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RECEIVED-FPSC

11 OCT 28 PM 2:47

COMMISSION
CLERK



October 27, 2011

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

claim of confidentiality
is not required
 no claim of confidentiality
is required

Per Dkt. 07967-11 which
is in the public domain, no
confidentiality claim is required.

RE: Docket No. 110138-EI

Dear Ms. Cole:

Enclosed is an original and seven copies of Gulf Power Company's Request for Confidential Classification pertaining to certain portions of Gulf's response to Staff's Thirteenth Set of Interrogatories. Also included is a DVD of Gulf Power's Request for Confidential Classification and Exhibit C in Microsoft Word format as prepared on a Windows XP operating system.

Sincerely,

Susan D. Ritenour

nm

Enclosures

COM _____
APA _____
ECR _____
GCL _____
RAD _____
SRC _____
ADM _____
OPC _____
CLK _____

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

65 40 11 00 300 11

DOCUMENT NUMBER-DATE

07966 OCT 28 =

FPSC-COMMISSION CLERK

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In Re: Petition for increase in rates by Gulf
Power Company.

Docket No. 110138-EI
Dated: October 27, 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 its request that the Florida Public Service Commission enter an order protecting from public disclosure certain information included Gulf Power's response to Commission Staff's Thirteenth Interrogatories to Gulf Power (Nos. 142-162). In support of its request, Gulf states as follows.

1. Gulf Power's response to Interrogatory No. 156 of Staff's Thirteenth Interrogatories contains proprietary confidential business information as defined by section 366.093(3), Florida Statutes. Specifically, this response contains non-public salary data for a number of employee positions which have been filled or will be filled in the near future. Public disclosure of this information could provide Gulf's competitors with an advantage in acquiring and obtaining qualified employees, increase Gulf's employee turnover and associated training costs, and give prospective employees an advantage in negotiating compensation packages, leading to increases in the overall amount paid to employees. This information is confidential pursuant to section 366.093(3)(e), Florida Statutes. See, Florida Power & Light v. Florida Public Service Commission, 31 So.3d 860 (Fla. 1st DCA 2010).

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.

DOCUMENT NUMBER-DATE

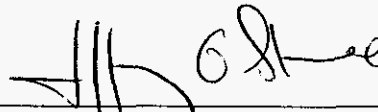
07966 OCT 28 =

FPSC-COMMISSION CLERK

3. Submitted as Exhibit "A" is a copy of the subject document. 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 document, 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 27th day of October, 2011.



JEFFREY A. STONE

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RUSSELL A. BADDERS

Florida Bar No. 007455

STEVEN R. GRIFFIN

Florida Bar No. 0627569

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Attorneys for Gulf Power Compan

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

IN RE: Petition for increase in rates by Gulf
Power Company

Docket No.: 110138-EI
Date: October 27, 2011

REQUEST FOR CONFIDENTIAL CLASSIFICATION

EXHIBIT "A"

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

REDACTED

EXHIBIT "B"

DOCUMENT NUMBER-DATE

07966 OCT 28 =

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REDACTED

A

Location: Plant Crist

(Salary and benefits)

<u>Position Title</u>	<u>Position Description/Responsibilities</u>	<u>Annual Cost</u>	<u>Salary Type</u>	<u>Date Position Created</u>	<u>Date Position Filled</u>	<u>New</u>
Operator	Reduced by 4 operator positions					
1 Welder Mechanic	Ensure efficient management of mechanical maintenance work		Capital	Pre 2002	February 2011	
2 Welder Mechanic	Ensure efficient management of mechanical maintenance work		Capital	Pre 2002	February 2011	
3 Welder Mechanic	Ensure efficient management of mechanical maintenance work		Capital	Pre 2002	February 2011	
4 Welder Mechanic	Ensure efficient management of mechanical maintenance work		Capital	Pre 2002	February 2011	
5 Welder Mechanic	Ensure efficient management of mechanical maintenance work		O&M	Pre 2002	July 2011	
6 Welder Mechanic	Ensure efficient management of mechanical maintenance work		O&M	Pre 2002	July 2011	
7 Operations Specialist	Added to ensure efficient management of operations support (updating procedures, initiative, training)		O&M	After 2002	October 2011	X
8 I&C Specialist - Should be Electrician	Added to ensure efficient management of electrical maintenance work considering overtime and contractor/SCS cost		O&M	Pre 2002	February 2011	
9 I&C Specialist - Should be Electrician	Added to ensure efficient management of electrical maintenance work considering overtime and contractor/SCS cost		O&M	Pre 2002	February 2011	
10 I&C Specialist - Should be Electrician	Added to ensure efficient management of electrical maintenance work considering overtime and contractor/SCS cost		O&M	Pre 2002	July 2011	
11 Planner	Added to ensure efficient planning and scheduling of I/C work considering overtime and contractor/SCS cost		O&M	After 2002	June 2011	X
12 Engineer	Added to ensure efficient management of system owner work - maintenance and planning		O&M	After 2002	November 2011	X
13 Engineer	Ensure efficient management of maintenance and design work		O&M	Pre 2002	November 2011	
14 Maintenance Specialist	Added to ensure efficient management of system owner work - maintenance and planning		O&M	After 2002	June 2011	X
15 Maintenance Specialist	Added to ensure efficient management of system owner work - maintenance and planning		O&M	After 2002	June 2011	X
16 Administrative Assistant	Ensure efficient management of administrative work considering overtime and temporary help		Capital	Pre 2002	March 2011	
17 C & R Technician	Ensure efficient management of additional work load from new environmental equipment		ECRC	Pre 2002	October 2011	

Staff's Thirteenth Set of Interrogatories
Docket No. 110138-EI
GULF POWER COMPANY
October 27, 2011
Item No. 156
Page 5 of 9

DOCUMENT NUMBER-DATE
07966 OCT 28 =
FPSC-COMMISSION CLERK

Location:		A				
Plant Crist		(Salary and benefits)				
<u>Position Title</u>	<u>Position Description/Responsibilities</u>	<u>Annual Cost</u>	<u>Salary Type</u>	<u>Date Position Created</u>	<u>Date Position Filled</u>	<u>New</u>
1 C & R Technician	Ensure efficient management of additional work load from new environmental equipment	[REDACTED]	ECRC	Pre 2002	Remains Vacant	
2 Team Leader - Fuel	Ensure efficient management of resources in fuel		O&M	Pre 2002	February 2011	
3 Utility Person	Ensure support of craft positions (e.g., heavy coal equipment operators, operators, electrician, mechanic, etc.) while learning a craft to fill future vacancies		O&M	Pre 2002	January 2011	
4 Utility Person	Ensure support of craft positions (e.g., heavy coal equipment operators, operators, electrician, mechanic, etc.) while learning a craft to fill future vacancies		O&M	Pre 2002	January 2011	
5 Utility Person	Ensure support of craft positions (e.g., heavy coal equipment operators, operators, electrician, mechanic, etc.) while learning a craft to fill future vacancies		O&M	Pre 2002	January 2011	
6 Utility Person	Ensure support of craft positions (e.g., heavy coal equipment operators, operators, electrician, mechanic, etc.) while learning a craft to fill future vacancies		O&M	Pre 2002	January 2011	
7 Utility Person	Ensure support of craft positions (e.g., heavy coal equipment operators, operators, electrician, mechanic, etc.) while learning a craft to fill future vacancies		O&M	Pre 2002	January 2011	
Total Annual Cost:		1,776,210				

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<u>Location:</u>	<u>Plant Smith</u>	(Salary and benefits)			
<u>Position Title</u>	<u>Position Description/Responsibilities</u>	<u>Annual Cost</u>	<u>Salary Type</u>	<u>Date Position Created</u>	<u>Date Position Filled</u>
1 Operator	Ensure adequate coverage of operations shifts		O&M	Pre 2002	Oct. 2011
2 Operator	Ensure adequate coverage of operations shifts		O&M	Pre 2002	Oct. 2011
3 Team Leader - Operations	Ensure management of operations shifts		O&M	Pre 2002	Nov. 2011
4 Utility Person	Ensure support of the craft positions (e. g., heavy coal equipment operators, operators, electrician, mechanic, etc.) while learning a craft to fill future craft vacancies		O&M	Pre 2002	8/22/2011
5 Utility Person	Ensure support of the craft positions (e. g., heavy coal equipment operators, operators, electrician, mechanic, etc.) while learning a craft to fill future craft vacancies		O&M	Pre 2002	8/23/2011
6 Utility Person	Ensure support of the craft positions (e. g., heavy coal equipment operators, operators, electrician, mechanic, etc.) while learning a craft to fill future craft vacancies		O&M	Pre 2002	8/24/2011
7 Utility Person	Ensure support of the craft positions (e. g., heavy coal equipment operators, operators, electrician, mechanic, etc.) while learning a craft to fill future craft vacancies		O&M	Pre 2002	8/29/2011
8 Utility Person	Ensure support of the craft positions (e. g., heavy coal equipment operators, operators, electrician, mechanic, etc.) while learning a craft to fill future craft vacancies		O&M	Pre 2002	Oct. 2011
9 Utility Person	Ensure support of the craft positions (e. g., heavy coal equipment operators, operators, electrician, mechanic, etc.) while learning a craft to fill future craft vacancies		O&M	Pre 2002	Oct. 2011
10 Utility Person	Ensure support of the craft positions (e. g., heavy coal equipment operators, operators, electrician, mechanic, etc.) while learning a craft to fill future craft vacancies		O&M	Pre 2002	Oct. 2011
11 Utility Person	Ensure support of the craft positions (e. g., heavy coal equipment operators, operators, electrician, mechanic, etc.) while learning a craft to fill future craft vacancies		O&M	Pre 2002	Oct. 2011
12 Electrician	Ensure efficient management of electrical maintenance work		O&M	Pre 2002	4/19/2011
13 Electrician	Ensure efficient management of electrical maintenance work		O&M	Pre 2002	Remain Vacant
14 Electrician	Ensure efficient management of electrical maintenance work		O&M	Pre 2002	Remain Vacant

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Location: Plant Smith		(Salary and benefits)			
<u>Position Title</u>	<u>Position Description/Responsibilities</u>	<u>Annual Cost</u>	<u>Salary Type</u>	<u>Date Position Created</u>	<u>Date Position Filled</u>
1 Welder Mechanic	Ensure efficient management of mechanical maintenance work	[REDACTED]	O&M	Pre 2002	Remain Vacant
2 Welder Mechanic	Ensure efficient management of mechanical maintenance work		O&M	Pre 2002	5/28/2011
3 Welder Mechanic	Ensure efficient management of mechanical maintenance work		O&M	Pre 2002	6/25/2011
4 I&C Specialist	Ensure efficient management of instrument and control maintenance work		O&M	Pre 2002	Remain Vacant
5 Engineer	Ensure efficient management of maintenance and planning design work.		O&M	Pre 2002	6/6/2011
6 Planner	Ensure efficient planning and scheduling of maintenance work.		O&M	Pre 2002	6/6/2011
7 C&R Technician	Ensure efficient management of laboratory work.		O&M	2007	6/13/2011
8 Compliance/Financial Specialist	Ensure management of the Compliance/Financial requirements for the plant.		O&M	Pre 2002	2/7/2011
9 Contract Support Specialist	Ensure management of contracts at the Plant.		O&M	2011	4/16/2011
Total Annual Cost:		1,696,594			

Location:		A				
Plant Scholz						
<u>Position Title</u>	<u>Position Description/Responsibilities</u>	<u>(Salary and benefit : Annual Cost</u>	<u>Salary Type</u>	<u>Date Position Created</u>	<u>Date Position Filled</u>	
1 Operations Specialist	Added to ensure efficient management of operations support (updating procedures, initiative, training)	[REDACTED]	O&M	Pre 2002	Remain Vacant	
2 Operator	Ensure adequate coverage of operations shifts		O&M	Pre 2002	Remain Vacant	
3 Utility Person	Ensure support of the craft positions (e. g., heavy coal equipment operators, operators, electrician, mechanic, etc.) while learning a craft to fill future craft vacancies		O&M	Pre 2002	Remain Vacant	
4 I&C Technician	Responsible for trouble shooting, repairing, performing maintenance and installing equipment.		O&M	Pre 2002	Remain Vacant	
5 Welder Mechanic	Ensure efficient management of mechanical maintenance work		O&M	Pre 2002	Oct. 2011	
6 Welder Mechanic	Ensure efficient management of mechanical maintenance work		O&M	Pre 2002	Remain Vacant	
7 Maintenance Specialist	Added to ensure efficient management of system owner work - maintenance and planning		O&M	Pre 2002	Dec. 2011	
8 Team Leader - Compliance	Accountable for effectively administering compliance programs in the areas of environmental compliance.		O&M	Pre 2002	Oct. 2011	
Total Annual Cost:		782,006				

<u>Location:</u>	<u>Plant Crist</u>	A (Salary and benefits)	<u>Annual Cost</u>	<u>Salary Type</u>	<u>Date Position Created</u>	<u>Date Position Filled</u>	<u>New</u>
Operator	Reduced by 4 operator positions						
1 Welder Mechanic	Ensure efficient management of mechanical maintenance work			Capital	Pre 2002	February 2011	
2 Welder Mechanic	Ensure efficient management of mechanical maintenance work			Capital	Pre 2002	February 2011	
3 Welder Mechanic	Ensure efficient management of mechanical maintenance work			Capital	Pre 2002	February 2011	
4 Welder Mechanic	Ensure efficient management of mechanical maintenance work			Capital	Pre 2002	February 2011	
5 Welder Mechanic	Ensure efficient management of mechanical maintenance work			O&M	Pre 2002	July 2011	
6 Welder Mechanic	Ensure efficient management of mechanical maintenance work			O&M	Pre 2002	July 2011	
7 Operations Specialist	Added to ensure efficient management of operations support (updating procedures, initiative, training)			O&M	After 2002	October 2011	X
8 I&C Specialist - Should be Electrician	Added to ensure efficient management of electrical maintenance work considering overtime and contractor/SCS cost			O&M	Pre 2002	February 2011	
9 I&C Specialist - Should be Electrician	Added to ensure efficient management of electrical maintenance work considering overtime and contractor/SCS cost			O&M	Pre 2002	February 2011	
10 I&C Specialist - Should be Electrician	Added to ensure efficient management of electrical maintenance work considering overtime and contractor/SCS cost			O&M	Pre 2002	July 2011	
11 Planner	Added to ensure efficient planning and scheduling of I/C work considering overtime and contractor/SCS cost			O&M	After 2002	June 2011	X
12 Engineer	Added to ensure efficient management of system owner work - maintenance and planning			O&M	After 2002	November 2011	X
13 Engineer	Ensure efficient management of maintenance and design work			O&M	Pre 2002	November 2011	
14 Maintenance Specialist	Added to ensure efficient management of system owner work - maintenance and planning			O&M	After 2002	June 2011	X
15 Maintenance Specialist	Added to ensure efficient management of system owner work - maintenance and planning			O&M	After 2002	June 2011	X
16 Administrative Assistant	Ensure efficient management of administrative work considering overtime and temporary help			Capital	Pre 2002	March 2011	
17 C & R Technician	Ensure efficient management of additional work load from new environmental equipment			ECRC	Pre 2002	October 2011	

Location:		Plant Crist				
<u>Position Title</u>	<u>Position Description/Responsibilities</u>	<u>Annual Cost</u>	<u>Salary Type</u>	<u>Date Position Created</u>	<u>Date Position Filled</u>	<u>New</u>
1 C & R Technician	Ensure efficient management of additional work load from new environmental equipment	[REDACTED]	ECRC	Pre 2002	Remains Vacant	
2 Team Leader - Fuel	Ensure efficient management of resources in fuel		O&M	Pre 2002	February 2011	
3 Utility Person	Ensure support of craft positions (e.g., heavy coal equipment operators, operators, electrician, mechanic, etc.) while learning a craft to fill future vacancies		O&M	Pre 2002	January 2011	
4 Utility Person	Ensure support of craft positions (e.g., heavy coal equipment operators, operators, electrician, mechanic, etc.) while learning a craft to fill future vacancies		O&M	Pre 2002	January 2011	
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6 Utility Person	Ensure support of craft positions (e.g., heavy coal equipment operators, operators, electrician, mechanic, etc.) while learning a craft to fill future vacancies		O&M	Pre 2002	January 2011	
7 Utility Person	Ensure support of craft positions (e.g., heavy coal equipment operators, operators, electrician, mechanic, etc.) while learning a craft to fill future vacancies		O&M	Pre 2002	January 2011	
Total Annual Cost:		1,776,210				

A

(Salary and benefits)

A

Location: Plant Smith

(Salary and benefits)

<u>Position Title</u>	<u>Position Description/Responsibilities</u>	<u>Annual Cost</u>	<u>Salary Type</u>	<u>Date Position Created</u>	<u>Date Position Filled</u>
1 Operator	Ensure adequate coverage of operations shifts		O&M	Pre 2002	Oct. 2011
2 Operator	Ensure adequate coverage of operations shifts		O&M	Pre 2002	Oct. 2011
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6 Utility Person	Ensure support of the craft positions (e. g., heavy coal equipment operators, operators, electrician, mechanic, etc.) while learning a craft to fill future craft vacancies		O&M	Pre 2002	8/24/2011
7 Utility Person	Ensure support of the craft positions (e. g., heavy coal equipment operators, operators, electrician, mechanic, etc.) while learning a craft to fill future craft vacancies		O&M	Pre 2002	8/29/2011
8 Utility Person	Ensure support of the craft positions (e. g., heavy coal equipment operators, operators, electrician, mechanic, etc.) while learning a craft to fill future craft vacancies		O&M	Pre 2002	Oct. 2011
9 Utility Person	Ensure support of the craft positions (e. g., heavy coal equipment operators, operators, electrician, mechanic, etc.) while learning a craft to fill future craft vacancies		O&M	Pre 2002	Oct. 2011
10 Utility Person	Ensure support of the craft positions (e. g., heavy coal equipment operators, operators, electrician, mechanic, etc.) while learning a craft to fill future craft vacancies		O&M	Pre 2002	Oct. 2011
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13 Electrician	Ensure efficient management of electrical maintenance work		O&M	Pre 2002	Remain Vacant
14 Electrician	Ensure efficient management of electrical maintenance work		O&M	Pre 2002	Remain Vacant

Location:

Plant Smith

A

(Salary and benefits)

<u>Position Title</u>	<u>Position Description/Responsibilities</u>	<u>Annual Cost</u>	<u>Salary Type</u>	<u>Date Position Created</u>	<u>Date Position Filled</u>
1 Welder Mechanic	Ensure efficient management of mechanical maintenance work		O&M	Pre 2002	Remain Vacant
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3 Welder Mechanic	Ensure efficient management of mechanical maintenance work		O&M	Pre 2002	6/25/2011
4 I&C Specialist	Ensure efficient management of instrument and control maintenance work		O&M	Pre 2002	Remain Vacant
5 Engineer	Ensure efficient management of maintenance and planning design work. .		O&M	Pre 2002	6/6/2011
6 Planner	Ensure efficient planning and scheduling of maintenance work.		O&M	Pre 2002	6/6/2011
7 C&R Technician	Ensure efficient management of laboratory work.		O&M	2007	6/13/2011
8 Compliance/Financial Specialist	Ensure management of the Compliance/Financial requirements for the plant.		O&M	Pre 2002	2/7/2011
9 Contract Support Specialist	Ensure management of contracts at the Plant.		O&M	2011	4/16/2011
Total Annual Cost:		1,696,594			

A

Location: Plant Scholz

<u>Position Title</u>	<u>Position Description/Responsibilities</u>	(Salary and benefit.) <u>Annual Cost</u>	<u>Salary Type</u>	<u>Date Position Created</u>	<u>Date Position Filled</u>
1 Operations Specialist	Added to ensure efficient management of operations support (updating procedures, initiative, training)		O&M	Pre 2002	Remain Vacant
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Total Annual Cost:		782,006			

EXHIBIT "C"

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

Line(s)/Field(s)

Interrogatory No. 156

Page 5, Column A, Lines 1-17

Page 6, Column A, Lines 1-7

Page 7, Column A, Lines 1-14

Page 8, Column A, Lines 1-9

Page 9, Column A, Lines 1-8

Justification

This information is entitled to confidential classification pursuant to §366.093(3)(e), Florida Statutes. The basis for this information being designated as confidential is more fully set forth in paragraph 1.

DOCUMENT NUMBER-DATE

07966 OCT 28 =

FPSC-COMMISSION CLERK

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

IN RE: Petition for Increase in Rates)
by Gulf Power Company)
)
)
_____)

Docket No. 110138-EI

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true copy of the foregoing was furnished by overnight delivery the 27th day of October, 2011, on the following:

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