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COMMISSION
CLERK



October 21, 2011

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

07750-11

RE: Docket No. 110001-EI

Dear Ms. Cole:

Enclosed is Gulf Power Company's Request for Confidential Classification regarding certain documents produced by Commission Staff and Gulf Power in connection with a review of Gulf Power's 2011 hedging settlements in the above-referenced docket (ACN 11-129-1-1).

Sincerely,

Susan D. Ritenour

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Enclosures
I also fwd

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

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DOCUMENT NUMBER-DATE

07749 OCT 24 =

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.: 110001-EI
Date: October 21, 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 Commission Staff and Gulf Power in connection with a review of Gulf Power’s 2011 hedging settlements in the above-referenced docket (ACN 11-129-1-1) (the “Review”). As grounds for this request, the Company states:

1. A portion of the information submitted by Gulf Power in response to Commission Data Requests and also included in Staff’s work papers constitutes “proprietary confidential business information” as defined by section 366.093(3), Florida Statutes.
2. Specifically, the information relates to competitive interests, the disclosure of which would impair the competitive business of Gulf Power. This information contains details concerning Gulf Power’s hedging activities between August 2010 and July 2011, including specific pricing information and target ranges for natural gas hedging transactions. Disclosure of this information would give other market participants a competitive advantage over Gulf Power and adversely affect Gulf’s ability to conduct its hedging activities to the benefit of its customers. Similarly, hedging counterparties may to refuse to conduct business with Gulf Power, or may charge higher prices, if pricing terms were made public. The information is entitled to confidential classification pursuant to section 366.093(3)(d), Florida Statutes.

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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. 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 21st day of October, 2011.



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BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

IN RE: Fuel and purchased power cost
recovery clause and generating performance
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Docket No.: 110001-EI
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EXHIBIT "A"

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