FILED APR 01, 2014 DOCUMENT NO. 01439-14 FPSC - COMMISSION CLERK

Robert L. McGee, Jr. Regulatory & Pricing Manager One Energy Place Pensacola, Florida 32520-0780

Tel 850 444 6530 Fax 850 444 6026 RLMCGEE@southernco.com

March 31, 2014



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

RE: Docket No. 140007-EI

Dear Ms. Stauffer:

Enclosed is Gulf Power Company's Request for Confidential Classification for certain portions of its Environmental Compliance Program Update to be filed in the above referenced docket.

Also enclosed is a CD containing the Request for Confidential Classification as well as Exhibit C in Microsoft Word as prepared on a Windows based computer.

Sincerely,

Robert L. M. Sert.

Robert L. McGee, Jr. / Regulatory and Pricing Manager

md

COM _____ Enclosures AFD _____ cc: Beggs & Lane Jeffrey A. Stone, Esq. ECO _____ EL ____ LLN



BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

IN RE: Environmental Cost Recovery Clause Docket No.: 140007-EI Date: April 1, 2014

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 files a request that the Florida Public Service Commission enter an order protecting from public disclosure certain portions of its Air Quality Environmental Compliance Program Update for the Clean Air Interstate Rule, National Ambient Air Quality Standards, Mercury and Air Toxics Standards and Clean Air Visibility Rule (the "Compliance Program"). As grounds for this request, the Company states:

1. Gulf Power seeks confidential classification for portions of its Compliance Program which is being filed concurrently with this request. The subject information relates to competitive interests, the disclosure of which would impair the competitive business of Gulf Power and Gulf Power's ability to procure goods and services on a fair and reasonable basis. The information is therefore entitled to confidential classification pursuant to section 366.093(3)(d)-(e), Florida Statutes.

2. Table 3.1-1 identifies in detail Gulf Power's projected capital expenditures, by plant and by project, associated with the Compliance Program capital projects that have not yet been placed in service. Table 3.1-2 identifies in detail Gulf Power's projected operation and maintenance expenses, by plant and by project, associated with the Compliance Program capital projects that have not yet been placed in service. Disclosure of this information could negatively impact Gulf's ability to negotiate pricing favorable to its customers when contracting with vendors of materials and services needed by Gulf in order to implement its Compliance Program. Specifically, public disclosure of this information would enable vendors of materials and services

to tailor their pricing proposals to the Company's projections, resulting in higher costs for the Company and its customers. For example, if prospective vendors have access to such information, those vendors will view the forecasted costs as the lower limit of what Gulf expects to pay and will offer to supply goods or services at higher prices.

 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 highlighted pages from the Compliance Program which contain confidential information. Exhibit "A" should be treated as confidential pending a ruling on this request. Attached as Exhibit "B" are two edited copies of Exhibit "A," 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 31st day of March, 2014.

JEFFREY A. STONE Florida Bar No. 325953 RUSSELL A. BADDERS Florida Bar No. 007455 STEVEN R. GRIFFIN Florida Bar No. 0627569 Beggs & Lane P. O. Box 12950 Pensacola, FL 32591 (850) 432-2451 Attorneys for Gulf Power Company

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

IN RE: Environmental Cost Recovery Clause

• · · ·

____)

Docket No.: 140007-EI Date: April 1, 2014

REQUEST FOR CONFIDENTIAL CLASSIFICATION

EXHIBIT "A"

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