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April 27, 2018

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

RE: Docket No. 20160170-EI
Docket No. 20160186-EI

Dear Ms. Stauffer:

Attached for filing in the above-referenced docket is Gulf Power Company's Request for Extended Confidential Classification pertaining to certain information being produced in response to the Office of Public Counsel's First Request to Produce Documents to Gulf Power Company.

Sincerely,

A handwritten signature in blue ink that reads "Rhonda J. Alexander".

Rhonda J. Alexander
Regulatory, Forecasting and Pricing Manager

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Attachments

cc: Gulf Power Company
Jeffrey A. Stone, Esq., General Counsel
Beggs & Lane
Russell Badders, Esq.

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In Re: Petition for Approval of 2016 Depreciation and Dismantlement Studies, Approval of Proposed Depreciation Rates and Annual Dismantlement Accruals and Plant Smith Units 1 & 2 Regulatory Asset Amortization, by Gulf Power Company

Docket No. 20160170-EI

In Re: Petition for Rate Increase by Gulf Power Company

Docket No. 20160186-EI
Date: April 27, 2018

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 included in Gulf Power’s responses to the Office of Public Counsel’s First Request to Produce Documents to Gulf Power (Nos. 1-19) in Docket No. 20160170-EI. As grounds for this request, the Company states:

1. On September 23, 2016, Gulf Power filed a request for confidential classification of certain information contained within Gulf Power’s responses to the Office of Public Counsel’s First Request to Produce Documents to Gulf Power (Nos. 1-19) in Docket No. 20160170-EI. (Document No. 07753-2016)
2. On November 3, 2016, the Commission entered Order No. PSC-16-0508-CFO-EI granting Gulf’s request for confidential classification.
3. On November 9, 2016, the Commission entered Order No. PSC-16-0511-PCO-EI consolidating Docket No. 20160170-EI with Docket No. 20160186-EI and directing that all future filings be filed in Docket No. 20160186-EI.

4. As provided in section 366.093(4), Florida Statutes, and by the Commission's order granting confidential classification, 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 May 3, 2018.

5. Gulf hereby requests that the Commission enter an order extending the confidential classification of the information contained within Exhibit "A" of Gulf's original request for an additional 18-month period.

6. The information contained with 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, the subject information consists of a negotiated agreement between Gulf's agent and Sensus USA, Inc. for the provision of AMI metering infrastructure. This agreement remains in effect and the information contained therein remains competitively sensitive insofar as public disclosure could impair Gulf Power's negotiating position in future contracts for similar products. Specifically, counterparties could view this negotiated result as a starting point in future negotiations. This, in turn, would impact Gulf Power's ability to contract for goods and services on the most favorable terms for the benefit of its customers. This information is therefore confidential pursuant to section 366.093(3)(d)-(e), Florida Statutes.

7. 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 contained within Exhibit "A" to Gulf's original request from public disclosure as proprietary confidential business information

Respectfully submitted this 27th day of April, 2018.



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