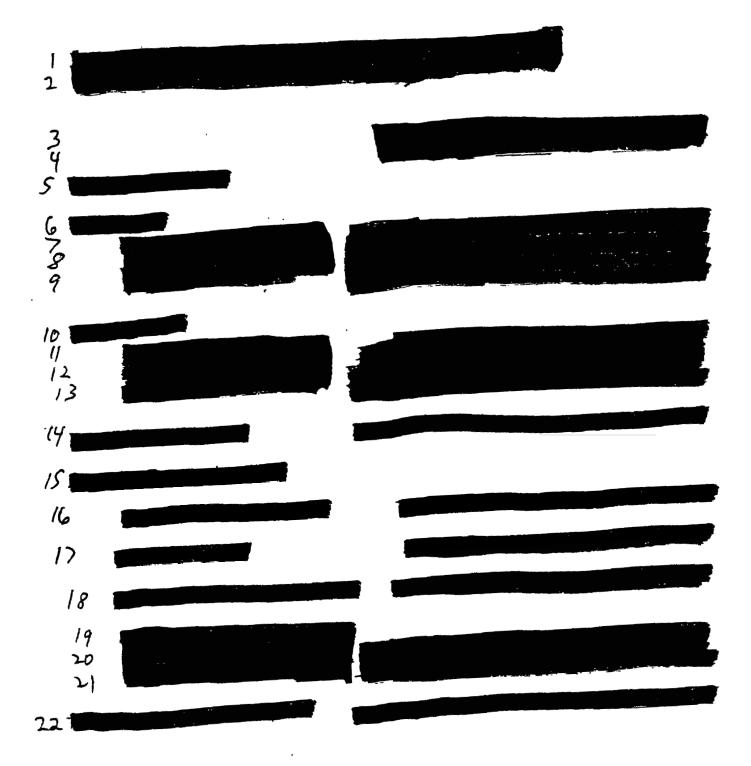


EXHIBIT "C"

Field/Line

Interrogatory 235 Lines 1 - 9

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

Justification

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.

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 <u>/2</u>th day of February 2002 by U.S. Mail to the following:

Marlene Stern, Esquire Staff Counsel FL Public Service Commission 2540 Shumard Oak Boulevard Tallahassee FL 32399-0863

Stephen Burgess, Esquire Office of Public Counsel c/o The Florida Legislature 111 W. Madison St., Room 812 Tallahassee FL 32399-1400

Vicki Kaufman, Esquire McWhirter Reeves, P.A. 117 S. Gadsden Street Tallahassee FL 32301 John W. McWhirter, Esquire McWhirter Reeves, P.A. 400 N. Tampa St., Suite 2450 Tampa FL 33601-3350

Douglas A. Shropshire, Lt. Col. USAFR AFCESA/Utility Litigation Team 6608 War Admiral Trail Tallahassee FL 32309

Michael A. Gross Vice President Florida Cable Telecommunications Assn 246 East 6th Avenue, Suite 100 Tallahassee FL 32303

malles me JEFFREY A. STONE

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