



August 27, 2020

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

RE: Docket No. 20190044-EI

Dear Mr. Teitzman:

Attached for filing is Gulf Power Company's Request for Extended Confidential Classification for the Earnings Surveillance Report, Supplemental 2 for December 2018.

Sincerely,

*S/Richard Hume*

Richard Hume  
Regulatory Issues Manager

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Attachments

cc : Gulf Power Company  
Russell Badders, Esq., VP & Associate General Counsel  
Florida Public Service Commission  
Andrew Maurey

**BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION**

In re: Gulf Power Company Earnings  
Surveillance Report Supplemental Filing for  
December 2018

Docket No.: 20190044-EI

Date: August 27, 2020

**GULF POWER COMPANY'S REQUEST FOR EXTENDED CONFIDENTIAL  
CLASSIFICATION OF INFORMATION**

Gulf Power Company ("Gulf"), pursuant to Rule 25-22.006, Florida Administrative Code ("F.A.C.") and Section 366.093, Florida Statutes ("F.S."), hereby requests an extension of confidential classification by the Florida Public Service Commission ("Commission") of certain information contained within the December 2017 supplements for Gulf Power Company's Earnings Surveillance Report which were submitted to the Commission pursuant to Order Nos. PSC-96-1219-FOF-EI, PSC-01-0390-TRF-EI, and PSC-14-0197-PAA-EI (collectively the "CISR Surveillance Filings"). In support of this Request, Gulf states as follows:

1. On February 15, 2019, Gulf filed a request for confidential classification of certain information contained within the CISR Surveillance Filings. *See* Document No. 00997-2019. On February 28, 2019, the Commission entered Order No. PSC-2019-0084-CFO-EI granting Gulf's request for confidential classification. Under that Order, the confidential classification of the CISR Surveillance Filings expires on August 28, 2020.

2. This request is being filed in order to request an extension of the confidential classification previously approved by the Commission in Order No. PSC-2019-0084-CFO-EI of the CISR Surveillance Filings, consistent with Rule 25-22.006, F.A.C. The information subject to Gulf's request is attached hereto as Exhibit "A".

3. Gulf submits that the information contained attached as Exhibit "A" to this filing is entitled to continued confidential classification for the same reasons that it was initially classified as such. As stated in Gulf's original request, the public disclosure of information contained in the

CISR Surveillance Filings would cause irreparable harm to Gulf and the entities with which it has entered Contract Service Arrangement ("CSA") contracts under the authority of Gulf's Commercial/Industrial Service Rider, many or all of which contracts are still in force. The CISR Surveillance Filings contain proprietary confidential business information regarding pricing under the CSAs. Public disclosure of this information would impair the ability of Gulf to negotiate terms and conditions in future CSAs that are the most favorable to Gulf and its general body of customers. Moreover, the public disclosure of this information may prevent Gulf from successfully negotiating CSA's with customers. The information is regarded as sensitive and confidential by the CISR customers because its public disclosure would impact the customers' ability to compete in their native markets. In the event such information is made public, future potential CISR customers may avoid the risk of public disclosure of their confidential information by refusing to negotiate with Gulf. This may lead to uneconomic bypass of Gulf's facilities. This information is therefore confidential pursuant to section 366.093(3)(d)-(e), F.S.

4. The information which is the subject of this request is intended to be, and is treated as, confidential by Gulf Power and has not been otherwise publicly disclosed.

5. Upon a finding by the Commission that the confidential information contained in the CISR Surveillance Filings 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, Gulf Power Company respectfully requests that the Commission grant Gulf's Request for Extended Confidential Classification and enter an order extending the confidential classification and protecting from public disclosure the information attached hereto as Exhibit "A".

Respectfully submitted this 27<sup>th</sup> day of August, 2020.

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By: *s/ Jason A. Higginbotham*  
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