



Jason A. Higginbotham
Senior Attorney
Florida Power & Light Company
700 Universe Boulevard
Juno Beach, FL 33408-0420
(561) 691-7108
(561) 691-7135 (Facsimile)
E-mail: jason.higginbotham@fpl.com

March 27, 2020

VIA HAND DELIVERY

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

REDACTED

RECEIVED-FPSC
2020 MAR 27 PM 3:57
COMMISSION
CLERK

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

Dear Mr. Teitzman:

I enclose for filing in the above referenced docket Gulf Power Company's ("Gulf") Request for Confidential Classification of Information Provided in Response to the Office of Public Counsel's Second Set of Interrogatories (Nos. 47, 59, 65, 75 and 76) and Second Request for Production of Documents (Nos. 23, 24, 26, 27, and 29-32). The enclosed filing includes Exhibits A, B, C and D.

Exhibit A consists of the confidential documents, some of which are provided on a disc, and all the information that Gulf asserts is entitled to confidential treatment has been highlighted. Exhibit B is an edited version of Exhibit A, consisting of an identifying cover page and redacted responses. Exhibit C is a justification table in support of Gulf's Request for Confidential Classification. Exhibit D contains a declaration in support of Gulf's filing.

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

Sincerely,

/s/ Jason A. Higginbotham
Jason A. Higginbotham

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: March 27, 2020

**GULF POWER COMPANY'S REQUEST FOR
CONFIDENTIAL CLASSIFICATION OF INFORMATION PROVIDED
IN RESPONSE TO OPC'S SECOND SET OF INTERROGATORIES (NOS. 47, 59, 65, 75
& 76) & OPC'S SECOND REQUEST FOR PRODUCTION OF DOCUMENTS (NOS. 23,
24, 26, 27 & 29-32)**

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") Second Set of Interrogatories, Nos. 47, 59, 65, 75 and 76 and OPC's Second Request for Production of Documents, Nos. 23, 24, 26, 27 and 29-32 (collectively, the "Confidential Documents"). In support of this Request, Gulf states as follows:

1. On March 23, 2020, Gulf served its responses to OPC's Second Set of Interrogatories and OPC's Second Request for Production of Documents, which included Gulf's responses to Interrogatory Nos. 47, 59, 65, 75 and 76 and Request for Production of Documents Nos. 23, 24, 26, 27 and 29-32. 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, F.A.C.

2. The following exhibits are attached to and made a part of this Request:
- a. Exhibit A consists of the confidential documents, and all the information that Gulf asserts is entitled to confidential treatment has been highlighted.

- 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 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 27 day of March, 2020.

Jason A. Higginbotham
Senior Attorney
Jason.Higginbotham@fpl.com
Florida Power & Light Company
700 Universe Boulevard
Juno Beach, FL 33408
Telephone: (561) 691-7108
Facsimile: (561) 691-7135

By: /s/ Jason A. Higginbotham
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 27th day of March 2020 to the following:

Kenneth A. Hoffman
Vice President, Regulatory Affairs
Florida Power & Light Company
134 West Jefferson Street
Tallahassee, FL 32301
Phone: 850-521-3919
Fax: 850-521-3939
ken.hoffman@fpl.com

Russell A. Badders
Vice President & Associate General
Counsel
Gulf Power Company
One Energy Place
Pensacola, FL 32520
Phone: 850-444-6550
Fax: 850-444-6744
russell.badders@nexteraenergy.com

Mark Bubriski
Director of State Regulatory
Relations
Florida Power & Light Company
134 West Jefferson Street
Tallahassee, Florida 32301
Phone: 850-521-3937
Fax: 850-521-3939
mark.bubriski@nexteraenergy.com

Kenneth M. Rubin
Assistant General Counsel
Florida Power & Light Company
700 Universe Boulevard
Juno Beach, FL 33408-0420
Phone: 561-691-2512
Fax: 561-691-7135
ken.rubin@fpl.com

Jason Higginbotham
Senior Attorney
Florida Power & Light Company
700 Universe Boulevard
Juno Beach, FL 33408-0420
Phone: 561-304-2593
Fax: 561-691-7135
jason.higginbotham@fpl.com

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

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

EXHIBIT A

**CONFIDENTIAL
DOCUMENTS
PROVIDED AND
ON ENCLOSED CD**

EXHIBIT B

REDACTED

**Gulf's response to
OPC's Second Set of Interrogatories**

**Interrogatory No. 47
Attachment No. 1
Bates Nos. 062433 - 062434**

is confidential in its entirety

**Gulf's response to
OPC's Second Set of Interrogatories**

**Interrogatory No. 59
Attachment Nos. 1 - 2
Bates Nos. 062461 - 062490**

is confidential in its entirety

**Gulf's response to
OPC's Second Set of Interrogatories**

**Interrogatory No. 65
Attachment No. 1
Bates Nos. 062491 - 062516**

is confidential in its entirety

1
2
3
4
5

6 QUESTION:

7 Refer to Gulf's response to POD 10 in OPC's First Request for Production of Documents,
8 specifically to invoice binder 100.0 containing copies of invoices from [REDACTED].
9 Refer also to Bates numbered pages 001265-001267 of Gulf's response to POD 6 in OPC's First
10 Request for Production of Documents, which provides the contract rate pages for this vendor, but
11 not the full contracts. The straight time rates matched for 2018 and 2019 for all work invoiced.
12 For some of the crews in October and November 2018, overtime rates were charged while for
13 other crews only straight time rates were charged. Overtime rates were charged for all crews
14 starting in December 2018. Explain why this occurred and why the apparent billing discrepancy
15 is appropriate. In addition, explain why a change in billing occurred starting in 2018 to charge
16 overtime rates for all crews. An example of each type of invoice is referenced below as located
17 in invoice binder 100.0 based on the vendor's invoice numbers.

18 [REDACTED]
19 [REDACTED]

20 RESPONSE:

21 The discrepancies in billing rates among certain invoices produced in binder 100.0 occurred as a
22 result of two distinct situations. First, certain invoices in that binder were billed pursuant to the
23 terms of a contract between [REDACTED] Because [REDACTED]
24 [REDACTED] and Gulf were both subsidiaries of [REDACTED] at the time Hurricane Michael
25 made landfall, and because [REDACTED] generally performed work for [REDACTED] Gulf
26 allowed those contractors to bill for Hurricane Michael storm restoration work under their pre-
27 negotiated rates with [REDACTED], which differed from Gulf's embedded straight time and
28 overtime rates. The following invoices reflect the rates negotiated between [REDACTED]
29 [REDACTED] 3023, 3025, 3026, 3027, 3028, 3029, 3030, 3049, 3050, 3051, 3052, 3053, 3054,
30 3055, 3089, 3090, 3091, 3092, 3093, 3094, and 3095. The contract between [REDACTED]
31 [REDACTED], which is attached to this response and labeled
32 "OPC2ndINT_ItemNO.75_attachment1_[REDACTED] Contract", is confidential.

33 Second, Gulf has determined that certain other invoices produced in binder 100.0 were
34 incorrectly paid double time. Those invoices are as follows: 3149, 3162, 3163, 3167, 3227,
35 3230, 3229, 3265, 3264, 3266, 3313, 3320, and 3321. The overpayment of these invoices totals
36 [REDACTED], which Gulf plans to remove from the total costs for which it is seeking recovery in
37 this proceeding. Gulf anticipates submitting a revised cost recovery figure, which reflects the
38 removal of the [REDACTED] with its rebuttal testimony.

**Gulf's response to
OPC's Second Set of Interrogatories**

**Interrogatory No. 75
Attachment No. 1
Bates Nos. 062518 - 062590**

is confidential in its entirety

1
2
3
4
5

6
7
8
9
10
11
12
13
14
15
16

QUESTION:

Refer to Gulf's response to POD 10 of OPC's First Request for Production of Documents, specifically to Gulf's response to POD 10 in OPC's First Request for Production of Documents invoice binder 100.0, containing copies of invoices from [REDACTED] Refer also to Bates numbered pages 001265-001267 of Gulf's response to POD 6 in OPC's First Request for Production of Documents, which provides the contract rate pages for this vendor, but not the full contracts. The billing rates on the invoices changed to the 2019 rates per the contract pages starting in December 2018 for all December invoices after the week ending 12/1/2018. Explain why this occurred and specifically why the change before 2019 is appropriate. Two examples of such invoices are referenced below as located in invoice binder 100.0 based on the vendor's invoice numbers.

17
18



19
20

RESPONSE:

Please see Gulf's response to OPC's Second Set of Interrogatories No. 75.

**Gulf's response to
OPC's Second Request for Production of
Documents**

**Request No. 23
Attachment No. 1
Bates Nos. 065068 - 065089**

is confidential in its entirety

**Gulf's response to
OPC's Second Request for Production of
Documents**

**Request No. 24
Attachment Nos. 1 – 8a
Bates Nos. 062592 - 065067**

is confidential in its entirety

**Gulf's response to
OPC's Second Request for Production of
Documents**

**Request No. 26
Attachment No. 1
Bates Nos. 062436 - 062437**

is confidential in its entirety

**Gulf's response to
OPC's Second Request for Production of
Documents**

**Request No. 27
Attachment No. 1
Bates No. 062449**

is confidential in its entirety

**Gulf's response to
OPC's Second Request for Production of
Documents**

**Request No. 29
Attachment No. 1
Bates No. 062435**

is confidential in its entirety

QUESTION:

Refer to Gulf's response to POD 10 in OPC's First Request for Production of Documents specifically to binder 17.0 for vendor [REDACTED] and refer also to the contract pages located in Gulf's response to POD 6 of OPC's First Request for Production of Documents related to this same vendor. The contract pages in Gulf's response to POD 6 include the hourly labor and equipment rates for a number of the various crews for the invoices for this vendor included in binder 17.0, but some of the applicable contract rates for labor and the equipment for some crews are not included. Examples of some invoices for various crews contained in binder 17.0 are listed below. Provide Bates number and PDF page number reference to the pages containing correctly applicable contract hourly rates listed in the invoices in Gulf's response to POD 6. If Gulf has not already provided these documents, please supplement the response to the First Set of PODs.

[REDACTED]

RESPONSE:

The invoices for [REDACTED] include multiple rates which vary depending on the type of work the vendor provided in connection with Hurricane Michael restoration. [REDACTED] provided different categories of workers (e.g., Embedded vs. Off System crews, Distribution vs. Transmission crews, and Lighting crews), each of which performed a different type and scope of work, with a resulting variation in the rates charged for the different types of work.

Please see Gulf's response to OPC's First Request for Production of Documents No. 6, which are confidential. Refer to Bates 000940 – 000995.

**Gulf's response to
OPC's Second Request for Production of
Documents**

**Request No. 31
Attachment No. 1
Bates Nos. 062438 - 062448**

is confidential in its entirety

QUESTION:

Refer to Gulf's response to POD 10 in OPC's First Request for Production of Documents, specifically to invoice binder 94.0 for vendor [REDACTED] and refer also to the contract pages located in Gulf's response to POD 6 in OPC's First Request for Production of Documents related to this same vendor. The contract pages in Gulf's response to POD 6 include the hourly labor and equipment rates for the overhead portion of the distribution services, but are not included in the underground portion. Examples of two invoices contained in binder 94.0 are listed below. Provide Bates number and PDF page number references to the pages containing contract hourly rate amounts listed on the invoices in Gulf's response to POD 6 which show the underground contract rates for the vendor. If not already provided, please supplement the response.

[REDACTED]

RESPONSE:

Please see Gulf's response to OPC's Second Request for Production of Documents No. 32, Attachment No. 1, which are the [REDACTED] underground rates in the format provided by the vendor, and are confidential.

**Gulf's response to
OPC's Second Request for Production of
Documents**

**Request No. 32
Attachment No. 1
Bates Nos. 062454 - 062460**

is confidential in its entirety

EXHIBIT B

REDACTED

**Gulf's response to
OPC's Second Set of Interrogatories**

**Interrogatory No. 47
Attachment No. 1
Bates Nos. 062433 - 062434**

is confidential in its entirety

**Gulf's response to
OPC's Second Set of Interrogatories**

**Interrogatory No. 59
Attachment Nos. 1 - 2
Bates Nos. 062461 - 062490**

is confidential in its entirety

**Gulf's response to
OPC's Second Set of Interrogatories**

**Interrogatory No. 65
Attachment No. 1
Bates Nos. 062491 - 062516**

is confidential in its entirety

1
2
3
4
5
6 QUESTION:

7 Refer to Gulf's response to POD 10 in OPC's First Request for Production of Documents,
8 specifically to invoice binder 100.0 containing copies of invoices from [REDACTED].
9 Refer also to Bates numbered pages 001265-001267 of Gulf's response to POD 6 in OPC's First
10 Request for Production of Documents, which provides the contract rate pages for this vendor, but
11 not the full contracts. The straight time rates matched for 2018 and 2019 for all work invoiced.
12 For some of the crews in October and November 2018, overtime rates were charged while for
13 other crews only straight time rates were charged. Overtime rates were charged for all crews
14 starting in December 2018. Explain why this occurred and why the apparent billing discrepancy
15 is appropriate. In addition, explain why a change in billing occurred starting in 2018 to charge
16 overtime rates for all crews. An example of each type of invoice is referenced below as located
17 in invoice binder 100.0 based on the vendor's invoice numbers.

18 [REDACTED]
19 [REDACTED]

20 RESPONSE:

21 The discrepancies in billing rates among certain invoices produced in binder 100.0 occurred as a
22 result of two distinct situations. First, certain invoices in that binder were billed pursuant to the
23 terms of a contract between [REDACTED]. Because [REDACTED]
24 [REDACTED] and Gulf were both subsidiaries of [REDACTED] at the time Hurricane Michael
25 made landfall, and because [REDACTED] generally performed work for [REDACTED] Gulf
26 allowed those contractors to bill for Hurricane Michael storm restoration work under their pre-
27 negotiated rates with [REDACTED], which differed from Gulf's embedded straight time and
28 overtime rates. The following invoices reflect the rates negotiated between [REDACTED]
29 [REDACTED] 3023, 3025, 3026, 3027, 3028, 3029, 3030, 3049, 3050, 3051, 3052, 3053, 3054,
30 3055, 3089, 3090, 3091, 3092, 3093, 3094, and 3095. The contract between [REDACTED]
31 [REDACTED], which is attached to this response and labeled
32 "OPC2ndINT_ItemNO.75_attachment1_[REDACTED] Contract", is confidential.

33 Second, Gulf has determined that certain other invoices produced in binder 100.0 were
34 incorrectly paid double time. Those invoices are as follows: 3149, 3162, 3163, 3167, 3227,
35 3230, 3229, 3265, 3264, 3266, 3313, 3320, and 3321. The overpayment of these invoices totals
36 [REDACTED], which Gulf plans to remove from the total costs for which it is seeking recovery in
37 this proceeding. Gulf anticipates submitting a revised cost recovery figure, which reflects the
38 removal of the [REDACTED] with its rebuttal testimony.

**Gulf's response to
OPC's Second Set of Interrogatories**

**Interrogatory No. 75
Attachment No. 1
Bates Nos. 062518 - 062590**

is confidential in its entirety

1
2
3
4
5

6
7
8
9
10
11
12
13
14
15
16

QUESTION:

Refer to Gulf's response to POD 10 of OPC's First Request for Production of Documents, specifically to Gulf's response to POD 10 in OPC's First Request for Production of Documents invoice binder 100.0, containing copies of invoices from [REDACTED] Refer also to Bates numbered pages 001265-001267 of Gulf's response to POD 6 in OPC's First Request for Production of Documents, which provides the contract rate pages for this vendor, but not the full contracts. The billing rates on the invoices changed to the 2019 rates per the contract pages starting in December 2018 for all December invoices after the week ending 12/1/2018. Explain why this occurred and specifically why the change before 2019 is appropriate. Two examples of such invoices are referenced below as located in invoice binder 100.0 based on the vendor's invoice numbers.

17
18



19
20

RESPONSE:

Please see Gulf's response to OPC's Second Set of Interrogatories No. 75.

**Gulf's response to
OPC's Second Request for Production of
Documents**

**Request No. 23
Attachment No. 1
Bates Nos. 065068 - 065089**

is confidential in its entirety

**Gulf's response to
OPC's Second Request for Production of
Documents**

**Request No. 24
Attachment Nos. 1 – 8a
Bates Nos. 062592 - 065067**

is confidential in its entirety

**Gulf's response to
OPC's Second Request for Production of
Documents**

**Request No. 26
Attachment No. 1
Bates Nos. 062436 - 062437**

is confidential in its entirety

**Gulf's response to
OPC's Second Request for Production of
Documents**

**Request No. 27
Attachment No. 1
Bates No. 062449**

is confidential in its entirety

**Gulf's response to
OPC's Second Request for Production of
Documents**

**Request No. 29
Attachment No. 1
Bates No. 062435**

is confidential in its entirety

1
2
3
4
5

6 QUESTION:

7 Refer to Gulf's response to POD 10 in OPC's First Request for Production of Documents
8 specifically to binder 17.0 for vendor [REDACTED] and refer also to the contract
9 pages located in Gulf's response to POD 6 of OPC's First Request for Production of Documents
10 related to this same vendor. The contract pages in Gulf's response to POD 6 include the hourly
11 labor and equipment rates for a number of the various crews for the invoices for this vendor
12 included in binder 17.0, but some of the applicable contract rates for labor and the equipment for
13 some crews are not included. Examples of some invoices for various crews contained in binder
14 17.0 are listed below. Provide Bates number and PDF page number reference to the pages
15 containing correctly applicable contract hourly rates listed in the invoices in Gulf's response to
16 POD 6. If Gulf has not already provided these documents, please supplement the response to the
17 First Set of PODs.

18 [REDACTED]
19 [REDACTED]
20 [REDACTED]

21 RESPONSE:

22 The invoices for [REDACTED] include multiple rates which vary depending on the
23 type of work the vendor provided in connection with Hurricane Michael restoration. [REDACTED]
24 [REDACTED] provided different categories of workers (e.g., Embedded vs. Off System
25 crews, Distribution vs. Transmission crews, and Lighting crews), each of which performed a
26 different type and scope of work, with a resulting variation in the rates charged for the different
27 types of work.

28 Please see Gulf's response to OPC's First Request for Production of Documents No. 6, which are
29 confidential. Refer to Bates 000940 – 000995.

**Gulf's response to
OPC's Second Request for Production of
Documents**

**Request No. 31
Attachment No. 1
Bates Nos. 062438 - 062448**

is confidential in its entirety

QUESTION:

Refer to Gulf's response to POD 10 in OPC's First Request for Production of Documents, specifically to invoice binder 94.0 for vendor [REDACTED] and refer also to the contract pages located in Gulf's response to POD 6 in OPC's First Request for Production of Documents related to this same vendor. The contract pages in Gulf's response to POD 6 include the hourly labor and equipment rates for the overhead portion of the distribution services, but are not included in the underground portion. Examples of two invoices contained in binder 94.0 are listed below. Provide Bates number and PDF page number references to the pages containing contract hourly rate amounts listed on the invoices in Gulf's response to POD 6 which show the underground contract rates for the vendor. If not already provided, please supplement the response.

[REDACTED]

RESPONSE:

Please see Gulf's response to OPC's Second Request for Production of Documents No. 32, Attachment No. 1, which are the [REDACTED] underground rates in the format provided by the vendor, and are confidential.

**Gulf's response to
OPC's Second Request for Production of
Documents**

**Request No. 32
Attachment No. 1
Bates Nos. 062454 - 062460**

is confidential in its entirety

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 Second Set of Interrogatories, No. 47, 59, 65, and 75-76; OPC's Second Request for Production of Documents, Nos. 23-24, 26-27, and 29-32
DATE: March 23, 2020

Set	Bates Number Start	Bates Number End	Description	Line No. / Col. No.	Florida Statute 3.66.093(3) Subsection	Declarant
OPC's 2nd Set of Interrogatories No. 47	062433	062434	Asplundh Tree Expert Co – Appendix 6 – Contractor's Proposal for Storm Work	All	(d)	Mitchell Goldstein
OPC's 2nd Set of Interrogatories No. 59	062461	062474	Southern Company – Procurement and Payment Guidelines	All	(e)	Mitchell Goldstein
OPC's 2nd Set of Interrogatories No. 59	062475	062490	NextEra Energy – NEE-ACG-098 – Invoice Approval and Processing Policy and Procedures	All	(e)	Mitchell Goldstein
OPC's 2nd Set of Interrogatories No. 65	062491	062516	On Disc: Holiday Inn Resort Panama City Beach – Guests INH by Group	All	(e)	Mitchell Goldstein
OPC's 2nd Set of Interrogatories No. 75	062517	062517	Response Narrative to OPC's 2nd INT No. 75	Line Nos. 8, 18-19, 23-25, 27-32, 36, and 38	(d)	Mitchell Goldstein
OPC's 2nd Set of Interrogatories No. 75	062518	062590	On Disc: Agreement for Services between Alabama Power Company and Powergrid Services, LLC	All	(d)	Mitchell Goldstein
OPC's 2nd Set of Interrogatories No. 76	062591	062591	Response Narrative to OPC's 2nd INT No. 76	Line Nos. 9 and 17-18	(d, e)	Mitchell Goldstein
OPC's 2nd Request for Production of Documents No. 23	065068	065089	On Disc: Hurricane Michael Incremental Cost and Capitalization Approach Adjustments	All	(e)	Mitchell Goldstein
OPC's 2nd Request for Production of Documents No. 24	062592	062593	On Disc: Oracle and SAP Invoice Log – Attachment No. 1	All	(d)	Mitchell Goldstein
OPC's 2nd Request for Production of Documents No. 24	062594	062673	On Disc: Invoices, Expense Reports, and Receipts – Attachment No. 2	All	(d)	Mitchell Goldstein

OPC's 2nd Request for Production of Documents No. 24	062674	062752	On Disc: Invoices, Expense Reports, and Receipts – Attachment No. 2a	All	(d)	Mitchell Goldstein
OPC's 2nd Request for Production of Documents No. 24	062753	062806	On Disc: Invoices, Expense Reports, and Receipts – Attachment No. 3	All	(d)	Mitchell Goldstein
OPC's 2nd Request for Production of Documents No. 24	062807	062862	On Disc: Invoices, Expense Reports, and Receipts – Attachment No. 3a	All	(d)	Mitchell Goldstein
OPC's 2nd Request for Production of Documents No. 24	062863	063022	On Disc: Invoices, Expense Reports, and Receipts – Attachment No. 4	All	(d)	Mitchell Goldstein
OPC's 2nd Request for Production of Documents No. 24	063023	063181	On Disc: Invoices, Expense Reports, and Receipts – Attachment No. 4a	All	(d)	Mitchell Goldstein
OPC's 2nd Request for Production of Documents No. 24	063182	063353	On Disc: Invoices, Expense Reports, and Receipts – Attachment No. 5	All	(d)	Mitchell Goldstein
OPC's 2nd Request for Production of Documents No. 24	063354	063526	On Disc: Invoices, Expense Reports, and Receipts – Attachment No. 5a	All	(d)	Mitchell Goldstein
OPC's 2nd Request for Production of Documents No. 24	063527	063766	On Disc: Invoices, Expense Reports, and Receipts – Attachment No. 6	All	(d)	Mitchell Goldstein
OPC's 2nd Request for Production of Documents No. 24	063767	064007	On Disc: Invoices, Expense Reports, and Receipts – Attachment No. 6a	All	(d)	Mitchell Goldstein
OPC's 2nd Request for Production of Documents No. 24	064008	064347	On Disc: Invoices, Expense Reports, and Receipts – Attachment No. 7	All	(d)	Mitchell Goldstein
OPC's 2nd Request for Production of Documents No. 24	064348	064687	On Disc: Invoices, Expense Reports, and Receipts – Attachment No. 7a	All	(d)	Mitchell Goldstein
OPC's 2nd Request for Production of Documents No. 24	064688	064877	On Disc: Invoices, Expense Reports, and Receipts – Attachment No. 8	All	(d)	Mitchell Goldstein
OPC's 2nd Request for Production of Documents No. 24	064878	065067	On Disc: Invoices, Expense Reports, and Receipts – Attachment No. 8a	All	(d)	Mitchell Goldstein
OPC's 2nd Request for Production of Documents No. 26	062436	062437	On Disc: 2019 SAP - FERC Account 186 Hurricane Michael Activity	All	(d, e)	Mitchell Goldstein
OPC's 2nd Request for Production of Documents No. 27	062449	062449	B&B Electrical & Utility Contractors Storm Rates 2018	All	(d)	Mitchell Goldstein
OPC's 2nd Request for Production of Documents No. 29	062435	062435	Estimated Daily Cost for Fueling Equipment Personnel	All	(e)	Mitchell Goldstein
OPC's 2nd Request for Production of Documents No. 30	062450	062450	Response Narrative to OPC's 2nd POD No. 30	Line Nos. 8, 18-20, and 22-24	(d)	Mitchell Goldstein

OPC's 2nd Request for Production of Documents No. 31	062438	062448	Contract Rates – Attachment A - SWS Environmental Services	All	(d)	Mitchell Goldstein
OPC's 2nd Request for Production of Documents No. 32	062453	062453	Response Narrative to OPC's 2nd POD No. 32	Line Nos. 8, 17-18 and 21	(d)	Mitchell Goldstein
OPC's 2nd Request for Production of Documents No. 32	062454	062460	On Disc: Pike Electric LLC Underground Rates	All	(d)	Mitchell Goldstein

EXHIBIT D

DECLARATION

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 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: March 26, 2020