



Robert L. McGee, Jr.  
Regulatory & Pricing Manager

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March 13, 2017

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

RECEIVED - FPSC  
2017 MAR 14 AM 9:50  
COMMISSION  
CLERK

RE: Docket No. 160186-EI

**REDACTED**

Dear Ms. Stauffer:

Enclosed for filing in the above-referenced docket is Gulf Power Company's Request for Confidential Classification pertaining to certain portions of Gulf's response to Citizens' Ninth Set of Interrogatories to Gulf Power Company (Nos. 193-219). Also enclosed is a copy of Gulf Power's Request for Confidential Classification and Exhibit "A" which is a justification for confidential treatment of the Confidential Information in Microsoft Word format. A copy of the confidential documents are provided in the enclosed envelope labeled "Confidential."

Sincerely,

Robert L. McGee, Jr.  
Regulatory and Pricing Manager

md

Enclosures

cc: Beggs & Lane  
Jeffrey A. Stone, Esq.  
Gunster Law Firm  
Charles A. Guyton, Esq.  
Richard A. Melson, Esq.

COM \_\_\_\_\_  
AFD \_\_\_\_\_  
APA \_\_\_\_\_  
ECO \_\_\_\_\_  
**ENG** **ICD**  
GCL \_\_\_\_\_  
IDM \_\_\_\_\_  
TEL \_\_\_\_\_  
CLK \_\_\_\_\_

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In Re: Petition for rate increase by Gulf  
Power Company.

Docket No. 160186-EI  
Dated: March 14, 2017

\_\_\_\_\_/

**GULF POWER COMPANY'S REQUEST  
FOR CONFIDENTIAL CLASSIFICATION AND  
MOTION FOR TEMPORARY PROTECTIVE ORDER**

Gulf Power Company ("Gulf Power," "Gulf," or the "Company"), pursuant to Section 366.093, Florida Statutes, and Rule 25-22.006, Florida Administrative Code, hereby files its request for confidential classification and motion for protective order pertaining to certain information produced in response to Citizens' (OPC's) Ninth Set of Interrogatories to Gulf Power Company (Nos. 193-219). Confidential information submitted in response to OPC's Discovery has been segregated and placed in the enclosed envelope bearing the label "CONFIDENTIAL" ("Confidential Information"). This document should be treated as confidential. In support, Gulf states as follows:

1. On February 16, 2017, OPC served Gulf with its Ninth Set of Interrogatories (Nos. 193-219).
2. Gulf served timely responses to OPC's Ninth Set of Interrogatories.
3. Gulf's responses to OPC's Ninth Set of Interrogatories included confidential information.
4. Per agreement between Gulf and Commission Staff counsel, the confidential information contained in Gulf's responses to OPC's Discovery was made available for Staff to review in Gulf's Tallahassee office. Staff agreed to identify any confidential information it wanted to receive from Gulf out of Gulf's production to OPC.

5. After reviewing the confidential information submitted in response to OPC's Ninth Set of Interrogatories, Staff counsel requested Gulf to provide confidential information included in Gulf's response to OPC's Interrogatory No. 205.

6. In order to ensure the confidentiality of the information included in Gulf's response to OPC's Interrogatory No. 205, Gulf now files this request.

**Description of the Document(s)**

7. The Confidential Information consists of a document produced in response to OPC's Interrogatory No. 205. This document is identified with specificity on Exhibit "A" to this Request.

8. Subsection 366.093(1), Florida Statutes, provides that any records "found by the Commission to be proprietary confidential business information shall be kept confidential and shall be exempt from s. 119.07(1), Florida Statutes [requiring disclosure under the Public Records Act]." Proprietary confidential business information includes, but is not limited to "[i]nformation concerning . . . 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." Subsection 366.093(3)(d), Florida Statutes. Proprietary confidential business information also includes "[i]nformation relating to competitive interests, the disclosure of which would impair the competitive business of the provider of the information." Section 366.093(3)(e), Florida Statutes. The Confidential Information that is the subject of this request and motion falls within the statutory categories and, thus, constitutes proprietary confidential business information entitled to protection under Section 366.093, Florida Statutes, and Rule 25-22.006, Florida Administrative Code.

9. Attached hereto as Exhibit "A" is a justification for confidential treatment of the Confidential Information.

10. Attached hereto as Exhibit "B" is a public version of the Document with the Confidential Information redacted, unless previously filed as indicated.

11. The Confidential Information is intended to be and is treated by Gulf Power as private and, to this attorney's knowledge, has not been publicly disclosed.

12. For the same reasons set forth herein in support of its request for confidential classification, Gulf Power also moves the Commission for entry of a temporary protective order pursuant to Rule 25-22.006(6)(c), Florida Administrative Code, protecting the Confidential Information from public disclosure.

**Requested Duration of Confidential Classification**

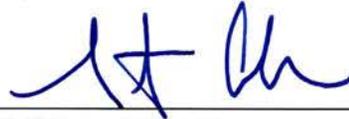
13. Gulf Power requests that the Confidential Information be treated by the Commission as confidential proprietary business information for at least the 18 month period prescribed in Rule 25-22.006(9)(a), Florida Administrative Code. If, and to the extent that the Company is in need of confidential classification of the Confidential Information beyond the 18 month period set forth in the Commission rule, the justification and grounds for such extended confidential treatment are set forth in Exhibit "C" to this request and motion.

WHEREFORE, Gulf Power Company respectfully requests that the Confidential Information that is the subject of this request and motion be accorded confidential classification for the reasons set forth herein and for a minimum period of 18 months, subject to any request for a longer period of confidential classification as may be set forth in Exhibit "C" to this request and motion. The company further moves for the entry of a temporary protective order pursuant

to Rule 25-22.006(6)(c), Florida Administrative Code, protecting the Confidential Information from public disclosure.

DATED this 13th day of March, 2017.

Respectfully submitted,



---

**JEFFREY A. STONE**

Florida Bar No. 325953

**RUSSELL A. BADDERS**

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**STEVEN R. GRIFFIN**

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**Attorneys for Gulf Power Company**

**EXHIBIT "A"**

**JUSTIFICATION FOR CONFIDENTIAL TREATMENT OF PORTIONS  
OF GULF POWER'S RESPONSES TO OPC'S NINTH  
SET OF INTERROGATORIES (NOS. 193-219)**

<u>ROG No.</u>	<u>Bates Pages or File Names</u>	<u>Detailed Description</u>	<u>Rationale</u>
205	OPC 9th ROG 205 Page 2 - CONF	All highlighted information	(1)

- 
- (1) The information identified in the listed file contains confidential employee data, including salaries and other compensation data. Public disclosure of this information could provide Gulf's competitors with an advantage in acquiring and obtaining qualified employees, increase Gulf's employee turnover and associated training costs, and give existing and prospective employees an advantage in negotiating compensation packages, leading to increases in the overall amount paid to employees. This information is confidential pursuant to section 366.093(3)(e), Florida Statutes. *See Florida Power & Light v. Florida Public Service Commission*, 31 So.3d 860 (Fla. 1st DCA 2010).

**EXHIBIT "B"**

**PUBLIC VERSION(S) OF THE DOCUMENT(S)**

Attached hereto (unless previously filed as may be noted below) are two public versions of the Document(s) with the Confidential Information redacted.

Public Version(s) of the Document(s) attached  X \_\_\_\_\_

Public Version(s) of the Document(s) previously filed on \_\_\_\_\_

Document(s) are confidential in their entirety \_\_\_\_\_

Position	Variance	Emp Class	Compensation Expense Data							
			Allocation Percentage (%)			Salary and PPP Compensation (\$)				
			O&M	Capital	Clause	Salary	PPP	Salary O&M	PPP O&M	Total O&M
Customer Care Representative	(1)	Non-Exempt	100%	0%	0%					
Customer Care Representative	(1)	Non-Exempt	100%	0%	0%					
Business & Marketing Specialist	(1)	Non-Exempt	100%	0%	0%					
Special Projects Manager	(1)	Exempt	100%	0%	0%					
Intern	(1)	Non-Exempt	50%	50%	0%					
Admin - Marketing Services	(1)	Non-Exempt	58%	0%	42%					
Business Development Analyst	(1)	Exempt	100%	0%	0%					
Admin - Military Affairs	(1)	Non-Exempt	0%	0%	100%					
Commercial Rep	(1)	Exempt	75%	0%	25%					
Marketing Tech	(1)	Non-Exempt	50%	0%	50%					
Residential Rep	(1)	Exempt	60%	0%	40%					
Economic Development Representative	(1)	Exempt	100%	0%	0%					
Administrative Assistant	(1)	Non-Exempt	100%	0%	0%					
Mechanic-Garage	(1)	Covered	100%	0%	0%					
Engineer III	(1)	Exempt	30%	70%	0%					
Engineer III	(1)	Exempt	30%	70%	0%					
Technical Services Supervisor	(1)	Exempt	30%	70%	0%					
Distribution System Operator	(1)	Exempt	30%	70%	0%					
Line Clearing Specialist	(1)	Exempt	89%	11%	0%					
Forestry Services Tech	(1)	Non-Exempt	89%	11%	0%					
Administrative Assistant	(1)	Non-Exempt	35%	65%	0%					
Distribution Operations Tech I	(1)	Non-Exempt	60%	40%	0%					
Engineering Field Rep, Sr	(1)	Exempt	15%	85%	0%					
Service Technician	(1)	Covered	30%	70%	0%					
Service Technician	(1)	Covered	30%	70%	0%					
Engineering Field Rep, Sr	(1)	Exempt	30%	70%	0%					
Service Technician	(1)	Covered	50%	50%	0%					
Apprentice Line Tech	(1)	Covered	30%	70%	0%					
Service Technician	(1)	Covered	50%	50%	0%					
Apprentice Line Tech	(1)	Covered	50%	50%	0%					
Apprentice Line Tech	(1)	Covered	50%	50%	0%					
Administrative Assistant	(1)	Non-Exempt	65%	35%	0%					
Engineer, SR	(1)	Exempt	70%	30%	0%					
Engineering Technician	(1)	Exempt	55%	45%	0%					
Substation Technician	(1)	Covered	70%	30%	0%					
Substation Technician	(1)	Covered	70%	30%	0%					
Engineer, SR	(1)	Exempt	70%	30%	0%					
Power System Coordinator	(1)	Exempt	70%	30%	0%					
CSO Training Supv	(1)	Exempt	100%	0%	0%					
Engineering Training Analyst	(1)	Exempt	100%	0%	0%					
Cust Svc Training Analyst	(1)	Exempt	100%	0%	0%					
Cust Svc Training Analyst	(1)	Exempt	100%	0%	0%					
Storekeeper	(1)	Covered	100%	0%	0%					
Storekeeper	(1)	Covered	100%	0%	0%					
Budget Analyst, Staff	(1)	Exempt	100%	0%	0%					
Fuels Analyst, Lead	(1)	Exempt	100%	0%	0%					
Fuel Specialist	(1)	Exempt	100%	0%	0%					
Security Officer	(1)	Non-Exempt	70%	0%	30%					
Security Officer	(1)	Non-Exempt	70%	0%	30%					
Security Officer	(1)	Non-Exempt	70%	0%	30%					
Security Officer	(1)	Non-Exempt	70%	0%	30%					
Security Officer	(1)	Non-Exempt	70%	0%	30%					
Security Officer	(1)	Non-Exempt	70%	0%	30%					
Security Officer	(1)	Non-Exempt	70%	0%	30%					
Security Officer	(1)	Non-Exempt	70%	0%	30%					
Security Officer	(1)	Non-Exempt	70%	0%	30%					
Security Officer	(1)	Non-Exempt	70%	0%	30%					
Security Officer	(1)	Non-Exempt	70%	0%	30%					
Security Officer	(1)	Non-Exempt	70%	0%	30%					
Security Supervisor	(1)	Exempt	70%	0%	30%					
Security Team Leader	(1)	Exempt	70%	0%	30%					
Security Team Leader	(1)	Exempt	70%	0%	30%					
Operator	(1)	Covered	100%	0%	0%					
Operator	(1)	Covered	100%	0%	0%					
Operator	(1)	Covered	100%	0%	0%					
Operator	(1)	Covered	100%	0%	0%					
Utility	(1)	Covered	100%	0%	0%					
Utility	(1)	Covered	100%	0%	0%					
Utility	(1)	Covered	100%	0%	0%					
Utility	(1)	Covered	100%	0%	0%					
Utility	(1)	Covered	100%	0%	0%					
Fuels & By-Products Operator	(1)	Covered	100%	0%	0%					
Operator - Scrubber	(1)	Covered	0%	0%	100%					
Chemical and Results Tech	(1)	Covered	100%	0%	0%					
Welder Mechanic	(1)	Covered	0%	100%	0%					
Welder Mechanic	(1)	Covered	0%	100%	0%					
Welder Mechanic	(1)	Covered	0%	100%	0%					
Team Leader Fuels	(1)	Exempt	100%	0%	0%					
Instruments and Control Specialist	(1)	Exempt	100%	0%	0%					
Operations Team Leader	(1)	Exempt	100%	0%	0%					
Fuels & By-Products Operator	(1)	Covered	100%	0%	0%					
Operator	(1)	Covered	100%	0%	0%					
Engineer, SR	(1)	Exempt	100%	0%	0%					
Maintenane Tech	(1)	Non-Exempt	100%	0%	0%					
Communications Specialist	(1)	Exempt	100%	0%	0%					
Supervisor of Land and Water	(1)	Exempt	80%	0%	20%					
Communication Technician (BUE)	(1)	Covered	100%	0%	0%					
Regulatory Analyst Sr.	(1)	Exempt	100%	0%	0%					
Regulatory Analyst Sr.	(1)	Exempt	100%	0%	0%					
Accounting Assistant	(1)	Non-Exempt	100%	0%	0%					
HR Business Rep	(1)	Exempt	100%	0%	0%					
Disability Management Consultant	(1)	Exempt	100%	0%	0%					
	(93)									

REDACTED

Position	Variance	Emp Class	Compensation Expense Data							
			Allocation Percentage (%)			Salary and PPP Compensation (\$)				
			O&M	Capital	Clause	Salary	PPP	Salary O&M	PPP O&M	Total O&M
Customer Care Representative	(1)	Non-Exempt	100%	0%	0%					
Customer Care Representative	(1)	Non-Exempt	100%	0%	0%					
Business & Marketing Specialist	(1)	Non-Exempt	100%	0%	0%					
Special Projects Manager	(1)	Exempt	100%	0%	0%					
Intern	(1)	Non-Exempt	50%	50%	0%					
Admin - Marketing Services	(1)	Non-Exempt	58%	0%	42%					
Business Development Analyst	(1)	Exempt	100%	0%	0%					
Admin - Military Affairs	(1)	Non-Exempt	0%	0%	100%					
Commercial Rep	(1)	Exempt	75%	0%	25%					
Marketing Tech	(1)	Non-Exempt	50%	0%	50%					
Residential Rep	(1)	Exempt	60%	0%	40%					
Economic Development Representative	(1)	Exempt	100%	0%	0%					
Administrative Assistant	(1)	Non-Exempt	100%	0%	0%					
Mechanic-Garage	(1)	Covered	100%	0%	0%					
Engineer III	(1)	Exempt	30%	70%	0%					
Engineer III	(1)	Exempt	30%	70%	0%					
Technical Services Supervisor	(1)	Exempt	30%	70%	0%					
Distribution System Operator	(1)	Exempt	30%	70%	0%					
Line Clearing Specialist	(1)	Exempt	89%	11%	0%					
Forestry Services Tech	(1)	Non-Exempt	89%	11%	0%					
Administrative Assistant	(1)	Non-Exempt	35%	65%	0%					
Distribution Operations Tech I	(1)	Non-Exempt	60%	40%	0%					
Engineering Field Rep, Sr	(1)	Exempt	15%	85%	0%					
Service Technician	(1)	Covered	30%	70%	0%					
Service Technician	(1)	Covered	30%	70%	0%					
Engineering Field Rep, Sr	(1)	Exempt	30%	70%	0%					
Service Technician	(1)	Covered	50%	50%	0%					
Apprentice Line Tech	(1)	Covered	30%	70%	0%					
Service Technician	(1)	Covered	50%	50%	0%					
Apprentice Line Tech	(1)	Covered	50%	50%	0%					
Apprentice Line Tech	(1)	Covered	50%	50%	0%					
Administrative Assistant	(1)	Non-Exempt	65%	35%	0%					
Engineer, SR	(1)	Exempt	70%	30%	0%					
Engineering Technician	(1)	Exempt	55%	45%	0%					
Substation Technician	(1)	Covered	70%	30%	0%					
Substation Technician	(1)	Covered	70%	30%	0%					
Engineer, SR	(1)	Exempt	70%	30%	0%					
Power System Coordinator	(1)	Exempt	70%	30%	0%					
CSO Training Supv	(1)	Exempt	100%	0%	0%					
Engineering Training Analyst	(1)	Exempt	100%	0%	0%					
Cust Svc Training Analyst	(1)	Exempt	100%	0%	0%					
Cust Svc Training Analyst	(1)	Exempt	100%	0%	0%					
Storekeeper	(1)	Covered	100%	0%	0%					
Storekeeper	(1)	Covered	100%	0%	0%					
Budget Analyst, Staff	(1)	Exempt	100%	0%	0%					
Fuels Analyst, Lead	(1)	Exempt	100%	0%	0%					
Fuel Specialist	(1)	Exempt	100%	0%	0%					
Security Officer	(1)	Non-Exempt	70%	0%	30%					
Security Officer	(1)	Non-Exempt	70%	0%	30%					
Security Officer	(1)	Non-Exempt	70%	0%	30%					
Security Officer	(1)	Non-Exempt	70%	0%	30%					
Security Officer	(1)	Non-Exempt	70%	0%	30%					
Security Officer	(1)	Non-Exempt	70%	0%	30%					
Security Officer	(1)	Non-Exempt	70%	0%	30%					
Security Officer	(1)	Non-Exempt	70%	0%	30%					
Security Officer	(1)	Non-Exempt	70%	0%	30%					
Security Officer	(1)	Non-Exempt	70%	0%	30%					
Security Officer	(1)	Non-Exempt	70%	0%	30%					
Security Supervisor	(1)	Exempt	70%	0%	30%					
Security Team Leader	(1)	Exempt	70%	0%	30%					
Security Team Leader	(1)	Exempt	70%	0%	30%					
Operator	(1)	Covered	100%	0%	0%					
Operator	(1)	Covered	100%	0%	0%					
Operator	(1)	Covered	100%	0%	0%					
Operator	(1)	Covered	100%	0%	0%					
Utility	(1)	Covered	100%	0%	0%					
Utility	(1)	Covered	100%	0%	0%					
Utility	(1)	Covered	100%	0%	0%					
Utility	(1)	Covered	100%	0%	0%					
Fuels & By-Products Operator	(1)	Covered	100%	0%	0%					
Operator - Scrubber	(1)	Covered	0%	0%	100%					
Chemical and Results Tech	(1)	Covered	100%	0%	0%					
Welder Mechanic	(1)	Covered	0%	100%	0%					
Welder Mechanic	(1)	Covered	0%	100%	0%					
Welder Mechanic	(1)	Covered	0%	100%	0%					
Team Leader Fuels	(1)	Exempt	100%	0%	0%					
Instruments and Control Specialist	(1)	Exempt	100%	0%	0%					
Operations Team Leader	(1)	Exempt	100%	0%	0%					
Fuels & By-Products Operator	(1)	Covered	100%	0%	0%					
Operator	(1)	Covered	100%	0%	0%					
Engineer, SR	(1)	Exempt	100%	0%	0%					
Maintenane Tech	(1)	Non-Exempt	100%	0%	0%					
Communications Specialist	(1)	Exempt	100%	0%	0%					
Supervisor of Land and Water	(1)	Exempt	80%	0%	20%					
Communication Technician (BUE)	(1)	Covered	100%	0%	0%					
Regulatory Analyst Sr.	(1)	Exempt	100%	0%	0%					
Regulatory Analyst Sr.	(1)	Exempt	100%	0%	0%					
Accounting Assistant	(1)	Non-Exempt	100%	0%	0%					
HR Business Rep	(1)	Exempt	100%	0%	0%					
Disability Management Consultant	(1)	Exempt	100%	0%	0%					
	(93)									

Average Compensation: Salary 67,268 PPP 10,633 Salary O&M 51,146 PPP O&M 8,120 Total O&M 59,265

## **EXHIBIT "C"**

### **REQUESTED DURATION OF CONFIDENTIAL CLASSIFICATION**

Gulf Power requests that the Confidential Information that is the subject of this request be treated as proprietary confidential business information exempt from the Public Records Law for a minimum of 18 months from the date of the order granting such classification. To the extent the company needs confidential protection of the Confidential Information for a period longer than 18 months, the company's justification therefor is set forth below:

n/a

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

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

Docket No.: 160186-EI

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true copy of the foregoing has been furnished by overnight mail this 13th day of March, 2017 to the following:

Office of Public Counsel  
J. R. Kelly/Stephanie A. Morse  
Public Counsel  
c/o The Florida Legislature  
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Florida Industrial Power Users Group  
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Karen Putnal  
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Alisa Coe, Esq.  
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John T. LaVia, III  
c/o Gardner, Bist, Bowden, Bush, Dee,  
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Lane Johnson  
Sierra Club  
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Pensacola FL 32591-2950  
(850) 432-2451  
**Attorneys for Gulf Power**