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March 2, 2020

– VIA ELECTRONIC FILING –

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

Re: Docket No. 20190038-EI

Dear Mr. Teitzman:

I attach for electronic filing in the above docket Gulf Power Company's Amended Request for Confidential Classification and Motion for Temporary Protective Order for Certain Confidential Information Provided in Response to the Office of Public Counsel's First Set of Interrogatories and First Request for Production of Documents.

Please contact me if you or your Staff has any questions regarding this filing at (561) 691-7108 or jason.higginbotham@fpl.com.

Sincerely,

A handwritten signature in black ink that reads 'Jason A. Higginbotham'.

Jason A. Higginbotham

Enclosure

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Petition by Gulf Power Company for
Limited Proceeding for Recovery of
Incremental Storm Restoration Costs Related
to Hurricane Michael.

Docket No: 20190038-EI

Date: March 2, 2020

**GULF POWER COMPANY’S AMENDED REQUEST FOR CONFIDENTIAL
CLASSIFICATION AND MOTION FOR TEMPORARY PROTECTIVE ORDER FOR
CERTAIN CONFIDENTIAL INFORMATION PROVIDED IN RESPONSE TO THE
OFFICE OF PUBLIC COUNSEL’S FIRST SET OF INTERROGATORIES AND
FIRST REQUEST FOR PRODUCTION OF DOCUMENTS**

Pursuant to Section 366.093, Florida Statutes (“Fla. Stat.”), and Rule 25-22.006, Florida Administrative Code (“F.A.C.”), Gulf Power Company (“Gulf”) submits this Amended Request for Confidential Classification and Motion for Temporary Protective Order of certain information provided in response to the Office of Public Counsel’s (“OPC”) First Set of Interrogatories (Nos. 1-35) (“First Interrogatories”) and OPC’s First Request for Production of Documents (Nos. 1-22) (“First PODs”). In support of this Amended Request, Gulf states as follows:

1. On January 10, 2020, Gulf served its responses to OPC’s First Interrogatories and First PODs. On the same day, Gulf filed a Notice of Intent to Request Confidential Classification (“Notice of Intent”) and a Motion for Temporary Protective Order for certain confidential information provided in Gulf’s responses to OPC’s First Interrogatories and First PODs.

2. On January 31, 2020, Gulf filed a Request for Confidential Classification (“RFCC”) of information provided in Gulf’s responses to OPC’s First Interrogatories and First PODs. Gulf attached to its January 10 and January 31 pleadings all of the documents for which Gulf seeks confidential treatment.

3. It has come to Gulf’s attention that the record requires clarification as to which of Gulf’s responses to OPC’s First Interrogatories and First PODs should receive confidential treatment.

4. Gulf hereby clarifies that it requests confidential treatment for the following responses to OPC's First Interrogatories and First PODs, including all attachments thereto:

- Gulf's response to OPC's Interrogatory No. 15; and
- Gulf's responses to OPC's Request for Production of Document Nos. 1, 2, 6, 9-15, 18, and 20.

5. For the reasons set forth in Gulf's Notice of Intent, Motion for Temporary Protective Order, and RFCC, Gulf requests that the Commission enter a temporary protective order affording Gulf the protection that is needed to provide OPC the confidential information identified herein and further requests that the information being provided to the Staff of the Florida Public Service Commission ("Commission") 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, Gulf Power Company respectfully requests that its Amended Request for Confidential Classification and Motion for Temporary Order be granted.

Respectfully submitted this 2nd day of March, 2020.

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By: /s/ Jason A. Higginbotham
Jason A. Higginbotham
Florida Authorized Counsel No. 1017875

CERTIFICATE OF SERVICE

I **HEREBY CERTIFY** that a true and correct copy of the foregoing has been furnished by electronic service on this 2nd day of March 2020 to the following:

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