

State of Florida



# 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-

**DATE:** November 25, 2014

**TO:** Division of Auditing and Performance Analysis, Office of Primary Responsibility

**FROM:** OFFICE OF COMMISSION CLERK

**RE:** CONFIDENTIALITY OF CERTAIN INFORMATION

DOCKET NO(s): 090484-EI DOCUMENT NO(s): 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 pertains to a request for extended confidential classification, filed 11/12/14 (DN 06291-14). 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.

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 COMMISSION CLERK

This response was prepared by Victor Cordiano on 11/25/14 a copy of which has been sent to the Office of Commission Clerk and the Office of General Counsel.

State of Florida



## Public Service Commission

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TALLAHASSEE, FLORIDA 32399-0850

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

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**DATE:** November 25, 2014  
**TO:** Kathryn Cowdery, Senior Attorney, Office of the General Counsel  
**FROM:** Victor Cordiano, <sup>vc</sup>Engineering Specialist II, Office of Auditing and Performance Analysis  
**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: 06291-14 and 11174-09

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Attached is a November 12, 2014 request (DN 06291-14) 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.

**Robert L. McGee, Jr.**  
Regulatory & Pricing Manager  
One Energy Place  
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RLMCGEE@southernco.com



November 12, 2014

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

RE: Docket No. 090484-EI

Dear Ms. Stauffer:

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

Sincerely,

*Robert L. McGee, Jr. (CSB)*

Robert L. McGee, Jr.  
Regulatory and Pricing Manager

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Attachments

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



**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: November 12, 2014

**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

4. On December 19, 2012, Gulf timely filed a second request for extended confidential classification. See, Document No. 08242-12. On May 17, 2013, the Commission entered an order granting Gulf Power's request for extended confidential classification. See, Order No. PSC-13-0201-PCO-EI

5. As provided in section 366.093(4), Florida Statutes, and by the Commission's May 17, 2013 order, the confidential information will be made public after November 17, 2014 unless Gulf or another affected party shows, and the Commission finds, that the confidential information is entitled to continued confidential treatment.

6. 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.

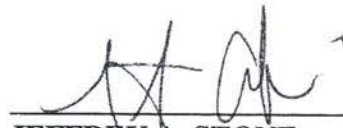
7. Document No. 11174-09 contains findings and results of an audit performed by Gulf Power's agent pertaining to the Company's distribution construction quality assurance processes. Specifically, the confidential information consists of findings from a 2005 risk assessment audit performed by an independent 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, PSC-11-0283-PCO-EI and PSC-13-0201-PCO-EI.

8. 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.

9. 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 12<sup>th</sup> day of November, 2014.



**JEFFREY A. STONE**

Florida Bar No. 325953

**RUSSELL A. BADDERS**

Florida Bar No. 007455

**STEVEN R. GRIFFIN**

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**Attorneys for Gulf Power Company**