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



September 1, 2015

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

RE: Docket No. 150007-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 12-019-1-1). Also attached is Gulf's Request for Extended Confidential Classification in Microsoft Word format.

Sincerely,

Robert L. M. Suf.

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: Environmental cost recovery clause

Docket No.:150007-EIDate:September 1, 2015

<u>REQUEST FOR EXTENDED CONFIDENTIAL CLASSIFICATION</u>

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 granting extended confidential classification for certain information produced in connection with a review of Gulf Power's 2011 environmental cost recovery expenditures (ACN 12-019-1-1) (the "Review"). As grounds for this request, the Company states:

1. On June 11, 2012, Gulf Power filed a request for confidential classification of certain information produced in connection with the Review. (Document No. 03796-12)

2. On March 3, 2014, the Commission entered Order No. PSC-14-0116-CFO-EI granting Gulf's request for confidential classification.

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 documents continue to contain proprietary confidential business information. The 18-month extension period expires on September 3, 2015.

4. Gulf hereby requests that the Commission enter an order extending the confidential classification of the information identified in line-by-line format on Exhibit "C" to Gulf's original Request for Confidential Classification for an additional 18-month period.

5. The information identified on Exhibit "C" to Gulf's original request remains sensitive despite the passage of time and is entitled to continued confidential classification for the same reasons that it was initially classified. As stated in Gulf's original request, the subject information consists of pricing data for products purchased by Gulf for use in its day-to-day operations. This pricing was the product of negotiations between Gulf and its vendors. Disclosure of this information would impair Gulf Power's ability to continue to procure such goods at prices favorable to its customers insofar as vendors of such goods would be given insight into prices paid by Gulf and could adjust their pricing accordingly. Additionally, Gulf's existing vendors may be unwilling to offer favorable pricing in the future. The information is entitled to confidential classification pursuant to sections 366.093(3)(d), Florida Statutes.

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 protecting the information identified on Exhibit "C" of Gulf's original request from public disclosure for an additional period of eighteen (18) months. Respectfully submitted this 1st day of September, 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

IN RE:	Environmental Cost
	Recovery Clause

Docket No.: 150007-El

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true copy of the foregoing was furnished by electronic mail this 1st day of September, 2015 to the following:

Ausley Law Firm James D. Beasley J. Jeffry Wahlen Ashley M. Daniels Post Office Box 391 Tallahassee, FL 32302 <u>ibeasley@ausley.com</u> <u>adaniels@ausley.com</u> <u>iwahlen@ausley.com</u>

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

Office of Public Counsel J. Kelly/C. Rehwinkel/P. Christensen c/o The Florida Legislature 111 W. Madison Street, Room 812 Tallahassee, FL 32399-1400 Christensen.patty@leg.state.fl.us

Tampa Electric Company Ms. Paula K. Brown, Manager Regulatory Coordination P. O. Box 111 Tampa, FL 33601-0111 <u>Regdept@tecoenergy.com</u> PCS Phosphate – White Springs c/o Stone Law Firm James W. Brew/Owen J. Kopon Laura A. Wynn Eighth Floor, West Tower 1025 Thomas Jefferson St, NW Washington, DC 20007 jbrew@smxblaw.com ojk@smxblaw.com laura.wynn@bbrslaw.com

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

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

Office of the General Counsel Charles Murphy 2540 Shumard Oak Blvd Tallahassee, FL 32399-0850 <u>cmurphy@psc.state.fl.us</u> DLynn@psc.state.fl.us Florida Power & Light Company Kenneth Hoffman 215 South Monroe Street, Suite 810 Tallahassee, FL 32301-1858 Ken.Hoffman@fpl.com

Hopping Green & Sams Gary V. Perko P. O. Box 6526 Tallahassee, FL 32314 gperko@hgslaw.com

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

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