



October 13, 2020

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

RE: Docket No. 20160186-EI

Dear Mr. Teitzman:

Attached for official filing is Gulf Power Company's Request for Extended Confidential Classification regarding certain information submitted by Gulf Power in connection with Commission Staff's audit in the above-referenced docket (ACN16-295-1-1).

Sincerely,

S/Richard Hume

Richard Hume
Regulatory Issues Manager

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Attachments

cc: Gulf Power Company
Russell A. Badders, Esq., VP & Associate General Counsel
Beggs & Lane
Gunster Law Firm
Charles A. Guyton, Esq.
Richard A. Melson, Esq.

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In Re: Petition for Rate Increase by Gulf Power
Company

Docket No. 20160186-EI
Filed: October 13, 2020

REQUEST FOR EXTENDED CONFIDENTIAL CLASSIFICATION

Gulf Power Company (“Gulf Power,” “Gulf,” or “the Company”), pursuant to section 366.093, Florida Statutes, and Rule 25-22.006, Florida Administrative Code, hereby requests extended confidential classification of certain documents and information produced in connection with the Florida Public Service Commission (“Commission”) Staff’s audit of Gulf Power’s request for an increase in rates in the above-referenced matter (ACN 16-295-l-1) (the “Confidential Information”). As grounds for this request, the Company states:

1. On January 27, 2017, Gulf Power filed its initial Request for Confidential Classification of the Confidential Information. (Document No. 00986-2017)

2. On March 2, 2017, the Commission entered Order No. PSC-2017-0082-CFO-EI granting Gulf Power’s request.

3. On September 6, 2018, Gulf Power filed its first Request for Extended Confidential Classification of the Confidential Information. (Document No. 05821-2018)

4. On April 11, 2019, the Commission entered Order No. PSC-2019-0126-CFO-EI granting Gulf Power’s request.

5. As provided in section 366.093(4), Florida Statutes, and by the Commission’s order, the Confidential Information will be made public after a period of eighteen months unless Gulf or another affected party shows, and the Commission finds, that the confidential documents

continue to contain proprietary confidential business information. The eighteen-month extension period expires on October 12, 2020.

6. Gulf Power hereby requests that the Commission enter an order extending the confidential classification of the Confidential Information identified in Gulfs initial Request for Confidential Classification for an additional eighteen-month period.

7. The Confidential Information is entitled to continued confidential classification for the same reasons that it was initially classified. As stated in Gulfs initial request, the Confidential Information is entitled to confidential classification pursuant to section 366.093(3)(d) and (e), Florida Statutes, as information, the public disclosure of which could cause irreparable harm to the competitive interests of Gulf Power and the ability of the Company to enter into contracts on terms favorable to it and its customers. Specifically, the Confidential Information is broken down into two categories: (i) capacity revenues received under unit power sales agreements; and (ii) internal Management Procedures.

8. The capacity revenues are regarded by both Gulf and the counterparties as confidential. Disclosure of this information could enable third parties to back calculate contractual pricing terms which are specific to the individual contracts and are not publicly known. Disclosure of this information would negatively impact Gulf Power's ability to negotiate payment terms favorable to its customers in future power purchase agreements. In addition, potential counterparties may refuse to enter into contracts with Gulf, or may charge higher prices, if such pricing information was publicly disclosed. This information is entitled to confidential classification pursuant to section 366.093(3)(d)-(e), Florida Statutes.

9. The Management Procedures are considered proprietary by Gulf Power and have been carefully developed and revised over time based on Gulf's own expertise, resources and experience. Public disclosure of this information would provide other market participants with access to Gulf's work product, enabling them to optimize their own systems and procedures at the Company's expense. This information is entitled to confidential classification pursuant to section 366.093(3)(e), Florida Statutes.

10. 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.

WHEREFORE, Gulf Power Company respectfully requests that the Commission enter an order protecting from public disclosure the Confidential Information identified in Gulf's initial request for an additional eighteen-month period.

Respectfully submitted this 13th day of October, 2020.

s/ Russell A. Badders

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BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

IN RE: Petition for Increase in Rates)
By Gulf Power Company)
IN RE: Petition for approval of 2016 depreciation and)
dismantlement studies, approval of proposed)
depreciation rates and annual dismantlement)
accruals and Plant Smith Units 1 and 2 regulatory)
asset amortization, by Gulf Power Company)

Docket No.: 20160186-EI

Docket No.: 20160170-EI

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true copy of the foregoing has been furnished by electronic mail this 13th day of October, 2020 to the following:

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