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REDACTED



July 12, 2013

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

RECEIVED-FPSC
13 JUL 12 AM 11:00
COMMISSION
CLERK

RE: Docket No. 130140-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 Minimum Filing Requirement ("MFR") Schedule D-2 filed in connection with Gulf's Petition for Rate Increase. Also included is a CD-ROM of Gulf Power's Request for Confidential Classification and Exhibit C in Microsoft Word format as prepared on a Windows XP operating system.

Sincerely,

Robert L. McGee, Jr.
Regulatory and Pricing Manager

md

Enclosures

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

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ECO |
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TEL |
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BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

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

Docket No.: 130140-EI
Date: July 12, 2013

_____)

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 portions of Minimum Filing Requirement ("MFR") Schedule D-2 filed in connection with Gulf's Petition for Rate Increase. As grounds for this request, the Company states:

1. On July 12, 2013, Gulf filed its Petition for Rate Increase along with the prefiled direct testimony of its witnesses and the requisite MFRs.

2. MFR Schedule D-2 contains confidential information. The confidential information contained in MFR Schedule D-2 consists of projected information about the capital structure of affiliated and consolidated companies. If publicly disclosed, this information would harm the competitive interests of the provider of the information. If the provider's suppliers, investors, or competitors are made aware of this information, they may adjust their behavior in the marketplace with respect to activities such as pricing and acquisition and provision of goods, materials and services. This information is entitled to confidential classification pursuant to section 366.093(3)(e), Florida Statutes.

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, on which are highlighted the information 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 highlighted on Exhibit "A" from public disclosure as proprietary confidential business information.

Respectfully submitted this 12th day of July, 2013.



JEFFREY A. STONE

Florida Bar No. 325953

RUSSELL A. BADDERS

Florida Bar No. 007455

STEVEN R. GRIFFIN

Florida Bar No. 0627569

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(850) 432-2451

Attorneys for Gulf Power Company

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

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

Docket No.: 130140-EI
Date: July 12, 2013

REQUEST FOR CONFIDENTIAL CLASSIFICATION

EXHIBIT "A"

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

EXHIBIT "B"

COM	_____
AED	_____ _____
APA	_____
ECO	_____
ENG	_____
GCL	_____
IDM	_____
TEL	_____
CLK	_____

FLORIDA PUBLIC SERVICE COMMISSION

EXPLANATION: For the subject Florida utility, all other regulated utility operations combined, all non-regulated operations combined, the parent company, and on a consolidated basis, provide the year-end capital structure for investor capital (i.e. common equity, preferred stock, long-term debt, and short-term debt) for the five years through the end of the projected test year.

Type of Data Shown:

 Projected Test Year Ended 12/31/14 Prior Year Ended 12/31/13 Historical Year Ended 12/31/10 - 12/31/12

Witness: R. S. Teel, S. D. Ritenour

COMPANY: GULF POWER COMPANY

DOCKET NO.: 130140-EI

(1) Line No.	(2) Class of Capital	(3) 2010		(5) 2011		(7) 2012		(9) 2013		(11) 2014	
		(4) Amount (000's)	(6) Percent of Total	(5) Amount (000's)	(6) Percent of Total	(7) Amount (000's)	(8) Percent of Total	(9) Amount (000's)	(10) Percent of Total	(11) Amount (000's)	(12) Percent of Total
1	<u>Gulf Power Company</u>										
2	Common Stock Equity	1,075,036	43.17	1,124,948	43.72	1,180,742	44.52	1,234,206	44.98	1,349,633	45.00
3	Preference Stock	97,998	3.93	97,998	3.81	97,998	3.70	147,998	5.40	147,998	4.94
4	Long-Term Debt	1,224,398	49.16	1,235,447	48.02	1,245,870	46.99	1,241,457	45.26	1,377,011	45.92
5	Short-Term Debt	93,183	3.74	114,507	4.45	127,002	4.79	119,499	4.36	124,165	4.14
6	Total	2,490,615	100.00	2,572,900	100.00	2,651,612	100.00	2,743,160	100.00	2,998,807	100.00
7	<u>Other Regulated Utility Operations</u>										
8	Common Stock Equity	16,381,551	46.01	17,195,182	46.76	18,359,649	47.40				
9	Preferred (Preference) Stock	983,826	2.76	983,825	2.68	983,825	2.54				
10	Long-Term Debt	15,772,865	44.30	16,149,240	43.93	16,829,477	43.45				
11	Short-Term Debt	2,468,847	6.93	2,436,709	6.63	2,561,780	6.61				
12	Total	35,607,089	100.00	36,764,956	100.00	38,734,731	100.00				
13	<u>Non-Regulated Operations Combined (All other Subsidiaries)</u>										
14	Common Stock Equity	766,637	89.91	750,835	99.55	669,211	99.87				
15	Preference Stock	0	0.00	0	0.00	0	0.00				
16	Long-Term Debt	8,183	0.96	822	0.11	178	0.03				
17	Short-Term Debt	77,834	9.13	2,602	0.34	645	0.10				
18	Total	852,654	100.00	754,259	100.00	670,034	100.00				

FLORIDA PUBLIC SERVICE COMMISSION

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Witness: R. S. Teel, S. D. Ritenour

COMPANY: GULF POWER COMPANY

DOCKET NO.: 130140-EI

(1) Line No.	(2) Class of Capital	(3) 2010		(5) 2011		(7) 2012		(9) 2013		(11) 2014	
		(4) Amount (000's)	(6) Percent of Total	(4) Amount (000's)	(6) Percent of Total	(8) Amount (000's)	(8) Percent of Total	(10) Amount (000's)	(10) Percent of Total	(11) Amount (000's)	(12) Percent of Total
1	<u>Parent Company</u>										
2	Common Stock Equity	16,283,075	89.44	17,702,542	90.95	18,438,428	90.93				
3	Preference Stock	0	0.00	0	0.00	0	0.00				
4	Long-Term Debt	1,258,853	6.91	1,761,967	9.05	1,258,867	6.21				
5	Short-Term Debt	664,809	3.65	0	0.00	580,152	2.86				
6	Total	18,206,737	100.00	19,464,509	100.00	20,277,447	100.00				
7	<u>Eliminations</u>										
8	Common Stock Equity	(18,304,451)	95.73	(19,196,019)	97.57	(20,351,074)	99.18				
9	Preference Stock	0	0.00	0	0.00	0	0.00				
10	Long-Term Debt	0	0.00	0	0.00	0	0.00				
11	Short-Term Debt	(816,982)	4.27	(477,671)	2.43	(168,859)	0.82				
12	Total	(19,121,433)	100.00	(19,673,690)	100.00	(20,519,933)	100.00				
13	<u>Consolidated Basis</u>										
14	Common Stock Equity	16,201,848	42.60	17,577,488	44.07	18,296,956	43.75				
15	Preference Stock	1,081,824	2.84	1,081,823	2.71	1,081,823	2.59				
16	Long-Term Debt	18,264,299	48.02	19,147,476	48.01	19,334,392	46.24				
17	Short-Term Debt	2,487,691	6.54	2,076,147	5.21	3,100,720	7.42				
18	Total	38,035,662	100.00	39,882,934	100.00	41,813,891	100.00				

EXHIBIT "C"

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

Line(s)/Field(s)

MFR Schedule D-2

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Page 2 of 2, Columns 9-12, Lines 2-18

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 2.

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

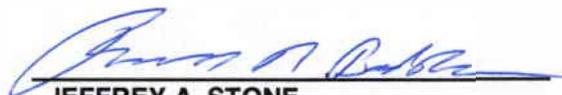
IN RE: Petition for Increase in Rates)
by Gulf Power Company)
)

Docket No.: 130140-EI

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true copy of the foregoing was furnished by hand delivery this 12th day of July, 2013 to the following:

J. R. Kelly/Joseph A. McGlothlin
Public Counsel
Office of Public Counsel
c/o The Florida Legislature
111 W. Madison Street, Room 812
Tallahassee, FL 32393-1400
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