

One Energy Place
Pensacola, Florida 32520

850 444.6111



December 21, 2000

Ms. Blanca S. Bayo, Director
Division of Records and Reporting
Florida Public Service Commission
2540 Shumard Oak Boulevard
Tallahassee FL 32399-0870

Dear Ms. Bayo:

RE: Docket No. 001217-EI

Enclosed are an original and fifteen copies of Gulf Power Company's Notice of Intent to Request Confidential Classification for responses to Staff's Data Request dated November 13, 2000, to be filed in the above docket.

Sincerely,

A handwritten signature in cursive script that reads "Susan D. Ritenour".

Susan D. Ritenour
Assistant Secretary and Assistant Treasurer

lw

Enclosures

cc: Beggs and Lane
J. A. Stone, Esquire
Florida Public Service Commission
Elisabeth Draper

DOCUMENT NUMBER-DATE

16348 DEC 22 8

FPSC-RECORDS/REPORTING

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

IN RE: Petition for authority to modify)
Commercial/Industrial Service Rider Pilot)
Study by Gulf Power Company)
_____)

Docket No. 001217-EI
Date Filed: December 22, 2000

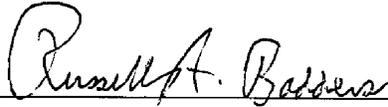
NOTICE OF INTENT TO REQUEST CONFIDENTIAL CLASSIFICATION

GULF POWER COMPANY ["Gulf Power", "Gulf", or "the Company"], by and through its undersigned attorney and pursuant to Rule 25-22.006, Florida Administrative Code, hereby gives notice that it intends to request confidential classification for responses to data request numbered 1 through 5 of Commission Staff's Informal Data Request to Gulf Power Company (Nos. 1-6). A copy of the informal data request attached hereto as exhibit "A".

The information requested is entitled to confidential classification pursuant to Section 366.093(3)(a), (d) and (e). The Company's responses to the staff information request contains proprietary confidential business information regarding contractual matters which would cause irreparable harm to Gulf Power Company and the entities with whom it has entered into contracts if such information is disclosed to the general public. In addition, the responses contain sensitive business and trade secret information relating to the competitive interests of the entity with whom Gulf has contracted. The information for which confidential classification is sought is intended to be and is treated by Gulf Power Company and the entities with whom it has or intends to contract with as private. A formal request for confidential classification will be filed within the time period specified in Rule 25-22.006(3)(a), Florida Administrative Code, if the Staff determines that the information will be retained by the Commission and not returned to the Companies within the specified time period. In the event the Staff determines that it will retain this information, the Company requests to be notified, through the undersigned counsel, prior to the expiration of the

period specified in Rule 25-22.006(3)(a).

Respectfully submitted this 21st day of December 2000,



JEFFREY A. STONE

Florida Bar No. 325953

RUSSELL A. BADDERS

Florida Bar No. 007455

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Attorneys for Gulf Power Company

Staff's Data Request
Docket No. 001217-EI
GULF POWER COMPANY
December 20, 2000
Item No. 1
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This data request addresses Gulf Power Company's two executed Contract Service Agreements (CSAs) under Gulf Power Company's Commercial/Industrial Service Rider (CISR). For the purpose of this data request, Gulf Power Company's first executed CSA is referred to as CSA-1 and its second executed CSA is referred to as CSA-2.

- 1. Please provide all documents and analyses upon which Gulf relied to determine that the load attributed to its CSA-1 and CSA-2 customers was "at risk" of not being served by Gulf.**

Answer

Provided pursuant to Notice of Intent to Request Confidentiality.

- 2. Please provide separate incremental cost calculations for CSA-1 and CSA-2. For purposes of this data request, incremental costs are defined as those costs incurred to serve load which, but for the application of CISR rates, would not be served by Gulf. Please show all incremental cost components separately.**

Answer

Provided pursuant to Notice of Intent to Request Confidentiality.

- 3. Please demonstrate that the incremental revenues received through CSA-1 are greater than the incremental costs incurred by Gulf to provide service under CSA-1. Similarly, please demonstrate that the incremental revenues received through CSA-2 are greater than the incremental costs incurred by Gulf to provide service under CSA-2. Show cost recovery clause revenues separately.**

Answer

Provided pursuant to Notice of Intent to Request Confidentiality.

4. Please indicate if CSA-1 and/or CSA-2 contains a provision for interruptible service. If so, please respond to the following:
- a. Please explain how Gulf calculates the benefits derived from the interruptible provision and provide a calculation using actual data for the most recently available month.
 - b. Please explain the conditions under which Gulf would interrupt service under CSA-1 and/or CSA-2.
 - c. Please indicate whether Gulf has interrupted service under CSA-1 and/or CSA-2. If so, please indicate when service was interrupted, the duration of the interruption, and explain why it was interrupted.
 - d. Please indicate whether Southern Company recognizes the existence of the interruptible load under CSA-1 and/or CSA-2 for purposes of the IIC.

Answer

Provided pursuant to Notice of Intent to Request Confidentiality.

5. Please indicate whether CSA-1 and CSA-2 are in the same industry and/or in the same SIC code.

Answer

Provided pursuant to Notice of Intent to Request Confidentiality.

Staff's Data Request
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6. Please indicate for the period from September 3, 1996 to date whether Gulf has received a request for CISR rates from a customer that is in the same SIC code as either CSA-1 or CSA-2. If yes, please describe the request and if the request was rejected, please explain why it was rejected. If the request is pending, please describe the status of the negotiations.

Answer

Gulf Power Company has not received a request for a CISR rate from a customer in the same SIC code of either CSA-1 or CSA-2.