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March 13, 2015

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

Re: Docket No. 150049-EI – Petition for approval of energy purchase agreement
between Gulf Power Company and Morgan Stanley Capital Group Incorporated

Dear Ms. Stauffer:

Enclosed for filing in the above-referenced docket is Gulf Power Company's
Request for Confidential Classification pertaining to certain portions of Gulf's
response to Commission Staff's First Data Request (Nos. 1-55). In addition to
the "Confidential" DVD labeled as Exhibit "A", enclosed is a separate DVD
containing a copy of Gulf Power's Request for Confidential Classification and
Exhibit "B" in Microsoft Word format as prepared on a Windows based system.

Sincerely,

Robert L. McGee, Jr.
Regulatory and Pricing Manager

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Enclosures

cc: Beggs & Lane
Jeffrey A. Stone, Esq.

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BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Petition for Approval of Energy
Purchase Agreement between Gulf Power
Company and Morgan Stanley Capital
Group Inc. dated December 18, 2014

Docket No. 150049 -EI
Filed: March 16, 2015

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 information submitted by Gulf Power in response to Commission Staff’s First Data Request to Gulf Power Company (Nos. 1-55) in the above-referenced docket. Confidential information submitted in response to Staff’s First Data Request has been segregated and placed upon the enclosed DVD bearing the label “CONFIDENTIAL” (“Confidential Information”). This DVD should be treated as confidential in its entirety. As grounds for this request, the Company states:

1. Portions of information submitted by Gulf Power in response to question numbers 3, 21(a)-(b), 21(d)-(f), 27, 39, 43 and 44 of Commission Staff’s Data Request constitute “proprietary confidential business information” as defined pursuant to section 366.093(3), Florida Statutes.

2. Information submitted in response to question 3 consists of revenue requirements associated with the Energy Purchase Agreement between Gulf Power and Morgan Stanley Capital Group, Inc. This data, when combined with other publicly available data, could be used to calculate the avoided cost figures utilized in Gulf Power’s economic evaluations. These avoided cost calculations are not disclosed elsewhere in information submitted publicly by Gulf Power. Disclosure of the information in question would impair the efforts of Gulf Power to

contract for goods and services on favorable terms. It is also information relating to the competitive interests of Gulf Power, the disclosure of which would impair the competitive business of Gulf Power. The information could be used by wholesale competitors and competitive suppliers of power to Gulf Power to model the company's system and/or affect the Company's purchases from third party suppliers. As such, the information in question is entitled to confidential treatment pursuant to section 366.093(3)(e), Florida Statutes.

3. Information submitted in response to questions 21(a)-(b) and 27 consists of Gulf's fuel price forecast data which is utilized by the Company to, among other things, perform cost-effectiveness analyses for purchased power agreements. This data was developed by Gulf, Southern Company Services, and their consultant, Charles Rivers Associates, using an extensive proprietary modeling analysis. These forecasts are based on non-public data, were developed at significant cost to the Company, and are considered proprietary by Gulf Power, Southern Company Services, and their consultant. This information reveals key inputs into the Company's decision-making process and is subject to extensive efforts to maintain its secrecy. Only select Company personnel with a "need to know" are granted access. Public disclosure of this information would enable competitors to access and utilize Gulf's forecasts without incurring costs to obtain similar information, thus bestowing an economic advantage upon such competitors at the cost of Gulf and its customers. Additionally, public disclosure of this information would enable vendors of commodities 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 fuel suppliers have access to such information, those suppliers will view the forecasted prices as the lower limit of what Gulf expects to pay and will offer to supply fuel at higher prices. Finally, the subject information is used in developing future generation strategies for Gulf. Generation wholesalers, power marketers or other competitors could utilize this information to tailor proposals with the intention of pricing products that could undermine

the Company's market position. This information derives economic value from not being generally known to, and being readily ascertainable by proper means to, other persons who can obtain economic value from its disclosure or use. Protection of this information has taken on added importance recently given data mining trends in the industry. Trade publications are increasingly scouring regulatory filings, compiling data and selling these packaged products to industry participants such as commodity suppliers. Consequently, this information is entitled to confidential classification pursuant to section 366.093(3)(a) and (e), Florida Statutes. The Commission has previously determined that Gulf's fuel price forecasting data constitutes proprietary confidential business information pursuant to section 366.093(3), Florida Statutes. See e.g., Order No. PSC-14-0368-CFO-EI.

4. Information submitted in response to questions 21(d)-(e), 43 and 44 includes Gulf Power's projected avoided cost calculations. This information is not disclosed elsewhere in information submitted publicly by Gulf Power. Disclosure of the information in question would impair the efforts of Gulf Power to contract for goods and services on favorable terms. It is also information relating to the competitive interests of Gulf Power, the disclosure of which would impair the competitive business of Gulf Power. The information could be used by wholesale competitors and competitive suppliers of power to Gulf Power to model the company's system and/or affect the Company's purchases from third party suppliers. As such, the information in question is entitled to confidential treatment pursuant to section 366.093(3)(e), Florida Statutes.

5. Information submitted in response to question 21(f) includes fuel forecasts which were developed by parties other than Southern Company and Charles River Associates and which were purchased by Southern Company Services through a paid subscription service. This information is subject to non-disclosure agreements and is regarded by the vendors as proprietary information. Public disclosure of this information would enable others in the marketplace to capitalize on this data without compensating the vendors for the same and could result in vendors

charging higher prices, or refusing to do business with Gulf, out of concern that their data would be publicly disclosed. Public disclosure of this data would impair the competitive business interests of Gulf Power and its vendors and is therefore entitled to confidential classification pursuant to section 366.093(3)(e), Florida Statutes.


6. Information submitted in response to question number 39 consists of annual average basis differentials which were used in developing Gulf's natural gas forecasts. The basis differential data is purchased by Gulf Power through a third party subscription service with Platts Gas Daily. This information is subject to a non-disclosure agreement and is regarded by the vendor as proprietary information. Public disclosure of this information would enable others in the market place to capitalize on this data without compensating the vendor for the same and could result in vendors charging higher prices, or refusing to do business with Gulf, out of concern that their data would be publicly disclosed. Public disclosure of this data would impair the competitive business interests of Gulf Power and its vendor and is therefore entitled to confidential classification pursuant to section 366.093(3)(e), Florida Statutes.

7. 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.

8. Attached hereto as Exhibit "A" is a DVD containing the Confidential Information. Attached hereto as Exhibit "B" is a justification for confidential treatment of the Confidential Information.

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

Respectfully submitted this 13th day of March, 2015.



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REQUEST FOR CONFIDENTIAL CLASSIFICATION

EXHIBIT "A"

DVD provided to the Commission Clerk
under separate cover as confidential information

EXHIBIT "B"

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

Line(s)/Field(s)

Justification

Response to Request # 3

See file titled:
"DR1-3 Annual Revenue
Requirements_CONF.xlsx"

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.

Response to Request #'s 21(a)-(b) and 27

See files titled:
"DR1-21a 2014 Fuel Price Forecasts yrs 2014-2043_CONF.xlsx"
"DR1-21b 2015 Fuel Price Forecasts yrs 2014-2043_CONF.xlsx."
"DR1-27 2014-2015 fuel price forecasts_CONF.xlsx"

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

Response to Request #'s 21(d)-(e), 43 and 44

See files titled:
"DR1-21d-21e 2014-2015 Energy budget_CONF.xlsx"
"DR1-43 Cost Effectiveness 2014 budget_CONF.xlsx"
"DR1-44 Cost Effectiveness 2015 budget_CONF.xlsx"

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 4.

Response to Request # 21(f)

See file titled:
"DR1-21f Alternative Fuel Price forecasts from 3rd party_CONF.xlsx"

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 5.

Response to Request # 39

See file titled:
"DR1-39.Annual average base differentials_CONF.xlsx"

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 6.

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

IN RE: **Petition for approval of energy purchase**)
agreement between Gulf Power Company)
and Morgan Stanley Capital Group,)
Incorporated)

Docket No.: **150049-EI**

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true copy of the foregoing was furnished by overnight mail this 13th day of March, 2015 to the following:

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