



Public Service Commission

CAPITAL CIRCLE OFFICE CENTER • 2540 SHUMARD OAK BOULEVARD
TALLAHASSEE, FLORIDA 32399-0850

-M-E-M-O-R-A-N-D-U-M-

RECEIVED-FPSC
13 APR 29 PM 1:09
COMMISSION CLERK

DATE: April 29, 2013
TO: Office of Auditing and Performance Analysis, Office of Primary Responsibility
FROM: OFFICE OF COMMISSION CLERK
RE: CONFIDENTIALITY OF CERTAIN INFORMATION

DOCKET NO: 090484-EI DOCUMENT NO: 11174-09

DESCRIPTION: GPC (Griffin) - (CONFIDENTIAL) Certain information in staff's report concerning review of GPC's quality assurance process for distribution construction (PA-09-02-006).

SOURCE: Gulf Power Company

The above confidential material was filed along with a request for extended confidential classification (DN 08242-12). Please complete the following form by checking all applicable information and forward it to the attorney assigned to the docket, along with a brief memorandum supporting your recommendation.

- The document(s) is (are), in fact, what the utility asserts it (them) to be.
- The utility has provided enough details to perform a reasoned analysis of its request.
- The material has been received incident to an inquiry.
- The material is confidential business information because it includes:
 - (a) Trade secrets;
 - (b) Internal auditing controls and reports of internal auditors;
 - (c) Security measures, systems, or procedures;
 - (d) Information concerning bids or other contractual data, the disclosure of which would impair the efforts of the company to contract for services on favorable terms;
 - (e) Employee personnel information unrelated to compensation, duties, qualifications, or responsibilities;
 - (f) Tax returns or tax-related information;
 - (g) Information relating to competitive interests, the disclosure of which would impair the competitive business of the provider of information.
- The material appears to be confidential in nature and harm to the company or its ratepayers will result from public disclosure.
- The material appears not to be confidential in nature.
- The material is a periodic or recurring filing and each filing contains confidential information.

This response was prepared by Victor Cordiano on 04/29/13, a copy of which has been sent to the Office of Commission Clerk and the Office of General Counsel.

DOCUMENT NUMBER - DATE
02249 APR 29 2013
FPSC-COMMISSION CLERK

State of Florida



Public Service Commission

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TALLAHASSEE, FLORIDA 32399-0850

-M-E-M-O-R-A-N-D-U-M-

DATE: April 29, 2013
TO: Kathryn Cowdery, Senior Attorney, Office of the General Counsel
FROM: Victor Cordiano, Engineering Specialist II, Office of Auditing and Performance Analysis ^{VC}
RE: 090484-EI - Request for extended confidential classification of portions of staff's *Review of Gulf Power Company's Quality Assurance Process for Distribution Construction*
Documents: 08242-12 and 11174-09

Attached is a December 19, 2012 request (DN 08242-12) from Gulf Power Company (Gulf) requesting extended confidential treatment of certain information contained in staff's report, entitled *Review of Gulf Power Company's Quality Assurance Process for Distribution Construction*. The report has been published with all requested items redacted. The company cites §366.093(3)(b) and (e), F.S., as the basis for such request.

Staff has reviewed this request and recommends the following:

Page 20, Lines 1-2 and Page 21 (entire):

Audit staff notes that this information is derived from a risk assessment external audit and is competitively sensitive and proprietary pursuant to the aforementioned statutes. Therefore, audit staff recommends that Gulf's request for confidentiality be approved.

Eric Fryson

From: Darnes, Melissa Ann [MADARNES@SOUTHERNCO.COM]
Sent: Wednesday, December 19, 2012 5:00 PM
To: Filings@psc.state.fl.us
Subject: Gulf Power Company's Request for Extended Confidential Classification to Portions of Gulf Power's Distribution Quality Assurance Audit Report

Attachments: 12-19-12 Request for Ext Confidential Classification.pdf

A. s/Robert L. McGee

Gulf Power Company

One Energy Place

Pensacola FL 32520

850.444.6530

rlmcgee@southernco.com

B. Docket No. 090484-EI

C. Gulf Power Company

D. Document consists of 4 pages.

E. The attached document is Gulf Power Company's Request for Extended Confidential Classification to Portions of Gulf Power's Distribution Quality Assurance Audit Report.

Melissa Darnes

Gulf Power Company • Admin Assistant I/Regulatory & Pricing

One Energy Place • Pensacola, FL 32520-0601

Phone: 850.444.6730 • Fax: 850.444.6026

Stay connected with Gulf Power



12/20/2012

08242 DEC 19 2012

08242 DEC 19 2012

FPSC-COMMISSION CLERK

Robert L. McGee, Jr.
Regulatory & Pricing Manager

One Energy Place
Pensacola, Florida 32520-0780

Tel 850.444.6530
Fax 850.444.6026
RLMCGEE@southernco.com



December 19, 2012

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

Dear Ms. Cole:

RE: Docket No. 090484-EI

Attached is Gulf Power Company's Request for Extended Confidential Classification pertaining to portions of Gulf Power's Distribution Quality Assurance Audit Report (PA-09-02-006).

Sincerely,

A handwritten signature in black ink that reads "Robert L. McGee, Jr." in a cursive style.

Robert L. McGee, Jr.
Regulatory and Pricing Manager

md

Attachments

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

DOCUMENT NUMBER DATE

08242 DEC 19 02

FPSC-COMMISSION CLERK

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

IN RE: Review of Gulf Power Company's
Quality Assurance Process for Distribution
Construction

Docket No.: 090484-EI
Date: December 19, 2012

REQUEST FOR EXTENDED CONFIDENTIAL CLASSIFICATION

GULF POWER COMPANY ["Gulf Power", "Gulf", or the "Company"], by and through its undersigned attorney and pursuant to Rule 25-22.006, Florida Administrative Code, hereby files its request that the Florida Public Service Commission (the "Commission") enter an order granting extended confidential classification for certain information contained in Staff Document PA-09-02-006, "Review of Gulf Power Company's Quality Assurance Process for Distribution Construction." As grounds for this request, the Company states:

1. On November 6, 2009, Gulf filed an Amended Request for Confidential Classification of information contained in Document No. 11174-09. See, Document No. 11173-09.
2. On December 3, 2009, the Commission entered an order granting Gulf's confidentiality request for a period of eighteen (18) months. See, Order No. PSC-09-0802-CFO-EI (Document No. 11738-09)
3. On May 19, 2011, Gulf timely filed a request that the Commission extend the confidential treatment of the same information contained in Document No. 11174-09 for an additional 18-month period. See, Document No. 03512-11. On June 29, 2011, the Commission entered an order granting Gulf Power's request for extended confidential classification. See, Order No. PSC-11-0283-PCO-EI

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4. As provided in section 366.093(4), Florida Statutes, and by the Commission's June 29, 2011 order, the confidential information will be made public after December 30, 2012 unless Gulf or another affected party shows, and the Commission finds, that the confidential information is entitled to continued confidential treatment.

5. Gulf hereby requests that the Commission enter an order extending the confidential classification of the information contained on lines 1-2 of page 20 and all of page 21 in Document No. 11174-09 for an additional 18-month period.

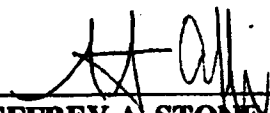
6. Document No. 11174-09 contains findings and results of an audit performed by Gulf Power's agent pertaining to the Company's distribution construction quality assurance processes. Specifically, the confidential information consists of findings from a 2005 risk assessment audit performed by an independent audit company, AEGIS. This information is confidential pursuant to section 366.093(3)(b), Florida Statutes. The findings contained in this audit and Gulf's responses to such findings are still relevant to Gulf's distribution construction quality assurance processes. This information remains confidential for the reasons articulated in Gulf's previous requests and Order Nos. PSC-09-0802-CFO-EI and PSC-11-0283-PCO-EI.

7. 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.

8. The confidential information is attached as Exhibit "A," to Gulf's Amended Request for Confidential Classification and is identified as Document No. 11174-09.

WHEREFORE, Gulf Power Company respectfully requests that the Commission enter an order protecting the information contained in Document No. 11174-09 from public disclosure for an additional period of eighteen (18) months.

Respectfully submitted this 19th day of December, 2012.



JEFFREY A. STONE
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Florida Bar No. 007455
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