

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



July 12, 2016

Ms. Carlotta Stauffer  
Florida Public Service Commission  
2540 Shumard Oak Boulevard  
Tallahassee FL 32399-0868

RECEIVED-FPSC  
2016 JUL 13 AM 9:46  
COMMISSION  
CLERK

Re: Docket No. 160108-EI – Petition for approval of 2016-2018 storm hardening plan, pursuant to Rule 25-6.0342, F.A.C., by Gulf Power Company

Dear Ms. Stauffer:

Enclosed is Gulf Power Company's Request for Confidential Classification pertaining to Gulf Power's response to Staff's First Data Request in the above-referenced docket.

**REDACTED**

Sincerely,

Robert L. McGee, Jr.  
Regulatory and Pricing Manager

md

Enclosures

cc w/encl.: Beggs and Lane  
Jeffrey A. Stone, Esquire  
Division of Engineering  
Penelope D. Buys

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BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

IN RE: Petition for approval of 2016-2018  
storm hardening plan, pursuant to Rule 25-  
6.0342, F.A.C., by Gulf Power Company

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Docket No.: 160108-EI  
Date: July 13, 2016

**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 in the above-referenced docket. As grounds for this request, the Company states:

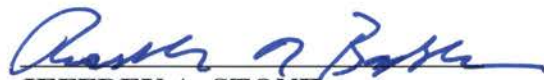
1. A portion of the information submitted by Gulf Power in response to question number eleven of Commission Staff's First Data Request constitutes proprietary confidential business information. Specifically, the confidential information consists of pricing data for software support services provided by the software licensor. This pricing is the product of contractual negotiations between Southern Company Services, Inc. (as agent for Gulf Power and its affiliates) and the licensor of the software. Public disclosure of this information would impair the licensor's ability to negotiate pricing with other purchasers of its services on a going-forward basis. Similarly, disclosure would harm Gulf's efforts to contract for goods and/or services on favorable terms insofar as the licensor --and other vendors in the marketplace-- may charge higher prices or refuse to do business with the Company out of concern that their pricing information will become public. Consequently, the information is entitled to confidential classification pursuant to section 366.093(3)(d) and (e), Florida Statutes.

2. 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.

3. Submitted as Exhibit "A" is one copy of Gulf's response to question number eleven. The confidential information has been highlighted in yellow. Exhibit "A" 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 12<sup>th</sup> day of July, 2016.



**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

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**REQUEST FOR CONFIDENTIAL CLASSIFICATION**

**EXHIBIT "A"**

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

**EXHIBIT "B"**



EXHIBIT "C"

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

**Line(s)/Field(s)**

**Response to Question # 11**

Page 1 of 1

Line 1

**Justification**

This information is entitled to confidential classification pursuant to §366.093(3)(d)-(e), Florida Statutes. The basis for this information being designated as confidential is more fully set forth in paragraph 1.