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April 5, 2016

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

RE: Docket No. 160001-EI

Dear Ms. Stauffer:

Attached for official filing is Gulf Power Company's Request for Extended Confidential Classification regarding certain documents produced by Gulf Power and Commission Staff in connection with a review (ACN 14-083-1-1) of Gulf Power's 2014 hedging settlements.

Sincerely,

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

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.: 160001-EI
Date: April 5, 2016

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 this request that the Florida Public Service Commission enter an order extending confidential classification for portions of documents produced by Gulf Power and Commission Staff in connection with a review of Gulf Power’s 2014 hedging settlements in Docket No. 140001-EI (ACN 14-083-1-1) (the “Review”). As grounds for this request, the Company states:

1. On September 25, 2014, Gulf Power filed a request for confidential classification of certain information produced in connection with the Review. (Document No. 05392-14, Docket No. 140001-EI)
2. On October 7, 2014, the Commission entered Order No. PSC-14-0538-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 information continues to comprise proprietary confidential business information. The 18-month extension period expires on April 7, 2016.
4. Gulf hereby requests that the Commission enter an order extending the confidential classification of the information highlighted on Exhibit “A” of Gulf’s original request. See, Document No. 05393-14.

5. Information contained in Exhibit "A" to Gulf's original request remains confidential. Specifically, portions of information contained in Exhibit "A" reflect the percentage of annual projected natural gas burn which Gulf targets for financial hedging. This information has consistently been afforded confidential treatment by the Commission, as it provides insights into Gulf's hedging strategy which could place Gulf at a competitive disadvantage when negotiating with hedging counterparties. Similarly, Gulf has active hedges in place with many of the same counterparties reflected in Exhibit A. Public disclosure of negotiated pricing from 2014 would enable these counterparties to compare their negotiated pricing to pricing of other counterparties for similar transactions and potentially provide a source of leverage in negotiating future pricing with Gulf. This information consists of information the disclosure of which would impair the competitive business of Gulf Power and is entitled to confidential classification pursuant to section 366.093(3)(e), 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 otherwise been publicly disclosed.

WHEREFORE, Gulf Power Company respectfully requests that the Commission enter an order extending confidential classification of the information highlighted on Exhibit "A" of Gulf's original request from public disclosure as proprietary confidential business information.

Respectfully submitted this 5th day of April, 2016.

A handwritten signature in blue ink, appearing to be 'HAW', is written over a horizontal line.

JEFFREY A. STONE

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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.: **160001-EI**

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true copy of the foregoing was furnished by electronic mail this 5th day of April, 2016 to the following:

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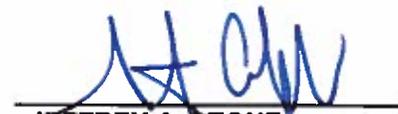
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