



July 26, 2019

Mr. Adam Teitzman, Commission Clerk
Florida Public Service Commission
2540 Shumard Oak Boulevard
Tallahassee, FL 32399-0850

Re: Docket No. 20190016-EG

REDACTED

RECEIVED-FPSC
2019 JUL 26 AM 3:13
COMMISSION
CLERK

Dear Mr. Teitzman:

Enclosed for filing in the above-referenced docket is Gulf Power Company's Request for Confidential Classification pertaining to certain portions of Gulf's response to Staff's Tenth Set of Interrogatories (Nos. 88-93) to Gulf Power Company.

Sincerely,

C. Shane Boyett

C. Shane Boyett
Regulatory, Forecasting and Pricing Manager

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Enclosures

cc: Gulf Power Company
Russell Badders, Esq., VP & Associate General Counsel

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Commission review of numeric
conservation goals (Gulf Power Company).

DOCKET NO. 20190016-EG
DATED: JULY 26, 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 contained within the Company’s response to Commission Staff Interrogatory No. 89 contained within Staff’s Tenth Set of Interrogatories to Gulf Power in the above-referenced docket. As grounds for this request, the Company states:

1. A portion of the information contained within Gulf’s response to Staff Interrogatory No. 89 is proprietary confidential business information regarding contractual matters which would cause irreparable harm to Gulf Power, the entities with whom it has entered into contracts and most importantly to Gulf’s customers, if such information was publicly disclosed. Specifically, this response contains information regarding payments made pursuant to contracts with Gulf Power’s vendors for consulting services associated with the 2020 FEECA Goalsetting process. This information is regarded by both Gulf and its vendors as confidential. The information is specific to the individual contracts and is not publicly known. Disclosure of this information would negatively impact Gulf’s ability to effectively negotiate for goods and services in the future. In addition, potential counterparties may refuse to enter into contracts with Gulf, or may charge higher prices, if such terms are publicly disclosed. The information is therefore entitled to confidential classification pursuant to section 366.093(3)(d) and (e), Florida Statutes.

2. 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.

3. Submitted as Exhibit "A" is a copy of Gulf Power's response to Staff Interrogatory 89, on which is highlighted the information for which confidential classification is requested. Exhibit "A" should be treated as confidential pending a ruling on this request. Attached as Exhibit "B" are two (2) edited copies of the response, 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.

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

Respectfully submitted this 26th day of July, 2019.



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Attorneys for Gulf Power Company

EXHIBIT "B"

FEECA Proceeding

89. Regarding the Company's expenses for participants in the FEECA Goalsetting proceeding, please answer the following questions.
- a. What are the Company's actual expenses as of the filing of the Rebuttal Testimony, in total and by category, such as consultant fees, legal expenses, and salaries?
 - b. What are the Company's estimated expenses for the full FEECA Goalsetting proceeding, in total and by category, such as consultant fees, legal expenses, and salaries?
 - c. Does the Company intend to recover expenses associated with the FEECA Goalsetting proceeding? If so, explain how. If not, explain why not.

ANSWER:

- a. Through July 12, 2019, Gulf has incurred actual expenses of \$158,800 associated with consulting services and legal fees broken down as follows: legal- [REDACTED] and consulting [REDACTED]. The Company does not track internal salaries associated with this docket and therefore cannot provide this information.
- b. The Company estimates total expenses associated with this FEECA goalsetting proceeding to be \$222,400 broken down as follows: legal- [REDACTED] and consulting [REDACTED]. The Company does not track internal salaries associated with this docket and therefore cannot provide this information.
- c. Yes. Consistent with past practices, the Company intends to recover expenses associated with this FEECA goal setting docket through the Energy Conservation Cost Recovery clause. These expenses are associated with development of the Technical Potential Study as required by statute and subsequent evaluation of reasonably achievable potential utilized in development of the proposed goals which, in turn, form the basis for the Company's conservation plan and programs.

EXHIBIT "C"

Line-by-Line/Field-by-Field
JustificationLine(s)/Field(s)

Interrogatory No. 89
Page 1 of 1
All highlighted information

Justification

This information is entitled to confidential classification pursuant to §366.093(3) (d) and (e), Florida Statutes. The basis for this information being designated as confidential is more fully set forth in paragraph 1.

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

IN RE: **Commission Review of Numeric**)
Conservation Goals (Gulf Power Company))

Docket No.: **20190016-EG**

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true copy of the foregoing has been was furnished by hand delivery to the Commission Clerk and via electronic mail to all remaining parties this 26th day of July, 2019:

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