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June 26, 2015

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

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15 JUN 29 PM 2:29  
COMMISSION  
CLERK

**REDACTED**

Re: Docket No. 150007-EI

Dear Ms. Stauffer:

Enclosed is Gulf Power Company's Request for Confidential Classification pertaining to Gulf Power's response to Staff's First Request for Production of Documents (No. 1) in the above-referenced docket.

Sincerely,

Robert L. McGee, Jr.  
Regulatory and Pricing Manager

md

Enclosures

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

- COM \_\_\_\_\_
- AFD \_\_\_\_\_
- APA \_\_\_\_\_
- ECO \_\_\_\_\_
- ENG \_\_\_\_\_
- GCL \_\_\_\_\_
- IDM \_\_\_\_\_
- TEL \_\_\_\_\_
- CLK \_\_\_\_\_

CDT Redacted

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In Re: Environmental cost recovery clause

Docket No.: 150007-EI

Date: June 29, 2015

**REQUEST FOR 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 protecting from public disclosure certain information submitted by Gulf Power in response to Commission Staff’s First Request for Production of Documents to Gulf Power Company (No. 1) in the above-referenced docket. As grounds for this request, the Company states:

1. The information submitted by Gulf Power in response to request number 1 of Commission Staff’s First Request for Production constitutes proprietary confidential business information relating to competitive interests, the disclosure of which would impair the competitive business of the Company. The information is entitled to confidential classification pursuant to section 366.093(3)(e), Florida Statutes. The information consists of the results of a detailed economic viability analysis performed by Gulf Power of various options for achieving compliance with the EPA’s MATS rule at Gulf Power’s Plant Smith. Among other things, the analysis provides cost projections for various compliance alternatives which, in turn, reveal highly competitive data including fuel and avoided cost projections, load forecasts, non-public transmission data, production costs and internal cost projections for construction of new generating capacity and environmental controls. Wholesale competitors as well as suppliers of commodities and services could utilize this information to undermine Gulf’s bargaining position in the markets where Gulf must compete to obtain commodities and services or make purchases or sales of wholesale power. This, in turn, would result in Gulf’s customers paying higher prices for such purchases.

2. 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.

3. Submitted as Exhibit "A" are copies of the subject documents in un-redacted form. Exhibit "A" should be treated as confidential pending a ruling on this request. Attached as Exhibit "B" are two copies of Exhibit "A" in redacted form which may be made available for public inspection. Attached as Exhibit "C" to this request is a line-by-line justification for the request for confidential classification.

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

Respectfully submitted this 26<sup>th</sup> day of June, 2015.



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**Attorneys for Gulf Power Company**

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

IN RE: Environmental cost recovery clause  
\_\_\_\_\_ /

Docket No.: 150007-EI  
Date: June 29, 2015

**REQUEST FOR CONFIDENTIAL CLASSIFICATION**

**EXHIBIT "A"**

Provided to the Commission Clerk  
under separate cover as confidential information

**EXHIBIT "B"**

**REDACTED**

Staff's First Request for Production  
of Documents  
Docket No. 150007-EI  
GULF POWER COMPANY  
June 29, 2015  
Item No. 1

1. Page 13 of Gulf's Air Quality Compliance Program Update, indicates that the Company has determined that the most cost-effective option to comply with the regulations imposed by EPA is to retire Plant Smith Units 1 and 2. Please provide the cost-effectiveness analysis that Gulf performed to determine that Plant Smith Units 1 and 2 should be retired.

ANSWER:

See pages 1-24. Documents bearing page numbers 2 through 12 and 15 through 24 are confidential in their entirety.

**EXHIBIT "C"**

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

**Line(s)/Field(s)**

**Justification**

**Response to Request # 1**

Pages 2-12 and 15-24 are confidential in their entirety.

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 1.

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

IN RE: **Environmental Cost** )  
**Recovery Clause** )

Docket No.: 150007-EI

**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that a true copy of the foregoing was furnished by overnight mail this 26th day of June, 2015 to the following:

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