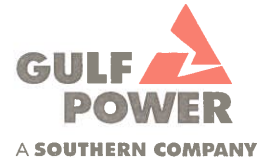


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December 1, 2015

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

RE: Docket No. 110138-EI

Dear Ms. Stauffer:

Attached for official filing is Gulf Power Company's Request for Extended Confidential Classification regarding certain information submitted in connection with Commission Staff's Audit (ACN 11-200-1-1) of Gulf Power Company's request for an increase in rates in the above-referenced docket. Also attached is Gulf's Request for Extended Confidential Classification in Microsoft Word format.

Sincerely,

A handwritten signature in blue ink that reads "Robert L. McGee, Jr." in a cursive style.

Robert L. McGee, Jr.
Regulatory and Pricing Manager

md

Attachment

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

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In Re: Petition for increase in rates by Gulf
Power Company.

Docket No. 110138-EI
Dated: December 1, 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 granting extended confidential classification for certain information submitted in connection with Audit Control No. 11-200-1-1 (the Audit) in Docket No. 110138-EI. As grounds for this request, the Company states:

1. On October 25, 2011, Gulf Power filed a request for confidential classification of certain information submitted in connection with the Audit. (Document No. 07855-11)
2. On June 2, 2014, the Commission entered Order No. PSC-14-0285-CFO-EI granting Gulf’s First Request for Confidential Classification.
3. As provided in section 366.093(4), Florida Statutes, and by the Commission’s Order, the confidential documents 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 December 2, 2015.
4. Gulf hereby requests that the Commission enter an order extending the confidential classification of the information highlighted on Exhibit “A” of Gulf’s First Request for Confidential Classification (Document No. 07856-11) and identified in line/by line format on

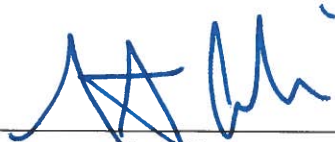
Exhibit “C” of Gulf’s First Request for Confidential Classification (Document No. 07858-11) for an additional 18-month period.

5. The information highlighted on Exhibit “A” to Gulf’s First Request for Confidential Classification is entitled to continued confidential classification for the same reasons that it was initially classified. As stated in Gulf’s first request, the subject information consists of contractual data and other information, the disclosure of which would impair the competitive business of Gulf Power or entities with which Gulf Power does business. A significant portion of the documents submitted in connection with the request reveal pricing/revenue information under land leases and wholesale power agreements, many of which are still in effect. Disclosure of this information would negatively impact Gulf Power’s ability to negotiate payment terms favorable to its customers in future agreements. In addition, potential counterparties may refuse to enter into contracts with Gulf, or may charge higher prices, if such pricing information was publicly disclosed. This information is entitled to continued confidential classification pursuant to section 366.093(3)(d), Florida Statutes. The remainder of the documents identify property damage claims, amounts owed and the strategy for claim resolution. Disclosure of this information could impair the Company’s efforts to negotiate settlements favorable to its customers and could reveal legal strategies and practices for resolution of damage claims. This information is entitled to continued confidential classification pursuant to section 366.093(3)(e), Florida Statutes and on the ground that it consists of protected attorney-work product.

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 highlighted on Exhibit "A" to Gulf's First Request for Confidential Classification (Document No. 07856-11) from public disclosure for an additional period of eighteen (18) months.

Respectfully submitted this 1st day of December, 2015.



JEFFREY A. STONE

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Attorneys for Gulf Power Company

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

IN RE: Petition for Increase in Rates)
By Gulf Power Company)
)

Docket No.: 110138-EI

CERTIFICATE OF SERVICE

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

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