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Pensacola, Florida 32520

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COMMISSION
CLERK

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October 16, 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. 020001-EI

Enclosed are an original and ten copies of Gulf Power Company's Request for Confidential Classification regarding interrogatory number 6 of Staff's First Set of Interrogatories to Gulf Power Company (Nos. 1-7 and 18-21).

Sincerely,

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

Susan D. Ritenour
Assistant Secretary and Assistant Treasurer

lw

cc: Beggs and Lane
Jeffrey A. Stone, Esquire

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FPSC-BUREAU OF RECORDS

DOCUMENT NUMBER-DATE

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FPSC-COMMISSION CLERK

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 16, 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 the Company’s responses to interrogatory numbered 6 of Staff’s First Set of Interrogatories to Gulf Power Company (Nos. 1-7 and 18-21). As grounds for this request, the Company states:.

1. On September 27, 2002, a notice of intent to request confidential classification was filed with regard to interrogatory number 6 of Staff’s First Set of Interrogatories to Gulf Power Company (Nos. 1-7 and 18-21).

2. The response to interrogatory number 6 contains proprietary and commercially sensitive information regarding Gulf Power, which if disclosed to the general public would cause irreparable harm to Gulf Power. This information is entitled to confidential classification pursuant to §366.093(3)(a) and (e), Florida Statutes. The response is a listing of specific pricing and economic dispatch information about the Gulf Power Company and the Southern electric system generating fleet during a specified time period. Gulf and other members of the market in which it competes consider this type of information to be trade secret and competitively sensitive. Gulf’s competitors are not required to disclose this information or information similar

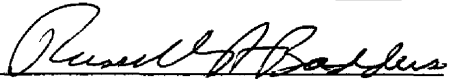
to it such that Gulf could gain the same competitive advantage that its competitors would gain from this information if it were publically disclosed. Disclosure of this information would adversely affect Gulf's ability to economically operate its system to the benefit of its customers. Knowledge of the economic details of a utility's generating fleet would enable a competitor or resource supplier to undermine that utility's competitive and economic position.

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

4. Submitted as Exhibit "A" is a copy of the response, 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 response, 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 16th day of October 2002,


JEFFREY A. STONE
Florida Bar No. 325953
RUSSELL A. BADDERS
Florida Bar No. 007455
Beggs & Lane
P. O. Box 12950
Pensacola, FL 32591
(850) 432-2451
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 16, 2002

_____)

REQUEST FOR CONFIDENTIAL CLASSIFICATION

EXHIBIT "A"

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

EXHIBIT "B"

6. For each hour referenced in response to staff's Interrogatory No. 3, provide the following information for each resource, in ascending order of marginal cost, that Gulf Power dispatched to meet its total load:
- a. Name of system resource;
 - b. Output of system resource; and
 - c. Marginal cost of system resource.

For purposes of this interrogatory, a system resource can include, but is not limited to: Gulf Power's generating units; a wholesale energy purchase; interruptible or curtailable load; and dispatchable load management.

ANSWER:

See pages 2 through 11 for response.

A B C D E

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A	B	C	D	E
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Staff's First Set of Interrogatories
Docket No. 020001-EI
GULF POWER COMPANY
September 27, 2002
Item No. 6
Page 6 of 11

A B C D E

Date	Hr	Resource Name	Mwh	\$/Mwh
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Date	Hrs	Resource Name	Mwh	\$/Mwh

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Date	Hr	ResourceName	Mwh	\$/Mwh
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A Date	B Hr	C ResourceName	D MWh	E S/MWh
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A	B	C	D	E
Date	Time	Resource Name	MWh	\$/MWh

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EXHIBIT C

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

Line(s)/Field(s)

Interrogatory 6
Page 2 of 11, Lines 1-39, Columns A-E
Page 3 of 11, Lines 1-38, Columns A-E
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Page 5 of 11, Lines 1-25, Columns A-E
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Justification

This information is entitled to confidential classification pursuant to §366.093(3)(a) and (e), Florida Statutes. The basis for this information being designated as confidential is more fully set forth in paragraph 2.

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 16th day of October 2002 on the following:

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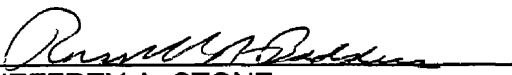
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