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July 1, 2020

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

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RECEIVED-FPSC
2020 JUL -2 AM 10:35
FPL/FPSC

Re: Docket No. 20200070-EI
Gulf Power Company's Request for Confidential Classification

Dear Mr. Teitzman:

I enclose for filing in the above-referenced docket Gulf Power Company's ("Gulf") Request for Confidential Classification ("RFCC") of Information Provided in Response to the Office of Public Counsel's ("OPC") First Request for Production of Documents (No. 1), Second Request for Production of Documents (No. 18.), Fourth Set of Interrogatories (No. 171), and Fourth Request for Production of Documents (Nos. 56, 58, 61, and 62). The enclosed filing includes Exhibits A, B, C and D.

Exhibit A consists of the confidential documents, some of which are on 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 versions of Gulf's responses to OPC's discovery requests. Exhibit C is a justification table in support of Gulf's RFCC. Exhibit D consists of two declarations in support of Gulf's filing.

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

Sincerely,

/s/ Jason A. Higginbotham
Jason A. Higginbotham

APA _____

ECO _____

ENG 1 Exh B

GCL _____ Enclosure

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

CLK _____

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Review of 2020-2029 Storm Protection
Plan pursuant to Rule 25-6.030, F.A.C., Gulf
Power Company.

Docket No: 20200070-EI

Date: July 2, 2020

**GULF POWER COMPANY’S REQUEST
FOR CONFIDENTIAL CLASSIFICATION OF INFORMATION
PROVIDED IN RESPONSE TO THE OFFICE OF PUBLIC COUNSEL’S FIRST
REQUEST FOR PRODUCTION OF DOCUMENTS (NO. 1), SECOND REQUEST FOR
PRODUCTION OF DOCUMENTS (No.18), FOURTH REQUEST FOR PRODUCTION
OF DOCUMENTS (NOS. 56, 58, 61 AND 62), AND FOURTH SET OF
INTERROGATORIES (NO. 171)**

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 Request for Production of Documents (No. 1), Second Request for Production of Documents (No.18), Fourth Request for Production of Documents (Nos. 56, 58, 61 and 62), and Fourth Set of Interrogatories (No. 171) (collectively, the “Confidential Documents”) that has been requested by the Florida Public Service Commission’s (“Commission”) Staff (“Staff”). In support of this Request, Gulf states as follows:

1. Gulf previously produced the Confidential Documents requested by Staff in response to discovery propounded by OPC in this case and designated the documents as confidential. This Request is being filed in order to request confidential classification of certain information contained in the Confidential Documents, 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 a copy of the Confidential Documents on which all information that Gulf asserts is entitled to confidential treatment is highlighted.

- b. Exhibit B consists of an edited version of the Confidential Documents on which all information that Gulf asserts is entitled to confidential treatment is redacted.
- c. Exhibit C is a table that identifies the information highlighted in Exhibit A and references the specific statutory basis for the claim of confidentiality and identifies the Declarant who supports the requested classification.
- d. Exhibit D consists of the declarations of Elizabeth Fuentes and Paul Talley in support of this Request.

3. Gulf submits that the highlighted 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, the confidential business information includes: proprietary information, internal auditing controls and reports of internal auditors, and trade secrets; information relating to bids or other contractual data, the disclosure of which would impair the efforts of the public utility or its affiliates to contract for goods or services on favorable terms; and information relating to competitive interests, the disclosure of which would impair the competitive business of the provider of the information. This information is protected by Sections 366.093(3)(a), (b), (d) and (e), 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 Section 366.093(4), F.S.

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 1st day of July 2020

Russell A. Badders
Vice President & Associate General Counsel
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Jason.Higginbotham@fpl.com

By: s/ Jason A. Higginbotham
Jason A. Higginbotham
Attorney for Gulf Power Company
Florida Auth. House Counsel No. 1017875

CERTIFICATE OF SERVICE
Docket No. 20200070-EI

I HEREBY CERTIFY that a true and correct copy of the foregoing has been furnished by electronic service on this 1st day of July 2020 to the following:

Charles Murphy, Esquire Rachael Dziechciarz, Esquire Florida Public Service Commission 2540 Shumard Oak Boulevard Tallahassee, FL 32399 rdziehc@psc.state.fl.us cmurphy@psc.state.fl.us	Office of Public Counsel J.R. Kelly Thomas A. (TAD) David c/o The Florida Legislature 111 West Madison Street, Room 812 Tallahassee, FL 32399-1400 kelly.jr@leg.state.fl.us christensen.patty@leg.state.fl.us
Stephanie U. Eaton Spilman Thomas & Battle, PLLC 110 Oakwood Drive, Suite 500 Winston-Salem, NC 27103 seaton@spilmanlaw.com	Derrick Price Williamson Spilman Thomas & Battle, PLLC 1100 Bent Creek Boulevard, Suite 101 Mechanicsburg, PA 17050 dwilliamson@spilmanlaw.com

By: s/ Jason A. Higginbotham
Jason A. Higginbotham
Attorney for Gulf Power Company
Fla. Auth. House Counsel No. 1017875
Florida Power & Light Company
700 Universe Boulevard (JB/LAW)
Juno Beach, Florida 33408

Exhibit A

Exhibit B

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

**Interrogatory No. 171
Attachment Nos. 1 - 2
Bates No. 000196 - 000197**

is confidential in its entirety

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

**Request No. 1
Bates No. 000015 - 000036**

is confidential in its entirety

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

**Request No. 18
Bates No. 000103**

is confidential in its entirety

**FPL's response to
OPC's Fourth Request for Production of
Documents**

**Request No. 56
Bates No. 000223 – 000240**

is confidential in its entirety

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

**Request No. 58
Bates No. 000256 - 000265**

is confidential in its entirety

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

**Request No. 61
Bates No. 000267 - 000269**

is confidential in its entirety

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

**Request No. 62
Bates No. 000270**

is confidential in its entirety

EXHIBIT C

COMPANY: Gulf Power Company
TITLE: List of Confidential Documents
DOCKET NO.: 20200070-EI
DOCKET TITLE: Review of 2020-2029 Storm Protection Plan pursuant to Rule 25-6.030, F.A.C., Gulf Power Company
SUBJECT: Gulf's Responses to OPC's First Request for Production of Documents, No. 1; OPC's Second Request for Production of Documents, No. 18; OPC's Fourth Set of Interrogatories No. 171; and OPC's Fourth Request for Production of Documents, Nos. 56, 58, and 61 - 62
DATE: July 2, 2020

Set	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. 1	000015	000036	Sarbanes-Oxley (SOX) Narratives	All	(b)	Elizabeth Fuentes
OPC's 2nd Request for Production of Documents No. 18	000103	000103	Gulf Power – YTD 2019 Corporate Indicator Performance	All	(a) (e)	Paul Talley
OPC's 2nd Request for Production of Documents No. 18	000104	000104	Gulf Power – YTD 2020 Corporate Indicator Performance	All	(a) (e)	Paul Talley
OPC's 4th Set of Interrogatories No. 171, Attachment No. 1	000196	000196	2015 – 2019 SAIDI / SAIFI	All	(a)	Paul Talley
OPC's 4th Set of Interrogatories No. 171, Attachment No. 2	000197	000197	Substation / Feeder / CIF	All	(a) (e)	Paul Talley
OPC's 4th Request for Production of Documents No. 56	000223	000226	Osmoste Utilities Services, INC. - 2019 Pole Inspection and Treatment Pricing Proposal	All	(d)	Paul Talley
OPC's 4th Request for Production of Documents No. 56	000227	000240	Gulf's Purchase Contract - Osmoste Utilities Services, INC.	All	(d)	Paul Talley
OPC's 4th Request for Production of Documents No. 58	000256	000258	Distribution Feeder SOW	All	(d)	Paul Talley
OPC's 4th Request for Production of Documents No. 58	000259	000261	Distribution Feeder SOW	All	(d)	Paul Talley

OPC's 4th Request for Production of Documents No. 58	000262	000265	Gulf's Purchase Contract - Osmose Utilities Services, INC	All	(d)	Paul Talley
OPC's 4th Request for Production of Documents No. 61	000267	000269	Bank Resiliency Priority - Guideline for Improving Substation Resiliency	All	(a) (e)	Paul Talley
OPC's 4th Request for Production of Documents No. 62	000270	000270	Storm Hardening Feeder List	All	(a) (e)	Paul Talley

EXHIBIT D

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Review of 2020-2029 Storm
Protection Plan pursuant to Rule 25-6.030,
F.A.C., Gulf Power Company

Docket No: 20200070-EI

DECLARATION OF ELIZABETH M. FUENTES

1. My name is Elizabeth Fuentes. I am currently employed by Florida Power & Light Company as Senior Director of Regulatory Accounting . I have personal knowledge of the matters stated in this declaration.

2. I have reviewed the documents and information included in Exhibit A to Gulf Power Company's ("Gulf") Request for Confidential Classification, for which I am listed as the declarant on Exhibit C. The documents that I have reviewed and which are asserted by Gulf to be proprietary confidential business information contain proprietary information, internal auditing controls and reports of internal auditors, and trade secrets. 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.



Elizabeth M. Fuentes

Date: July 2, 2020

EXHIBIT D

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Review of 2020-2029 Storm
Protection Plan pursuant to Rule 25-6.030,
F.A.C., Gulf Power Company

Docket No: 20200070-EI

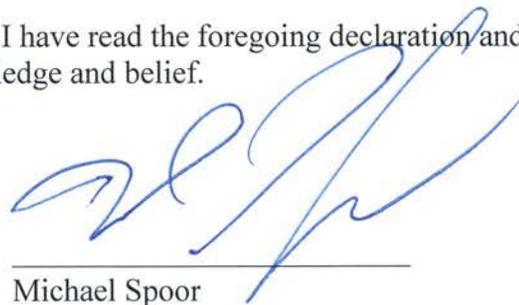
DECLARATION OF MICHAEL SPOOR

1. My name is Michael Spoor. I am currently employed by Gulf Power Company (“Gulf”) as Vice President of Power Delivery. I have personal knowledge of the matters stated in this declaration.

2. I have reviewed the documents and information included in Exhibit A to Gulf’s Request for Confidential Classification, for which I am listed as the 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 information concerning competitive interests. Specifically, the information constitutes information concerning trade secrets, competitive interests and bids or other contractual data, the disclosure of which would impair the efforts of Gulf to contract for goods or services on favorable terms. 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.



Michael Spoor
Date: July 2, 2020