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11 JUL -8 AM 10:41

COMMISSION
CLERK



July 8, 2011

Ms. Ann Cole, Commission Clerk
Florida Public Service Commission
2540 Shumard Oak Boulevard
Tallahassee FL 32399-0850

claim of confidentiality
 notice of intent
 request for confidentiality
 filed by OPC

For DN 04723-11, which
is in locked storage. You must be
authorized to view this DN.-CLK

Dear Ms. Cole:

RE: Docket No. ~~110138-ET~~ ^{110138-ET}
-RM

Enclosed is an original and seven copies of Gulf Power Company's Request for Confidential Classification pertaining to certain portions of Minimum Filing Requirement ("MFR") Schedule D-2 filed in connection with Gulf's Petition for Rate Increase. Also included is a CD-ROM of Gulf Power's Request for Confidential Classification and Exhibit C in Microsoft Word format as prepared on a Windows XP operating system.

Sincerely,

Susan D. Ritenour

nbn

COM Enclosures

APA 1

ECR 3 cc: 3

GCL 1

RAD 1

SSC 1

ADM 1

OPC 1

CLK 1

Beggs & Lane
Jeffrey A. Stone, Esq.
containing request and exhibit C.

DOCUMENT NUMBER-DATE

04722 JUL -8 =

FPSC-COMMISSION CLERK

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In Re: Petition for increase in rates
by Gulf Power Company

Docket No.: 110138-EI
Date: July 8, 2011

REQUEST FOR CONFIDENTIAL CLASSIFICATION

GULF POWER COMPANY ["Gulf Power", "Gulf", or the "Company"], by and through its undersigned attorneys and pursuant to Rule 25-22.006, Florida Administrative Code, hereby requests that the Florida Public Service Commission enter an order protecting from public disclosure certain portions of Minimum Filing Requirement ("MFR") Schedule D-2 filed in connection with Gulf's Petition for Rate Increase. As grounds for this request, the Company states:

1. On July 8, 2011, Gulf filed its Petition for Rate Increase along with the prefiled direct testimony of its witnesses and the requisite MFRs.

2. MFR Schedule D-2 contains confidential information. The confidential information contained in MFR Schedule D-2 consists of projected information about the capital structure of affiliated and consolidated companies. If publicly disclosed, this information would harm the competitive interests of the provider of the information. If the provider's suppliers, investors, or competitors were made aware of this information, they may adjust their behavior in the marketplace with respect to activities such as pricing and acquisition and provision of goods, materials and services. This information is entitled to confidential classification pursuant to section 366.093(3)(e), Florida Statutes.

3. 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.

4. Submitted as Exhibit "A" are copies of the subject documents, on which are highlighted the information for which confidential classification is requested. Exhibit "A"

DOCUMENT NUMBER-DATE

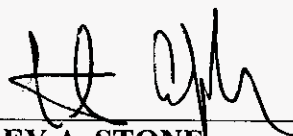
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FPSC-COMMISSION CLERK

should be treated as confidential pending a ruling on this request. Attached as Exhibit "B" are two (2) edited copies of the subject documents, which may be made available for public review and inspection. Attached as Exhibit "C" to this request is a line-by-line/field-by-field justification for the request for confidential classification.

WHEREFORE, Gulf Power Company respectfully requests that the Commission enter an order protecting the information highlighted on Exhibit "A" from public disclosure as proprietary confidential business information.

Respectfully submitted this 8th day of July, 2011.



JEFFREY A. STONE

Florida Bar No. 325953

RUSSELL A. BADDERS

Florida Bar No. 007455

STEVEN R. GRIFFIN

Florida Bar No. 0627569

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Attorneys for Gulf Power Company

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In Re: Petition for increase in rates
by Gulf Power Company

Docket No.: 110138-EI
Date: July 8, 2011

REQUEST FOR CONFIDENTIAL CLASSIFICATION

EXHIBIT "A"

Provided to the Commission Clerk
under separate cover as confidential information.

REDACTED

EXHIBIT "B"

FLORIDA PUBLIC SERVICE COMMISSION

EXPLANATION: For the subject Florida utility, all other regulated utility operations combined, all non-regulated operations combined, the parent company, and on a consolidated basis, provide the year-end capital structure for investor capital (i.e. common equity, preferred stock, long-term debt, and short-term debt) for the five years through the end of the projected test year.

Type of Data Shown:
 Projected Test Year Ended 12/31/12
 Prior Year Ended 12/31/11
 Historical Year Ended 12/31/08 - 12/31/10
Witness: R. S. Teel, R. J. McMillan

COMPANY: GULF POWER COMPANY

DOCKET NO.: 110138-EI

(1) Line No.	(2) Class of Capital	(3) 2008		(5) 2009		(7) 2010		(9) 2011		(11) 2012	
		(4) Amount (000's)	(6) Percent of Total	(4) Amount (000's)	(6) Percent of Total	(8) Amount (000's)	(8) Percent of Total	(10) Amount (000's)	(10) Percent of Total	(12) Amount (000's)	(12) Percent of Total
1	<u>Gulf Power Company</u>										
2	Common Stock Equity	822,092	42.87	1,004,292	43.45	1,075,036	43.17	1,161,291	45.09	1,228,867	45.14
3	Preference Stock	97,998	5.11	97,998	4.24	97,998	3.93	137,998	5.36	137,998	5.07
4	Long-Term Debt	849,265	44.29	978,914	42.35	1,114,398	44.74	1,234,918	47.95	1,315,439	48.32
5	Short-Term Debt	148,239	7.73	230,331	9.96	203,183	8.16	41,153	1.60	39,990	1.47
6	Total	1,917,594	100.00	2,311,535	100.00	2,490,615	100.00	2,575,360	100.00	2,722,294	100.00
7	<u>Other Regulated Utility Operations</u>										
8	Common Stock Equity	13,697,666	44.94	15,219,590	45.72	16,381,551	46.01				
9	Preferred (Preference) Stock	983,865	3.23	983,825	2.96	983,826	2.76				
10	Long-Term Debt	14,372,965	47.16	15,746,955	47.30	15,772,865	44.30				
11	Short-Term Debt	1,421,937	4.67	1,338,611	4.02	2,468,847	6.93				
12	Total	30,476,433	100.00	33,288,981	100.00	35,607,089	100.00				
13	<u>Non-Regulated Operations Combined (All other Subsidiaries)</u>										
14	Common Stock Equity	557,880	51.49	750,456	74.48	766,637	89.91				
15	Preference Stock	0	0.00	0	0.00	0	0.00				
16	Long-Term Debt	494,208	45.62	255,375	25.34	8,183	0.96				
17	Short-Term Debt	31,295	2.89	1,828	0.18	77,834	9.13				
18	Total	1,083,383	100.00	1,007,659	100.00	852,654	100.00				



FLORIDA PUBLIC SERVICE COMMISSION

EXPLANATION: For the subject Florida utility, all other regulated utility operations combined, all non-regulated operations combined, the parent company, and on a consolidated basis, provide the year-end capital structure for investor capital (i.e. common equity, preferred stock, long-term debt, and short-term debt) for the five years through the end of the projected test year.

Type of Data Shown:
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 Witness: R. S. Teel, R. J. McMillan

COMPANY: GULF POWER COMPANY

DOCKET NO.: 110138-EI

(1) Line No.	(2) Class of Capital	(3) 2008		(5) 2009		(7) 2010		(9) 2011		(11) 2012	
		Amount (000's)	Percent of Total	Amount (000's)	Percent of Total	Amount (000's)	Percent of Total	Amount (000's)	Percent of Total	Amount (000's)	Percent of Total
1	<u>Parent Company</u>										
2	Common Stock Equity	13,390,956	88.63	14,976,181	87.96	16,283,075	89.44				
3	Preference Stock	0	0.00	0	0.00	0	0.00				
4	Long-Term Debt	1,350,000	8.93	1,400,000	8.22	1,258,853	6.91				
5	Short-Term Debt	368,834	2.44	649,971	3.82	664,809	3.65				
6	Total	<u>15,109,790</u>	<u>100.00</u>	<u>17,026,152</u>	<u>100.00</u>	<u>18,206,737</u>	<u>100.00</u>				
7	<u>Eliminations</u>										
8	Common Stock Equity	(15,192,837)	95.89	(17,073,185)	95.95	(18,304,451)	95.73				
9	Preference Stock	-	0.00	-	0.00	-	0.00				
10	Long-Term Debt	(250,000)	1.58	(250,000)	1.41	-	0.00				
11	Short-Term Debt	(400,453)	2.53	(468,837)	2.64	(816,982)	4.27				
12	Total	<u>(15,843,290)</u>	<u>100.00</u>	<u>(17,792,022)</u>	<u>100.00</u>	<u>(19,121,433)</u>	<u>100.00</u>				
13	<u>Consolidated Basis</u>										
14	Common Stock Equity	13,275,757	40.55	14,877,334	41.50	16,201,848	42.60				
15	Preference Stock	1,081,863	3.30	1,081,823	3.02	1,081,824	2.84				
16	Long-Term Debt	16,816,438	51.36	18,131,244	50.59	18,154,299	47.73				
17	Short-Term Debt	1,569,852	4.79	1,751,904	4.89	2,597,691	6.83				
18	Total	<u>32,743,910</u>	<u>100.00</u>	<u>35,842,305</u>	<u>100.00</u>	<u>38,035,662</u>	<u>100.00</u>				

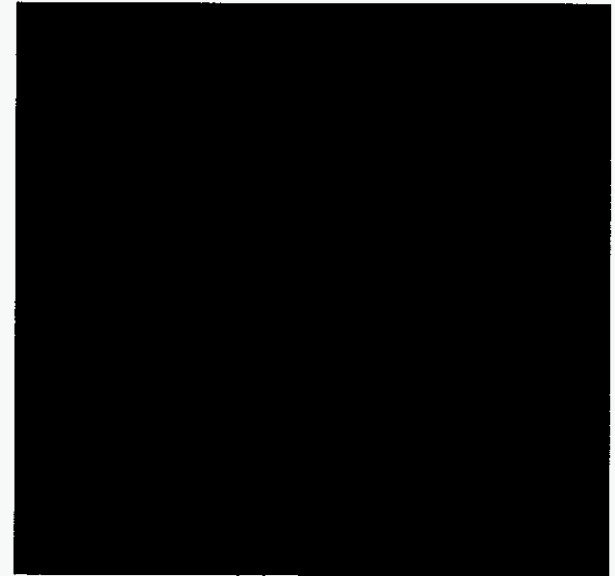


EXHIBIT "C"

Line-by-Line/Field-by-Field Justification

Line(s)/Field(s)

MFR Schedule D-2

Page 1 of 2, Columns 9-12, Lines 8-18

Page 2 of 2, Columns 9-12, Lines 2-18

Justification

This information is entitled to confidential classification pursuant to §366.093(3)(e), Florida Statutes. The basis for this information being designated as confidential is more fully set forth in paragraph 2.

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

IN RE: Petition for Increase in Rates)
by Gulf Power Company)
)
)
_____)

Docket No. 110138-EI

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true copy of the foregoing was furnished by hand delivery this 8th day of July, 2011, on the following:

J.R. Kelly
Public Counsel
Office of Public Counsel
111 West Madison Street, Rm. 812
Tallahassee, FL 32399- 1400
Kelly.jr@leg.state.fl.us



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