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March 30, 2012



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

RE: Docket No. 120007-EI

For DN 01952-12, which
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12 APR -2 AM 9:51
COMMISSION
CLERK

Dear Ms. Cole:

Enclosed is Gulf Power Company's Request for Confidential Classification for certain portions of its Environmental Compliance Program Update to be filed in the above referenced docket.

Also enclosed is a compact disc containing the Request for Confidential Classification as well as exhibit C in Microsoft Word as prepared on a Windows XP operating system.

Sincerely,

12 APR -2 AM 9:51

wb

Enclosures

cc: Gunster, Yoakley & Stewart, P.A.
Charles A. Guyton, Esq.
Beggs & Lane
Jeffrey A. Stone, Esq.

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FPSC-COMMISSION CLERK

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

IN RE: Environmental Cost
Recovery Clause

Docket No.: 120007-EI
Date: April 2, 2012

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 portions of its Environmental Compliance Program Update for the Clean Air Interstate Rule, Cross State Air Pollution Rule, National Ambient Air Quality Standards, Mercury and Air Toxics Standards and Clean Air Visibility Rule (the "Compliance Program"). As grounds for this request, the Company states:

1. Gulf Power seeks confidential classification for portions of its Compliance Program which is being filed concurrently with this request. The subject information relates to competitive interests, the disclosure of which would impair the competitive business of Gulf Power and Gulf Power's ability to procure goods and services on a fair and reasonable basis. The information is therefore entitled to confidential classification pursuant to section 366.093(3)(d)-(e), Florida Statutes.

2. Table 3.1-1 identifies in detail Gulf Power's projected capital expenditures, by plant and by project, associated with the Compliance Program. Disclosure of this information could negatively impact Gulf's ability to negotiate pricing favorable to its customers when contracting with vendors of materials needed by Gulf in order to implement its Compliance Program. Similarly, Table 3.1-2 identifies in detail Gulf Power's projected operation and maintenance expenses, by plant and by project, associated with the Compliance Program. Disclosure of this information could negatively impact Gulf's ability to negotiate pricing

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favorable to its customers when contracting with vendors of services needed by Gulf in order to implement its Compliance Program.

3. Table 3.3-1 provides the results of an economic viability study by Gulf Power of its generating assets. This table provides unit-specific cost projections for combined cycle generation for use as coal retirement replacements. Wholesale competitors as well as suppliers of commodities and services could utilize this information to undermine Gulf's bargaining position in the markets where Gulf must compete to obtain commodities and services or make purchases or sales of wholesale power. In addition, disclosure of this information could negatively impact Gulf's ability to negotiate pricing favorable to its customers in the event that Gulf determined to sell one or more of its generating assets.

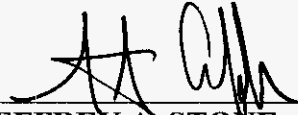
4. Finally, the Section 3.3.4 of the Compliance Program contains certain transmission cost assumptions which are specific to Gulf Power's generating plants. Competitors, as well as suppliers of commodities and services, could utilize this information to undermine Gulf's bargaining position in the markets. In addition, disclosure of this information could negatively impact Gulf's ability to negotiate pricing favorable to its customers in the event that Gulf determined to sell one or more of its generating assets.

5. 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.

6. Submitted as Exhibit "A" are highlighted pages from the Compliance Program which contain confidential information. Exhibit "A" should be treated as confidential pending a ruling on this request. Attached as Exhibit "B" are two edited copies of Exhibit "A," 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 30th day of March, 2012.

A handwritten signature in black ink, appearing to read 'JA Stone', positioned above a horizontal line.

JEFFREY A. STONE

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