

Robert L. McGee, Jr.
Regulatory & Pricing Manager
One Energy Place
Pensacola, Florida 32520-0780
Tel 850.444.6530
Fax 850.444.6026
RLMCGEE@southernco.com

April 7, 2015



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

RE: Docket No. 150001-EI

Dear Ms. Stauffer:

Attached for official filing is Gulf Power Company's Request for Extended Confidential Classification regarding certain information submitted by Gulf Power in connection with Commission Staff's audits in the above-referenced docket (ACN 13-016-1-1). Also attached is Gulf's Request for Extended Confidential Classification in Microsoft Word format.

Sincerely,

A handwritten signature in cursive script that reads "Robert L. McGee, Jr.".

Robert L. McGee, Jr.
Regulatory and Pricing Manager

md

Attachments

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.: 150001-EI
Date: April 7, 2015

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 a request that the Florida Public Service Commission enter an order extending confidential classification for certain documents produced by Gulf Power in connection with a review of Gulf Power’s 2012 fuel and purchased power transactions in Docket No. 130001-EI (ACN 13-016-1-1) (the “Review”). As grounds for this request, the Company states:

1. On May 21, 2013, Gulf Power filed a request for confidential classification of certain information submitted by Gulf pursuant to the Review (the “Original Request”). (Document No. 02791-13). The subject information is contained within Document No. 02792 - 13 (the “Confidential Information”).
2. On October 14, 2013, the Commission entered Order No. PSC-13-0457-CFO-EI granting Gulf’s Original Request.
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 constitute proprietary confidential business information. The 18-month extension period expires on April 14, 2015.

4. Gulf hereby requests that the Commission enter an order extending the confidential classification of the Confidential Information for an additional 18-month period.

5. The Confidential Information 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. This information is entitled to confidential classification pursuant to section 366.093(3)(d) Florida Statutes. Specifically, the Confidential Information consists of pricing data for coal, oil and natural gas transportation/storage. Contracts forming the basis for this pricing data are still in effect. This pricing data is the product of contractual negotiations between Gulf and various counterparties. 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.

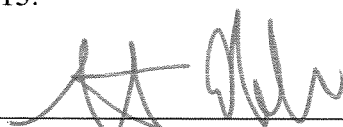
In addition to pricing-related data, a portion of the Confidential Information is included in a summary description of pending litigation in which the Company is presently involved. The subject information consists of legal counsel's mental impressions concerning potential damages which may be awarded as a result of the litigation. Public disclosure of this information could impair the Company's litigation positions and, ultimately, the Company's competitive business position. Consequently, this information is protected from public disclosure pursuant to section 366.093(3)(e), Florida Statutes. Additionally, this information is protected from public disclosure pursuant to the attorney work-product and attorney-client privileges. Florida's

appellate courts have held that information other than the types of information specifically listed in subsections (a) through (f) of section 366.093(3) can qualify for protection under the statute. See Florida Power & Light v. Florida Public Service Commission, 31 So.3d 860, 865 (Fla. 1st DCA 2010). Privileged attorney work-product and attorney-client communications fall squarely within the statute's catch-all provisions.

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 been otherwise publicly disclosed.

WHEREFORE, Gulf Power Company respectfully requests that the Commission enter an order extending confidential classification of the Confidential Information for an additional 18-month period.

Respectfully submitted this 7th day of April, 2015.



JEFFREY A. STONE
Florida Bar No. 325953
RUSSELL A. BADDERS
Florida Bar No. 007455
STEVEN R. GRIFFIN
Florida Bar No. 0627569
Beggs & Lane
P. O. Box 12950
Pensacola, FL 32591
(850) 432-2451
Attorneys for Gulf Power Company

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

IN RE: **Fuel and Purchased Power Cost**)
Recovery Clause with Generating)
Performance Incentive Factor)

Docket No.: **150001-EI**

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true copy of the foregoing was furnished by electronic mail this 7th day of April, 2015 to the following:

Florida Public Utilities Company
Cheryl M. Martin, Director
Regulatory Affairs
911 South 8th Street
Fernandina Beach, FL 32034
Cheryl_Martin@fpuc.com

PCS Phosphate – White Springs
c/o Brickfield Law Firm
James W. Brew/Owen J. Kopon
Laura A. Wynn
Eighth Floor, West Tower
1025 Thomas Jefferson St, NW
Washington, DC 20007
jbrew@bbrslaw.com
owen.kopon@bbrslaw.com
laura.wynn@bbrslaw.com

Duke Energy Florida
John T. Burnett
Dianne M. Triplett
299 First Avenue North
St. Petersburg, FL 33701
Dianne.triplett@duke-energy.com
John.burnett@duke-energy.com

Florida Power & Light Company
John T. Butler
700 Universe Boulevard (LAW/JB)
Juno Beach, FL 33408-0420
John.Butler@fpl.com

Florida Power & Light Company
Kenneth Hoffman
215 South Monroe Street,
Suite 810
Tallahassee, FL 32301-1858
Ken.Hoffman@fpl.com

Ausley Law Firm
James D. Beasley
J. Jeffry Wahlen
Ashley M. Daniels
Post Office Box 391
Tallahassee, FL 32302
jbeasley@ausley.com
adaniels@ausley.com
jwahlen@ausley.com

Gunster Law Firm
Beth Keating
215 South Monroe Street, Suite 601
Tallahassee, FL 32301-1839
bkeating@gunster.com

Office of Public Counsel
Patricia A. Christensen
Associate Public Counsel
c/o The Florida Legislature
111 W. Madison Street, Room 812
Tallahassee, FL 32399-1400
Christensen.patty@leg.state.fl.us

Duke Energy Florida, Inc.
Matthew R. Bernier
Cameron Cooper
106 East College Avenue,
Suite 800
Tallahassee, FL 32301-7740
Matthew.bernier@duke-energy.com
Cameron.Cooper@duke-energy.com

Florida Industrial Power Users Group
c/o Moyle Law Firm
Jon C. Moyle, Jr.
118 North Gadsden Street
Tallahassee, FL 32301
jmoyle@moylelaw.com

Tampa Electric Company
Ms. Paula K. Brown, Manager
Regulatory Coordination
P. O. Box 111
Tampa, FL 33601-0111
Regdept@tecoenergy.com

Office of the General Counsel
Suzanne Brownless
Martha Barrera
2540 Shumard Oak Blvd
Tallahassee, FL 32399-0850
sbrownle@psc.state.fl.us
mbarrera@psc.state.fl.us
tefarley@psc.state.fl.us
ASoete@psc.state.fl.us

Florida Retail Federation
Robert Scheffel Wright
John T. LaVia
c/o Gardner Law Firm
1300 Thomaswood Drive
Tallahassee, FL 32308
schef@gbwlegal.com
jlavia@gbwlegal.com



JEFFREY A. STONE
Florida Bar No. 325953
jas@beggsllane.com
RUSSELL A. BADDERS
Florida Bar No. 007455
rab@beggsllane.com
STEVEN R. GRIFFIN
Florida Bar No. 0627569
srg@beggsllane.com
BEGGS & LANE
P. O. Box 12950
Pensacola FL 32591-2950
(850) 432-2451
Attorneys for Gulf Power