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July 25, 2017

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

Re: Docket No.: 20120200 - EI

Dear Ms. Stauffer:

Attached for official filing is Gulf Power Company's Request for Extended Confidential Classification pertaining to portions of the Commission's Review of Customer Payment Arrangement Programs.

Sincerely,

A handwritten signature in blue ink that reads "Robert L. McGee, Jr." with a stylized flourish at the end.

Robert L. McGee, Jr.
Regulatory and Pricing Manager

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Attachments

cc: Beggs and Lane
Jeffrey A. Stone, Esq

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

IN RE: Review of Investor-Owned Utilities'
Payment Arrangement Programs
_____)

Docket No.: 20120200-EI
Date: July 25, 2017

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 a request that the Florida Public Service Commission enter an order extending confidential classification for certain information contained in Commission Staff's workpapers generated during an audit of Gulf's customer payment arrangement programs. As grounds for this request, the Company states:

1. On September 19, 2012, Gulf Power filed a request for confidential classification of certain information contained in Commission Staff's workpapers generated during an audit of Gulf's customer payment arrangement programs. (Document No. 06291-2012)
2. On November 15, 2012, the Commission entered Order No. PSC-12-0610-CFO-EI granting Gulf's request for confidential classification.
3. On May 9, 2014, Gulf filed its first Request for Extended Confidential Classification pertaining to the workpapers. (Document No. 02181-2014)
4. On July 1, 2014, the Commission entered Order No. PSC-14-0337-CFO-EI granting Gulf's first Request for Extended Confidential Classification.
5. On December 30, 2015, Gulf filed its second Request for Extended Confidential Classification pertaining to the workpapers. (Document No. 08048-2015)
6. On February 4, 2016, the Commission entered Order No. PSC-16-0063-CFO-EI granting Gulf's second Request for Extended Confidential Classification.

7. 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 August 4, 2017.

8. 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 and identified in line/by line format on Exhibit "C" of Gulf's original request for an additional 18-month period.

9. The information highlighted on Exhibit "A" to Gulf's original request is entitled to continued confidential classification for the same reasons that it was initially classified. As stated in Gulf's original request, Staff's workpapers provide details on Gulf's internal policies and procedures concerning late payment arrangements. These policies and procedures are still in effect. Among other things, these procedures outline the maximum timeframes for which payments may be extended and the criteria which the Company will use in determining whether late payment arrangements will be made. While Gulf continually works in good faith with all of its customers who are experiencing difficulties paying their bills, the Company must also work to ensure that its payment arrangement process is not abused. Public disclosure of the criteria used in determining whether customers qualify for late payment arrangements and the maximum periods of time for which payments may be extended would enable customers to abuse or "game" the system, resulting in unnecessary delays in bill payment and increased delinquencies and write-offs. Delinquencies and write-offs adversely affect the financial integrity of the Company and ultimately work to the detriment of Gulf's general body of customers.

Consequently, the subject information is entitled to confidential classification pursuant to section 366.093(3)(e), Florida Statutes.

10. The information which is the subject of 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.

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

Respectfully submitted this 25th day of July, 2017.



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