

ORIGINAL

State of Florida



Public Service Commission

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CLERK

DATE: April 30, 2007

TO: Kira Scott, Senior Attorney, Office of the General Counsel *KS*

FROM: Lisa S. Harvey, Chief of Performance Analysis, Division of Competitive Markets & Enforcement *LSH*

RE: Docket 070244-EI, Recommendation concerning Gulf Power Company, Inc.'s (Gulf) request for confidential classification on a portion of staff work papers prepared during "Review of Customer Deposit Procedures of Florida's Five Investor-Owned Utilities". Document Numbered 02554-07.

On March 21, 2007 pursuant to Section 366.093, Florida Statutes, and Rule 25-22-006, Florida Administrative Code, Gulf filed a request that the Florida Public Service Commission enter an order protecting from public disclosure certain information provided during staff's review of company deposit procedures.

Specifically, Gulf seeks to protect from public disclosure lists of personal account numbers used by the auditors during sampling of customer service operations. These numbers appear in auditors' handwritten notes included in staff work papers identified as Document Number 02554-07.

Gulf contends that customer account numbers are proprietary confidential business information pursuant to Section 366.093(3) of the Florida Statutes and that public disclosure could cause harm to ratepayers. Gulf posits that disclosure may enable unauthorized persons to fully access personal account information using Gulf's automated telephone system.

CMP _____ Gulf currently holds all account numbers as confidential and has not otherwise publicly disclosed them.

CTR _____ The information identified by Gulf should be granted a confidential classification. Disclosure of customers' personal account numbers could provide unauthorized access to third parties possessing no legitimate right or need for such access. The potential for harm to customers and to Gulf is clear.

OPC _____ Further, any order resolving Gulf's request should provide that once the order becomes final, the docket should be closed.

RCR _____

SCA _____

SEC _____

OTH _____

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DOCUMENT NUMBER-DATE

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