



Public Service Commission

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TALLAHASSEE, FLORIDA 32399-0850

-M-E-M-O-R-A-N-D-U-M-

DATE: 05/20/11
TO: Office of Auditing and Performance Analysis, Office of Primary Responsibility
FROM: OFFICE OF COMMISSION CLERK
RE: CONFIDENTIALITY OF CERTAIN INFORMATION
DOCKET NO(s): 090484-EI DOCUMENT NO(s): 11174-09
DESCRIPTION: GPC (Griffin) - (CONFIDENTIAL) Certain information in staff's report concerning quality process distribution (PA-09-02-006).
SOURCE: Gulf Power Company

11 MAY 25 PM 11:11
RECEIVED-FPSC
COMMISSION CLERK

The above confidential material was filed along with a request for extended confidential classification. In accordance with Section 11.04.C.5.c.(4) of the APM, please complete the following form by checking all applicable information and forward it to the attorney assigned to the docket, along with a brief memorandum supporting your recommendation.

- Checkboxes for document classification: (a) Trade secrets; (b) Internal auditing controls and reports of internal auditors; (c) Security measures, systems, or procedures; (d) Information concerning bids or other contractual data; (e) Employee personnel information; (f) Tax returns; (g) Information relating to competitive interests.

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The material appears to be confidential in nature and harm to the company or its ratepayers will result from public disclosure.
The material appears not to be confidential in nature.
The material is a periodic or recurring filing and each filing contains confidential information.

My response was prepared by VICTOR CORDIANO on 5/25/11. I have provided one copy of the full recommendation to the Office of General Counsel and two copies to the Office of Commission Clerk for the docket file and processing of the confidential material.

DOCUMENT NUMBER: PA 09 02 006
03676 MAY 25 11
FPSC-COP HIS 104 CLERK

APF

090484-E1

**Diamond Williams**

**From:** Milstead, Natalie [NBMILSTE@SOUTHERNCO.COM]  
**Sent:** Thursday, May 19, 2011 4:08 PM  
**To:** Filings@psc.state.fl.us  
**Cc:** 'jas@beggslane.com'; Griffin, Steven R. (Beggs & Lane); Badders, Russell A. (Beggs & Lane); Larry Harris; Vic Cordiano  
**Subject:** Gulf Power Company's Request for Extended Confidential Classification  
**Attachments:** Request for Ext Confidential Classification.pdf

A. s/Susan D. Ritenour  
 Gulf Power Company  
 One Energy Place  
 Pensacola FL 32520  
 850.444.6231  
[sdriteno@southernco.com](mailto:sdriteno@southernco.com)

**RECEIVED**  
 MAY 20 2011

claim of confidentiality  
 notice of intent  
 request for confidentiality  
 filed by OPC

For DN 1174-09, which is in locked storage. You must be authorized to view this DN.-CLK

- B. Docket No. 090484-E1
- C. Gulf Power Company
- D. Document consists of 4 pages
- E. The attached document is Gulf Power Company's Request for Extended Confidential Classification.

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DOCUMENT NUMBER-DATE  
 03512 MAY 19 =  
 FPSC-COMMISSION CLERK

5/19/2011

**Susan D. Ritenour**  
Secretary and Treasurer  
and Regulatory Manager

One Energy Place  
Pensacola, Florida 32520-0781

Tel 850.444.6231  
Fax 850.444.6026  
SDRITENO@southernco.com



May 19, 2011

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

Dear Ms. Cole:

RE: Docket No. 090484-E1

Enclosed is Gulf Power Company's Request for Extended Confidential  
Classification pertaining to Portions of Gulf Powers Distribution Quality  
Assurance Audit Report (PA-09-02-006).

Sincerely,

A handwritten signature in black ink that reads "Susan D. Ritenour". The signature is written in a cursive, flowing style.

nbn

Enclosures

cc: Beggs & Lane  
Jeffrey A. Stone, Esq.  
Office of General Counsel  
Lawrence Harris  
Office of Auditing and Performance Analysis  
Victor Cordiano

DOCUMENT NUMBER-DATE

03512 MAY 19 =

FPSC-COMMISSION CLERK

**BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION**

IN RE: Review of Gulf Power Company's  
Quality Assurance Process for Distribution  
Construction

Docket No.: 090484-EI  
Date: May 19, 2011

**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 information contained in Staff Document PA-09-02-006, "Review of Gulf Power Company's Quality Assurance Process for Distribution Construction." As grounds for this request, the Company states:

1. On November 6, 2009, Gulf filed an Amended Request for Confidential Classification of information contained in Document No. 11174-09. See, Document No. 11173-09.
2. On December 3, 2009, the Commission entered an order granting Gulf's confidentiality request. See, Order No. PSC-09-0802-CFO-EI (Document No. 11738-09)
3. As provided in section 366.093(4), Florida Statutes, and by the Commission's Order, the confidential information will be made public after a period of 18 months unless Gulf or another affected party shows, and the Commission finds, that the confidential information is entitled to continued confidential treatment. The 18-month extension period expires on June 3, 2011.

4. Gulf hereby requests that the Commission enter an order extending the confidential classification of the information contained on lines 1-2 of page 20 and all of page 21 in Document No. 11174-09 for an additional 18-month period.

5. Document No. 11174-09 contains findings and results of an audit performed by Gulf Power's agent pertaining to the Company's distribution construction quality assurance processes. Specifically, the confidential information consists of findings from a 2005 risk assessment audit performed by an independent audit company, AEGIS. This information is confidential pursuant to section 366.093(3)(b), Florida Statutes. This information remains confidential for the reasons articulated in Gulf's previous request and Order No. PSC-09-0802-CFO-EI.

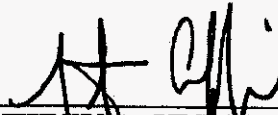
6. The information filed pursuant to this Request is intended to be, and is treated as, confidential by Gulf Power and, to this attorney's knowledge, has not been otherwise publicly disclosed.

7. The confidential information is attached as Exhibit "A," to Gulf's Amended Request for Confidential Classification and is identified as Document No. 11174-09.

**WHEREFORE**, Gulf Power Company respectfully requests that the Commission enter an order protecting the information contained in Document No. 11174-09 from public disclosure for an additional period of eighteen (18) months.

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Respectfully submitted this 19<sup>th</sup> day of May, 2011.



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**JEFFREY A. STONE**

Florida Bar No. 325953

**RUSSELL A. BADDERS**

Florida Bar No. 007455

**STEVEN R. GRIFFIN**

Florida Bar No. 0627569

**Beggs & Lane**

P. O. Box 12950

Pensacola, FL 32591

(850) 432-2451

**Attorneys for Gulf Power Company**