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March 19, 2015

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

Re: Docket No. 150049-EI – Petition for approval of energy purchase agreement between Gulf Power Company and Morgan Stanley Capital Group Incorporated

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 Commission Staff's Revised First Data Request (Nos. 1-55). In addition to the "Confidential" DVD labeled as Exhibit "A", enclosed is a separate DVD containing a copy of Gulf Power's Request for Confidential Classification and Exhibit "B" in Microsoft Word format as prepared on a Windows based system.

Sincerely,

Robert L. McGee, Jr.
Regulatory and Pricing Manager

md

Enclosures

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

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BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Petition for Approval of Energy
Purchase Agreement between Gulf Power
Company and Morgan Stanley Capital
Group Inc. dated December 18, 2014

Docket No. 150049 -EI
Filed: March 20, 2015

SUPPLEMENTAL REQUEST FOR CONFIDENTIAL CLASSIFICATION
(COMMISSION STAFF'S FIRST DATA REQUEST)

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 a request that the Florida Public Service Commission enter an order protecting from public disclosure certain revised information submitted by Gulf Power in response to Commission Staff's First Data Request to Gulf Power Company (Nos. 1-55) in the above-referenced docket. Revised confidential information submitted in response to Staff's First Data Request has been segregated and placed upon the enclosed DVD bearing the label "CONFIDENTIAL." This DVD should be treated as confidential in its entirety. As grounds for this request, the Company states:

1. On March 16, 2015, Gulf Power filed a Request for Confidential Classification for portions of information submitted in response to items 3, 21(a)-(b), 21(d)-(f), 27, 39, 43 and 44 of Commission Staff's First Data Request to Gulf Power Company in the above-referenced docket. (Document No. 01442-15)

2. Subsequent to filing Gulf's responses to Staff's First Data Request and the original Request for Confidential Classification, Gulf discovered a calculation error in the file submitted in response to Item No. 21(f) of Staff's First Data Request. This file, titled "DR1-21f Alternative Fuel Price forecasts from 3rd party_CONF.xlsx" contains coal and natural gas price forecasts prepared by parties other than Gulf Power or its agents. The calculation error relates solely to the coal price forecasts. Gulf has corrected this error and is submitting the corrected

response on the enclosed DVD. The remainder of Gulf's response to Staff's First Data Request remains unaffected and continues to be subject to Gulf's original Request for Confidential Classification. This Supplemental Request for Confidential Classification addresses the corrected data presented herewith in response to Item No. 21(f).

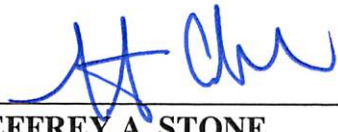
3. As noted in Gulf's original Request for Confidential Classification, information submitted in response to Item No. 21(f) includes fuel forecasts which were developed by parties other than Southern Company and Charles River Associates and which were purchased by Southern Company Services through a paid subscription service. This information is subject to non-disclosure agreements and is regarded by the vendors as proprietary information. Public disclosure of this information would enable others in the marketplace to capitalize on this data without compensating the vendors for the same and could result in vendors charging higher prices, or refusing to do business with Gulf, out of concern that their data would be publicly disclosed. Public disclosure of this data would impair the competitive business interests of Gulf Power and its vendors and is therefore entitled to confidential classification pursuant to section 366.093(3)(e), Florida Statutes.

4. The information filed pursuant to this Supplemental 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.

5. Attached hereto as Exhibit "A" is a DVD containing Gulf's revised response to Item No. 21(f). Attached hereto as Exhibit "B" is a justification for confidential treatment of the Confidential Information.

WHEREFORE, Gulf Power Company respectfully requests that the Commission enter an order protecting the information contained within Exhibit "A" from public disclosure as proprietary confidential business information.

Respectfully submitted this 19th day of March, 2015.

A handwritten signature in blue ink, appearing to read 'H. Stone', is written above a horizontal line.

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

REQUEST FOR CONFIDENTIAL CLASSIFICATION

EXHIBIT "A"

DVD provided to the Commission Clerk
under separate cover as confidential information

EXHIBIT "B"

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

Line(s)/Field(s)

Justification

Revised Response to Item # 21(f)

See file titled:
"Revised DR1-21f Alternative Fuel Price
forecasts from 3rd party_CONF.xlsx"

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 3.

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

IN RE: **Petition for approval of energy purchase**)
agreement between Gulf Power Company)
and Morgan Stanley Capital Group,)
Incorporated)

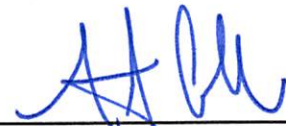
Docket No.: **150049-EI**

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true copy of the foregoing was furnished by overnight mail this 19th day of March, 2015 to the following:

Office of Public Counsel
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