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COMMISSION
CLERK



September 29, 2010

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

Dear Ms. Cole:

RE: Docket No. 100001-EI

Enclosed is Gulf Power Company's Request for Confidential Classification regarding interrogatory 45 submitted by Gulf Power in response to Commission Staff's Fourth Set of Interrogatories to Gulf Power Company (Nos. 45-54).

Sincerely,

Susan D. Ritenour

vm

Enclosures

COM _____
APA 1
ECR 1
GCL 1
RAD 1
SSC _____
ADM _____
OPC _____
CLK Pena

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

____ CLAIM OF CONFIDENTIALITY
____ NOTICE OF INTENT
 REQUEST FOR CONFIDENTIALITY
____ FILED BY OPC
FOR DN 08181-16, WHICH
IS IN LOCKED STORAGE. YOU MUST BE
AUTHORIZED TO VIEW THIS DN. - CLK

DOCUMENT NUMBER-DATE

08180 SEP 30 e

FPSC-COMMISSION CLERK

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

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

Docket No.: 100001-EI

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true copy of the foregoing was furnished by U.S. Mail this 29th day of September, 2010, on the following:

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Pensacola FL 32591-2950

(850) 432-2451

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.: 100001-EI
Date: September 29, 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 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 Fourth Set of Interrogatories to Gulf Power Company (Nos. 45-54). As grounds for this request, the Company states:

1. A portion of the information submitted by Gulf Power in response to interrogatory number 45 of Commission Staff’s Fourth Set of Interrogatories constitutes proprietary confidential business information concerning bids or other contractual data the disclosure of which would impair the efforts of Gulf Power to contract for goods and/or services on favorable terms. The information is entitled to confidential classification pursuant to section 366.093(3)(d) and (e), Florida Statutes. Specifically, the confidential information consists of pricing for natural gas hedging transactions executed by Gulf in 2007-2010. Gulf and other members of the market in which it competes consider this type of information to be competitively sensitive. Disclosure of this information could affect the pricing and availability of hedging opportunities for Gulf in the market and thereby adversely affect Gulf’s ability to conduct its hedging activities to the benefit of its customers.

2. 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.

DOCUMENT NUMBER-DATE

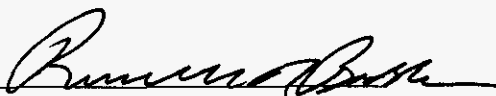
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FPSC-COMMISSION CLERK

3. Submitted as Exhibit "A" are copies of the subject documents, on which is 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 29th day of September, 2010.



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Attorneys for Gulf Power Company

REDACTED

EXHIBIT "B"

DOCUMENT NUMBER-DATE
08180 SEP 30 9
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										(A)	(B)
Line No.	Deal Number	Transaction Date	Deal Type	Opco	Deal Start Date	Deal End Date	Gulf Fixed Price	Avg. Price	Close-NYMEX	% Diff	
1	84	7/23/2007	Swaps	GULF	4/1/2010	10/31/2010		\$	7.7448		
2	86	7/24/2007	Swaps	GULF	11/1/2009	3/31/2010		\$	8.9440		
3	95	8/21/2007	Swaps	GULF	11/1/2009	3/31/2010		\$	8.7410		
4	97	8/21/2007	Swaps	GULF	4/1/2010	10/31/2010		\$	7.5950		
5	111	9/17/2007	Swaps	GULF	11/1/2009	3/31/2010		\$	8.7430		
6	134	10/11/2007	Swaps	GULF	11/1/2009	3/31/2010		\$	8.6114		
7	195	12/17/2007	Swaps	GULF	11/1/2009	3/31/2010		\$	8.7618		
8	232	1/22/2008	Swaps	GULF	11/1/2009	3/31/2010		\$	8.6100		
9	234	1/23/2008	Swaps	GULF	11/1/2009	3/31/2010		\$	8.5550		
10	318	3/20/2008	Swaps	GULF	4/1/2010	10/31/2010		\$	8.0041		
11	319	3/20/2008	Swaps	GULF	11/1/2009	3/31/2010		\$	9.1250		
12	342	4/1/2008	Swaps	GULF	5/1/2010	7/31/2010		\$	8.2690		
13	580	7/17/2008	Swaps	GULF	11/1/2009	3/31/2010		\$	11.0980		
14	595	7/22/2008	Swaps	GULF	4/1/2010	10/31/2010		\$	9.1533		
15	602	7/22/2008	Swaps	GULF	11/1/2009	3/31/2010		\$	10.7330		
16	682	8/8/2008	Swaps	GULF	11/1/2009	3/31/2010		\$	9.8940		
17	701	8/11/2008	Swaps	GULF	11/1/2009	3/31/2010		\$	9.9350		
18	717	8/14/2008	Swaps	GULF	11/1/2009	3/31/2010		\$	9.7840		
19	726	8/15/2008	Swaps	GULF	11/1/2009	3/31/2010		\$	9.7350		
20	772	8/28/2008	Swaps	GULF	4/1/2010	10/31/2010		\$	8.7220		
21	788	9/4/2008	Swaps	GULF	4/1/2010	10/31/2010		\$	8.4617		
22	841	9/29/2008	Swaps	GULF	11/1/2009	3/31/2010		\$	8.8148		
23	850	10/2/2008	Swaps	GULF	11/1/2009	3/31/2010		\$	8.9374		
24	856	10/6/2008	Swaps	GULF	4/1/2010	10/31/2010		\$	7.9967		
25	861	10/6/2008	Swaps	GULF	11/1/2009	3/31/2010		\$	8.5310		
26	864	10/7/2008	Swaps	GULF	11/1/2009	3/31/2010		\$	8.5240		
27	898	10/23/2008	Swaps	GULF	4/1/2010	10/31/2010		\$	7.4153		
28	902	10/24/2008	Swaps	GULF	4/1/2010	10/31/2010		\$	7.3941		
29	963	11/14/2008	Swaps	GULF	4/1/2010	10/31/2010		\$	7.5103		
30	1032	12/19/2008	Swaps	GULF	1/1/2010	12/31/2010		\$	6.8972		
31	1068	1/8/2009	Swaps	GULF	4/1/2010	12/31/2010		\$	7.0229		
32	1088	1/14/2009	Swaps	GULF	4/1/2010	12/31/2010		\$	6.7313		
33	1110	1/23/2009	Swaps	GULF	4/1/2010	11/30/2010		\$	6.4344		
34	1228	3/5/2009	Swaps	GULF	4/1/2010	10/31/2010		\$	5.7224		
35	1233	3/6/2009	Swaps	GULF	4/1/2010	10/31/2010		\$	5.6454		
36	1234	3/6/2009	Swaps	GULF	12/1/2009	12/31/2009		\$	5.5450		
37	1240	11/20/2007	Swaps	GULF	4/1/2010	10/31/2010		\$	7.8421		
38	1266	3/17/2009	Swaps	GULF	4/1/2010	10/31/2010		\$	5.4958		
39	1292	3/27/2009	Swaps	GULF	4/1/2010	10/31/2010		\$	5.7033		
40	1293	3/27/2009	Swaps	GULF	1/1/2010	3/31/2010		\$	5.7407		
41	1301	4/1/2009	Swaps	GULF	4/1/2010	10/31/2010		\$	5.7163		
42	5005	4/13/2009	Swaps	GULF	4/1/2010	10/31/2010		\$	5.7636		
43	5015	4/20/2009	Swaps	GULF	4/1/2010	10/31/2010		\$	5.8206		
44	5034	4/27/2009	Swaps	GULF	1/1/2010	3/31/2010		\$	5.6113		
45	5035	4/27/2009	Swaps	GULF	4/1/2010	10/31/2010		\$	5.6993		
46	5363	11/18/2009	Swaps	GULF	4/1/2010	10/31/2010		\$	5.0561		
47	5465	1/26/2010	Swaps	GULF	4/1/2010	10/31/2010		\$	5.5853		

								(A)			(B)
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29	963	11/14/2008	Swaps	GULF	4/1/2010	10/31/2010		\$	7.5103		
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40	1293	3/27/2009	Swaps	GULF	1/1/2010	3/31/2010		\$	5.7407		
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42	5005	4/13/2009	Swaps	GULF	4/1/2010	10/31/2010		\$	5.7636		
43	5015	4/20/2009	Swaps	GULF	4/1/2010	10/31/2010		\$	5.8206		
44	5034	4/27/2009	Swaps	GULF	1/1/2010	3/31/2010		\$	5.6113		
45	5035	4/27/2009	Swaps	GULF	4/1/2010	10/31/2010		\$	5.6993		
46	5363	11/18/2009	Swaps	GULF	4/1/2010	10/31/2010		\$	5.0561		
47	5465	1/26/2010	Swaps	GULF	4/1/2010	10/31/2010		\$	5.5853		

EXHIBIT "C"

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

Line(s)/Field(s)

Response to Interrogatory # 45

Schedule A

Page 1 of 1

Lines 1-47, 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 1.

DOCUMENT NUMBER-DATE

8180 SEP 30 9

FPSC-COMMISSION CLERK

State of Florida



Public Service Commission
CAPITAL CIRCLE OFFICE CENTER • 2540 SHUMARD OAK BOULEVARD
TALLAHASSEE, FLORIDA 32399-0850

**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 September 30, 2010, in the above-referenced docket.

Document Number 08181-10 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.