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January 31, 2020

VIA HAND DELIVERY

Mr. Adam Teitzman
Division of the Commission Clerk and Administrative Services
Florida Public Service Commission
2540 Shumard Oak Blvd.
Tallahassee, FL 32399-0850

REDACTED

**Re: Docket No. 20190038-EI
Gulf Power Company's Request for Confidential Classification of
Information Provided in Response to OPC's First Set of
Interrogatories and First Request for Production of Documents**

Dear Mr. Teitzman:

I enclose for filing in the above docket Gulf Power Company's ("Gulf's") Request for Confidential Classification of Information Provided in Response to the Office of Public Counsel's First Set of Interrogatories, No. 15, and First Request for Production of Documents, Nos. 1, 2, 6, 9, 10, 18, and 20. The request includes Exhibits A, B, C and D.

Exhibit A consists of the confidential documents, which are confidential in their entirety and are provided on three flash drives. Exhibit B is an edited version of Exhibit A, consisting of an identifying cover page. Exhibit C is a justification table in support of Gulf's Request for Confidential Classification. Exhibit D contains two declarations in support of Gulf's request.

Please contact me if you or your Staff has any questions regarding this filing at (561) 691-

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7108
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COMMISSION CLERK

Sincerely,

/s/ Jason A. Higginbotham
Jason A. Higginbotham

COM _____
AFD 3 USB Drives
APA _____
ECO _____
ENG _____
GCL _____
IDM _____
CLK _____

Enclosure

cc: Counsel for Parties of Record (w/ copy of Gulf's Request for Confidential Classification)

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Petition for limited proceeding for recovery of incremental storm restoration costs related to Hurricane Michael, by Gulf Power Company.

Docket No: 20190038-EI

Date: January 31, 2020

**GULF POWER COMPANY'S REQUEST FOR
CONFIDENTIAL CLASSIFICATION OF INFORMATION PROVIDED
IN RESPONSE TO OPC'S FIRST SET OF INTERROGATORIES (NO. 15) & OPC'S
FIRST REQUEST FOR PRODUCTION OF DOCUMENTS (NOS. 1, 2, 6, 9, 10, 18 & 20)**

Pursuant to Section 366.093, Florida Statutes ("Fla. Stat."), and Rule 25-22.006, Florida Administrative Code ("F.A.C."), Gulf Power Company ("Gulf") hereby requests confidential classification of certain information provided in response to the Office of Public Counsel's ("OPC") First Set of Interrogatories, No. 15 (the "Confidential Documents") and OPC's First Request for Production of Documents, Nos. 1, 2, 6, 9, 10, 18, and 20. In support of this Request, Gulf states as follows:

1. On January 10, 2020, Gulf served its responses to OPC's First Set of Interrogatories and OPC's First Request for Production of Documents, which included Gulf's responses to Interrogatory No. 15 and Request for Production of Documents Nos. 1, 2, 6, 9, 10, 18, and 20. On the same day, Gulf also filed a Notice of Intent to Request Confidential Classification within 21 days of serving its responses to Gulf's discovery request. Accordingly, this request is being filed in order to request confidential classification of certain information contained in Gulf's responses to OPC's discovery, consistent with Rule 25-22.006, Florida Administrative Code.

2. The following exhibits are attached to and made a part of this Request:

- a. Exhibit A consists of the confidential document, which is confidential in its entirety and is provided on flash drives.

- b. Exhibit B is an edited version of Exhibit A, consisting of an identifying cover page.
- c. Exhibit C is a justification table in support of Gulf's Request for Confidential Classification.
- d. Exhibit D is the declaration of Paul A. Talley and Mitchell Goldstein in support of this Request.

3. Gulf submits that the information in Exhibit A is proprietary and confidential business information, and its disclosure would cause harm to Gulf and its customers. Pursuant to Section 366.093, Fla. Stat., such materials are entitled to confidential treatment and are exempt from the disclosure provisions of the public records law. Thus, once the Commission determines that the information in question is proprietary confidential business information, the Commission is not required to engage in any further analysis or review such as weighing the harm of disclosure against the public interest in access to the information.

4. As described in the declaration in Exhibit D, some of the Confidential Information contains information concerning bids or contractual data. This information is protected by Section 366.093(3)(d), Fla. Stat.

5. Upon a finding by the Commission that the information contained in the Confidential Documents is proprietary and confidential business information, the information should not be declassified for at least eighteen (18) month period and should be returned to Gulf as soon as it is no longer necessary for the Commission to conduct its business. *See* § 366.093(4), Fla. Stat.

WHEREFORE, for the above and foregoing reasons, as more fully set forth in the supporting materials, Gulf Power Company respectfully requests that its Request for Confidential Classification be granted.

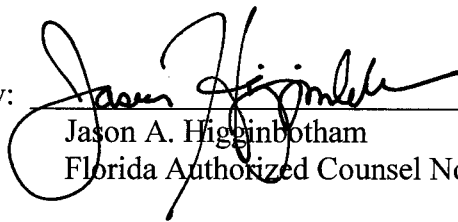
Respectfully submitted this 31st day of January, 2020.

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Vice President & Associate General
Counsel
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By:



Jason A. Higginbotham
Florida Authorized Counsel No. 1017875

CERTIFICATE OF SERVICE
Docket No. 20190038-EI

I **HEREBY CERTIFY** that a true and correct copy of the foregoing has been furnished
by electronic service on this 31st day of January 2020 to the following:

Jennifer Crawford
Andrew King
Kristen Simmons
Office of General Counsel
2540 Shumard Oak Blvd.
Tallahassee, Florida 32399-0850
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aking@psc.state.fl.us
ksimmons@psc.state.fl.us
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J. R. Kelly
Thomas A. (Tad) David
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srg@beggsllane.com
Beggs Law Firm

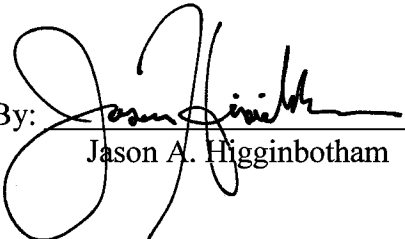
By: 
Jason A. Higginbotham

EXHIBIT A

**CONFIDENTIAL
DOCUMENTS
ON ENCLOSED
THUMBDRIVE**

EXHIBIT B

REDACTED

EXHIBIT C

JUSTIFICATION TABLE

EXHIBIT C

COMPANY: Gulf Power Company
TITLE: List of Confidential Documents
DOCKET NO.: 20190038-EI
DOCKET TITLE: Recovery of Incremental Storm Restoration Costs Related to Hurricane Michael
SUBJECT: Gulf's Responses to OPC's First Set of Interrogatories, No. 15; OPC's First Request for Production of Documents, Nos. 1, 2, 6, 9, 10, 18, and 20
DATE: January 31, 2020

Set - Flash Drive No. 1	Bates Number Start	Bates Number End	Description	Line No. / Col. No.	Florida Statute 3.66.093(3) Subsection	Declarant
OPC's 1st Set of Interrogatories No. 15	062318	062324	Southern Company Storm Agreement for Contract Tree Crews - Excerpt - Confidential.pdf	All	(d)	Paul Talley
OPC's 1st Set of Interrogatories No. 15	062299	062317	Distribution Overhead Services - Supplemental Conditions - Confidential.pdf	All	(d)	Paul Talley
OPC's 1st Request for Production of Documents No. 1	062154	062177	20190038_OPC1stPOD_Item No.1_attachment 2_Clearing Entries CONF - Confidential.xlsx	All	(d)	Paul Talley
OPC's 1st Request for Production of Documents No. 1	062135	062153	20190038_OPC1stPOD_Item No. 1_attachment 1_Storm Costs CONF - Confidential.xlsx	All	(d)	Paul Talley
OPC's 1st Request for Production of Documents No. 2	062178	062196	20190038_OPC1stPOD_Item No.2_attachment 4_AFT Storm Preparedness CONF- Confidential Attachement.pdf	All	(d)	Paul Talley
OPC's 1st Request for Production of Documents No. 2	062197	062199	20190038_OPC1stPOD_Item No.2_attachment 5_Customer Operations Support CONF - Confidential attachment.pdf	All	(d)	Paul Talley
OPC's 1st Request for Production of Documents No. 6	000040	000704	Storm Contracts-Rates A- G.pdf	All	(d)	Paul Talley
OPC's 1st Request for Production of Documents No. 6	000705	001112	Storm Contracts-Rates H - L.pdf	All	(d)	Paul Talley
OPC's 1st Request for Production of Documents No. 6	001113	001801	Storm Contracts-Rates M - Z.pdf	All	(d)	Paul Talley
OPC's 1st Request for Production of Documents No. 9	062284	062286	Davis H. Elliot AEP Ohio Crews to Gulf Power (10.9.18).pdf	All	(d)	Paul Talley
OPC's 1st Request for Production of Documents No. 9	062254	062254	DRM---Security-Frank Brown Park.PDF	All	(d)	Paul Talley

OPC's 1st Request for Production of Documents No. 9	062255	062255	DRM---Security-Ft Walton Fairgrounds.PDF	All	(d)	Paul Talley
OPC's 1st Request for Production of Documents No. 9	062256	062256	DRM---Security-Mosley High School.PDF	All	(d)	Paul Talley
OPC's 1st Request for Production of Documents No. 9	062257	062257	DRM---Security-NW FL State College.PDF	All	(d)	Paul Talley
OPC's 1st Request for Production of Documents No. 9	062258	062258	DRM---Security-PC Beach Office.PDF	All	(d)	Paul Talley
OPC's 1st Request for Production of Documents No. 9	062259	062261	FW 2nd request - Five Storekeepers needed for rooms tonight in PC.pdf	All	(d)	Paul Talley
OPC's 1st Request for Production of Documents No. 9	062262	062265	FW APC Resource Options for Gulf Service Restoration.pdf	All	(d)	Paul Talley
OPC's 1st Request for Production of Documents No. 9	062266	062266	FW BB Gulf Power Hurricane Michael Roster.pdf	All	(d)	Paul Talley
OPC's 1st Request for Production of Documents No. 9	062267	062268	FW Chain Electric Crews-19503.pdf	All	(d)	Paul Talley
OPC's 1st Request for Production of Documents No. 9	062269	062269	FW Davis H Elliot AEP Ohio Crews to Gulf Power (10 9 18).pdf	All	(d)	Paul Talley
OPC's 1st Request for Production of Documents No. 9	062270	062270	FW DRM-Security.pdf	All	(d)	Paul Talley
OPC's 1st Request for Production of Documents No. 9	062271	062272	FW External Email RE Mutual Assistance Email.pdf	All	(d)	Paul Talley
OPC's 1st Request for Production of Documents No. 9	062273	062274	FW Hurricane Micheal.pdf	All	(d)	Paul Talley
OPC's 1st Request for Production of Documents No. 9	062275	062276	FW Irby Construction Company Roster - Transmission - Hurricane Michael (1).pdf	All	(d)	Paul Talley
OPC's 1st Request for Production of Documents No. 9	062277	062278	FW Irby Construction Company Roster - Transmission - Hurricane Michael.pdf	All	(d)	Paul Talley
OPC's 1st Request for Production of Documents No. 9	062279	062279	FW Linetec Services Storm Roster Rates (10 10 18).pdf	All	(d)	Paul Talley
OPC's 1st Request for Production of Documents No. 9	062287	062287	Irby Construction Roster for Gulf Power Hurricane Michael 10-13-18 (1).xlsx	All	(d)	Paul Talley

OPC's 1st Request for Production of Documents No. 9	062288	062288	Irby Construction Roster for Gulf Power Hurricane Michael 10-13-18.xlsx	All	(d)	Paul Talley
OPC's 1st Request for Production of Documents No. 9	062289	062289	Linetec Services Storm Crew Roster 10-10-18 (Gulf Power).xlsx	All	(d)	Paul Talley
OPC's 1st Request for Production of Documents No. 9	062290	062292	Mutual Assistance Michael CNP.pdf	All	(d)	Paul Talley
OPC's 1st Request for Production of Documents No. 9	062296	062298	RMAG Service Electric Company 2018-10-10 1518hrs Gulf Power Company.pdf	All	(d)	Paul Talley
OPC's 1st Request for Production of Documents No. 9	062293	062295	RMAG MP Technologies LLC 2018-10-09 1248hrs..pdf	All	(d)	Paul Talley
OPC's 1st Request for Production of Documents No. 9	062259	062261	2nd request - Five Storekeepers needed for rooms tonight in PC.pdf	All	(d)	Paul Talley
OPC's 1st Request for Production of Documents No. 9	062251	062251	2018 Local Crews Storm Roster.pdf	All	(d)	Paul Talley
OPC's 1st Request for Production of Documents No. 9	062280	062280	2018 Local Crews Storm Roster.xlsx	All	(d)	Paul Talley
OPC's 1st Request for Production of Documents No. 9	062281	062281	BB Roster - Hurricane Michael.xlsx	All	(d)	Paul Talley
OPC's 1st Request for Production of Documents No. 9	062282	062282	Chain Mike Morel Storm Roster 10-09-018.xlsx	All	(d)	Paul Talley
OPC's 1st Request for Production of Documents No. 9	062283	062283	Chain Randy Morel Storm Roster 10-09-018.xlsx	All	(d)	Paul Talley
OPC's 1st Request for Production of Documents No. 9	062252	062253	Contracts for Gulf Power.pdf	All	(d)	Paul Talley
OPC's 1st Request for Production of Documents No. 9	062397	062397	Hurricane Michael Release Notification - Team 20128 20130 20136 VOLT POWER - Louisiana.pdf	All	(d)	Paul Talley
OPC's 1st Request for Production of Documents No. 9	062398	062398	Hurricane Michael Release Notification - Team 20129 - Storm Services Engineering - Hamilton.pdf	All	(d)	Paul Talley
OPC's 1st Request for Production of Documents No. 9	062399	062399	Hurricane Michael Release Notification - Team 20271 - ARC American - Vandonselaar.pdf	All	(d)	Paul Talley
OPC's 1st Request for Production of Documents No. 9	062400	062400	Hurricane Michael Release Notification - Team 20301 - Powertown Line Construction - Vonstetina.pdf	All	(d)	Paul Talley

OPC's 1st Request for Production of Documents No. 9	062401	062401	Hurricane Michael Release Notification - Team 20326 - B B Electrical Utility Contractors - Stewart.pdf	All	(d)	Paul Talley
OPC's 1st Request for Production of Documents No. 9	062402	062402	Hurricane Michael Release Notification - Team 20724 - Power Secure - Cooper.pdf	All	(d)	Paul Talley
OPC's 1st Request for Production of Documents No. 9	062403	062403	Hurricane Michael Release Notification - Team 20736 20745 20743 20740.pdf	All	(d)	Paul Talley
OPC's 1st Request for Production of Documents No. 9	062404	062404	Hurricane Michael Release Notification - Team 20748- IRBY.pdf	All	(d)	Paul Talley
OPC's 1st Request for Production of Documents No. 9	062405	062405	Hurricane Michael Release Notification - Team 20789 22618 22614 - Mastec.pdf	All	(d)	Paul Talley
OPC's 1st Request for Production of Documents No. 9	062406	062406	Hurricane Michael Release Notification - Team 20849 20850 20851 20853- HIGHER POWER ELECTRIC.pdf	All	(d)	Paul Talley
OPC's 1st Request for Production of Documents No. 9	062407	062407	Hurricane Michael Release Notification - Team 21007 - James Power Line Constr - Mendez.pdf	All	(d)	Paul Talley
OPC's 1st Request for Production of Documents No. 9	062408	062408	Hurricane Michael Release Notification - Team 21601.pdf	All	(d)	Paul Talley
OPC's 1st Request for Production of Documents No. 9	062409	062409	Hurricane Michael Release Notification - Team 21646 22956.pdf	All	(d)	Paul Talley
OPC's 1st Request for Production of Documents No. 9	062410	062410	Hurricane Michael Release Notification - Team 21725 21742 21719 21728 21721 - APC Contract Coord.pdf	All	(d)	Paul Talley
OPC's 1st Request for Production of Documents No. 9	062411	062411	Hurricane Michael Release Notification - Team 21735 21716 21731 21730 21734.pdf	All	(d)	Paul Talley
OPC's 1st Request for Production of Documents No. 9	062412	062412	Hurricane Michael Release Notification - Team 21750 21878 21876 21877 21872 21874.pdf	All	(d)	Paul Talley
OPC's 1st Request for Production of Documents No. 9	062413	062413	Hurricane Michael Release Notification - Team 21786 OnCor.pdf	All	(d)	Paul Talley
OPC's 1st Request for Production of Documents No. 9	062414	062414	Hurricane Michael Release Notification - Team 21858 - APC Management - Greg White.pdf	All	(d)	Paul Talley
OPC's 1st Request for Production of Documents No. 9	062415	062415	Hurricane Michael Release Notification - Team 21949 21950 21952.pdf	All	(d)	Paul Talley
OPC's 1st Request for Production of Documents No. 9	062416	062416	Hurricane Michael Release Notification - Team 21953 - APC Dist MOB Lead Team.pdf	All	(d)	Paul Talley

OPC's 1st Request for Production of Documents No. 9	062417	062417	Hurricane Michael Release Notification - Team 22029 - APC Trans Line Contract Support - Nolan Jones.pdf	All	(d)	Paul Talley
OPC's 1st Request for Production of Documents No. 9	062418	062418	Hurricane Michael Release Notification - Team 22275 - GPC UTILICON - Banks.pdf	All	(d)	Paul Talley
OPC's 1st Request for Production of Documents No. 9	062419	062419	Hurricane Michael Release Notification - Team 22277 22615 22616 22009.pdf	All	(d)	Paul Talley
OPC's 1st Request for Production of Documents No. 9	062420	062420	Hurricane Michael Release Notification - Team 22434 - GPC Distribution A Team.pdf	All	(d)	Paul Talley
OPC's 1st Request for Production of Documents No. 9	062421	062421	Hurricane Michael Release Notification - Team 22762 - 22770.pdf	All	(d)	Paul Talley
OPC's 1st Request for Production of Documents No. 9	062422	062422	Hurricane Michael Release Notification - Team GPC - Trans Pike (22252 22257).pdf	All	(d)	Paul Talley
OPC's 1st Request for Production of Documents No. 9	062423	062423	Hurricane Michael Release Notification - Team Name 21960 APC DIST.BHM Lead Team 1.pdf	All	(d)	Paul Talley
OPC's 1st Request for Production of Documents No. 9	062424	062424	Hurricane Michael Release Notification - Team Name GPC Fleet Svcs (Hayes) Split Team 22990.pdf	All	(d)	Paul Talley
OPC's 1st Request for Production of Documents No. 9	062425	062425	Hurricane Michael Release Notification - Team Name Team Duke Gulfport-Mills (19913) I M.pdf	All	(d)	Paul Talley
OPC's 1st Request for Production of Documents No. 9	062426	062426	Hurricane Michael Release Notification - Volt Power - Macks Team 20735.pdf	All	(d)	Paul Talley
OPC's 1st Request for Production of Documents No. 9	062427	062427	Hurricane Michael Release Notification 2.pdf	All	(d)	Paul Talley
OPC's 1st Request for Production of Documents No. 9	062428	062428	Hurricane Michael Release Notification Team Name J J Strong Team 21055 21293 21564 19556 22991 22992 20953.pdf	All	(d)	Paul Talley
OPC's 1st Request for Production of Documents No. 9	062429	062429	Hurricane Michael Release Notification.pdf	All	(d)	Paul Talley
OPC's 1st Request for Production of Documents No. 9	062430	062430	Hurricane Michael Release Notifications - see below for team information.pdf	All	(d)	Paul Talley
OPC's 1st Request for Production of Documents No. 9	062431	062431	Hurricane Michael Release Notification-Team Name Specialty Fuel Services Team 21316 22870.pdf	All	(d)	Paul Talley
OPC's 1st Request for Production of Documents No. 9	062432	062432	RE Hurricane Michael Release Notification - Team 20789 22618 22614 - Mastec.pdf	All	(d)	Paul Talley

OPC's 1st Request for Production of Documents No. 9	062325	062325	Correction - Hurricane Michael Release Notification - Team 19676 - Storm Services Engineering - Cameron.pdf	All	(d)	Paul Talley
OPC's 1st Request for Production of Documents No. 9	062326	062326	FW Hurricane Michael Release Notification - J W Didado Electric LLC Team IDs 20051 20055 20056 20060 20062.pdf	All	(d)	Paul Talley
OPC's 1st Request for Production of Documents No. 9	062327	062327	FW Hurricane Michael Release Notification - Pike Teams 19488 19490 19492 19493 19494.pdf	All	(d)	Paul Talley
OPC's 1st Request for Production of Documents No. 9	062328	062328	FW Hurricane Michael Release Notification - Team 20724 - Power Secure - Cooper.pdf	All	(d)	Paul Talley
OPC's 1st Request for Production of Documents No. 9	062329	062329	FW Hurricane Michael Release Notification - Team 19965 - Power Secure - McNeal.pdf	All	(d)	Paul Talley
OPC's 1st Request for Production of Documents No. 9	062330	062330	FW Hurricane Michael Release Notification - Team VOLT POWER - Texas.pdf	All	(d)	Paul Talley
OPC's 1st Request for Production of Documents No. 9	062331	062331	Hurricane Michael Notification - Volt Power-Mississippi Team 19938 19933 19945 19948.pdf	All	(d)	Paul Talley
OPC's 1st Request for Production of Documents No. 9	062332	062332	Hurricane Michael Release Notification - Proforce Team 22876 21981.pdf	All	(d)	Paul Talley
OPC's 1st Request for Production of Documents No. 9	062333	062333	Hurricane Michael Release Notification - SWS Team 23183 21269 22926.pdf	All	(d)	Paul Talley
OPC's 1st Request for Production of Documents No. 9	062334	062334	Hurricane Michael Release Notification (1).pdf	All	(d)	Paul Talley
OPC's 1st Request for Production of Documents No. 9	062335	062336	Hurricane Michael Release Notification - APC Team 22004 22005 22006 22007 22008 22017 22018 22019 22020 22021 22022.pdf	All	(d)	Paul Talley
OPC's 1st Request for Production of Documents No. 9	062337	062337	Hurricane Michael Release Notification - APC Teams 21739 Massey 21738-Garner 21722 Voss.pdf	All	(d)	Paul Talley
OPC's 1st Request for Production of Documents No. 9	062338	062338	Hurricane Michael Release Notification - APC Teams 22904 22900 22905 22906.pdf	All	(d)	Paul Talley
OPC's 1st Request for Production of Documents No. 9	062339	062339	Hurricane Michael Release Notification - Centerpoint Energy Team 19830 19822 19826.pdf	All	(d)	Paul Talley
OPC's 1st Request for Production of Documents No. 9	062340	062340	Hurricane Michael Release Notification - Chain Electric - Morel 22958.pdf	All	(d)	Paul Talley
OPC's 1st Request for Production of Documents No. 9	062341	062341	Hurricane Michael Release Notification - Irby Construction - Teams 21583 21587 21585.pdf	All	(d)	Paul Talley

OPC's 1st Request for Production of Documents No. 9	062342	062342	Hurricane Michael Release Notification - J W Didado Team ID 20058.pdf	All	(d)	Paul Talley
OPC's 1st Request for Production of Documents No. 9	062343	062343	Hurricane Michael Release Notification - Michaels Power (Team 20288).pdf	All	(d)	Paul Talley
OPC's 1st Request for Production of Documents No. 9	062344	062344	Hurricane Michael Release Notification - MPC Teams 22656 22658 22653.pdf	All	(d)	Paul Talley
OPC's 1st Request for Production of Documents No. 9	062345	062345	Hurricane Michael Release Notification - Par Electric Team 20047.pdf	All	(d)	Paul Talley
OPC's 1st Request for Production of Documents No. 9	062346	062346	Hurricane Michael Release Notification - Pike - K Headley Team 20714.pdf	All	(d)	Paul Talley
OPC's 1st Request for Production of Documents No. 9	062347	062347	Hurricane Michael Release Notification - Pike - T Headley Team 20704.pdf	All	(d)	Paul Talley
OPC's 1st Request for Production of Documents No. 9	062348	062348	Hurricane Michael Release Notification - Pike Teams 19636 19647 19616 20635.pdf	All	(d)	Paul Talley
OPC's 1st Request for Production of Documents No. 9	062349	062349	Hurricane Michael Release Notification - Robert Henry (Team 19796 Gardiner 19792 Woodruff and 19781).pdf	All	(d)	Paul Talley
OPC's 1st Request for Production of Documents No. 9	062350	062350	Hurricane Michael Release Notification - SEC - Kellar Team 19591.pdf	All	(d)	Paul Talley
OPC's 1st Request for Production of Documents No. 9	062351	062351	Hurricane Michael Release Notification - SEC Teams 20020 20022.pdf	All	(d)	Paul Talley
OPC's 1st Request for Production of Documents No. 9	062352	062352	Hurricane Michael Release Notification - Southern Tire - Fleet (Zimmerman-Stacks) Team 21287.pdf	All	(d)	Paul Talley
OPC's 1st Request for Production of Documents No. 9	062353	062353	Hurricane Michael Release Notification - SPX Team 23031.pdf	All	(d)	Paul Talley
OPC's 1st Request for Production of Documents No. 9	062354	062354	Hurricane Michael Release Notification - Sumter Teams 22274 22273.pdf	All	(d)	Paul Talley
OPC's 1st Request for Production of Documents No. 9	062355	062355	Hurricane Michael Release Notification - SWS Team 23174 23175 23171 23170 22023.pdf	All	(d)	Paul Talley
OPC's 1st Request for Production of Documents No. 9	062356	062356	Hurricane Michael Release Notification - SWS Team-22926 22663 22975 22662 22665 22666 22024.pdf	All	(d)	Paul Talley
OPC's 1st Request for Production of Documents No. 9	062357	062357	Hurricane Michael Release Notification - Team multiple teams (GPC Jordan High Voltage).pdf	All	(d)	Paul Talley

OPC's 1st Request for Production of Documents No. 9	062358	062359	Hurricane Michael Release Notification - Team (see below list) Storm Services Engineering.pdf	All	(d)	Paul Talley
OPC's 1st Request for Production of Documents No. 9	062360	062360	Hurricane Michael Release Notification - Team 2081 - Tampa Electric.pdf	All	(d)	Paul Talley
OPC's 1st Request for Production of Documents No. 9	062361	062361	Hurricane Michael Release Notification - Team 19468 - Storm Services Engineering - Wallace.pdf	All	(d)	Paul Talley
OPC's 1st Request for Production of Documents No. 9	062362	062362	Hurricane Michael Release Notification - Team 19471 - Storm Services Engineering - Russell.pdf	All	(d)	Paul Talley
OPC's 1st Request for Production of Documents No. 9	062363	062363	Hurricane Michael Release Notification - Team 19492 Pike.pdf	All	(d)	Paul Talley
OPC's 1st Request for Production of Documents No. 9	062364	062364	Hurricane Michael Release Notification - Team 19494 19488 19493 19490 Pikes.pdf	All	(d)	Paul Talley
OPC's 1st Request for Production of Documents No. 9	062365	062365	Hurricane Michael Release Notification - Team 19495 - WR Stone - Casalnuovo.pdf	All	(d)	Paul Talley
OPC's 1st Request for Production of Documents No. 9	062366	062366	Hurricane Michael Release Notification - Team 19510 22281 22290 21199 21200 20855 20944 21527 22288 20189 20196.pdf	All	(d)	Paul Talley
OPC's 1st Request for Production of Documents No. 9	062367	062367	Hurricane Michael Release Notification - Team 19513 - Kentucky Power - Keesee.pdf	All	(d)	Paul Talley
OPC's 1st Request for Production of Documents No. 9	062368	062368	Hurricane Michael Release Notification - Team 19523 19526 19519 19529 19527 19524 - Bird Electric.pdf	All	(d)	Paul Talley
OPC's 1st Request for Production of Documents No. 9	062369	062369	Hurricane Michael Release Notification - Team 19584 - Davis H Elliott - Evans.pdf	All	(d)	Paul Talley
OPC's 1st Request for Production of Documents No. 9	062370	062370	Hurricane Michael Release Notification - Team 19586 19648 21640 19666 19658 19604 19634 - Storm Services Engineering.pdf	All	(d)	Paul Talley
OPC's 1st Request for Production of Documents No. 9	062371	062371	Hurricane Michael Release Notification - Team 19638 - Storm Services Engineering - Martinez.pdf	All	(d)	Paul Talley
OPC's 1st Request for Production of Documents No. 9	062372	062372	Hurricane Michael Release Notification - Team 19639.pdf	All	(d)	Paul Talley
OPC's 1st Request for Production of Documents No. 9	062373	062373	Hurricane Michael Release Notification - Team 19646 19650 19659 19657 GPC.pdf	All	(d)	Paul Talley
OPC's 1st Request for Production of Documents No. 9	062374	062374	Hurricane Michael Release Notification - Team 19649 19656 19522 20065 20741 20744 - 5 Star Electric (AEP).pdf	All	(d)	Paul Talley

OPC's 1st Request for Production of Documents No. 9	062375	062375	Hurricane Michael Release Notification - Team 19660 - Storm Services Engineering-Vint.pdf	All	(d)	Paul Talley
OPC's 1st Request for Production of Documents No. 9	062376	062376	Hurricane Michael Release Notification - Team 19676 - Storm Services Engineering - Cameron.pdf	All	(d)	Paul Talley
OPC's 1st Request for Production of Documents No. 9	062377	062377	Hurricane Michael Release Notification - Team 19859 - MP Technologies.pdf	All	(d)	Paul Talley
OPC's 1st Request for Production of Documents No. 9	062378	062378	Hurricane Michael Release Notification - Team 19908 - Centerpoint Energy - Weaver.pdf	All	(d)	Paul Talley
OPC's 1st Request for Production of Documents No. 9	062379	062379	Hurricane Michael Release Notification - Team 19915 19924 19925 19921 19935 - AEP - Ohio.pdf	All	(d)	Paul Talley
OPC's 1st Request for Production of Documents No. 9	062380	062380	Hurricane Michael Release Notification - Team 19917 - PSO Gulfport (AEP).pdf	All	(d)	Paul Talley
OPC's 1st Request for Production of Documents No. 9	062381	062381	Hurricane Michael Release Notification - Team 19932 19919 19944 - AEP - Ohio.pdf	All	(d)	Paul Talley
OPC's 1st Request for Production of Documents No. 9	062382	062382	Hurricane Michael Release Notification - Team 19950- AEP- Texas.pdf	All	(d)	Paul Talley
OPC's 1st Request for Production of Documents No. 9	062383	062383	Hurricane Michael Release Notification - Team 19951 - Can-Fer - Byram.pdf	All	(d)	Paul Talley
OPC's 1st Request for Production of Documents No. 9	062384	062384	Hurricane Michael Release Notification - Team 19958 - AEP- Texas.pdf	All	(d)	Paul Talley
OPC's 1st Request for Production of Documents No. 9	062385	062385	Hurricane Michael Release Notification - Team 19960 - AEP- Texas.pdf	All	(d)	Paul Talley
OPC's 1st Request for Production of Documents No. 9	062386	062386	Hurricane Michael Release Notification - Team 19961 Pike.pdf	All	(d)	Paul Talley
OPC's 1st Request for Production of Documents No. 9	062387	062387	Hurricane Michael Release Notification - Team 19962 - AEP - Texas - Roberts.pdf	All	(d)	Paul Talley
OPC's 1st Request for Production of Documents No. 9	062388	062388	Hurricane Michael Release Notification - Team 19964 - AEP - Texas - Michael.pdf	All	(d)	Paul Talley
OPC's 1st Request for Production of Documents No. 9	062389	062389	Hurricane Michael Release Notification - Team 19966 - AEP - Texas - Gomez.pdf	All	(d)	Paul Talley
OPC's 1st Request for Production of Documents No. 9	062390	062390	Hurricane Michael Release Notification - Team 19968 - AEP - Texas - O'Dell.pdf	All	(d)	Paul Talley

OPC's 1st Request for Production of Documents No. 9	062391	062391	Hurricane Michael Release Notification - Team 20007 - Intren Chicago - Young.pdf	All	(d)	Paul Talley
OPC's 1st Request for Production of Documents No. 9	062392	062392	Hurricane Michael Release Notification - Team 20028 20016 20023 20026 - Linetec Services LLC.pdf	All	(d)	Paul Talley
OPC's 1st Request for Production of Documents No. 9	062393	062393	Hurricane Michael Release Notification - Team 20030 - MJ Electric - Consiglio.pdf	All	(d)	Paul Talley
OPC's 1st Request for Production of Documents No. 9	062394	062394	Hurricane Michael Release Notification - Team 20046 - Front Line Const - Barrett.pdf	All	(d)	Paul Talley
OPC's 1st Request for Production of Documents No. 9	062395	062395	Hurricane Michael Release Notification - Team 20105 Storm Services Engineering - Grainger.pdf	All	(d)	Paul Talley
OPC's 1st Request for Production of Documents No. 9	062396	062396	Hurricane Michael Release Notification - Team 20126 - Storm Services Engineering - Harwell.pdf	All	(d)	Paul Talley
OPC's 1st Request for Production of Documents No. 10	001853	002202	Binder 001.0.PDF	All	(d)	Paul Talley
OPC's 1st Request for Production of Documents No. 10	002203	002432	Binder 002.0.PDF	All	(d)	Paul Talley
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OPC's 1st Request for Production of Documents No. 10	006024	006536	Binder 014.2.PDF	All	(d)	Paul Talley
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OPC's 1st Request for Production of Documents No. 10	017064	017167	Binder 063.0.PDF	All	(d)	Paul Talley
OPC's 1st Request for Production of Documents No. 10	017168	017592	Binder 064.0.PDF	All	(d)	Paul Talley
OPC's 1st Request for Production of Documents No. 18	000001	000039	Gulf Power Storm Damage Forensics Report_Final Report - Confidential.pdf	All	(d)	Paul Talley
OPC's 1st Request for Production of Documents No. 20	001836	001836	20190038_OPC1stPOD_Item No. 20_attachment 4_Invoice Review Team Process - Confidential Attachment.docx	All	(d)	Paul Talley Mitchell Goldstein
OPC's 1st Request for Production of Documents No. 20	001837	001843	20190038_OPC1stPOD_Item No. 20_attachment 5_Internal Auditing CONF.pdf	All	(d)	Paul Talley Mitchell Goldstein
OPC's 1st Request for Production of Documents No. 20	001844	001844	20190038_OPC1stPOD_Item No. 20_attachment 6_MB51_CommTower_Material-Issue CONF - Confidential Attachment.xlsx	All	(d)	Paul Talley Mitchell Goldstein
OPC's 1st Request for Production of Documents No. 20	001845	001851	20190038_OPC1stPOD_Item No. 20_attachment 7_Power Generation 1.3m CONF - Confidential Attachment.xlsx	All	(d)	Paul Talley Mitchell Goldstein
OPC's 1st Request for Production of Documents No. 20	001852	001852	20190038_OPC1stPOD_Item No. 20_attachment 8_Warehouse Storm Reconciliation Transactions - Confidential Attachment.xlsx	All	(d)	Paul Talley Mitchell Goldstein
OPC's 1st Request for Production of Documents No. 20	001805	001811	20190038_OPC1stPOD_Item No. 20_attachment 1_Mass Property CONF - Confidential Attachment.xlsx	All	(d)	Paul Talley Mitchell Goldstein
OPC's 1st Request for Production of Documents No. 20	001812	001814	20190038_OPC1stPOD_Item No. 20_attachment 2_Storm Cost Review CONF - Confidential Attachment.pdf	All	(d)	Paul Talley Mitchell Goldstein
OPC's 1st Request for Production of Documents No. 20	001815	001835	20190038_OPC1stPOD_Item No. 20_attachment 3_DBU Capital Effects Reporting CONF - Confidential Attachment.xlsx	All	(d)	Paul Talley Mitchell Goldstein
Set - Flash Drive No. 2	Bates Number Start	Bates Number End	Description	Line No. / Col. No.	Florida Statute 3.66.093(3) Subsection	Declarant

OPC's 1st Request for Production of Documents No. 10	017593	017836	Binder 065.0.PDF	All	(d)	Paul Talley
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OPC's 1st Request for Production of Documents No. 10	018110	018169	Binder 067.0.PDF	All	(d)	Paul Talley
OPC's 1st Request for Production of Documents No. 10	018170	018243	Binder 068.0.PDF	All	(d)	Paul Talley
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OPC's 1st Request for Production of Documents No. 10	021487	021624	Binder 084.0.PDF	All	(d)	Paul Talley
OPC's 1st Request for Production of Documents No. 10	021625	022151	Binder 085.0.PDF	All	(d)	Paul Talley
OPC's 1st Request for Production of Documents No. 10	022152	022723	Binder 086.0.PDF	All	(d)	Paul Talley
OPC's 1st Request for Production of Documents No. 10	022724	023268	Binder 086.1.PDF	All	(d)	Paul Talley
OPC's 1st Request for Production of Documents No. 10	023269	023516	Binder 087.0.PDF	All	(d)	Paul Talley
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OPC's 1st Request for Production of Documents No. 10	024784	025241	Binder 087.3.PDF	All	(d)	Paul Talley
OPC's 1st Request for Production of Documents No. 10	025242	025973	Binder 087.4.PDF	All	(d)	Paul Talley
OPC's 1st Request for Production of Documents No. 10	025974	026419	Binder 087.5.PDF	All	(d)	Paul Talley
OPC's 1st Request for Production of Documents No. 10	026420	026834	Binder 087.6.PDF	All	(d)	Paul Talley
OPC's 1st Request for Production of Documents No. 10	026835	027278	Binder 087.7.PDF	All	(d)	Paul Talley
OPC's 1st Request for Production of Documents No. 10	027279	027911	Binder 087.8.PDF	All	(d)	Paul Talley
OPC's 1st Request for Production of Documents No. 10	027912	028440	Binder 087.9.PDF	All	(d)	Paul Talley
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OPC's 1st Request for Production of Documents No. 10	030876	031350	Binder 100.0.PDF	All	(d)	Paul Talley
OPC's 1st Request for Production of Documents No. 10	031351	031440	Binder 101.0.PDF	All	(d)	Paul Talley
OPC's 1st Request for Production of Documents No. 10	031441	032065	Binder 102.0.PDF	All	(d)	Paul Talley
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OPC's 1st Request for Production of Documents No. 10	032424	032858	Binder 104.0.PDF	All	(d)	Paul Talley
OPC's 1st Request for Production of Documents No. 10	032859	033289	Binder 105.0.PDF	All	(d)	Paul Talley
OPC's 1st Request for Production of Documents No. 10	033290	033299	Binder 106.0.PDF	All	(d)	Paul Talley
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OPC's 1st Request for Production of Documents No. 10	034239	034316	Binder 111.0.PDF	All	(d)	Paul Talley
OPC's 1st Request for Production of Documents No. 10	034317	034397	Binder 112.0.PDF	All	(d)	Paul Talley
OPC's 1st Request for Production of Documents No. 10	034398	034617	Binder 113.0.PDF	All	(d)	Paul Talley
OPC's 1st Request for Production of Documents No. 10	034618	034947	Binder 113.1.PDF	All	(d)	Paul Talley
OPC's 1st Request for Production of Documents No. 10	034948	034969	Binder 114.0.PDF	All	(d)	Paul Talley

OPC's 1st Request for Production of Documents No. 10	034970	034981	Binder 115.0.PDF	All	(d)	Paul Talley
OPC's 1st Request for Production of Documents No. 10	034982	035002	Binder 116.0.PDF	All	(d)	Paul Talley
OPC's 1st Request for Production of Documents No. 10	035003	035085	Binder 117.0.PDF	All	(d)	Paul Talley
OPC's 1st Request for Production of Documents No. 10	035086	035144	Binder 119.0.PDF	All	(d)	Paul Talley
OPC's 1st Request for Production of Documents No. 10	035145	035629	Binder 121.0.PDF	All	(d)	Paul Talley
Set - Flash Drive No. 3	Bates Number Start	Bates Number End	Description	Line No. / Col. No.	Florida Statute 3.66.093(3) Subsection	Declarant
OPC's 1st Request for Production of Documents No. 10	035630	036158	Binder 123.0.PDF	All	(d)	Paul Talley
OPC's 1st Request for Production of Documents No. 10	036159	036557	Binder 124.0.PDF	All	(d)	Paul Talley
OPC's 1st Request for Production of Documents No. 10	036558	037183	Binder 124.1.PDF	All	(d)	Paul Talley
OPC's 1st Request for Production of Documents No. 10	037184	037607	Binder 124.2.PDF	All	(d)	Paul Talley
OPC's 1st Request for Production of Documents No. 10	037608	037910	Binder 125.0.PDF	All	(d)	Paul Talley
OPC's 1st Request for Production of Documents No. 10	037911	038565	Binder 126.0.PDF	All	(d)	Paul Talley
OPC's 1st Request for Production of Documents No. 10	038566	038725	Binder 127.0.PDF	All	(d)	Paul Talley
OPC's 1st Request for Production of Documents No. 10	038726	038951	Binder 128.0.PDF	All	(d)	Paul Talley
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OPC's 1st Request for Production of Documents No. 10	039218	039261	Binder 131.0.PDF	All	(d)	Paul Talley
OPC's 1st Request for Production of Documents No. 10	039262	039371	Binder 132.0.PDF	All	(d)	Paul Talley
OPC's 1st Request for Production of Documents No. 10	039372	039600	Binder 133.0.PDF	All	(d)	Paul Talley

OPC's 1st Request for Production of Documents No. 10	039601	039683	Binder 134.0.PDF	All	(d)	Paul Talley
OPC's 1st Request for Production of Documents No. 10	039684	040382	Binder 136.0.PDF	All	(d)	Paul Talley
OPC's 1st Request for Production of Documents No. 10	040383	040489	Binder 137.0.PDF	All	(d)	Paul Talley
OPC's 1st Request for Production of Documents No. 10	040490	040890	Binder 138.0.PDF	All	(d)	Paul Talley
OPC's 1st Request for Production of Documents No. 10	040891	041024	Binder 139.0.PDF	All	(d)	Paul Talley
OPC's 1st Request for Production of Documents No. 10	041025	041783	Binder 140.0.PDF	All	(d)	Paul Talley
OPC's 1st Request for Production of Documents No. 10	041784	041959	Binder 141.0.PDF	All	(d)	Paul Talley
OPC's 1st Request for Production of Documents No. 10	041960	042026	Binder 142.0.PDF	All	(d)	Paul Talley
OPC's 1st Request for Production of Documents No. 10	042027	042165	Binder 143.0.PDF	All	(d)	Paul Talley
OPC's 1st Request for Production of Documents No. 10	042166	043115	Binder 143.1.PDF	All	(d)	Paul Talley
OPC's 1st Request for Production of Documents No. 10	043116	043187	Binder 144.0.PDF	All	(d)	Paul Talley
OPC's 1st Request for Production of Documents No. 10	043188	043361	Binder 145.0.PDF	All	(d)	Paul Talley
OPC's 1st Request for Production of Documents No. 10	043362	043544	Binder 146.0.PDF	All	(d)	Paul Talley
OPC's 1st Request for Production of Documents No. 10	043545	043624	Binder 147.0.PDF	All	(d)	Paul Talley
OPC's 1st Request for Production of Documents No. 10	043625	043821	Binder 148.0.PDF	All	(d)	Paul Talley
OPC's 1st Request for Production of Documents No. 10	043822	044330	Binder 150.0.PDF	All	(d)	Paul Talley
OPC's 1st Request for Production of Documents No. 10	044331	044735	Binder 153.0.PDF	All	(d)	Paul Talley
OPC's 1st Request for Production of Documents No. 10	044736	044835	Binder 154.0.PDF	All	(d)	Paul Talley
OPC's 1st Request for Production of Documents No. 10	044836	044867	Binder 155.0.PDF	All	(d)	Paul Talley

OPC's 1st Request for Production of Documents No. 10	044868	045539	Binder 156.0.PDF	All	(d)	Paul Talley
OPC's 1st Request for Production of Documents No. 10	045540	045790	Binder 157.0.PDF	All	(d)	Paul Talley
OPC's 1st Request for Production of Documents No. 10	045791	046371	Binder 160.0.PDF	All	(d)	Paul Talley
OPC's 1st Request for Production of Documents No. 10	046372	047026	Binder 161.0.PDF	All	(d)	Paul Talley
OPC's 1st Request for Production of Documents No. 10	047027	047542	Binder 162.0.PDF	All	(d)	Paul Talley
OPC's 1st Request for Production of Documents No. 10	047543	048164	Binder 163.0.PDF	All	(d)	Paul Talley
OPC's 1st Request for Production of Documents No. 10	048165	048780	Binder 164.0.PDF	All	(d)	Paul Talley
OPC's 1st Request for Production of Documents No. 10	048781	049556	Binder 165.0.PDF	All	(d)	Paul Talley
OPC's 1st Request for Production of Documents No. 10	049557	050230	Binder 166.0.PDF	All	(d)	Paul Talley
OPC's 1st Request for Production of Documents No. 10	050231	050893	Binder 167.0.PDF	All	(d)	Paul Talley
OPC's 1st Request for Production of Documents No. 10	050894	051512	Binder 168.0.PDF	All	(d)	Paul Talley
OPC's 1st Request for Production of Documents No. 10	051513	052150	Binder 169.1.PDF	All	(d)	Paul Talley
OPC's 1st Request for Production of Documents No. 10	052151	052725	Binder 169.2.PDF	All	(d)	Paul Talley
OPC's 1st Request for Production of Documents No. 10	052726	053000	Binder 170.0.PDF	All	(d)	Paul Talley
OPC's 1st Request for Production of Documents No. 10	053001	053244	Binder 171.0.PDF	All	(d)	Paul Talley
OPC's 1st Request for Production of Documents No. 10	053245	053786	Binder 172.0.PDF	All	(d)	Paul Talley
OPC's 1st Request for Production of Documents No. 10	053787	054512	Binder 173.0.PDF	All	(d)	Paul Talley
OPC's 1st Request for Production of Documents No. 10	054513	054917	Binder 174.0.PDF	All	(d)	Paul Talley
OPC's 1st Request for Production of Documents No. 10	054918	055336	Binder 175.0.PDF	All	(d)	Paul Talley

OPC's 1st Request for Production of Documents No. 10	055337	055635	Binder 176.0.PDF	All	(d)	Paul Talley
OPC's 1st Request for Production of Documents No. 10	055636	055973	Binder 177.0.PDF	All	(d)	Paul Talley
OPC's 1st Request for Production of Documents No. 10	055974	056244	Binder 178.0.PDF	All	(d)	Paul Talley
OPC's 1st Request for Production of Documents No. 10	056245	056582	Binder 179.0.PDF	All	(d)	Paul Talley
OPC's 1st Request for Production of Documents No. 10	056583	056870	Binder 180.0.PDF	All	(d)	Paul Talley
OPC's 1st Request for Production of Documents No. 10	056871	057086	Binder 181.0.PDF	All	(d)	Paul Talley
OPC's 1st Request for Production of Documents No. 10	057087	057291	Binder 182.0.PDF	All	(d)	Paul Talley
OPC's 1st Request for Production of Documents No. 10	057292	057718	Binder 183.0.PDF	All	(d)	Paul Talley
OPC's 1st Request for Production of Documents No. 10	057719	057874	Binder 184.0.PDF	All	(d)	Paul Talley
OPC's 1st Request for Production of Documents No. 10	057875	058006	Binder 185.0.PDF	All	(d)	Paul Talley
OPC's 1st Request for Production of Documents No. 10	058007	058619	Binder 186.0.PDF	All	(d)	Paul Talley
OPC's 1st Request for Production of Documents No. 10	058620	059299	Binder 187.0.PDF	All	(d)	Paul Talley
OPC's 1st Request for Production of Documents No. 10	059300	059931	Binder 187.1.PDF	All	(d)	Paul Talley
OPC's 1st Request for Production of Documents No. 10	059932	059975	Binder 188.0.PDF	All	(d)	Paul Talley
OPC's 1st Request for Production of Documents No. 10	059976	060098	Binder 189.0.PDF	All	(d)	Paul Talley
OPC's 1st Request for Production of Documents No. 10	060099	060414	Binder T1.0.PDF	All	(d)	Paul Talley
OPC's 1st Request for Production of Documents No. 10	060415	060916	Binder T2.0.PDF	All	(d)	Paul Talley
OPC's 1st Request for Production of Documents No. 10	060917	061460	Binder T3.0.PDF	All	(d)	Paul Talley
OPC's 1st Request for Production of Documents No. 10	061461	062132	Binder T3.1.PDF	All	(d)	Paul Talley

OPC's 1st Request for Production of Documents No. 10	062133	062134	Hurricane Michael Master Log.xlsx	All	(d)	Paul Talley
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EXHIBIT D

DECLARATIONS

EXHIBIT D

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Petition for limited proceeding for recovery of incremental storm restoration costs related to Hurricane Michael, by Gulf Power Company.

Docket No: 20190038-EI

STATE OF FLORIDA

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COUNTY OF PALM BEACH

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WRITTEN DECLARATION OF MITCHELL GOLDSTEIN

1. My name is Mitchell Goldstein. I am currently employed by Gulf Power Company ("Gulf") as Vice President of Finance. I have personal knowledge of the matters stated in this written declaration.

2. I have reviewed the documents and information included in Exhibit A to Gulf's Request for Confidential Classification filed this date, for which I am listed as a declarant on Exhibit C. The documents that I have reviewed and which are asserted by Gulf to be proprietary confidential business information contain or constitute contractual data, and information related to competitive interests, the disclosure of which would impair the competitive business of Gulf, its affiliates and its contractors, vendors and suppliers. Specifically, the documents and exhibits contains the names, rates, quantity, contractual provisions, invoices of our third-party contractors, vendors and suppliers, payments to our contractors, vendors and suppliers, all of which was agreed upon exclusively with these contractors, vendors, and suppliers. The documents further describe the specific methodologies developed and used by Gulf to negotiate contracts, to secure resources, to receive, review and approve or reject requests for payment, and every other aspect of Gulf's unique processes developed and used by Gulf in responding to storm events, obtaining resources, and administering payment processes related thereto. Disclosure of this information would impair Gulf's contractor, vendor, and supplier relationships, and impair or negate the commercial interests of Gulf as Gulf negotiates contracts and seeks to obtain contractors, vendors and suppliers to provide critical construction, restoration resources necessary to perform storm restoration. Disclosure of this information would also impair or negate the commercial interests of Gulf's contractors, vendors and suppliers as they negotiate with others for the services they provide. The disclosure of this information will also impact the efforts of Gulf or its affiliates to contract for goods and services on favorable terms in the future, which in turn increases costs to Gulf and its customers. To the best of my knowledge, Gulf has maintained the confidentiality of this information.

3. Consistent with the provisions of the Florida Administrative Code, such materials should remain confidential for a period of eighteen (18) months. In addition, they should be returned to Gulf as soon as the information is no longer necessary for the Commission to conduct its business so that Gulf can continue to maintain the confidentiality of these documents.

4. Under penalties of perjury, I declare that I have read the foregoing declaration and that the facts stated in it are true to the best of my knowledge and belief.

Mitchell Goldstein

Date: Jan 30, 2020

EXHIBIT D

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Petition for limited proceeding for recovery of incremental storm restoration costs related to Hurricane Michael, by Gulf Power Company.

Docket No: 20190038-EI

STATE OF FLORIDA)
COUNTY OF PALM BEACH)

WRITTEN DECLARATION OF PAUL A. TALLEY

1. My name is Paul A. Talley. I am currently employed by Gulf Power Company ("Gulf") as Manager of Technical Services in the Power Delivery organization, and I was similarly employed in that capacity prior to and during the time that Hurricane Michael impacted Gulf's service territory. I have personal knowledge of the matters stated in this written declaration.

2. I have reviewed the documents and information included in Exhibit A to Gulf's Request for Confidential Classification filed this date, for which I am listed as a declarant on Exhibit C. The documents that I have reviewed and which are asserted by Gulf to be proprietary confidential business information contain or constitute contractual data, and information related to competitive interests, the disclosure of which would impair the competitive business of Gulf, its affiliates and its contractors, vendors and suppliers. Specifically, the documents and exhibits contains the names, rates, quantity, contractual provisions, invoices of our third-party contractors, vendors and suppliers, payments to our contractors, vendors and suppliers, all of which was agreed upon exclusively with these contractors, vendors, and suppliers. The documents further describe the specific methodologies developed and used by Gulf to negotiate contracts, to secure resources, to receive, review and approve or reject requests for payment, and every other aspect of Gulf's unique processes developed and used by Gulf in responding to storm events, obtaining resources, and administering payment processes related thereto. Disclosure of this information would impair Gulf's contractor, vendor, and supplier relationships, and impair or negate the commercial interests of Gulf as Gulf negotiates contracts and seeks to obtain contractors, vendors and suppliers to provide critical construction, restoration resources necessary to perform storm restoration. Disclosure of this information would also impair or negate the commercial interests of Gulf's contractors, vendors and suppliers as they negotiate with others for the services they provide. The disclosure of this information will also impact the efforts of Gulf or its affiliates to contract for goods and services on favorable terms in the future, which in turn increases costs to Gulf and its customers. To the best of my knowledge, Gulf has maintained the confidentiality of this information.

3. Consistent with the provisions of the Florida Administrative Code, such materials should remain confidential for a period of eighteen (18) months. In addition, they should be returned to Gulf as soon as the information is no longer necessary for the Commission to conduct its business so that Gulf can continue to maintain the confidentiality of these documents.

4. Under penalties of perjury, I declare that I have read the foregoing declaration and that the facts stated in it are true to the best of my knowledge and belief.

Handwritten signature of Paul A. Talley

Paul A. Talley

1-31-2020