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COMMISSION  
CLERK



April 14, 2008

Ms. Ann Cole, Commission Clerk  
Florida Public Service Commission  
2540 Shumard Oak Boulevard  
Tallahassee FL 32399-0850

Dear Ms. Cole:

RE: Docket No. 080001-EI

Enclosed are an original and seven copies of Gulf Power Company's Request for Extended Confidential Classification (Request Number 2 of Commission Staff's First Data Request dated August 18, 2006).

Sincerely,

*Susan D. Ritenour*

CMP \_\_\_\_\_

COM \_\_\_\_\_

CTR \_\_\_\_\_

ECR \_\_\_\_\_

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GCL 1

OPC \_\_\_\_\_

Enclosures

RCA \_\_\_\_\_

cc: Beggs & Lane  
Jeffrey A. Stone, Esq.

SCR \_\_\_\_\_

SGA \_\_\_\_\_

SEC \_\_\_\_\_

OTH 1 copy

records

DOCUMENT NUMBER DATE  
02875 APR 15 08  
FPSC-COMMISSION CLERK

BEFORE THE PUBLIC SERVICE COMMISSION

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

Docket No.: 080001-EI  
Date filed: April 14, 2008

**REQUEST FOR EXTENDED 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 its request that the Florida Public Service Commission (the "Commission") enter an order granting extended confidential classification for certain documents submitted in response to Request Number 2 of Commission Staff's First Data Request dated August 18, 2006. As grounds for this request, the Company states:

1. On September 12, 2006, Gulf filed its initial Request for Confidential Classification of certain documents submitted by Gulf in response to requests numbered 2 and 4 of Staff's First Data Request dated August 18, 2006. The documents consisted of six separate invoices from Bay Gas Storage Co, Ltd to Gulf Power and a copy of a natural gas Storage Service Agreement (the "Storage Contract") between Bay Gas Storage Co., Ltd and Southern Company Services, Inc. as agent for Gulf Power.

2. On November 1, 2006, the Commission entered an order granting Gulf Power's request. PSC-06-0910-CFO-EI.

3. As provided in section 366.093(4), Florida Statutes, and by the Commission's Order, the confidential documents will be made public after a period of 18 months unless Gulf or another affected party shows, and the Commission finds, that the confidential documents continue to contain proprietary confidential business information.

DOCUMENT NUMBER-DATE

02875 APR 15 08

FPSO-COMMISSION CLERK

4. Gulf hereby requests that the Commission enter an order extending the confidential classification of the Storage Contract for an additional 18-month period.

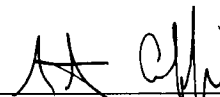
5. The Storage Contract is entitled to continued confidential classification for the same reasons it was initially classified. As stated in Gulf's initial Request, the Storage Contract is entitled to confidential classification pursuant to section 366.093(3)(d) and (e), Florida Statutes. The Storage Contract, which is still in effect, contains among other things pricing information relating to natural gas storage and is subject to a confidentiality provision. It is therefore regarded by Gulf and the counterparty as confidential in its entirety. Disclosure of this information would negatively impact Gulf's ability to negotiate pricing favorable to its customers in the future. Potential counterparties may refuse to enter into contracts with Gulf, or may charge higher prices, if the contract terms are made public.

6. The information filed pursuant to this Request is intended to be, and is treated as, confidential by Gulf Power and, to this attorney's knowledge, has not been otherwise publicly disclosed.

7. Submitted as Exhibit "A" is a complete, unredacted copy of the Storage Contract. Exhibit "A" should be treated as confidential pending a ruling on this request. Attached as Exhibit "B" is a cover page indicating that the Storage Contract has been redacted in its entirety, 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 14<sup>th</sup> day of April, 2008.



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**Attorneys for Gulf Power**

BEFORE THE PUBLIC SERVICE COMMISSION

IN RE: Fuel and purchased power cost  
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**REQUEST FOR CONFIDENTIAL CLASSIFICATION**

**Exhibit "A"**

Provided to the Commission Clerk

under separate cover as confidential information.

**Exhibit "B"**

**Pages 1 of 45 through 45 of 45 have been  
redacted in their entirety**

## EXHIBIT "C"

### **Line-by-Line/Field-by-Field Justification**

#### **Line(s)/Field(s)**

Pages 1 of 45 through 45 of 45 are confidential in their entirety.

#### **Justification**

This information is entitled to confidential classification pursuant to §366.093(3) (d) and (e), Florida Statutes. The basis for this information being designated as confidential is more fully set forth in paragraph 5.



**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that a true and correct copy of the foregoing was furnished by U. S mail this 14<sup>TH</sup> day of April, 2008, on the following:

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LISA POLAK EDGAR  
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NANCY ARGENZIANO  
NATHAN A. SKOP



OFFICE OF COMMISSION CLERK  
ANN COLE  
COMMISSION CLERK  
(850) 413-6770

**CONFIDENTIAL**

**Public Service Commission**

**ACKNOWLEDGEMENT**

DATE: April 15, 2008

TO: Susan Ritenour, Gulf Power Company

FROM: Ruth Nettles, Office of Commission Clerk

RE: **Acknowledgement of Receipt of Confidential Filing**

This will acknowledge receipt of a **CONFIDENTIAL DOCUMENT** filed in Docket Number 080001 or, if filed in an undocketed matter, concerning Extended confidential classification in response to Request No. 2 of Commission Staff's 1<sup>st</sup> Data request dated 8/18/06, and filed on behalf of Gulf Power Company. The document will be maintained in locked storage.

If you have any questions regarding this document, please contact Marguerite Lockard, Deputy Clerk, at (850) 413-6770.

DOCUMENT NUMBER - DATE  
02876 APR 15 08  
FPSC-COMMISSION CLERK

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