

State of Florida



Public Service Commission

CAPITAL CIRCLE OFFICE CENTER • 2540 SHUMARD OAK BOULEVARD
TALLAHASSEE, FLORIDA 32399-0850

-M-E-M-O-R-A-N-D-U-M-

DATE: October 13, 2016

TO: Division of Engineering, Office of Primary Responsibility

FROM: OFFICE OF COMMISSION CLERK

RE: CONFIDENTIALITY OF CERTAIN INFORMATION
 DOCKET NO(s): 160186-EI DOCUMENT NO(s): 08165-16
 DESCRIPTION: GPC (Badders) - (CONFIDENTIAL) Certain portions of MFR Schedule D-2 consisting of projected information about the capital structure of affiliated and consolidated companies.
 SOURCE: Gulf Power Company

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 2016 OCT 19 AM 7:56
 COMMISSION CLERK

The above confidential material was filed with a request of confidential classification. Please complete the following form by checking all applicable information and forward it to the attorney assigned to the docket, along with a brief memorandum supporting your recommendation.

- The document(s) is (are), in fact, what the utility asserts it (them) to be.
- The utility has provided enough details to perform a reasoned analysis of its request.
- The material has been received incident to an inquiry.
- The material is confidential business information because it includes:
 - (a) Trade secrets;
 - (b) Internal auditing controls and reports of internal auditors;
 - (c) Security measures, systems, or procedures;
 - (d) Information concerning bids or other contractual data, the disclosure of which would impair the efforts of the public utility or its affiliates to contract for goods or services on favorable terms;
 - (e) Information relating to competitive interests, the disclosure of which would impair the competitive business of the provider of information;
 - (f) Employee personnel information unrelated to compensation, duties, qualifications, or responsibilities;
- The material appears to be confidential in nature and harm to the company or its ratepayers will result from public disclosure.
- The material appears not to be confidential in nature.
- The material is a periodic or recurring filing and each filing contains confidential information.

This response was prepared by Anwar Arches on 10/14/16, a copy of which has been sent to the Office of Commission Clerk and the Office of General Counsel.



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-M-E-M-O-R-A-N-D-U-M-

DATE: October 14, 2016

TO: Lee Eng Tan, Senior Attorney, Office of the General Counsel

FROM: Anwar Archer, Public Utilities Analyst I, Division of Accounting & Finance MA

RE: CONFIDENTIALITY OF CERTAIN INFORMATION
DOCKET NO: 160186-EI DOCUMENT NO: 08165-16
DESCRIPTION: Gulf Power Company (Badders) – Certain CONFIDENTIAL portions of MFR Schedule D-2 consisting of projected information about the capital structure of affiliated and consolidated companies.
SOURCE: Gulf Power Company

On October 12, 2016, Gulf Power Company (Gulf) filed its MFRs in the above referenced docket. Pursuant to Section 366.093, Florida Statutes (F.S.), and Rule 25-22.006, Florida Administrative Code (F.A.C.), Gulf requested confidential classification of certain information provided in the MFR Schedules listed in the following table.

MFR Schedule No.	Description	Page No.	Column No. / Line No.
D-2	Cost of Capital – 5 Year History for Projected Test Year Ended 12/31/2017, Prior Year Ended 12/31/2016, and Historical Test Year Ended 12/31/2015	1 of 2	Columns 9-12, Lines 8-20
D-2	Cost of Capital – 5 Year History for Projected Test Year Ended 12/31/2017, Prior Year Ended 12/31/2016, and Historical Test Year Ended 12/31/2015	2 of 2	Columns 9-12, Lines 2-19

Gulf claims MFR Schedule D-2 contains confidential information, which comprises projected information about the capital structure of its affiliated and consolidated companies. Gulf asserts that disclosure of the information would cause harm to the competitive interests of Gulf and its affiliates. If Gulf's suppliers, investors or competitors are made aware of this confidential information, these interested parties may adjust their behavior in the marketplace with respect to activities such as pricing and acquisition and provision of goods. As such, this information is protected by Section 366.093(3) (e), F.S.

Staff reviewed Gulf's request and in staff's opinion, the information subject to the request meets the criteria for confidential classification pursuant to Section 366.093, F.S., and Rule 25-22.006,

F.A.C. Therefore, staff recommends that FPL's request for confidential classification be approved.