

BEFORE THE PUBLIC SERVICE COMMISSION

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

Docket No.: 100001-EI  
Date filed: July 30, 2010

**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 its request that the Florida Public Service Commission enter an order protecting from public disclosure certain portions of Gulf Power's Risk Management Plan for Fuel Procurement. As grounds for this request, the Company states:

1. Portions of Gulf Power's Risk Management Plan for Fuel Procurement are entitled to confidential classification pursuant to section 366.093(3)(d) and (e), Florida Statutes, as information, the public disclosure of which could cause irreparable harm to the competitive interests of Gulf Power and the ability of Gulf to enter into contracts on terms favorable to it and its ratepayers. The Risk Management Plan for Fuel Procurement contains, in a single resource, detailed information about Gulf's fuel procurement strategy, including technology selection criteria, for the near term and into the future. Gulf Power and the other market participants for fuel, fuel transportation and fuel storage consider this detailed information to be competitively sensitive. The document 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 fuel procurement strategy utilized by Gulf is discussed in detail. Pricing information is also included in this document. Similar information is not made public by other fuel market participants. Making this information public would give these other

CLAIM OF CONFIDENTIALITY  
 NOTICE OF INTENT  
 REQUEST FOR CONFIDENTIALITY  
 FILED BY OPC  
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DOCUMENT NUMBER-DATE  
06269 AUG-2 2010  
FPSC-COMMISSION FILED

market participants a competitive advantage over Gulf which would prevent Gulf from procuring its fuel needs in a manner that secures the best price and terms for its customers.

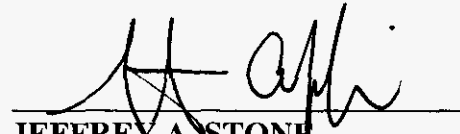
2. The information filed pursuant to this Request is intended to be, and is treated as, confidential by Gulf Power and, to this attorney's knowledge, has not been otherwise publicly disclosed.

3. The Commission granted confidential classification for previous versions of Gulf Power Company's Risk Management Plan for Fuel Procurement in Florida Public Service Commission Order Nos. PSC-03-0032-CFO-EI, PSC-04-1056-CFO-EI, PSC 05-0700-CFO-EI, PSC-06-0636-CFO-EI, PSC-09-0284-CFO-EI and PSC-10-0189-CFO-EI.

4. Submitted as Exhibit "A" is a highlighted copy of Gulf Power's Risk Management Plan for Fuel Procurement. Exhibit "A" should be treated as confidential pending a ruling on this request. Attached as Exhibit "B" are two (2) edited copies of Gulf Power's Risk Management Plan for Fuel Procurement, 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 30<sup>th</sup> day of July, 2010.

A handwritten signature in black ink, appearing to read "Jeffrey A. Stone", written over a horizontal line.

**JEFFREY A. STONE**

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**Attorneys for Gulf Power**

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**Exhibit "A"**

Provided to the Commission Clerk

under separate cover as confidential information.

**Exhibit "B"**

## **Exhibit "C": Line-by-Line/Field-by-Field Justification**

**Line(s)/Field(s)**<sup>1</sup>

**Justification**

Page 7 of 100  
Lines 5-9, 11-15 and 17-26

The information delineated in Exhibit "C" 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 1.

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Lines 8-13 and 26-29

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Lines 1-4

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<sup>1</sup> Page number references correspond with the page numbers printed in the bottom center of each page.

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

**Justification**

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Lines 10-12, 18-21 and 27-30

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Lines 7-18 and 24-25

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Lines 1-3, 12-14, 21-23 and 29-31

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Columns A, Lines 4a-4m  
Column B, Lines 4a-4m  
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Column A, Lines 3a-3e  
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**Line(s)/Field(s)**

**Justification**

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Lines 4-8, 10-13 and 15-16

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

**Justification**

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Lines 6-11

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Column A, Lines 4-6  
Column B, Lines 4-6

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Column A, Lines 1-4  
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Column A, Lines 5-6  
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Column A, Lines 1-3  
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Column A, Lines 2-5  
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Column A, Lines 5-7  
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Column A, Lines 1-3  
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Column A, Lines 1-3  
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Column A, Lines 1-2  
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**Line(s)/Field(s)**

**Justification**

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Column A, Lines 1-3  
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Lines 4-25

State of Florida



## Public Service Commission

CAPITAL CIRCLE OFFICE CENTER • 2540 SHUMARD OAK BOULEVARD  
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**Susan Ritenour**  
One Energy Place  
Pensacola FL 32520

**Re: Acknowledgement of Confidential Filing in Docket No. 100001-EI**

This will acknowledge receipt by the Florida Public Service Commission, Office of Commission Clerk, of a CONFIDENTIAL DOCUMENT filed on August 2, 2010, in the above-referenced docket.

Document Numbers 06264-10 and 06265-10 has been assigned to this filing, which will be maintained in locked storage.

If you have any questions regarding this document, please contact Kim Peña, Records Management Assistant, at (850) 413-6393.