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08 JUL 29 PM 4: 26

COMMISSION
CLERK



July 28, 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-E1

Enclosed are an original and fifteen copies of Gulf Power Company's Request for Confidential Classification regarding Mid-Course Correction Data Request number 13.

Sincerely,

Susan D. Ritenour
bnd

COM _____
ECR _____
GEL 3 _____
OPC _____
RCP *th* _____
SSC _____
SGA _____
ADM _____ cc: Beggs & Lane
CLK _____ Jeffrey A. Stone, Esq.

DOCUMENT NUMBER-DATE

06644 JUL 29 08

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.: 080001-EI
Date: July 28, 2008

REQUEST FOR CONFIDENTIAL CLASSIFICATION

GULF POWER COMPANY ["Gulf Power", "Gulf", or the "Company"], by and through its undersigned attorneys 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 certain information submitted by Gulf Power in response to Commission Staff's Mid-Course Correction Data Request number 13. As grounds for this request, the Company states:

1. On July 10, 2008, Gulf Power filed a Notice of Intent to Request Confidential Classification of information submitted in response to request number 13 of Staff's Mid-Course Correction Data Request pursuant to Rule 25-22.006, F.A.C. Because the documents are still in possession of the Commission Staff, Gulf files this Request for Confidential Classification pursuant to Rule 25-22.006(3)(a)1, F.A.C.

2. A portion of the information submitted by Gulf Power in response to request number 13 of Commission Staff's Mid-Course Correction Data Request is proprietary confidential business information regarding contractual matters which would cause irreparable harm to Gulf Power, the entities with whom it has entered into contracts and most importantly to Gulf's customers if such information were disclosed to the general public. The information is entitled to confidential classification pursuant to §366.093(3) (d) and (e), Florida Statutes. Specifically, the confidential information consists of pricing data from a fuel procurement contract. Disclosure of this information would negatively impact Gulf's Power's ability to negotiate pricing favorable to its customers in the future. In addition, potential counterparties

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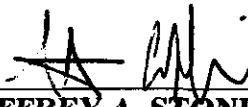
may refuse to enter into contracts with Gulf Power or would charge higher prices if the contract terms were made public.

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

4. Submitted as Exhibit "A" are copies of the subject documents, on which are 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 subject documents, 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 28th day of July, 2008.



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Attorneys for Gulf Power Company

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing was furnished by U. S mail this 28th day of July, 2008, on the following:

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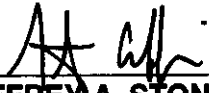
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BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

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

Docket No.: 080001-EI
Date: July 28, 2008

REQUEST FOR CONFIDENTIAL CLASSIFICATION

EXHIBIT "A"

Provided to the Commission Clerk
under separate cover as confidential information

EXHIBIT "B"

13. Regarding the force majeure event, what was the delivered price (dollars per ton and dollars per MMBtu) of the coal and what was the delivered price (dollars per ton and dollars per MMBtu) of the replacement coal? Please include in the response the number of tons not delivered due to the force majeure event and the number of tons of replacement coal that Gulf purchased. Also state the origin of the replacement coal.

GULF'S RESPONSE:

	A	B
	\$/MMBtu	\$/Ton
Contract Supply Price (Delivered to Crist Plant)	[REDACTED]	[REDACTED]
Average Replacement Price (Delivered to Crist Plant)	4.406	97.83
Contract Supply Tons Not Delivered		1,094,000 Tons*
Replacement Tons Purchased		1,104,000 Tons

* Volumes shown are on an equivalent MMBtu basis.

Origin of Replacement Coals:

Colorado
Utah
West Virginia

EXHIBIT "C"

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

Line(s)/Field(s)

Response to Request # 13

Page 1, Line 1, Columns A-B

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 2.

STATE OF FLORIDA

COMMISSIONERS:
MATTHEW M. CARTER II, CHAIRMAN
LISA POLAK EDGAR
KATRINA J. MCMURRIAN
NANCY ARGENZIANO
NATHAN A. SKOP



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

Public Service Commission

ACKNOWLEDGEMENT

DATE: July 30, 2008

TO: Susan D. 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 certain information submitted in response to staff's Mid-Course Correction Data Request No. 13, 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.

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