



June 1, 2020

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

REDACTED

Re: Docket No. 20200007-EI

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 First Request for Production of Documents (No. 1) to Gulf Power Company.

Sincerely,

S/ Richard Hume

Richard Hume
Regulatory Issues Manager

md

Enclosures

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

COM ___
AFD ___
APA ___
ECO ___
ENG 1 and 1 CD
GCL ___
IDM ___
CLK ___

RECEIVED-FPSC
2020 JUN -2 PM 12: 02
COMMISSION
CLERK

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In Re: Environmental cost recovery clause

Docket No. 20200007-EI

Date: June 2, 2020

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 submitted by Gulf Power in response to Commission Staff’s First Request for Production of Documents to Gulf Power Company (No. 1) in the above-referenced docket. As grounds for this request, the Company states:

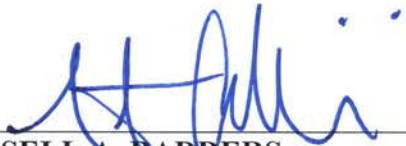
1. The information submitted by Gulf Power in response to Request Number 1 of Commission Staff’s First Request for Production constitutes proprietary confidential business information relating to competitive interests, the disclosure of which would impair the competitive business of the provider of the information. The information is entitled to confidential classification pursuant to section 366.093(3)(e), Florida Statutes. The information consists of pricing for services performed by a third party vendor. This pricing is the product of a competitive Request for Proposals that was issued to multiple third party vendors which were capable of performing the designated scope of work and are in direct competition with one another for such work. Disclosure of the subject pricing would enable all parties to the Request for Proposals to discern the pricing for the winning proposal and would place the winning vendor at a competitive disadvantage when bidding on similar projects in the future.

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 been otherwise publicly disclosed.

3. Submitted as Exhibit "A" are copies of the subject documents in un-redacted form. Exhibit "A" should be treated as confidential pending a ruling on this request. Attached as Exhibit "B" are two copies of Exhibit "A" in redacted form which may be made available for public inspection. Attached as Exhibit "C" to this request is a line-by-line justification for the request for confidential classification.

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

Respectfully submitted this 1st day of June, 2020.



RUSSELL A. BADDERS
Vice President & Associate General Counsel
Florida Bar No. 007455
Russell.Badders@nexteraenergy.com
Gulf Power Company
One Energy Place
Pensacola, FL 32520-0100
(850) 444-6550

STEVEN R. GRIFFIN
Florida Bar No. 0627569
Beggs & Lane
P. O. Box 12950
Pensacola, FL 32591
(850) 432-2451
Attorneys for Gulf Power Company

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In Re: Environmental cost recovery clause

Docket No. 20200007-EI

Date: June 2, 2020

REQUEST FOR CONFIDENTIAL CLASSIFICATION

EXHIBIT "A"

Provided to the Commission Clerk
under separate cover as confidential information

EXHIBIT "B"



P.O. BOX 65068
 SALT LAKE CITY, UTAH 84165-0068
 Tel: (801) 265-1000
 Fax: 801-265-1080
 ar@westech-inc.com

Invoice No.: 72847
Invoice Date: 06/26/19
Customer P.O. No.: 2000294189
Customer Job No.:
Job ID: 23347A -
Job Name: SOUTHERN COMPANY
Customer Account No.: GUL006
Payment Terms: NET 30 DAYS

INVOICE

Bill to: GULF POWER COMPANY
 GULF-PROCURE-TO-
 PAY.SharedMailbox@nexteraenergy.co
 11999 PATE STREET
 PENSACOLA, FL 32514
 UNITED STATES OF AMERICA

Ship to: SCHOLZ PLANT MATERIALS
 SCHOLZ PLANT MATERIALS
 1460 GULF POWER ROAD
 SNEADS, FL 32460
 UNITED STATES OF AMERICA

PUR0

Qty	Item No.	Description	Unit Price	Net Amount
-----	----------	-------------	------------	------------

PO NUMBER 2000294189

1

[REDACTED] FOR SERVICES - MAY 2019 [REDACTED] [REDACTED]

FL-SALES TAX EXEMPTION ON FILE

VIA WIRE TRANSFER
 WESTECH ENGINEERING, INC
 C/O WELLS FARGO BANK
 SALT LAKE CITY, UTAH 84111

[REDACTED]

Subtotal: [REDACTED]

Taxes:

[REDACTED] \$99,461.00

All accounts not paid after invoice due date will be charged a finance charge of 1 1/2% per month which is an annual rate of 18%.
 Customer agrees to pay all cost and expenses, including reasonable attorney's fees and court cost incurred in case of default in compliance with terms.
 Any invoices paid by credit card will be charged a credit card processing fee up to the allowable limit, where state law allows.



P.O. BOX 65068
 SALT LAKE CITY, UTAH 84165-0068
 Tel: (801) 265-1000
 Fax: 801-265-1080
 ar@westech-inc.com

Invoice No.: 72849
Invoice Date: 06/26/19
Customer P.O. No.: 2000294189
Customer Job No.:
Job ID: 23347A -
Job Name: SOUTHERN COMPANY
Customer Account No.: GUL006
Payment Terms: NET 30 DAYS

INVOICE

Bill to: GULF POWER COMPANY
 GULF-PROCURE-TO-
 PAY.SharedMailbox@nexteraenergy.co
 11999 PATE STREET
 PENSACOLA, FL 32514
 UNITED STATES OF AMERICA

Ship to: SCHOLZ PLANT MATERIALS
 SCHOLZ PLANT MATERIALS
 1460 GULF POWER ROAD
 SNEADS, FL 32460
 UNITED STATES OF AMERICA

PUR0

Qty	Item No.	Description	Unit Price	Net Amount
		PO NUMBER 2000294189		
1		[REDACTED] FOR SERVICES - JUNE 2019	[REDACTED]	[REDACTED]

FL-SALES TAX EXEMPTION ON FILE

VIA WIRE TRANSFER WESTECH ENGINEERING, INC C/O WELLS FARGO BANK SALT LAKE CITY, UTAH 84111	[REDACTED]	Subtotal: [REDACTED]
		Taxes:
		[REDACTED] \$99,461.00

All accounts not paid after invoice due date will be charged a finance charge of 1 1/2% per month which is an annual rate of 18%.
 Customer agrees to pay all cost and expenses, including reasonable attorney's fees and court cost incurred in case of default in compliance with terms.
 Any invoices paid by credit card will be charged a credit card processing fee up to the allowable limit, where state law allows.

EXHIBIT "C"

Line-by-Line/Field-by-Field Justification

Line(s)/Field(s)

Justification

Response to Request # 1

Pages 20200007-Staff –POD–1-5 of 6 and
20200007-Staff-POD-1-6 of 6
as highlighted.

This information is entitled to confidential classification pursuant to §366.093(3)(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: **Environmental Cost**)
Recovery Clause)

Docket No.: 20200007-EI

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true copy of the foregoing was furnished by overnight mail this 1st day of June, 2020 to the following:

Ausley Law Firm
James D. Beasley
J. Jeffrey Wahlen
Malcolm N. Means
Post Office Box 391
Tallahassee, FL 32302
jbeasley@ausley.com
jwahlen@ausley.com
mmeans@ausley.com

PCS Phosphate – White Springs
c/o Stone Mattheis Xenopoulos
& Brew, P.C.
James W. Brew/Laura Baker
Eighth Floor, West Tower
1025 Thomas Jefferson St, NW
Washington, DC 20007
jbrew@smxblaw.com
lwb@smxblaw.com

Florida Power & Light Company
Kenneth Hoffman
134 West Jefferson Street
Tallahassee, FL 32301
Kenneth.Hoffman@fpl.com

Florida Industrial Power Users Group
c/o Moyle Law Firm
Jon C. Moyle, Jr.
118 North Gadsden Street
Tallahassee, FL 32301
jmoyle@moylelaw.com
mqualls@moylelaw.com

Florida Power & Light Company
Maria J. Moncada
David Lee
700 Universe Boulevard
Juno Beach, FL 33408-0420
Maria.moncada@fpl.com
David.lee@fpl.com

Office of the General Counsel
Charles Murphy
2540 Shumard Oak Blvd
Tallahassee, FL 32399-0850
cmurphy@psc.state.fl.us

Office of Public Counsel
J. Kelly/C. Rehwinkel/P. Christensen
T. David
c/o The Florida Legislature
111 W. Madison Street, Room 812
Tallahassee, FL 32399-1400
Christensen.patty@leg.state.fl.us
KELLY.JR@leg.state.fl.us
David.tad@leg.state.fl.us

Duke Energy Florida, Inc.
Matthew R. Bernier
106 East College Avenue, Suite 800
Tallahassee, FL 32301
Matthew.bernier@duke-energy.com
FLRegulatoryLegal@duke-energy.com

Duke Energy Florida, Inc.
Dianne M. Triplett
299 First Avenue North
St. Petersburg, FL 33701
Dianne.triplett@duke-energy.com

Tampa Electric Company
Ms. Paula K. Brown, Manager
Regulatory Coordination
P. O. Box 111
Tampa, FL 33601-0111
Regdept@tecoenergy.com



RUSSELL A. BADDERS
VP & Associate General Counsel
Florida Bar No. 007455
Russell.Badders@nexteraenergy.com
Gulf Power Company
One Energy Place
Pensacola FL 32520-0100
(850) 444-6550

STEVEN R. GRIFFIN
Florida Bar No. 0627569
srg@beggslane.com
Beggs & Lane
P. O. Box 12950
Pensacola FL 32591-2950
(850) 432-2451
Attorneys for Gulf Power