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ORIGINAL



March 31, 2004

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
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Dear Ms. Bayo:

RE: Docket No. 040001-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,

lw

Enclosures

cc: Beggs and Lane
Jeffrey A. Stone, Esquire

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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.: 040001-EU
Date Filed: April 1, 2004

REQUEST FOR CONFIDENTIAL CLASSIFICATION

1. Notices and communications with respect to this Notice should be addressed to:

Jeffrey A. Stone, Esquire
Russell A. Badders, Esquire
Beggs & Lane
P. O. Box 12950
Pensacola, FL 32591

Susan D. Ritenour
Secretary and Treasurer
Gulf Power Company
One Energy Place
Pensacola, FL 32520-0780

2. Gulf Power Company ["Gulf Power", "Gulf", or "the Company"], by and through its undersigned attorney's 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 Powers's Risk Management Plan for Fuel Procurement. A copy of the Gulf Powers's Risk Management Plan for Fuel Procurement is attached hereto as exhibit "A".

3. Gulf Powers's Risk Management Plan for Fuel Procurement is entitled to confidential classification pursuant to section 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 Company 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.

4. Gulf Power Company's Risk Management Plan for Fuel Procurement contains proprietary and commercially sensitive information regarding Gulf Power Company 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 for the near term and into the future. This information is entitled to confidential classification pursuant to section 366.093(3)(a) and (e), Florida Statutes. Gulf Power and other members of the market in which it competes for fuel, 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 details regarding Gulf's fuel needs, market position and trends it sees in those markets in which it addresses its fuel needs. In addition, the strategy employed by Gulf or on its behalf in the procurement of fuel is discussed in detail. Similar information is not made public by other market participants which would give these other market participants an advantage over Gulf in the fuel markets. This would result in a detriment to Gulf's ratepayers as it would prevent Gulf from managing its fuel procurement in a manner that secures the best price and terms for its customers' fuel needs.

5. The Commission has granted confidential classification for Gulf Power Company's Risk Management Plan for Fuel Procurement in the past. See Florida Public Service Commission Order No. PSC-03-0032-CFO-EI.

6. The information filed pursuant to this request is intended to be, and is treated as, confidential by Gulf and has not been otherwise publically disclosed.

7. Submitted as Exhibit "A" is a copy of the Risk Management Plan for Fuel Procurement, on which the confidential portions are identified. Exhibit "A" should be treated as confidential pending a ruling on this request. Attached as Exhibit "B" are two edited copies of the Risk Management Plan for Fuel Procurement, which may be made available for public review. Attached as Exhibit "C" to this request is a 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 identified as confidential on Exhibit "A" from public disclosure as proprietary confidential business information.

Respectfully submitted this 5th day of April 2004,



JEFFREY A. STONE

Florida Bar No. 325953

RUSSELL A. BADDERS

Florida Bar No. 007455

Beggs & Lane

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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.: 040001-EI
Date: April 1, 2004

REQUEST FOR CONFIDENTIAL CLASSIFICATION

EXHIBIT "A"

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

EXHIBIT "B"

Gulf Power Company's Risk Management Plan for Fuel Procurement

Pages 1 - 77 in their entirety including all graphs, diagrams, charts, text and appendix are considers confidential and are the subject of this request for confidential classification.

EXHIBIT C

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

Line(s)/Field(s)

Gulf Power Company's Risk Management Plan
for Fuel Procurement

Pages 1 - 77 including but not limited to all
tables, notations, graphs and text.

Justification

This information is entitled to confidential classification pursuant to §366.093(3)(a) and (e), Florida Statutes. The information presents details about fuel procurement which are not compiled in a similar document that is publically available. Disclosure of the types of information that are a part of Gulf's Risk Management Plan for Fuel Procurement is itself confidential. This document sets forth Gulf's strategy with regard to fuel procurement. The basis for this information being designated as confidential is more fully set forth in paragraphs 3 and 4.

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

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

Docket No. 040001-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 31st day of March 2004 on the following:

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