



May 14, 2019

Mr. Adam Teitzman, Commission Clerk
Florida Public Service Commission
2540 Shumard Oak Boulevard
Tallahassee FL 32399-0870

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2019 MAY 15 AM 9:46
COMMISSION CLERK

Dear Mr. Teitzman:

Enclosed is Gulf Power Company's Request for Confidential Classification for certain portions of its response to Staff's First Data Request concerning Gulf's 2019 Ten Year Site Plan. Also enclosed is a DVD containing the requested electronic files.

Sincerely,

C. Shane Boyett
Regulatory, Forecasting and Pricing Manager

- COM _____
- AFD _____
- APA _____
- ECO _____
- ENG** _____
- GCL _____
- IDM _____
- CLK _____

1 CD REC; 1 CD Redacted Exh B

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Enclosures

cc w/o encl.: Florida Public Service Commission
Doug Wright, Division of Engineering
Phillip Ellis, Division of Engineering
Gulf Power Company
Russell Badders, Esq., VP & Associate General Counsel

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

IN RE: Review of Gulf Power Company's
2019 Ten-Year Site Plan

Docket No.: Undocketed
Date: May 15, 2019

REQUEST FOR 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 protecting from public disclosure certain information submitted by Gulf Power in response to Commission Staff's First Data Request relating to Gulf Power's 2019 Ten-Year Site Plan. As grounds for this request, the Company states:

1. A portion of the information submitted by Gulf Power in response to questions numbered 2 and 72 of Commission Staff's First Data Request constitutes proprietary confidential business information the disclosure of which would impair the competitive business of the provider of the information and Gulf's efforts to contract for goods and/or services on favorable terms. As explained below, the information is entitled to confidential classification pursuant to section 366.093(3)(e), Florida Statutes.

2. Tables in Appendix "A" to question number 2 labeled as "Nominal Delivered Coal Prices—Base Case" and "Nominal, Delivered Distillate Oil and Natural Gas Prices—Base Case" and Gulf's response to question number 72 contain Gulf Power's internal pricing forecasts for coal, natural gas and distillate oil through the year 2028. This data was developed by Gulf, Southern Company Services, and their consultant, Charles Rivers Associates, using an extensive proprietary modeling analysis. These forecasts are based on non-public data, were developed at significant cost to the Company, and are considered proprietary by Gulf Power, Southern Company Services, and their consultant. This information reveals key inputs into the Company's

decision-making process and is subject to extensive efforts to maintain its secrecy. Only select Company personnel with a "need to know" are granted access. Public disclosure of this information would enable competitors to access and utilize Gulf's forecasts without incurring costs to obtain similar information, thus bestowing an economic advantage upon such competitors at the cost of Gulf and its customers. Additionally, public disclosure of this information would enable vendors of commodities and services to tailor their pricing proposals to the Company's projections, resulting in higher costs for the Company and its customers. For example, if prospective fuel suppliers have access to such information, those suppliers will view the forecasted prices as the lower limit of what Gulf expects to pay and will offer to supply fuel at higher prices. Finally, the subject information is used in developing future generation strategies for Gulf. Generation wholesalers, power marketers or other competitors could utilize this information to tailor proposals with the intention of pricing products that could undermine the Company's market position. This information derives economic value from not being generally known to, and being readily ascertainable by proper means to, other persons who can obtain economic value from its disclosure or use. Protection of this information has taken on added importance recently given data mining trends in the industry. Trade publications are increasingly scouring regulatory filings, compiling data and selling these packaged products to industry participants such as commodity suppliers. Consequently, this information is entitled to confidential classification pursuant to section 366.093(3)(e), Florida Statutes. The Commission has previously determined that Gulf's fuel price forecasting data constitutes proprietary confidential business information pursuant to section 366.093(3), Florida Statutes. See e.g., Order No. PSC-14-0368-CFO-EI.

3. 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.

4. Submitted as Exhibit "A" is a DVD labeled "Confidential" containing highlighted information for which confidential classification is requested. Exhibit "A" should be treated as confidential pending a ruling on this request.¹ Attached and labeled as Exhibit "B" is electronic copies of the requested information, which may be made available for public review and inspection. Attached as Exhibit "C" to this request is a line-by-line/field-by-field justification for the request for confidential classification.

¹ Gulf Power is producing one DVD titled "Confidential" which includes an electronic version of the subject responses highlighted in yellow. This DVD should be treated as confidential.

WHEREFORE, Gulf Power Company respectfully requests that the Commission enter an order protecting the information highlighted on Exhibit "A" and the related DVD from public disclosure as proprietary confidential business information.

Respectfully submitted this 14th day of May, 2019.



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EXHIBIT "A"

Provided to the Commission Clerk
under separate cover as confidential information.

EXHIBIT "B"

EXHIBIT "C"

Line-by-Line/Field-by-Field Justification

Line(s)/Field(s)

Response to Question # 2

File name: "2019 TYSP Data Request #1 –
Appendix A_CONF"

Worksheet: "gas_base-CONF"
Columns 2-4 and 5-7, Lines 11-20
Lines, 24-25

Worksheet: "coal_base-CONF"
Columns 2-4, 6-8, and 10-12, Lines 11-20
Lines 24-27

Response to Question #72

File name: "2019 TYSP Data Request #1 –
Item 72_CONF"

Columns F, H, and L, as marked

Justification

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

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