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ORIGINAL

October 8, 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

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COMMISSION
CLERK

Dear Ms. Bayo:

RE: Docket No. 020001-EI

Enclosed are an original and ten copies of Gulf Power Company's Request for Confidential Classification regarding Gulf's Risk Management Plan for Fuel Procurement.

Sincerely,

Susan D. Ritenour
Assistant Secretary and Assistant Treasurer

lw

cc: Beggs and Lane
Jeffrey A. Stone, Esquire

- AUS _____
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BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

IN RE: Fuel and purchased power cost
recovery clause and generating performance
incentive factor

Docket No.: 020001-EI
Date: October 9, 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 enter an order protecting from public disclosure Gulf Power's Risk Management Plan for Fuel Procurement. As grounds for this request, the Company states:

1. On September 19, 2002, Gulf submitted its Risk Management Plan for Fuel Procurement under a Notice of Intent to Request Confidential Classification. This information is entitled to confidential classification pursuant to §366.093(3)(a) and (e), Florida Statutes, as information, the public disclosure of which would cause irreparable harm to the competitive interests of Gulf Power and the ability of Gulf to enter into contracts on terms favorable to it and its ratepayers. The information for which confidential classification is sought is intended to be and is treated by Gulf Power Company as private and is not otherwise publically available.

2. Gulf Power Company's Risk Management Plan for Fuel Procurement contains proprietary and commercially sensitive information regarding Gulf Power, which if disclosed to the general public would cause irreparable harm to Gulf Power. Specifically, the Risk Management Plan for Fuel Procurement contains, in a single resource, detailed information about Gulf's fuel procurement in the near term and into the future. This information is entitled to

confidential classification pursuant to §366.093(3)(a) and (e), Florida Statutes. Gulf and other members of the market in which it competes for fuel and fuel transportation, and fuel storage consider this type of information to be trade secret and competitively sensitive. This information discusses how Gulf manages its fuel procurement with specific information regarding Gulf's fuel needs, market position, trends it sees in those markets in which it addresses its fuel needs and the Company's possible reactions to various market events and conditions. In addition, the strategy employed by Gulf or on its behalf in the procurement of fuel are discussed in great detail. Gulf's competitors are not required to disclose this information or information similar to it such that Gulf could gain the same competitive advantage that its competitors would gain from this information if it were made public. Moreover, fuel suppliers can use this information to Gulf's disadvantage in negotiations for fuel and fuel transportation which would result in detriment to Gulf's ratepayers. Disclosure of this information would adversely affect Gulf's ability to manage its fuel procurement in a manner that secures the best price and terms for its customers fuel needs.

3. Portions of the information at various parts of Gulf Power Company's Risk Management Plan for Fuel Procurement are already the subject of either a pending request for confidential classification or an order granting such a request. This information continues to be regarded as confidential for the reasons set forth in those filings or orders.

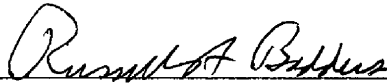
4. The information filed pursuant to this Request is intended to be, and is treated as, confidential by the Gulf and has not been otherwise publicly disclosed.

5. Submitted as Exhibit "A" is a copy of the Risk Management Plan for Fuel Procurement, 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 Risk Management Plan for Fuel Procurement, which may be made available for public review and inspection. Attached as Exhibit "C" to this request is a line-by-line/field-by-field justification for the request for confidential classification.

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 8th day of October 2002,



JEFFREY A. STONE

Florida Bar No. 325953

RUSSELL A. BADDERS

Florida Bar No. 007455

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Attorneys for Gulf Power Company

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

IN RE: Fuel and purchased power cost
recovery clause and generating performance
incentive factor

Docket No.: 020001-EI

Date: October 9, 2002

REQUEST FOR CONFIDENTIAL CLASSIFICATION

EXHIBIT "A"

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

EXHIBIT "B"

Gulf Power's Risk Management Plan for Fuel Procurement

Pages 1 - 68 in their entirety including all graphs, diagrams, charts and appendix are considered confidential and are the subject of this request for confidential classification.

EXHIBIT C

Line-by-Line/Field-by-Field Justification

Line(s)/Field(s) _____

Justification

Gulf Power Company's Risk Management Plan
for Fuel Procurement

Pages 1- 68 including but not limited to all
tables, notations, and text.

This information is entitled to confidential classification pursuant to §366.093(3)(a) and (e), Florida Statutes. The information provided presents details about fuel procurement which are not compiled in a similar document which is publically available. Disclosure of what types of information are a part of Gulf's Risk Management Plan for Fuel Procurement is itself confidential. This document sets forth what Gulf believes should be included or excluded in such a plan which tends to reveal Gulf's fuel procurement strategy. The basis for this information being designated as confidential is more fully set forth in paragraphs 2 and 3.

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

IN RE: Fuel and Purchased Power Cost)
Recovery Clause with Generating)
Performance Incentive Factor)
_____)

Docket No. 020001-EI

Certificate of Service

I HEREBY CERTIFY that a true copy of the foregoing was furnished by hand delivery or the U. S. Mail this 8th day of October 2002 on the following:

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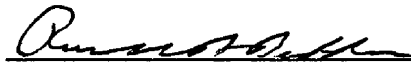
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