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February 14, 2018

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

**REDACTED**

RE: Request for Confidential Classification  
Earnings Surveillance Report, Supplemental 2 for December 2017

Dear Ms. Stauffer:

Enclosed for filing is Gulf Power Company's Request for Confidential Classification  
for the Earnings Surveillance Report, Supplemental 2 for December 2017.

Sincerely,

Rhonda J. Alexander  
Regulatory, Forecasting and Pricing Manager

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Enclosure

cc : Gulf Power Company  
Jeffrey A. Stone, Esq., General Counsel  
Beggs and Lane  
Russell Badders, Esq.  
Florida Public Service Commission  
Bart Fletcher

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BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

IN RE: Gulf Power Company  
Earnings Surveillance Report,  
Supplemental Filing for December 2017

Docket No.: Undocketed  
Date: February 15, 2018

**REQUEST FOR CONFIDENTIAL CLASSIFICATION**

GULF POWER COMPANY (“Gulf Power”, “Gulf”, or “the Company”), by and through its undersigned attorney 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 information contained within the December 2017 supplements for Gulf Power Company’s Earnings Surveillance Report which are being submitted to the Florida Public Service Commission pursuant to Order Nos. PSC-96-1219-FOF-EI, PSC-01-0390-TRF-EI, and PSC-14-0197-PAA-EI (collectively, the “CISR Surveillance Filings”). As grounds for this request, Gulf Power Company states:

1. On February 15, 2018, Gulf Power Company submitted to the Florida Public Service Commission Gulf Power Company’s CISR Surveillance Filings as required by Order Nos. PSC-96-1219-FOF-EI, PSC-01-0390-TRF-EI and PSC-14-0197-PAA-EI.

2. The public disclosure of the information contained in the CISR Surveillance Filings would cause irreparable harm to Gulf Power Company and the entities with which it has entered Contract Services Arrangement (“CSA”) contracts under the authority of Gulf Power’s Commercial/Industrial Service Rider. The CISR Surveillance Filings contain proprietary confidential business information regarding pricing under the CSAs. Public disclosure of this information would impair the ability of Gulf Power Company to negotiate terms and conditions in future CSAs that are the most favorable to Gulf and its general body of customers. Moreover, the public disclosure of this information may prevent Gulf from successfully negotiating CSAs with customers. The information is regarded as sensitive and confidential by the CISR customers because its public disclosure would impact the customers’ ability to compete in the native markets. In the event such information is made public, future potential CISR customers may avoid the risk of public disclosure of their confidential information by refusing to negotiate with Gulf Power. This may lead to uneconomic bypass of Gulf’s facilities. Thus, the Company

requests that this information be granted confidential classification pursuant to Section 366.093(3)(d)-(e), Florida Statutes.

3. Submitted as Exhibit "A" are copies of the CISR Surveillance Filings, on which are highlighted the information for which confidential classification is requested. Exhibit "A" should be treated as confidential pending a ruling on this request. Attached as Exhibit "B" are two (2) edited copies of the CISR Surveillance Filings, which may be made available for public review and inspection. Attached as Exhibit "C" to this request is a line-by-line justification for the request for confidential classification.

4. The material for which confidential classification is requested is intended to be, and is treated as, confidential by Gulf Power Company and the entity with which it has entered a CSA contract and 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" from public disclosure as proprietary confidential business information.

Respectfully submitted this 14<sup>th</sup> day of February, 2018.



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**Attorneys for Gulf Power Company**

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

IN RE: Gulf Power Company  
Earnings Surveillance Report,  
Supplemental Filing for December 2017

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Docket No.: Undocketed  
Date: February 15, 2018

**REQUEST FOR CONFIDENTIAL CLASSIFICATION**

The information provided herein should be maintained as proprietary confidential business information pursuant to Section 366.093 and Rule 25-22.006, F.A.C.

**Exhibit "A"**

This information has been provided to the Commission Clerk  
under separate cover as confidential information

**EXHIBIT "B"**

GULF POWER COMPANY  
SUPPLEMENTAL SURVEILLANCE REPORT INFORMATION  
COMMERCIAL/INDUSTRIAL SERVICE RIDER  
DECEMBER 2017

CONFIDENTIAL

The information below is presented to comply with FPSC Order No. PSC-96-1219-FOF-EI, FPSC Order No. PSC-01-0390-TRF-EI and FPSC Order No. PSC-14-0197-PAA-EI. This supplemental information is to be treated as confidential. For CSA-3, it is estimated that the contract execution-to-date revenues, excluding tax and franchise fees, that would have been produced by the application of Gulf Power's otherwise applicable standard tariff rates to the pre-contract load would have been [REDACTED] than the revenues actually received by Gulf Power pursuant to the executed CSA. For CSA-4, it is estimated that the contract execution-to-date revenues, excluding tax and franchise fees, that would have been produced by the application of Gulf Power's otherwise applicable standard tariff rates to the pre-contract load would have been [REDACTED] than the revenues actually received by Gulf Power pursuant to the executed CSA. For CSA-5, it is estimated that the contract execution-to-date revenues, excluding tax and franchise fees, that would have been produced by the application of Gulf Power's otherwise applicable standard tariff rates to the pre-contract load would have been [REDACTED] than the revenues actually received by Gulf Power pursuant to the executed CSA.

**EXHIBIT "C"**

Reporting Month: December 2017

**Line(s)**

**Justification**

Lines 16, 17, 20 and 24, as highlighted	This information is entitled to confidential classification pursuant to §366.093(3) (d) and (e), Florida Statutes. The basis for this information being designated as confidential is more fully set forth in paragraph 2.
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