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June 20, 2014

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

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COMMISSION
CLERK

RE: Docket No. 130202-EI

Dear Ms. Stauffer:

Enclosed for filing in the above referenced docket is Gulf Power Company's Request for Confidential Classification pertaining to certain portions of Gulf's response to Staff's Third Set of Interrogatories to Gulf Power (Nos. 67-80) and Staff's Third Request for Production of Documents (Nos. 10-18). Enclosed is a copy of Gulf Power's Request for Confidential Classification and Exhibit "A" which is a justification for confidential treatment of the Confidential Information in Microsoft Word format as prepared on a Windows based system. Exhibit "B" which contains a public version of the documents with the Confidential Information redacted is included. A copy of the confidential documents are provided on a separate DVD labeled "Confidential".

Sincerely,

Robert L. McGee, Jr. (RWD)

Robert L. McGee, Jr.

md

Enclosures

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

COM _____
AFD _____
APA _____
ECO _____
ENG _____ *Redacted A+B+C*
GCL _____
IDM _____
TEL _____
CLK _____

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Commission review of numeric
conservation goals (Gulf Power Company).

Docket No.: 130202-EI
Filed: June 23, 2014

**GULF POWER COMPANY'S
REQUEST FOR CONFIDENTIAL CLASSIFICATION
AND MOTION FOR TEMPORARY PROTECTIVE ORDER**

Gulf Power Company ("Gulf Power" or "the Company"), pursuant to Section 366.093, Florida Statutes, and Rule 25-22.006, Florida Administrative Code, hereby requests confidential classification of certain information produced in response to Florida Public Service Commission Staff's Third Interrogatories (Nos. 67-80) and Third Request for Production of Documents (Nos. 10-18 ("Staff's Discovery")). Confidential information submitted in response to Staff's Discovery has been segregated and placed upon the enclosed DVD bearing the label "CONFIDENTIAL" ("Confidential Information"). This DVD should be treated as confidential in its entirety.

Description of the Document(s)

The Confidential Information consists of fuel price forecasts produced in response to Interrogatory No. 67 and multiple electronic files which reflect runs from Gulf Power's "FIRE Model." These electronic files are being produced in response to Document Request Nos. 10, 11, 13 and 18. The Confidential Information identified with specificity on Exhibit "A" to this Request. In support of this request, the Company states:

1. Subsection 366.093(1), Florida Statutes, provides that any records "found by the Commission to be propriety confidential business information shall be kept confidential and shall be exempt from s. 119.07(1), Florida Statutes [requiring disclosure under the Public Records

Act].” Proprietary confidential business information includes “[i]nformation relating to competitive interests, the disclosure of which would impair the competitive business of the provider of the information.” Section 366.093(3)(e), Florida Statutes. Proprietary confidential business information also includes “trade secrets.” Section 366.093(3)(a), Florida Statutes. The Confidential Information that is the subject of this request and motion falls within these statutory categories and, thus, constitutes propriety confidential business information entitled to protection under Section 366.093, Florida Statutes, and Rule 25-22.006, Florida Administrative Code.

2. Attached hereto as Exhibit "A" is a justification for confidential treatment of the Confidential Information.

3. Attached hereto as Exhibit "B" are two public versions of Gulf's response to Interrogatory No. 67 with the Confidential Information redacted. Electronic files are not being provided in redacted form.

4. The Confidential Information is intended to be and is treated by Gulf Power as private and, to this attorney's knowledge, has not been publicly disclosed.

5. For the same reasons set forth herein in support of its request for confidential classification, Gulf Power also moves the Commission for entry of a temporary protective order pursuant to Rule 25-22.006(6)(c), Florida Administrative Code, protecting the Confidential Information from public disclosure.

Requested Duration of Confidential Classification


6. Gulf Power requests that the Confidential Information be treated by the Commission as confidential proprietary business information for at least the 18 month period prescribed in Rule 25-22.006(9)(a), Florida Administrative Code. If, and to the extent that the Company is in need of confidential classification of the Confidential Information beyond the 18

month period set forth in the Commission rule, the justification and grounds for such extended confidential treatment are set forth in Exhibit "C" to this request and motion.

WHEREFORE, Gulf Power Company respectfully requests that the Confidential Information that is the subject of this request and motion be accorded confidential classification for the reasons set forth herein and for a minimum period of 18 months, subject to any request for a longer period of confidential classification as may be set forth in Exhibit "C" to this request and motion. The company further moves for the entry of a temporary protective order pursuant to Rule 25-22.006(6)(c), Florida Administrative Code, protecting the Confidential Information from public disclosure.

DATED this 20th day of June, 2014.

Respectfully submitted,



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EXHIBIT "A"

JUSTIFICATION FOR CONFIDENTIAL TREATMENT OF HIGHLIGHTED PORTIONS OF GULF POWER'S RESPONSES TO STAFF'S THIRD INTERROGATORIES AND REQUEST FOR PRODUCTION OF DOCUMENTS

<u>Request No.</u>	<u>File Names</u>	<u>Detailed Description</u>	<u>Rationale</u>
ROG 67	Table 1, Columns C-D, Lines 5-25 Table 1, Columns E-F, Lines 5-20	All yellow highlighted information	(1)
POD 10	"System Input" tab within Excel File titled "Fire 2013 Res Base -Solar PV- Customer Equipment Cost to pass TRC"	All yellow highlighted information	(2)
POD 11	"System Input" tab within Excel File titled "Fire 2013 Res Base -Solar Thermal"	All yellow highlighted information	(2)
POD 13	"System Input" tabs within Excel Files titled "Fire 2013 Res Base -Solar Thermal" and "Fire 2013 Res Base - Solar PV base run no incentive"	All yellow highlighted information	(2)
POD 18	"System Input" tab within Excel File titled "Fire 2013 Res Base -Solar PV base run no incentive"	All yellow highlighted information	(2)

(1) The Confidential Information consists of Gulf's fuel price forecasts which are utilized by the Company to, among other things, perform cost-effectiveness analyses for Gulf's demand-side management measures and plans. These pricing scenarios were developed by Gulf, Southern Company Services, and their consultant, Charles Rivers Associates, using an extensive proprietary modeling analysis. These forecasts are based on non-public data, were developed at significant cost to the Company, and are considered proprietary by Gulf Power, Southern Company Services, and their consultant. This information reveals key inputs into the Company's decision-making process and is subject to extensive efforts to maintain its secrecy. Only select Company personnel with a "need to know" are granted access. Public disclosure of this information would enable competitors to access and utilize Gulf's forecasts without incurring costs to obtain similar information, thus bestowing an economic advantage upon such competitors at the cost of Gulf and its customers. Additionally, public disclosure of this information would enable vendors of commodities and services to tailor their pricing proposals to the Company's projections, resulting in higher costs for the Company and its customers. For example, if prospective fuel suppliers have access to such information, those suppliers will view

the forecasted prices as the lower limit of what Gulf expects to pay and will offer to supply fuel at higher prices. Finally, the base forecast underlying the subject information is used in developing future generation strategies for Gulf. Generation wholesalers, power marketers or other competitors could utilize this information to tailor proposals with the intention of pricing products that could undermine the Company's market position. This information derives economic value from not being generally known to, and being readily ascertainable by proper means to, other persons who can obtain economic value from its disclosure or use. Protection of this information has taken on added importance recently given data mining trends in the industry. Trade publications are increasingly scouring regulatory filings, compiling data and selling these packaged products to industry participants such as commodity suppliers. Consequently, this information is entitled to confidential classification pursuant to section 366.093(3)(a) and (e), Florida Statutes.

(2) The Confidential Information is contained within various electronic runs from Gulf Power Company's "FIRE" Model. The FIRE Model is utilized by the Company to, among other things, perform cost-effectiveness analyses for Gulf's demand-side management measures and plans. The FIRE Model utilizes various inputs including Company-specific avoided costs relating to fuel, generation, transmission and distribution. This avoided cost information derives economic value from not being generally known to, and not being readily ascertainable by proper means by other persons who can obtain economic value from its disclosure or use. More specifically, public disclosure of the information would provide other utilities, independent power producers and vendors of demand-side management services details related to the Company's avoided cost components and the calculations used in the Company's FIRE Model that determine pricing and cost effectiveness of marketing programs, individual customer loads, and certain supply-side and demand-side options. This information would bestow an unfair advantage on such entities with respect to resource planning, projected generation costs and DSM program development and contracting. If suppliers had access to such information, it would place Gulf Power at an economic disadvantage and provide an economic advantage to its competitors and/or bidders who have access to such information, which could increase costs to Gulf Power and result in higher rates to customers. Gulf Power's ability to negotiate the optimum price and contract terms and conditions would be undermined if competitors and suppliers were given access to the company's costs through disclosure of this information. Finally, Gulf Power's competitors are not required to disclose their avoided cost components. The Confidential Information is subject to substantial procedures to maintain its secrecy. Only select Gulf Power and Southern Company Services personnel and their legal counsel are granted access to the information. Those personnel receive access only on a "need to know" basis. Consequently, this information is entitled to confidential classification pursuant to section 366.093(3)(a) and (e), Florida Statutes.

EXHIBIT "B"

PUBLIC VERSION(S) OF THE DOCUMENT(S)

Attached hereto (unless previously filed as may be noted below) are two public versions of the Document(s) with the Confidential Information redacted.

Public Version(s) of the Document(s) attached X

Public Version(s) of the Document(s) previously filed on _____

Table 1

	A	B	C	D	E	F	
	Delivered Fuel Price (Nominal) ⁽¹⁾						
	Base Fuel Prices-2009 DSM Goals ⁽²⁾		Base Fuel Prices-2014 DSM Goals ⁽³⁾		Change 2009 DSM Goals vs. 2014 DSM Goals		
	Natural Gas (\$/MMBtu)	Coal (\$/MMBtu)	Natural Gas (\$/MMBtu)	Coal (\$/MMBtu)	Natural Gas (\$/MMBtu)	Coal (\$/MMBtu)	
1	2009	9.61	4.23	4.85	4.10	-4.76	-0.13
2	2010	10.12	5.22	6.14	4.00	-3.98	-1.22
3	2011	10.63	5.06	4.93	4.69	-5.70	-0.37
4	2012	10.88	4.56	3.72	5.48	-7.16	0.92
5	2013	11.79	4.38				
6	2014	12.69	4.31				
7	2015	12.98	4.53				
8	2016	13.53	4.71				
9	2017	13.59	4.64				
10	2018	13.82	4.70				
11	2019	14.08	4.84				
12	2020	13.58	4.99				
13	2021	13.08	5.19				
14	2022	13.35	5.47				
15	2023	13.82	5.67				
16	2024	14.34	5.95				
17	2025	14.95	6.17				
18	2026	15.53	6.27				
19	2027	16.03	6.34				
20	2028	16.62	6.45				
21	2029	Unavailable	Unavailable			N/A	N/A
22	2030	Unavailable	Unavailable			N/A	N/A
23	2031	Unavailable	Unavailable			N/A	N/A
24	2032	Unavailable	Unavailable			N/A	N/A
25	2033	Unavailable	Unavailable			N/A	N/A

(1) Prices are delivered to Plant Crist.

(2) Annual average forecasted prices for 2009-2028 shown. Prices for years 2029-2033 were not developed for the 2009 budget cycle.

(3) Annual average actual prices for 2009-2012 shown, annual average forecasted prices for 2013-2033.

EXHIBIT "C"

REQUESTED DURATION OF CONFIDENTIAL CLASSIFICATION

Gulf Power requests that the Confidential Information that is the subject of this request be treated as proprietary confidential business information exempt from the Public Records Law for a minimum of 18 months from the date of the order granting such classification. To the extent the company needs confidential protection of the Confidential Information for a period longer than 18 months, the company's justification therefor is set forth below:

n/a

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

IN RE: Commission review of numeric
conservation goals)

Docket No.: 130202-EI

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true copy of the foregoing was furnished by overnight mail this 20th day of June, 2014 to the following:

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