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Regulatory & Pricing Manager

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October 12, 2016

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

RECEIVED-FPSC
2016 OCT 12 AM 9:04
COMMISSION
CLERK

RE: Docket No. 160186-EI

Dear Ms. Stauffer:

Enclosed is 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 enclosed a CD containing Gulf's Request for Confidential Classification as well as Exhibit C in Microsoft Word format as prepared on a Windows based computer.

Sincerely,

Robert L. McGee, Jr.
Regulatory and Pricing Manager

md

Enclosures

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

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BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

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

Docket No.: 160186-EI
Date: October 12, 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 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 October 12, 2016, 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 are 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"

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 12th day of October, 2016.



JEFFREY A. STONE

Florida Bar No. 325953

RUSSELL A. BADDERS

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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.: 160186-EI
Date: October 12, 2016

REQUEST FOR CONFIDENTIAL CLASSIFICATION

EXHIBIT "A"

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

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 12/31/17 Prior Year Ended 12/31/16 Historical Year Ended 12/31/13 - 12/31/15

Witness: X. Liu, S. D. Ritenour

COMPANY: GULF POWER COMPANY

DOCKET NO.: 160186-EI

(1) Line No.	(2) Class of Capital	(3) 2013		(5) 2014		(7) 2015		(9) 2016		(11) 2017	
		(4) Amount (000s)	(6) Percent of Total	(4) Amount (000s)	(6) Percent of Total	(8) Amount (000s)	(8) Percent of Total	(10) Amount (000s)	(10) Percent of Total	(12) Amount (000s)	(12) Percent of Total
1	<u>Gulf Power Company</u>										
2	Common Stock Equity	1,235,126	44.90	1,309,590	44.61	1,354,665	45.99	1,351,701	47.32	1,340,230	47.33
3	Preference Stock	146,504	5.33	146,504	4.99	146,504	4.97	146,504	5.13	146,504	5.17
4	Long-Term Debt	1,158,163	42.10	1,369,594	46.65	1,192,927	40.49	1,350,923	47.29	1,266,393	44.72
5	Short-Term Debt	210,878	7.67	109,977	3.75	251,834	8.55	7,605	0.26	78,596	2.78
6	Total	2,750,671	100.00	2,935,665	100.00	2,945,930	100.00	2,856,733	100.00	2,831,723	100.00
7	<u>Other Regulated Utility Operations</u>										
8	Common Stock Equity	19,296,057	47.13	20,518,746	47.56	22,152,887	46.32				
9	Preferred (Preference) Stock	983,825	2.40	1,203,464	2.79	1,360,643	2.84				
10	Noncontrolling Interest	0	0.00	39,241	0.09	42,677	0.09				
11	Long-Term Debt	18,785,588	45.88	17,721,974	41.07	21,006,398	43.92				
12	Short-Term Debt	1,876,965	4.59	3,663,287	8.49	3,264,506	6.83				
13	Total	40,942,435	100.00	43,146,712	100.00	47,827,111	100.00				
14	<u>Non-Regulated Operations Combined (All other Subsidiaries)</u>										
15	Common Stock Equity	664,617	99.97	669,606	99.85	691,795	99.38				
16	Preference Stock	0	0.00	1,016	0.15	326	0.05				
17	Noncontrolling Interest	0	0.00	0	0.00	0	0.00				
18	Long-Term Debt	0	0.00	0	0.00	0	0.00				
19	Short-Term Debt	178	0.03	0	0.00	4,000	0.57				
20	Total	664,795	100.00	670,622	100.00	696,121	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.

COMPANY: GULF POWER COMPANY

DOCKET NO.: 160186-EI

Type of Data Shown:

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Witness: X. Liu, S. D. Ritenour

(1) Line No.	(2) Class of Capital	(3) 2013		(5) 2014		(7) 2015		(9) 2016		(11) 2017	
		(4) Amount (000s)	(6) Percent of Total	(5) Amount (000s)	(6) Percent of Total	(7) Amount (000s)	(8) Percent of Total	(9) Amount (000s)	(10) Percent of Total	(11) Amount (000s)	(12) Percent of Total
1	<u>Parent Company</u>										
2	Common Stock Equity	19,096,212	90.30	20,092,225	89.13	20,739,710	83.50				
3	Preference Stock	0	0.00	0	0.00	0	0.00				
4	Long-Term Debt	1,400,000	6.62	1,749,857	7.76	3,211,485	12.93				
5	Short-Term Debt	651,131	3.08	699,933	3.11	887,416	3.57				
6	Total	<u>21,147,343</u>	<u>100.00</u>	<u>22,542,015</u>	<u>100.00</u>	<u>24,838,611</u>	<u>100.00</u>				
7	<u>Eliminations</u>										
8	Common Stock Equity	(21,284,221)	96.43	(22,640,468)	98.53	(24,346,861)	95.75				
9	Preference Stock	0	0.00	0	0.00	0	0.00				
10	Long-Term Debt	0	0.00	0	0.00	(722,360)	2.84				
11	Short-Term Debt	(788,305)	3.57	(337,728)	1.47	(357,768)	1.41				
12	Total	<u>(22,072,526)</u>	<u>100.00</u>	<u>(22,978,196)</u>	<u>100.00</u>	<u>(25,426,989)</u>	<u>100.00</u>				
13	<u>Consolidated Basis</u>										
14	Common Stock Equity	19,007,790	43.77	19,949,700	43.07	20,592,194	40.47				
15	Preference Stock	1,130,329	2.60	1,350,984	2.92	1,507,473	2.96				
16	Noncontrolling Interest	0	0.00	39,241	0.08	42,677	0.09				
17	Long-Term Debt	21,343,752	49.14	20,841,424	45.00	24,688,450	48.52				
18	Short-Term Debt	1,950,846	4.49	4,135,470	8.93	4,049,988	7.96				
19	Total	<u>43,432,717</u>	<u>100.00</u>	<u>46,316,819</u>	<u>100.00</u>	<u>50,880,782</u>	<u>100.00</u>				

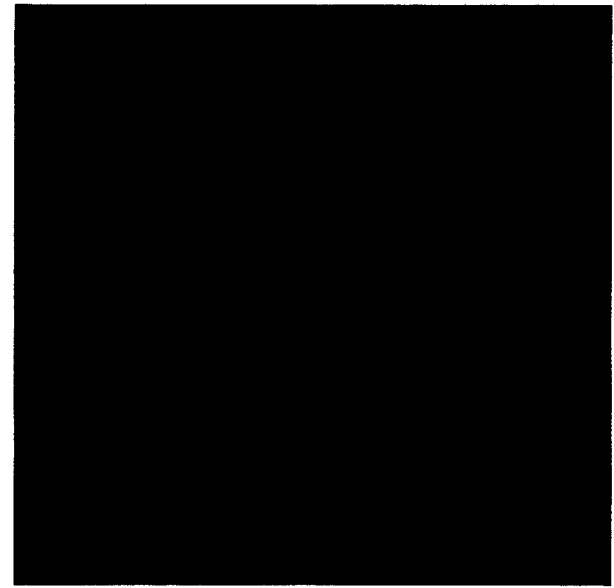


EXHIBIT "C"

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

Line(s)/Field(s)

MFR Schedule D-2

Page 1 of 2, Columns 9-12, Lines 8-20

Page 2 of 2, Columns 9-12, Lines 2-19

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 of this Request.

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

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

Docket No.: 160186-EI

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true copy of the foregoing has been furnished by hand delivery this 12th day of October, 2016 to the following:

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