

Shawna Senko

From: Darnes, Melissa Ann <MADARNES@SOUTHERNCO.COM>
Sent: Tuesday, February 18, 2014 3:15 PM
To: Filings@psc.state.fl.us
Subject: Gulf Power Company's Request for Extended Confidential Classification - Fuel transactions; Docket No. 140001-EI
Attachments: 2.18.14 Req for Ext Conf Classification - Fuel transactions.pdf; Fuel Audit Extension DN 04502-12 Final.doc

A. s/Susan D. Ritenour

Gulf Power Company

One Energy Place

Pensacola FL 32520

850.444.6231

sdriteno@southernco.com

B. Docket No. 140001-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 2011 fuel and purchased power transactions.

Melissa Darnes

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Stay connected with Gulf Power



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February 18, 2014

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

RE: Docket No. 140001-EI

Dear Ms. Stauffer:

Attached for official filing is Gulf Power Company's Request for Extended Confidential Classification pertaining to portions of the Commission's Review of Gulf Power's 2011 fuel and purchased power transactions (ACN 12-013-1-2). Also attached is Gulf's Request for Extended Confidential Classification in Microsoft Word format.

Sincerely,

A handwritten signature in cursive script that reads "Susan D. Ritenour".

Susan Ritenour

md

Attachment

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

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

IN RE: Fuel and purchased power cost
recovery clause and generating performance
incentive factor

Docket No.: 140001-EI
Date: February 18, 2014

REQUEST FOR EXTENDED 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 this request that the Florida Public Service Commission enter an order extending confidential classification for portions of documents produced by Gulf Power in connection with a review of Gulf Power's 2011 fuel and purchased power transactions (ACN 12-013-1-2) (the "Review"). As grounds for this request, the Company states:

1. On July 6, 2012, Gulf Power filed a request for confidential classification of certain information produced in connection with the Review. (Document No. 04501-12, Docket No. 120001-EI)

2. On August 28, 2012, the Commission entered Order No. PSC-12-0451-CFO-EI granting Gulf's request for confidential classification.

3. As provided in section 366.093(4), Florida Statutes, and by the Commission's Order, the confidential information will be made public after a period of 18 months unless Gulf or another affected party shows, and the Commission finds, that the confidential information continues to comprise proprietary confidential business information. The 18-month extension period expires on February 28, 2014.

4. Gulf hereby requests that the Commission enter an order extending the confidential classification of the information highlighted on Exhibit "A" of Gulf's original

request and identified in line/by line format on Exhibit "C" of Gulf's original request for an additional 18-month period.

5. The information highlighted on Exhibit "A" to Gulf's original request is entitled to continued confidential classification for the same reasons that it was initially classified. As stated in Gulf's original request, a portion of the information submitted by Gulf Power in connection with the Review constitutes proprietary confidential business information concerning bids and other contractual data, the disclosure of which would impair the efforts of Gulf Power to contract for goods and services on favorable terms.¹ The information is entitled to confidential classification pursuant to section 366.093(3)(d) and (e), Florida Statutes. Specifically, the confidential information consists of pricing data for coal, oil and natural gas transportation/storage. This pricing data is the product of contractual negotiations between Gulf and various counterparties. Contracts forming the basis for this pricing data are still in effect. This information is specific to individual contracts and is regarded by both Gulf and the counterparties as confidential. Disclosure of this information would negatively impact Gulf's ability to negotiate pricing favorable to its customers in future contracts. In addition, potential counterparties may refuse to enter into contracts with Gulf, or may charge higher prices, if the price terms were made public.

6. 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 otherwise been publicly disclosed.

¹ The confidential materials addressed in Gulf's request are included in Volume Three of Commission Staff's audit working papers. Volume Three contains a total of 273 pages. Gulf has determined that 35 of these 273 pages contain confidential information. These 35 pages are identified in Exhibit "C" of the original request. Any pages not identified on Exhibit "C" are not considered confidential by the Company.

WHEREFORE, Gulf Power Company respectfully requests that the Commission enter an order extending confidential classification of the information highlighted on Exhibit "A" and identified in line/by line format on Exhibit "C" of Gulf's original request from public disclosure as proprietary confidential business information.

Respectfully submitted this 18th day of February, 2014.



JEFFREY A. STONE

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Attorneys for Gulf Power Company

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