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COMMISSION
CLERK



November 14, 2013

REDACTED

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

RE: Request for Confidential Classification
Earnings Surveillance Report, Supplemental 2 for September 2013

Dear Ms. Cole,

Enclosed for filing is Gulf Power Company's Request for Confidential Classification for the Earnings Surveillance Report, Supplemental 2 for September 2013.

Sincerely,

Robert L. McGee, Jr.
Regulatory and Pricing Manager

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Enclosure

cc : Beggs and Lane
Jeffrey A. Stone, Esq.
Florida Public Service Commission
Andrew Maurey

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APD LEXHB + ICD
CPA _____
ECO _____
SNG _____
JCL _____
GM _____
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BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

IN RE: Gulf Power Company Earnings Surveillance Report, Supplemental Filing for September 2013	Docket No.: Undocketed Date: November 15, 2013
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REQUEST FOR 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 files a request that the Florida Public Service Commission enter an order protecting from public disclosure information contained within the September 2013 supplements for Gulf Power Company’s Earnings Surveillance Report which are being submitted to the Florida Public Service Commission pursuant to Order Nos. PSC-96-1219-FOF-EI and PSC-01-0390-TRF-EI (collectively, the “CISR Surveillance Filings”). As grounds for this request, Gulf Power Company states:

1. On November 15, 2013, Gulf Power Company submitted to the Florida Public Service Commission Gulf Power Company’s CISR Surveillance Filings as required by Order Nos. PSC-96-1219-FOF-EI and PSC-01-0390-TRF-EI.

2. The public disclosure of the information contained in the CISR Surveillance Filings would cause irreparable harm to Gulf Power Company and the entity with which it has entered a Contract Services Arrangement (“CSA”) contract under the authority of Gulf Power’s Commercial/Industrial Service Rider. The CISR Surveillance Filings contain proprietary confidential business information regarding contractual terms and pricing. Public disclosure of this information would impair the ability of Gulf Power Company 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 CSAs with customers. The information is regarded as sensitive and confidential by the CISR customer because its public disclosure would impact the customer's ability to compete in the 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 Power. This may lead to uneconomic bypass of Gulf's facilities. Thus, the Company requests that this information be granted confidential classification pursuant to Section 366.093(3)(d)-(e), Florida Statutes.

3. Submitted as Exhibit "A" are copies of the CISR Surveillance Filings, on which are highlighted the information for which confidential classification is requested. Exhibit "A" should be treated as confidential pending a ruling on this request. Attached as Exhibit "B" are two (2) edited copies of the CISR Surveillance Filings, which may be made available for public review and inspection. Attached as Exhibit "C" to this request is a line-by-line justification for the request for confidential classification.

4. The material for which confidential classification is requested is intended to be, and is treated as, confidential by Gulf Power Company and the entity with which it has entered a CSA contract and has not been otherwise publicly disclosed.

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 14th day of November, 2013.



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Attorneys for Gulf Power Company

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

IN RE: Gulf Power Company Earnings Surveillance Report, Supplemental Filing for September 2013	Docket No.: Undocketed Date: November 15, 2013
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EXHIBIT 'A'

REQUEST FOR CONFIDENTIAL CLASSIFICATION

The information provided herein should be maintained as proprietary confidential business information pursuant to Section 366.093 and Rule 25-22.006, F.A.C.

Exhibit "A"

Provided to the Commission Clerk
under separate cover as confidential information

EXHIBIT "B"

GULF POWER COMPANY
SUPPLEMENTAL SURVEILLANCE REPORT INFORMATION
COMMERCIAL/INDUSTRIAL SERVICE RIDER
SEPTEMBER 2013

CONFIDENTIAL

The information below is presented to comply with FPSC Order No. PSC-96-1219-FOF-EI and FPSC Order No. PSC-01-0390-TRF-EI. This supplemental information is to be treated as confidential. For CSA-3, it is estimated that the contract year-to-date revenues, excluding tax and franchise fees, that would have been produced by the application of Gulf Power's otherwise applicable standard tariff rates to the affected load would have been [REDACTED] than the revenues actually received by Gulf Power pursuant to the executed CSA. Although this dollar amount is required to be calculated and reported, Gulf believes a more accurate representation of the impact of CSA-3 on Gulf's general body of customers is shown in the paragraph below.

For CSA-3, it is estimated that the contract year-to-date net benefit to Gulf's customers, as represented by the contribution toward fixed costs associated with sales under CSA-3 which would not have occurred in the absence of CSA-3, is [REDACTED].

EXHIBIT "C"

Line-by-Line Justification

Line(s)

Justification

September 2013 Filing

Lines 16 and 23

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