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January 20, 2016

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COMMISSION
CLERK

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

REDACTED

Re: Docket No. 150248-EG – Gulf Power Company’s Petition for Approval of
Community Solar Pilot Program

Dear Ms. Stauffer:

Enclosed is Gulf Power Company’s Request for Confidential Classification
pertaining to Gulf Power’s response to Staff’s Second Data Request Item No. 4
in the above-referenced docket.

Sincerely,

Robert L. McGee, Jr.
Regulatory and Pricing Manager

- COM _____
- AFD _____
- APA _____
- ECO Redacted + CD
- ENG _____
- GCL _____
- IDM _____
- TEL _____
- CLK _____

md

Enclosures

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

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Petition for Approval of Gulf Power
Company's community solar pilot program

Docket No. 150248-EG

Filed: January 21, 2016

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 Second Data Request to Gulf Power Company (Nos. 1-4) in the above-referenced docket. As grounds for this request, the Company states:

1. Information submitted by Gulf Power in response to question number 4 of Commission Staff's Second Data Request constitutes "proprietary confidential business information" as defined pursuant to section 366.093(3), Florida Statutes.

2. Information submitted in response to question 4 consists of a study titled Economic and Normal Useful Life Study of Solar Project. The study was commissioned by Gulf's affiliate, Southern Company Service, Inc. ("SCS"), and performed by KPMG, LLP. The purpose of the study is to assist Gulf and its affiliates in internal planning and compliance with future financial reporting, tax compliance and regulatory requirements. This information is subject to non-disclosure obligations and is regarded by Gulf, SCS and KPMG as proprietary information. Public disclosure of this information would enable others in the market place to capitalize on this data without compensating the consultant for the same and could result in consultants charging higher prices, or refusing to do business with Gulf, out of concern that their analyses would be publicly disclosed. Public disclosure of this data would impair the

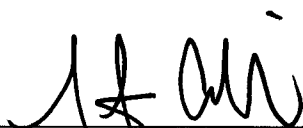
competitive business interests of Gulf Power and its consultant and is therefore entitled to confidential classification pursuant to section 366.093(3)(e), Florida Statutes.

3. 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.

4. Attached hereto as Exhibit "A" is a copy of Gulf Power's response to question 4. Exhibit "A" should be treated as confidential in its entirety pending a ruling on this request. . Attached hereto as Exhibit "B" is a public version of Gulf's response to question 4 which may be made available for public review and inspection. Attached hereto as Exhibit "C" 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 20th day of January, 2016.



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REQUEST FOR CONFIDENTIAL CLASSIFICATION

EXHIBIT "A"

This information has been provided to the Commission Clerk
under separate cover as confidential information

REDACTED

EXHIBIT "B"

**“Information submitted in response to Question No. 4
of Commission Staff’s Second Data Request
is confidential in its entirety.”**

EXHIBIT "C"

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

Line(s)/Field(s)

Justification

Gulf's response to Item No. 4 is confidential in its 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 2.

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

IN RE: Petition for approval of Community Solar Pilot)
Program by Gulf Power Company)
_____)

Docket No.: 150248-EI

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true copy of the foregoing was furnished by overnight mail this 20th day of January, 2016 to the following:

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