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October 14, 2013

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

REDACTED

RECEIVED - FPSC
13 OCT 15 AM 9:32
COMMISSION
CLERK

RE: Request for Confidential Classification
Quarterly CISR Report for the Third Quarter 2013

Dear Ms. Cole,

Enclosed for filing is Gulf Power Company's Request for Confidential Classification for the Quarterly CISR Report for the Third Quarter 2013.

Sincerely,

Robert L. McGee, Jr.
Regulatory and Pricing Manager

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Enclosure

cc : Beggs and Lane
Jeffrey A. Stone, Esq.
Florida Public Service Commission
Andrew Maurey

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AFD (EXL.B + 1CD) _____
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BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

IN RE: Gulf Power Company Quarterly Commercial/Industrial Service Rider ("CISR") Report for the Third Quarter 2013	Docket No.: Undocketed Date: October 15, 2013
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REQUEST FOR 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 a request that the Florida Public Service Commission enter an order protecting from public disclosure portions of Gulf Power Company's Quarterly Commercial/Industrial Service Rider Report for the Third Quarter, 2013 ("Quarterly CISR Report") submitted to the Florida Public Service Commission pursuant to Order Nos. PSC-96-1219-FOF-EI and PSC-01-0390-TRF-EI. As grounds for this request, Gulf Power Company states:

1. On October 15, 2013, Gulf Power Company submitted to the Florida Public Service Commission Gulf Power Company's Quarterly CISR Report for the Third Quarter of 2013 as required by Order Nos. PSC-96-1219-FOF-EI and PSC-01-0390-TRF-EI.
2. The public disclosure of the information contained in the Quarterly CISR Report would cause irreparable harm to Gulf Power Company and the entity with which it has entered a Contract Services Arrangement ("CSA") contract under the authority of Gulf Power's Commercial/Industrial Service Rider. The Quarterly CISR Report contains proprietary confidential business information regarding contractual terms and pricing. Public disclosure of this information would impair the ability of Gulf Power Company to negotiate terms and conditions in future CSAs that are the most favorable to Gulf and its general body of customers. Moreover, the public disclosure of this information may prevent Gulf from successfully

negotiating CSAs with customers. The information is regarded as sensitive and confidential by the CISR customer because its public disclosure would impact the customer's ability to compete in the native markets. In the event such information is made public, future potential CISR customers may avoid the risk of public disclosure of their confidential information by refusing to negotiate with Gulf Power. This may lead to uneconomic bypass of Gulf's facilities. Thus, the Company requests that this information be granted confidential classification pursuant to Section 366.093(3)(d)-(e), Florida Statutes.

3. Submitted as Exhibit "A" is a copy of the Quarterly CISR Report, on which is 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 Quarterly CISR Report, which may be made available for public review and inspection. Attached as Exhibit "C" to this request is a line-by-line justification for the request for confidential classification.

4. The material for which confidential classification is requested is intended to be, and is treated as, confidential by Gulf Power Company and the entity with which it has entered a CSA contract and has not been otherwise publicly disclosed.

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 14th day of October, 2013.



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Attorneys for Gulf Power Company

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

IN RE: Gulf Power Company Quarterly Commercial/Industrial Service Rider ("CISR") Report for the Third Quarter 2013	Docket No.: Undocketed Date: October 15, 2013
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EXHIBIT 'A'

REQUEST FOR CONFIDENTIAL CLASSIFICATION

The information provided herein should be maintained as proprietary confidential business information pursuant to Section 366.093 and Rule 25-22.006, F.A.C.

Exhibit "A"

Provided to the Commission Clerk
under separate cover as confidential information

EXHIBIT "B"

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CONFIDENTIAL

GULF POWER COMPANY

Quarterly CISR Report

Report Period: Third Quarter 2013

Under the authority of Gulf Power's Commercial/Industrial Service Rider (CISR), Gulf entered into its third Contract Service Arrangement (CSA) which became effective beginning in the third quarter of 2013. The CSA was signed by Gulf and a qualified candidate under the terms and conditions set forth in Order No. PSC-96-1219-FOF-EI in Docket No. 960789-EI and Order No. PSC-01-0390-TRF-EI in Docket No. 001217-EI. Gulf offered and signed the CSA based on extensive analysis and customer-specific research.

[REDACTED]

The CSA contains the following:

[REDACTED]

EXHIBIT "C"

Line-by-Line Justification

Line(s)

Justification

Page 1

Lines 12-17 and 20-27

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