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June 9, 2011

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

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

For DN 04035-11, which  
is in lock of storage. You must be  
authorized to view this DN.-CLK

Dear Ms. Cole:

RE: Docket No. 110007-EI

Enclosed for Official Filing is Gulf Power Company's Request for Confidential  
Classification regarding certain information submitted by Gulf Power in connection with  
Commission Staff's audit in the above referenced docket (ACN11-005-1-2).

Regards,

*Susan Ritenour (rwd)*

COM  nbm

APA

ECR  +1 Enclosures  
CP rwd containing request.

GCL  ec: Beggs & Lane  
RAD  Jeffrey A. Stone, Esq.

SSC

ADM

OPC

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DOCUMENT NUMBER-DATE

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FPSC-COMMISSION CLERK

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

IN RE: Environmental Cost Recovery Clause  
\_\_\_\_\_)

Docket No.: 110007-EI  
Date: June 9, 2011

**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 documents produced by Gulf Power in connection with a review of Gulf Power's 2010 expenditures in the above-referenced docket (ACN 11-005-1-2) (the "Review").

As grounds for this request, the Company states:

1. A portion of the information submitted by Gulf Power in connection with the Review constitutes "proprietary confidential business information" as defined by section 366.093(3), Florida Statutes.

2. Specifically, the information concerns:

a. Bids or other contractual data, the disclosure of which would impair the efforts of Gulf Power or its affiliates to contract for goods or services on favorable terms;

b. Competitive interests, the disclosure of which would impair the competitive business of Gulf Power; and/or

c. Employee personnel information unrelated to compensation, duties, qualifications, or responsibilities.

The information contains details concerning Gulf Power's environmental cost activities between January 2010 and December 2010, including specific pricing information; purchase order, customer, and/or project numbers; and personal employee information unrelated to their compensation, duties, qualifications, or responsibilities. Disclosure of this information would

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FPSC-COMMISSION CLERK

impair Gulf Power's ability to protect itself from fraudulent actions, give other market participants a competitive advantage over Gulf, adversely affect Gulf's ability to negotiate contracts to the benefit of its customers, and subject Gulf to potential litigation over the wrongful disclosure of private information. The information is entitled to confidential classification pursuant to sections 366.093(3)(d), (e), and (f), Florida Statutes.

3. 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.

4. Submitted as Exhibit "A" are copies of the subject documents. The information for which confidential classification is requested is highlighted in yellow. Exhibit "A" should be treated as confidential pending a ruling on this request. Submitted as Exhibit "B" are two (2) edited copies of the subject documents, which may be made available for public review and inspection. Submitted as Exhibit "C" 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 9<sup>th</sup> day of June, 2011.



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**Attorneys for Gulf Power Company**

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

IN RE: Environmental Cost Recovery Clause  
\_\_\_\_\_)

Docket No.: 110007-EI  
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**EXHIBIT "A"**

Provided to the Commission Clerk under separate cover as confidential information.