

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

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COMMISSION  
CLERK



December 5, 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 08798-11 which  
is in locked storage. You must be  
authorized to view this DN.-CLK

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 Twenty-Sixth 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

COM \_\_\_\_\_  
APA 1 Enclosures  
ECR 2+100 containing request and exhibit C.  
GCL 1 cc: Beggs & Lane  
RAD 1 Jeffrey A. Stone, Esq.  
SRC \_\_\_\_\_  
ADM \_\_\_\_\_  
OPC \_\_\_\_\_  
CLK 1

DOCUMENT NUMBER-DATE

08797 DEC-6 =

FPSC-COMMISSION CLERK

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

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

Docket No.: 110138-EI  
Date: December 5, 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 requests that the Florida Public Service Commission enter an order protecting from public disclosure certain information produced in response to Commission Staff's Twenty Sixth Interrogatories to Gulf Power (Nos. 310-327) (the "Discovery Requests"). As grounds for this request, the Company states:

1. On November 4, 2011, Commission Staff served Gulf Power with the Discovery Requests. Gulf Power is submitting its responses to the Discovery Requests on equal date with this Request for Confidential Classification.

2. A portion of the information provided in response to Interrogatory No. 320 constitutes proprietary confidential business information as defined pursuant to section 366.093(3)(a) and (e), Florida Statutes. Specifically, the confidential information is found on pages two through six of Gulf's response to Interrogatory No. 320 and consists of excerpts from Gulf Power's and the Southern Company's internal standards and specifications for overhead and underground distribution construction. The documents are considered proprietary by Gulf Power and represent the Company's best practices for operating its system. The Southern Company and its affiliates have expended significant resources in developing these standards for use in the course of business. The standards have not been publicly disclosed, are of value to Gulf Power's and its affiliates' business and would provide an economic advantage to Gulf

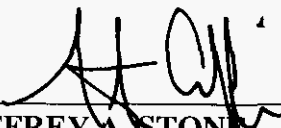
Power's competitors in the event of public disclosure. Public disclosure of this information will provide Gulf's competitors with access to the Company's internal procedures and the specifications of its facilities. Gulf's competitors could use this information to optimize their own systems at Gulf Power's expense. Similar Gulf Power documents were granted confidential classification in Order No. PSC-06-0427-CFO-EI and Order No. PSC-08-0048-CFO-EI.

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 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 contained in Exhibit "A" from public disclosure as proprietary confidential business information.

Respectfully submitted this 5<sup>th</sup> day of December, 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**

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

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

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)  
Docket No. 110138-EI

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true copy of the foregoing was furnished by overnight delivery the 5<sup>th</sup> day of December, 2011, on the following:

Office of Public Counsel  
J. R. Kelly/Joseph A. McGlothlin/Erik Sayler  
c/o The Florida Legislature  
111 W. Madison Street,  
Room 812  
Tallahassee, FL 32393-1400  
[mcglothlin.joseph@leg.state.fl.us](mailto:mcglothlin.joseph@leg.state.fl.us)  
[merchant.tricia@leg.state.fl.us](mailto:merchant.tricia@leg.state.fl.us)  
[Kelly.jr@leg.state.fl.us](mailto:Kelly.jr@leg.state.fl.us)  
[Sayler.erik@leg.state.fl.us](mailto:Sayler.erik@leg.state.fl.us)

Gunster Law Firm  
Charles A. Guyton  
215 S. Monroe St.,  
Suite 618  
Tallahassee, FL 32301  
[cguyton@gunster.com](mailto:cguyton@gunster.com)

Florida Industrial Power  
Users Group  
Vicki G. Kaufman/  
Jon C. Moyle, Jr.  
c/o Keefe Law Firm  
118 North Gadsden Street  
Tallahassee, FL 32301  
[vkaufman@kagmlaw.com](mailto:vkaufman@kagmlaw.com)

Richard Melson  
705 Piedmont Drive  
Tallahassee, FL 32312  
[rick@rmelsonlaw.com](mailto:rick@rmelsonlaw.com)

Gardner Law Firm  
Robert Scheffel Wright  
John T. La Via,  
1300 Thomaswood Drive  
Tallahassee, FL 32308  
[schef@gbwlegal.com](mailto:schef@gbwlegal.com)

Caroline Klancke  
Keino Young  
Martha Barrera  
Office of the General Counsel  
Florida Public Service Commission  
2540 Shumard Oak Boulevard  
Tallahassee, FL 32399-0850  
[mbarrera@psc.state.fl.us](mailto:mbarrera@psc.state.fl.us)  
[cklancke@psc.state.fl.us](mailto:cklancke@psc.state.fl.us)  
[kyoung@psc.state.fl.us](mailto:kyoung@psc.state.fl.us)

Federal Executive Agencies  
c/o Major Christopher C.  
Thompson  
Ms. Karen White  
AFLOA/JACL-ULFSC  
139 Barnes Drive, Suite 1  
Tyndall Air Force Base,  
Florida 32403  
[chris.thompson.2@tyndall.af.mil](mailto:chris.thompson.2@tyndall.af.mil)  
[karen.white@tyndall.af.mil](mailto:karen.white@tyndall.af.mil)

Florida Retail Federation  
227 South Adams Street  
Tallahassee, FL 32301



**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 32591-2950

(850) 432-2451

**Attorneys for Gulf Power Company**

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

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Docket No.: 110138-EI  
Date: December 5, 2011

**REQUEST FOR CONFIDENTIAL CLASSIFICATION**

**EXHIBIT "A"**

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

110138-EI

**REDACTED**

EXHIBIT "B"

Staff's Twenty-Sixth  
Set of Interrogatories  
Docket No. 110138-EI  
GULF POWER COMPANY  
December 5, 2011  
Item No. 320  
Page 2 of 6

Gulf Power's response to this interrogatory is being provided under separate cover pursuant to a Request for Confidential Classification pursuant to Rule 25-22.006(4).

DOCUMENT NUMBER - DATE  
08797 DEC -6 =  
FPSC-COMMISSION CLERK



Staff's Twenty-Sixth  
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Docket No. 110138-EI  
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Page 3 of 6

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Staff's Twenty-Sixth  
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Docket No. 110138-EI  
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Page 4 of 6

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Page 6 of 6

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EXHIBIT "C"

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

Line(s)/Field(s)

Justification

**Response to Interrogatory No. 320**

Pages 2 through 6  
**(Confidential in their entirety)**

This information is entitled to confidential classification pursuant to §366.093(3)(a) and (e), Florida Statutes. The basis for this information being designated as confidential is more fully set forth in paragraph 2.