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September 27, 2018

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

RE: Docket No. 20180001-EI

Dear Ms. Stauffer:

Attached is Gulf Power Company's Request for Extended Confidential Classification regarding information submitted by Gulf Power pertaining to Schedule CCA-4 of Exhibit CSB-1 and Schedule 2 of Exhibit CSB-3 to the Direct Testimony of C. Shane Boyett dated March 1, 2017.

Sincerely,

A handwritten signature in blue ink that reads "C. Shane Boyett".

C. Shane Boyett  
Regulatory and Cost Recovery 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: Fuel and purchased power cost  
recovery clause and generating performance  
incentive factor

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Docket No.: 20180001-EI  
Date: September 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 its request that the Florida Public Service Commission enter an order extending the confidential classification of certain information contained in Schedule CCA-4 of Exhibit CSB-1 and Schedule 2 of Exhibit CSB-3 to the Direct Testimony of C. Shane Boyett dated March 1, 2017, on behalf of Gulf Power. As grounds for this request, the Company states:

1. On March 1, 2017, Gulf Power filed a request for confidential classification of certain information contained within Schedule CCA-4 of Exhibit CSB-1 and Schedule 2 of Exhibit CSB-3 to the Direct Testimony of C. Shane Boyett dated March 1, 2017, on behalf of Gulf Power. (Document No. 02616-17)

2. On April 4, 2017, the Commission entered Order No. PSC-17-0129-CFO-EI granting Gulf’s request for confidential classification.

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 information continues to comprise proprietary confidential business information. The 18-month extension period expires on October 4, 2018.

4. 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.

5. 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, a portion of the information contained in Schedule CCA-4 is proprietary confidential business information regarding contractual matters which would cause irreparable harm to Gulf Power, the entities with whom it has contracted, and most importantly, to Gulf's customers if such information was disclosed to the general public. Schedule CCA-4 provides the price terms for capacity contracts which were active in 2016 and, in part, remain active today. The price terms in these contracts are regarded by both Gulf and the counterparties as confidential. The pricing, which resulted from negotiations between Gulf and the counterparties, is specific to the individual contracts and is not publicly known. Disclosure of this information would negatively impact Gulf's ability to negotiate pricing favorable to its customers in future capacity contracts because potential counterparties may refuse to enter into contracts with Gulf, or may charge higher prices if the price terms were made public. Similarly, Schedule 2 of Exhibit CSB-3 contains price terms for Gulf Power's coal purchases. Gulf and other members of the market in which it competes consider such price information to be competitively sensitive. Disclosure of this information would adversely affect Gulf's ability to conduct its coal procurement activities to the benefit of its customers. The information is entitled to confidential classification pursuant to section 366.093(3) (d) and (e), Florida Statutes.

6. 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 otherwise been publicly disclosed.

**WHEREFORE**, Gulf Power Company respectfully requests that the Commission enter an order extending confidential classification of the information highlighted on Exhibit "A" and identified in line/by line format on Exhibit "C" of Gulf's original request from public disclosure as proprietary confidential business information.

Respectfully submitted this 27th day of September, 2018.



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**Attorneys for Gulf Power**

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

IN RE: **Fuel and Purchased Power Cost** )  
**Recovery Clause with Generating** )  
**Performance Incentive Factor** )

Docket No.: 20180001-EI

**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that a true copy of the foregoing was furnished by electronic mail this 27th day of September, 2018 to the following:

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