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November 9, 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 certain information submitted by Gulf Power in connection with Commission Staff's audit in the above-referenced docket (ACN15-023-1-2). Also attached is Gulf's Request for Extended Confidential Classification in Microsoft Word format.

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

Docket No.: 20180001-EI
Date: November 9, 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 this request that the Florida Public Service Commission enter an order extending confidential classification for portions of documents produced by Gulf Power in connection with a review of Gulf Power's 2014 capacity expenditures (ACN 15-023-1-2) (the "Review"). As grounds for this request, the Company states:

1. On May 28, 2015, Gulf Power filed a request for confidential classification of certain information produced in connection with the Review. (Document No. 03150-15, Docket No. 150001-EI)
2. On September 10, 2015, the Commission entered Order No. PSC-15-0377-CFO-EI granting Gulf's request for confidential classification.
3. On March 7, 2017, Gulf Power filed its first request for extended confidential classification of the subject information. (Document No. 03206-2017)
4. On May 12, 2017, the Commission entered Order No. PSC-17-0168-CFO-EI granting Gulf's first request for extended confidential classification.
5. 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 November 12, 2018.

6. 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.

7. 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, the confidential information consists of pricing information for capacity purchases between Gulf Power and various counterparties. This information is regarded by both Gulf and the counterparties as confidential. The pricing, which resulted from negotiations with Gulf and the counterparties, is specific to individual contracts and is not publicly known. One or more contracts forming the basis for this pricing data are still in effect. Disclosure of this information would negatively impact Gulf's ability to negotiate pricing favorable to its customers in future contracts. In addition, potential counterparties may refuse to enter into contracts with Gulf, or may charge higher prices, if the price terms were made public. The information is entitled to confidential classification pursuant to section 366.093(3)(d)-(e), Florida Statutes.

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 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 9th day of November, 2018.



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Attorneys for Gulf Power Company

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 9th day of November, 2018 to the following:

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