



October 23, 2020

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

RE: Docket No. 20200001-EI

Dear Mr. Teitzman:

Attached 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 (ACN17-023-1-1). Also attached is Gulf's Request for Extended Confidential Classification in Microsoft Word.

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

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Fuel and purchased power cost
recovery clause and generating performance
incentive factor

Docket No.: 20200001-EI

Date: October 23, 2020

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

Gulf Power Company (“Gulf”), pursuant to Rule 25-22.006, Florida Administrative Code (“F.A.C.”) and Section 366.96, Florida Statutes (“F.S.”), hereby requests an extension of confidential classification by the Florida Public Service Commission (“Commission”) of certain information contained in documents showing Gulf’s 2016 fuel and purchased power expenditures (“2016 Fuel and Purchased Power Expenditures”), which Gulf previously produced to the Commission Staff (“Staff”) in Docket No. 170001-EI in connection with Staff’s Audit Control No. 2017-023-1-1. In support of this request, Gulf states as follows:

1. On June 1, 2017, in Docket No. 170001-EI, Gulf filed a request for confidential classification of certain information contained within the 2016 Fuel and Purchased Power Expenditures. *See* Document No. 05145-2017. On June 29, 2017, the Commission issued Order No. PSC-17-0252-CFO-EI granting Gulf’s request for confidential classification.

2. On December 20, 2018, in Docket No. 20180001-EI, Gulf filed its first request for extension of confidential classification of the 2016 Fuel and Purchased Power Expenditures. *See* Document No. 07605-2018. On April 24, 2019, the Commission issued Order No. PSC-2019-0148-CFO-EI granting Gulf’s request for extended confidential classification.

3. Under the April 24, 2019 Order, the confidential classification of the Fuel and Purchased Power Expenditures is set to expire on October 24, 2020. This request is being filed to request a second extension of the confidential classification previously approved by the Commission.

4. The information contained in the 2016 Fuel and Purchased Power Expenditures is entitled to continued confidential classification for the same reasons that it was initially classified. Specifically, the documents contain information that constitutes proprietary confidential business information concerning bids and other contractual data, the disclosure of which would impair the efforts of Gulf to contract for goods and services on favorable terms. Additionally, the documents include pricing data for negotiated purchase power agreements, coal, oil and natural gas transportation/storage. Contracts forming the basis for this pricing data are still in effect. This information is regarded by both Gulf and the counterparties as confidential. Disclosure of this information would negatively impact Gulf's ability to negotiate pricing favorable to its customers in future contracts. In addition, potential counterparties may refuse to enter into contracts with Gulf, or may charge higher prices, if the price terms were made public. The documents also include a listing of internal audits performed by Gulf and affiliated companies during 2016. Public disclosure of this information would reveal specific areas of focus for internal controls, compliance and security monitoring. The information subject to this request is intended to be, and is treated as, confidential by Gulf and has not been otherwise publicly disclosed. Therefore, it is entitled to confidential classification pursuant to section 366.093(3)(d) and (e), F.S.

5. Upon a finding by the Commission that the confidential information contained in the Fuel and Purchased Power Expenditures 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 identified herein.

Respectfully submitted this 23rd day of October 2020.

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By: s/ Jason A. Higginbotham
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BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

IN RE: **Fuel and Purchased Power Cost**)
Recovery Clause with Generating)
Performance Incentive Factor)

Docket No.: **20200001-EI**

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true copy of the foregoing was furnished by electronic mail this 23rd day of October, 2020 to the following:

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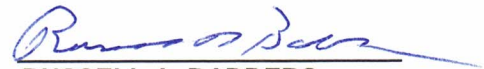
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