

State of Florida



Public Service Commission

CAPITAL CIRCLE OFFICE CENTER • 2540 SHUMARD OAK BOULEVARD
TALLAHASSEE, FLORIDA 32399-0850

-M-E-M-O-R-A-N-D-U-M-

DATE: June 5, 2019
TO: Rachael Dziechciarz, Senior Attorney, Office of the General Counsel
FROM: Devlin Higgins, Public Utility Analyst IV, Division of Economics
RE: CONFIDENTIALITY OF CERTAIN INFORMATION
DOCKET NO: 20190016-EG DOCUMENT NO: 04511-2019
DESCRIPTION: GPC (Griffin) - (CONFIDENTIAL) DVD containing certain information produced in response to staff's 1st request for PODs (Nos. 1-4).
SOURCE: Gulf Power Company

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2019 JUN -5 AM 9:13
COMMISSION CLERK

Staff notes this recommendation supplants the original (Document No. 04700-2019) as to amend the response referencing.

Pursuant to Section 366.093, (F.S.), and Rule 25-22.006, Florida Administrative Code, Gulf Power Company (GPC) requests confidential classification of certain information filed in response to a staff production request in the above referenced docket, dated May 22, 2019. This recommendation specifically addresses GPC's Response to Staff's First Request for Production of Documents, Nos. 1 and 2.

The Company is claiming confidentiality of its responses to Staff's First Request for Production of Documents, Nos. 1 and 2, under Section under Section 366.093(3)(a), F.S., and Section 366.093(3)(e), F.S. Per the Statute, propriety of confidential business information includes, but is not limited to; Subsection (a) "[t]rade secrets," and Subsection (e) "[i]nformation relating to competitive interests, the disclosure of which would impair the competitive business of the provider of the information."

Staff has reviewed GPC's Responses to Staff's First Request for Production of Documents, Nos. 1 and 2, as well as the Company's confidentiality request. Information contained in Response Nos. 1 and 2 includes GPC's internal pricing forecasts for coal, natural gas, and emissions allowances. This data was developed by GPC, Southern Company Services, and third-party consultant, Charles Rivers Associates, via proprietary modeling methods. GPC claims 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. In staff's opinion, the information that is the subject of GPC's request meets the criteria for confidentiality contained in 366.093(3)(e), FS.



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-M-E-M-O-R-A-N-D-U-M-

DATE: May 23, 2019

TO: Division of Engineering, Office of Primary Responsibility

FROM: OFFICE OF COMMISSION CLERK

RE: CONFIDENTIALITY OF CERTAIN INFORMATION
DOCKET NO: 20190016-EG DOCUMENT NO: 04511-2019
DESCRIPTION: GPC (Griffin) - (CONFIDENTIAL) DVD containing certain information produced in response to staff's 1st request for PODs (Nos. 1-4).
SOURCE: Gulf Power Company

The above confidential material was filed along with a request for confidential classification. Please complete the following form by checking all applicable information and forward it to the attorney assigned to the docket, along with a brief memorandum supporting your recommendation.

- The document(s) is (are), in fact, what the utility asserts it (them) to be.
- The utility has provided enough details to perform a reasoned analysis of its request.
- The material has been received incident to an inquiry.
- The material is confidential business information because it includes:
 - (a) Trade secrets;
 - (b) Internal auditing controls and reports of internal auditors;
 - (c) Security measures, systems, or procedures;
 - (d) Information concerning bids or other contractual data, the disclosure of which would impair the efforts of the public utility or its affiliates to contract for goods or services on favorable terms;
 - (e) Information relating to competitive interests, the disclosure of which would impair the competitive business of the provider of information;
 - (f) Employee personnel information unrelated to compensation, duties, qualifications, or responsibilities;
- The material appears to be confidential in nature and harm to the company or its ratepayers will result from public disclosure.
- The material appears not to be confidential in nature.
- The material is a periodic or recurring filing and each filing contains confidential information.

This response was prepared by Devlin Higgins on 6/5/2019, a copy of which has been sent to the Office of Commission Clerk and the Office of General Counsel.