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April 22, 2016

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COMMISSION
CLERK

Ms. Carlotta Stauffer
Florida Public Service Commission
2540 Shumard Oak Boulevard
Tallahassee FL 32399-0868

Re: Docket No. 160039-EI – Gulf Power Company’s Petition for Approval of
Regulatory Asset Related to the Retirement of Plant Smith Units 1 and 2

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 in the
above-referenced docket.

Sincerely,

Robert L. McGee, Jr.
Regulatory and Pricing Manager

md

Enclosures

cc w/encl.: Beggs and Lane
Jeffrey A. Stone, Esquire
Office of General Counsel
Suzanne Brownless

- COM _____
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- APA _____
- ECO _____
- ENG _____
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- IDM _____
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- CLK _____

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In Re: Petition of Gulf Power Company for approval of a regulatory asset related to the retirement of Plant Smith Units 1 and 2

Docket No.: 160039-EI
Date: April 25, 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 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 Second Data Request 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 same information submitted in response to request number 1 of Commission Staff's Second Data Request was previously submitted to the Commission in Docket No. 150007-EI pursuant to a Request for Confidential Classification. See, Document No. 03998-15. The information was returned to Gulf Power by Commission Staff on January 7, 2016. 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 22nd day of April, 2016.



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BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In Re: Petition of Gulf Power Company for
approval of a regulatory asset related to the
retirement of Plant Smith Units 1 and 2

Docket No. 160039-EI
Date: April 25, 2016

REQUEST FOR CONFIDENTIAL CLASSIFICATION

EXHIBIT "A"

Provided to the Commission Clerk
under separate cover as confidential information

EXHIBIT "B"

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: **Petition for approval of regulatory asset**)
related to the retirement of Plant Smith)
Units 1 and 2, by Gulf Power Company)

Docket No.: **160039-EI**

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true copy of the foregoing was furnished by overnight mail this 22nd day of April, 2016 to the following:

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