



Rhonda J. Alexander
Manager
Regulatory, Forecasting & Pricing

One Energy Place
Pensacola, FL 32520-0780
850 444 6743 tel
850 444 6026 fax
rjalexad@southernco.com

September 6, 2018

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

RE: Docket No. 20160186-EI

Dear Ms. Stauffer:

Attached for official filing is Gulf Power Company's Request for Extended Confidential Classification regarding certain information submitted by Gulf Power in connection with Commission Staff's audit in the above-referenced docket (ACN16-295-1-1).

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.
Gunster Law Firm
Charles A. Guyton, Esq.
Richard A. Melson, Esq.

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In Re: Petition for increase in rates
by Gulf Power Company

Docket No.: 160186-EI
Date: September 6, 2018

REQUEST FOR EXTENDED CONFIDENTIAL CLASSIFICATION

Gulf Power Company ("Gulf Power" or "the Company"), pursuant to Section 366.093, Florida Statutes, and Rule 25-22.006, Florida Administrative Code, hereby requests extended confidential classification of certain documents and information produced in connection with Commission Staff's audit of Gulf Power's request for an increase in rates in the above-referenced matter (ACN 16-295-1-1). ("Confidential Information"). As grounds for this request, the Company states:

1. On January 27, 2017, Gulf filed its initial Request for Confidential Classification of the Confidential Information. (Document No. 00986-17)
2. On March 2, 2017, the Commission entered an order granting Gulf Power's request. See, Order No. PSC-17-0082-CFO-EI.
3. 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 documents continue to contain proprietary confidential business information. The 18-month extension period expires on August 31, 2018.
4. Gulf Power hereby requests that the Commission enter an order extending the confidential classification of the Confidential Information identified in Gulf's initial Request for Confidential Classification for an additional 18-month period.

5. The Confidential Information is entitled to continued confidential classification for the same reasons that it was initially classified. As stated in Gulf's initial Request, the Confidential Information entitled to confidential classification pursuant to section 366.093(3)(d) and (e), Florida Statutes, as information, the public disclosure of which could cause irreparable harm to the competitive interests of Gulf Power and the ability of the Company to enter into contracts on terms favorable to it and its customers. Specifically, the Confidential Information is broken down into two categories: (i) capacity revenues received under unit power sales agreements; and (ii) internal Management Procedures.

6. The capacity revenues are regarded by both Gulf and the counterparties as confidential. Disclosure of this information could enable third parties to back calculate contractual pricing terms which are specific to the individual contracts and are not publicly known. Disclosure of this information would negatively impact Gulf Power's ability to negotiate payment terms favorable to its customers in future power purchase agreements. In addition, potential counterparties may refuse to enter into contracts with Gulf, or may charge higher prices, if such pricing information was publicly disclosed. This information is entitled to confidential classification pursuant to section 366.093(3)(d)-(e), Florida Statutes.

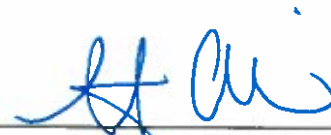
7. The Management Procedures are considered proprietary by Gulf Power and have been carefully developed and revised over time based on Gulf's own expertise, resources and experience. Public disclosure of this information would provide other market participants with access to Gulf's work product enabling them to optimize their own systems and procedures at Gulf's expense. This information is entitled to confidential classification pursuant to section 366.093(3)(e). The Commission has previously recognized that Gulf's internal policies and

procedures are entitled to confidential classification for the reasons stated. *See e.g.*, Order No. PSC-06-0427-CFO-EI, Order No. PSC-08-0048-CFO-EI and Order No. PSC-12-0035-CFO-EI.

8. The information filed pursuant to 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 from public disclosure the Confidential Information identified in Gulf's initial Request for an additional 18-month period.

Respectfully submitted this 6th day of September, 2018.



RUSSELL A. BADDERS

Florida Bar No. 007455

STEVEN R. GRIFFIN

Florida Bar No. 627569

Beggs & Lane

P.O. Box 12950

Pensacola, FL 32591

(850) 432-2451

Attorneys for Gulf Power

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

IN RE: Petition for Increase in Rates)
By Gulf Power Company)
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 and 2 regulatory)
asset amortization, by Gulf Power Company)

Docket No.: 20160186-EI

Docket No.: 20160170-EI

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true copy of the foregoing has been furnished by electronic mail this 6th day of September, 2018 to the following:

Office of Public Counsel
J. R. Kelly/Stephanie A. Morse
Public Counsel
c/o The Florida Legislature
111 W. Madison Street, Room 812
Tallahassee, FL 32399-1400
kelly.ir@leg.state.fl.us
morse.stephanie@leg.state.fl.us

Office of the General Counsel
Suzanne Brownless
2540 Shumard Oak Blvd
Tallahassee, FL 32399-0850
sbrownle@psc.state.fl.us

Federal Executive Agencies
c/o Thomas A. Jernigan
AFCEC/JA-ULFSC
139 Barnes Drive, Suite 1
Tyndall Air Force Base, FL 32403
Thomas.Jernigan.3@us.af.mil
Andrew.Unsicker@us.af.mil
Lanny.Zieman.1@us.af.mil
Natalie.Cepak.2@us.af.mil
Ebony.Payton.ctr@us.af.mil

Southern Alliance for Clean Energy
Bradley Marshall, Esq.
Alisa Coe, Esq.
Earthjustice
111 S. Martin Luther King Jr. Blvd.
Tallahassee, FL 32301
bmarshall@earthjustice.org
acoe@earthjustice.org

Florida Industrial Power Users Group
Jon C. Moyle, Jr.
Karen Putnal
c/o Moyle Law Firm, P.A.
118 North Gadsden Street
Tallahassee, FL 32301
jmoyle@moylelaw.com
kputnal@moylelaw.com

Bradley Marshall, Esq.
Alisa Coe, Esq.
c/o The League of Women Voters
of Florida, Inc.
Earthjustice
111 S. Martin Luther King Jr. Blvd
Tallahassee, FL 32301
bmarshall@earthjustice.org
acoe@earthjustice.org

Robert Scheffel Wright
John T. LaVia, III
c/o Gardner, Bist, Bowden, Bush, Dee,
LaVia & Wright, P.A.
1300 Thomaswood Drive
Tallahassee, FL 32308
schef@qbwlegal.com
ilavia@qbwlegal.com

Diana Csank
Lane Johnson
Sierra Club
50 F St. NW, 8th Floor
Washington, DC 20001
Diana.Csank@sierraclub.org
ljohnsonlawoffice@gmail.com



RUSSELL A. BADDERS
Florida Bar No. 007455
rab@beggslane.com
STEVEN R. GRIFFIN
Florida Bar No. 0627569
srg@beggslane.com
Beggs & Lane
P. O. Box 12950
Pensacola FL 32591-2950
(850) 432-2451
Attorneys for Gulf Power