

# FILED NOV 15, 2016 DOCUMENT NO. 08808-16 FPSC - COMMISSION CLERK

Robert L. McGee, Jr. Regulatory & Pricing Manager

One Energy Place Pensacola, FL 32520-0780 850 444 6530 tel 850 444 6026 fax rlmcgee@southernco.com

November 14, 2016

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

RE: Docket No. 160186-EI

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 Citizens' First Request to Produce Documents to Gulf Power Company (Nos. 1-73). Also enclosed is a copy of Gulf Power's Request for Confidential Classification and Exhibit "A" which is a justification for confidential treatment of the Confidential Information in Microsoft Word format. Exhibit "B" which contains a public version of the documents with the Confidential Information redacted is included on a separate DVD. A copy of the confidential documents are provided on a separate DVD labeled "Confidential."

Sincerely,

Robert L. McGee, Jr.

Regulatory and Pricing Manager

REDACTED

md

**Enclosures** 

CC:

Beggs & Lane

Jeffrey A. Stone, Esq.

Gunster Law Firm

Charles A. Guyton, Esq. Richard A. Melson, Esq.

AFD \_\_\_\_\_

APA \_\_\_\_

ECO

ENG 2 (CD)

GCL \_\_\_\_

TEL \_\_\_\_

CLK \_\_\_\_

#### BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In Re: Petition for rate increase by Gulf Power Company.

Docket No.

160186-EI

Dated:

November 15, 2016

# GULF POWER COMPANY'S REQUEST FOR CONFIDENTIAL CLASSIFICATION AND MOTION FOR TEMPORARY PROTECTIVE ORDER

Gulf Power Company ("Gulf Power," "Gulf," or the "Company"), pursuant to Section 366.093, Florida Statutes, and Rule 25-22.006, Florida Administrative Code, hereby requests confidential classification of certain documents and information produced in Response to Citizens' First Request to Produce Documents to Gulf Power Company (Nos. 1-73) ("OPC's Discovery"). Confidential information submitted in response to OPC's Discovery 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.

### **Description of the Document(s)**

The Confidential Information consists of multiple Excel spreadsheets and PDF files produced in response to Document Request Nos. 1 through 73. These documents are identified with specificity on Exhibit "A" to this Request. In support of this request, the Company states:

1. Subsection 366.093(1), Florida Statutes, provides that any records "found by the Commission to be proprietary confidential business information shall be kept confidential and shall be exempt from s. 119.07(1), Florida Statutes [requiring disclosure under the Public Records Act]." Proprietary confidential business information includes, but is not limited to "[i]nformation concerning... contractual data, the disclosure of which would impair the efforts of the public utility or its affiliates to contract for goods or services on favorable terms." Subsection 366.093(3)(d), Florida Statutes. Proprietary confidential business information also

includes "[i]information relating to competitive interests, the disclosure of which would impair the competitive business of the provider of the information." Section 366.093(3)(e), Florida Statutes. The Confidential Information that is the subject of this request and motion falls within the statutory categories and, thus, constitutes propriety confidential business information entitled to protection under Section 366.093, Florida Statutes, and Rule 25-22.006, Florida Administrative Code.

- 2. Attached hereto as Exhibit "A" is a justification for confidential treatment of the Confidential Information.
- 3. Attached hereto is a DVD labeled Exhibit "B" containing public versions of the Document(s) with the Confidential Information reducted, unless previously filed as indicated.
- 4. The Confidential Information is intended to be and is treated by Gulf Power as private and, to this attorney's knowledge, has not been publicly disclosed.
- 5. For the same reasons set forth herein in support of its request for confidential classification, Gulf Power also moves the Commission for entry of a temporary protective order pursuant to Rule 25-22.006(6)(c), Florida Administrative Code, protecting the Confidential Information from public disclosure.

#### **Requested Duration of Confidential Classification**

6. Gulf Power requests that the Confidential Information be treated by the Commission as confidential proprietary business information for at least the 18 month period prescribed in Rule 25-22.006(9)(a), Florida Administrative Code. If, and to the extent that the Company is in need of confidential classification of the Confidential Information beyond the 18 month period set forth in the Commission rule, the justification and grounds for such extended confidential treatment are set forth in Exhibit "C" to this request and motion.

WHEREFORE, Gulf Power Company respectfully requests that the Confidential Information that is the subject of this request and motion be accorded confidential classification for the reasons set forth herein and for a minimum period of 18 months, subject to any request for a longer period of confidential classification as may be set forth in Exhibit "C" to this request and motion. The company further moves for the entry of a temporary protective order pursuant to Rule 25-22.006(6)(c), Florida Administrative Code, protecting the Confidential Information from public disclosure.

DATED this 14th day of November, 2016.

Respectfully submitted,

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** 

## EXHIBIT "A"

# JUSTIFICATION FOR CONFIDENTIAL TREATMENT OF HIGHLIGHTED PORTIONS OF GULF POWER'S RESPONSES TO OPC's FIRST REQUEST TO PRODUCE DOCUMENTS (NOS. 1-73)

POD	Bates Pages or File Names	Detailed Description	Rationale
Request			
<u>No.</u>			
1 & 2	D-2 CONF	All highlighted information	(18)
	D-2 Support CONF	All highlighted information	(18)
	C-24 final for printing CONF	All highlighted information	(18)
			(19)
	MFR C-30 final (with back-up) CONF	All highlighted information	(1)
	Outage Dates 2017 – Gulf_CONF	Entire document	(23)
3 & 4	Commercial FIRE February 2016-	All highlighted information	(6)
	Commercial Capacity Run_conf		
	Fire 2013 Res Base – 15 SEER_conf	All highlighted information	(6)
	Fire 2013 Res Base – 16 SEER_conf	All highlighted information	(6)
	Fire 2013 Res Base – 17 SEER_conf	All highlighted information	(6)
	Fire 2013 Res Base – Ceiling	All highlighted information	(6)
	Insulation_conf		
	Fire 2013 Res Base – Duct Sealing_conf	All highlighted information	(6)
	Fire 2013 Res Base – HE Room AC_conf	All highlighted information	(6)
	Fire 2013 Res Base – HP Window_conf	All highlighted information	(6)
	Fire 2013 Res Base – HVAC Tune-	All highlighted information	(6)
	up_conf		
	Fire 2013 Res Base – QI_conf	All highlighted information	(6)
	Fire 2013 Res Base – Reflective Roof_conf	All highlighted information	(6)
	July_2016_CPO_Accounts_conf	Entire document	(20)
	Feb 20 2013 Smith and Scholz	Entire document	(9)
	Presentationv3 Priveledged		
	Confidential_CONF		
	Plant Smith Asset Evaluation – 12 11	Entire document	(9)
	14_CONF		
	FMSE00 Bay Gas Storage Agreement	Entire document	(1)
	(Aug 2000) _CONF		
	Fossil Fuel Policy – 10.01.14_CONF	Entire document	(3)
	FSME00 Bay Gas Storage Agreement	Entire document	(1)
	Amendment (Aug. 2006) _CONF		
	Leaf River Storage Service	Entire document	(1)
	Agreement_CONF		

<u>POD</u>	Bates Pages or File Names	Detailed Description	Rationale
Request			
<u>No.</u>			
	SC99002-G Petal Storage FSS Agr &	Entire document	(1)
	Amend_CONF		
	LandCosts 12-31-2011_CONF	All highlighted information	(1)
	Noah X3 20160727_CONF	Entire document	(9)
	Average New Hire Salary – Combined	All highlighted information	(2)
	Data CONF		
	Turnover – Combined Data CONF	All highlighted information	(2)
	CONF Estimated Revenue from First Two	All highlighted information	(20)
	Customers		
	CONF Gulf Power Jobs Numbers	All highlighted information	(20)
	CONF RE ED Rider Request	All highlighted information	(20)
	2016 BI Summary (utility)_Gulf_sent 05.04.2016_CONF	Entire document	(10)
	20160805 FPC Market Memo_CONF	Entire document	(10)
	Entire Benefit Program – Gulf Power 2016	Entire document	(10)
	- Blinded_CONF		
	JUNE 3 – Match Review FPC – Working	Entire document	(2)
	File_CONF		
	Summary 3 – Match Review FPC –	Entire document	(2)
	Working File_CONF		
	Total Comp Mix – Grades and	Entire document	(2)
	Formulas_CONF		
	B2016HandBillCustomerComponent_upda	All highlighted information	(20)
	ted_formatted for HB 2015-07-06_CONF		
	B2016A large commercial customer	All highlighted information	(20)
	forecast model West_CONF		
	B2016A calculate SBS & CSA rates 2015-	All highlighted information	(20)
	11-04_CONF		
		All highlighted information	(20)
	11-04_CONF		
	B2016A Handbill model – module 2 2015-	All highlighted information	(20)
	11-04_CONF		
	B2016A Handbill model – module 3 2015-	All highlighted information	(20)
	11-04_CONF		
	B2016A Handbill model – module 4 2015-	All highlighted information	(20)
	11-04_CONF	A11.1:-1.1: 1. 1: 0	(20)
	B2016A Handbill model – module 5 2015-	All highlighted information	(20)
	11-04_CONF	All highlights dimfarmentia	(20)
	Customer rev calc 2015-10-28_CONF	All highlighted information	(20)
	B2016A billed MB base revenue model	All highlighted information	(20)
	2015-11-11_CONF	<u> </u>	

POD	Bates Pages or File Names	Detailed Description	Rationale
Request			
<u>No.</u>			
6	Detail 2015 Jan-Dec_CONF		(11)
	Detail 2016 Jan-Aug_CONF		(11)
	Summary 2015 Jan-Dec_CONF		(11)
	Summary 2016 Jan-Aug_CONF		(11)
11	Gulf-PurchaseFuel-detail-Nov 2015 Update CONF	All highlighted information	(1)
	Interface Files-All Gulf-Nov 2015 Update CONF	All highlighted information	(22)
	Scherer3-Flint-50MW-cost-components- Nov 2015 Update-Summary CONF	All highlighted information	(22)
	Wholesale model details-2016Ebud-Gulf – Modified to Remove Scherer Capacity – CONF	All highlighted information	(1)
12	Expansion Plan 2016 CONF	All highlighted information	(1)
	Shell PPA Capacity	All highlighted information	(1)
	Rates_Payments_revised 08-07-14 CONF		
	2015 Teneska C Alabama Summary – CONF	All highlighted information	(1)
	AT&T Deferred Credit – roll forward – CONF	All highlighted information	(1)
	Deferred Credits – 2016 Final v3 – CONF	All highlighted information	(1)
	DirectorsComBud 2016-2020 Forecast – CONF	All highlighted information	(2)
	RE 25300365 Navy Fed (not AT&T) – CONF	All highlighted information	(1)
	Deferred Debits – 2016 v6 CONF	All highlighted information	(1)
	EPRI 2016 Easy Sheet 010716 CONF	All highlighted information	(1)
	Prepayments – 2016 v2 – CONF Highlighted	All highlighted information	(1)
	Rental Revenue – 2016 v2 – CONF – Highlighted	All highlighted information	(1)
24	Tax Sharing Agreement	Entire document	(1)
25	2015_PPP_Design_Details_Manager_CO NF	All highlighted information	(8)
	2015-PSP-DesignDetails-Mgr_CONF	All highlighted information	(8)
	2016_PPP_Design_Details _Manager_CONF	All highlighted information	(8)
27	2015 ASC 715 NQ Gulf_CONF	Entire document	(10)
	2015 ASC 715 OPRB Gulf_CONF	Entire document	(10)
	2015 ASC 715 QP Gulf_CONF	Entire document	(10)

POD	Bates Pages or File Names	Detailed Description	Rationale
Request			
No.			
28	Southern Company – Projected ASC 715-	Entire document	(10)
	30.60 Costs (2017 through 2026)_CONF		
	Updated Projection results 2017-	Entire document	(10)
	2026_CONF		
	YE2015 Parameters for Southern Company	Entire document	(10)
	Retirement Benefits_CONF		
29	Gulf Power Pension OPRB – Working	Entire document	(10)
	Paper_CONF		
	Updated Projection results 2017-	Entire document	(10)
	2026_CONF		
30	2016 Gulf Power Consulting	Entire document	(13)
	Agreement_CONF		
32	Hewitt MSA_CONF	Entire document	(13)
	Hewitt MSA Amendment One_CONF	Entire document	(13)
	Mercer Amendment Two	Entire document	(13)
	SCS23749_CONF		
	Mercer US Inc. SC23749 Amendment	Entire document	(13)
	1_CONF		
	Signed Mercer Agreement for ePRISM	Entire document	(13)
	software and services_CONF		
	TowersWatson SCS30413_CONF	Entire document	(13)
	TowersWatson SCS30413 Amend1_CONF	Entire document	(13)
	TowersWatson SCS30413 Amend2_CONF	Entire document	(13)
	TowersWatson SCS30413 Amend3_CONF	Entire document	(13)
	TowersWatson SCS30413 Amend	Entire document	(13)
	4_CONF		
	TowersWatson SCS36787 Master	Entire document	(13)
	Agreement_CONF		
33 & 35	Gulf Power Board and Committee Meeting	Entire document	(12)
	Minutes 2014		
	Gulf Power Board and Committee Meeting	Entire document	(12)
	Minutes 2015		
	Gulf Power Board and Committee Meeting	Entire document	(12)
	Minutes 2016		(10)
	2014-16 Gulf Power Rate Case	Entire document	(12)
	Extracts_SO Audit		

Request No.   No.   Entire docume	nent (12)
Audit #1-5  Audit #6-10  Entire docume Audit #11-15  Entire docume Audit #16-20  Entire docume  2014-16 Gulf Power Rate Case Extracts_SO BOD  BOD Attachments 1-5  BOD Attachments 6-10  BOD Attachments 11-15  Entire docume BOD Attachments 16-20  Entire docume BOD Attachments 21-25  Entire docume BOD Attachments 31-34  Entire docume Extracts_SO Comp  Comp #1-5  Comp #6-10  Entire docume	ent (12)
Audit #6-10  Audit #11-15  Entire docume  Audit #16-20  Entire docume  2014-16 Gulf Power Rate Case Extracts_SO BOD  BOD Attachments 1-5  BOD Attachments 6-10  BOD Attachments 11-15  BOD Attachments 16-20  BOD Attachments 21-25  BOD Attachments 21-25  BOD Attachments 31-34  Entire docume  BOD Attachments 31-34  Entire docume  Extracts_SO Comp  Comp #1-5  Entire docume  Comp #6-10  Entire docume	ent   (12)
Audit #11-15  Audit #16-20  Entire docume  2014-16 Gulf Power Rate Case Extracts_SO BOD  BOD Attachments 1-5  BOD Attachments 6-10  BOD Attachments 11-15  BOD Attachments 16-20  BOD Attachments 21-25  BOD Attachments 21-25  BOD Attachments 31-34  Entire docume  BOD Attachments 31-34  Entire docume  Extracts_SO Comp  Comp #1-5  Comp #6-10  Entire docume	
Audit #16-20  2014-16 Gulf Power Rate Case Extracts_SO BOD  BOD Attachments 1-5  BOD Attachments 6-10  BOD Attachments 11-15  BOD Attachments 16-20  BOD Attachments 21-25  BOD Attachments 21-25  BOD Attachments 26-30  BOD Attachments 31-34  Entire docume  BOD Attachments 31-34  Entire docume  Extracts_SO Comp  Comp #1-5  Comp #6-10  Entire docume  Comp #11-19  Entire docume	
2014-16 Gulf Power Rate Case Extracts_SO BOD  BOD Attachments 1-5  BOD Attachments 6-10  BOD Attachments 11-15  BOD Attachments 16-20  BOD Attachments 21-25  BOD Attachments 21-25  BOD Attachments 26-30  BOD Attachments 31-34  Entire docume  2014-16 Gulf Power Rate Case Extracts_SO Comp  Comp #1-5  Comp #6-10  Comp #11-19  Entire docume	
Extracts_SO BOD  BOD Attachments 1-5  BOD Attachments 6-10  BOD Attachments 11-15  BOD Attachments 16-20  BOD Attachments 21-25  BOD Attachments 26-30  BOD Attachments 31-34  Entire documents 2014-16 Gulf Power Rate Case Extracts_SO Comp  Comp #1-5  Comp #6-10  Comp #11-19  Entire documents 2014-16 Gulf Power Rate Case	ent (12)
BOD Attachments 1-5  BOD Attachments 6-10  BOD Attachments 11-15  BOD Attachments 16-20  BOD Attachments 21-25  BOD Attachments 21-25  BOD Attachments 26-30  BOD Attachments 31-34  Entire documents 2014-16 Gulf Power Rate Case Extracts_SO Comp  Comp #1-5  Comp #6-10  Comp #11-19  Entire documents 2014-16 Gulf Power Rate Case	ent (12)
BOD Attachments 6-10  BOD Attachments 11-15  BOD Attachments 16-20  BOD Attachments 21-25  BOD Attachments 26-30  BOD Attachments 26-30  BOD Attachments 31-34  Entire documents 2014-16 Gulf Power Rate Case Extracts_SO Comp  Comp #1-5  Comp #6-10  Comp #11-19  Entire documents 2014-16 Gulf Power Rate Case	
BOD Attachments 11-15  BOD Attachments 16-20  BOD Attachments 21-25  BOD Attachments 26-30  BOD Attachments 26-30  BOD Attachments 31-34  Entire documents 2014-16 Gulf Power Rate Case Extracts_SO Comp  Comp #1-5  Comp #6-10  Comp #11-19  Entire documents 2014-16 Gulf Power Rate Case	
BOD Attachments 16-20  BOD Attachments 21-25  BOD Attachments 26-30  BOD Attachments 31-34  Entire docume  2014-16 Gulf Power Rate Case Extracts_SO Comp  Comp #1-5  Comp #6-10  Comp #11-19  Entire docume  Entire docume Entire docume Entire docume Entire docume Entire docume Entire docume Entire docume Entire docume Entire docume Entire docume Entire docume Entire docume Entire docume	ent (12)
BOD Attachments 21-25  BOD Attachments 26-30  BOD Attachments 31-34  Entire docume  2014-16 Gulf Power Rate Case Extracts_SO Comp  Comp #1-5  Comp #6-10  Comp #11-19  Entire docume  2014-16 Gulf Power Rate Case Entire docume	ent (12)
BOD Attachments 26-30  BOD Attachments 31-34  Entire docume  2014-16 Gulf Power Rate Case Extracts_SO Comp  Comp #1-5  Comp #6-10  Comp #11-19  Entire docume  2014-16 Gulf Power Rate Case Entire docume Entire docume Entire docume Entire docume Entire docume Entire docume	ent (12)
BOD Attachments 31-34  2014-16 Gulf Power Rate Case Extracts_SO Comp  Comp #1-5  Comp #6-10  Comp #11-19  Entire docume	ent (12)
2014-16 Gulf Power Rate Case Extracts_SO Comp  Comp #1-5 Entire docume Comp #6-10 Entire docume Comp #11-19 Entire docume 2014-16 Gulf Power Rate Case Entire docume	ent (12)
Extracts_SO Comp  Comp #1-5 Entire docume Comp #6-10 Entire docume Comp #11-19 Entire docume 2014-16 Gulf Power Rate Case Entire docume	ent (12)
Comp #1-5 Entire docume Comp #6-10 Entire docume Comp #11-19 Entire docume 2014-16 Gulf Power Rate Case Entire docume	ent (12)
Comp #6-10 Entire docume Comp #11-19 Entire docume 2014-16 Gulf Power Rate Case Entire docume	
Comp #11-19 Entire docume 2014-16 Gulf Power Rate Case Entire docume	ent (12)
2014-16 Gulf Power Rate Case Entire docume	ent (12)
	ent (12)
l !	ent (12)
Extracts_SO Finance	
Finance attachments 1-5 Entire docume	ent (12)
Finance attachments 6-10 Entire docume	ent (12)
Finance attachments 11-15 Entire docume	nent (12)
Finance attachments 16-19 Entire docume	ent (12)
2014-16 Gulf Power Rate Case Entire docume	ent (12)
Extracts_SO NOps	
Nuc Ops #1-10 Entire docume	ent (12)
Nuc #10-23 Entire docume	ent (12)
34 1 Safety and Training BOD April 2014 Entire docume	nent (12)
2 Teel 1Q BOD Presentation v2 Entire docume	ent (12)
3 Ext Affairs Bentina-Jim 4.18.14 BoD Entire docume	ent (12)
4 Circle of Life Slide v2 Entire docume	ent (12)
5 Generation and Transmission Entire docume	nent (12)
Reliability.April 23	
6 Transmission and Distribution.Strategy Entire docume	nent (12)
Session.4.25.2014	
7 Emerging Trends.Strickland.April 21v2 Entire document	nent (12)
8 Forecasting. April 22 2014 Entire document	1
9 Energy Policy & Env Regulation (BoD April 2014)  Entire documents	nent (12)
Cash Flow Statement.Mar 2014 04 15 Entire documents	

POD	Bates Pages or File Names	Detailed Description	Rationale
Request			
<u>No.</u>			
	Income Statement. 1st Q	Entire document	(12)
	1 GULF 1Q Dashboard	Entire document	(12)
	1st Q Compliance Officer Letter	Entire document	(12)
	2 GULF copy of IA 1Q 2014 results	Entire document	(12)
	302 Internal Controls for BOD – April 25- 26 2014 v2	Entire document	(12)
	404 Internal Controls for BOD – April 25- 26 2014 – FINAL v2	Entire document	(12)
	CCC Compliance Officer.Bentina.April 2014	Entire document	(12)
	1 Feazell.Safety and Training.Feb 28 2014 v2	Entire document	(12)
	2 Engagement Survey 2013 .Board Presentation.Feb 2014	Entire document	(12)
	3 Teel 4Q BOD Presentation	Entire document	(12)
	4 Ext Affairs Bentina Feb 2014 BoD	Entire document	(12)
	Pres.Final		` '
	5 Bernard Jacob. Ice Storm Update	Entire document	(12)
	Board Cash Flow Dec 2013 02 14	Entire document	(12)
	Foundation 2013 Annual Report.Signed	Entire document	(12)
	Income Statement Q413	Entire document	(12)
	3 Internal Audit Operations Update December 2013	Entire document	(12)
	4th Quarter Compliance Letter	Entire document	(12)
	6a GULF Dashboard	Entire document	(12)
	6b GULF Master Copy of IA 4Q 2013 results	Entire document	(12)
	6d Southern Company 2014 Audit Plan Slides_01 31 14	Entire document	(12)
	302 Internal Controls for BOD – February 28 2014 - Final	Entire document	(12)
	404 Internal Controls for BOD – February 28 2014 - Final	Entire document	(12)
	2013 Annual CCC Report Full.Signed	Entire document	(12)
	CCC Compliance Officer	Entire document	(12)
	Presentation.February 2014		
<u> </u>	Deloitte Materials for February CCC Mtg	Entire document	(12)
	Gulf Comp Booklet 2014FINAL	Entire document	(12)
	Cash Flow Statement June 2014 07 14	Entire document	(12)
	External Affairs (Jim) July 2014 BoD	Entire document	(12)
	Income Statement Q2 14	Entire document	(12)
	1		1 \ /

POD	Bates Pages or File Names	Detailed Description	Rationale
Request No.			
110.	Operations Report.Final. Gulf BOD 7-17- 14	Entire document	(12)
	Risk Map Updated.McMillan	Entire document	(12)
	Safety and Training BOD July 2014.FINAL	Entire document	(12)
	Teel 2Q BOD Presentation Final	Entire document	(12)
	2Q Compliance Officer Letter	Entire document	(12)
	302 Internal Controls for BOD – July 17 2014	Entire document	(12)
	404 Internal Controls for BOD – July 17 2014	Entire document	(12)
	CCC Compliance Officer Report July 2014	Entire document	(12)
	Internal Audit Results.July.Combined	Entire document	(12)
	2014 Budget Income Statement Without COR v9 – BOD Final	Entire document	(12)
	Board Cash Flow September 2014 10 16	Entire document	(12)
	Customer Value Benchmark Oct 2014 BOD	Entire document	(12)
	External Affairs (Jim) Oct 2014 BOD	Entire document	(12)
	Financial Update Teel Oct 2014 BOD	Entire document	(12)
	Safety and Training Oct 2014 BOD	Entire document	(12)
	302 Internal Controls for BOD – Oct 23 2014	Entire document	(12)
	404 Internal Controls for BOD – Oct 23 2014 (2)	Entire document	(12)
	CCC Compliance Officer Report October 2014	Entire document	(12)
	Copy of Gulf Master Copy of Q3 2014 results (CCC version)	Entire document	(12)
	Deloitte – Gulf 2014 Audit Plan – final	Entire document	(12)
	Gulf Dashboard Q3 2014	Entire document	(12)
	Jim Kerr Letter 10.23.14	Entire document	(12)
	Red Flag CCC Meeting- Oct 2014 FINAL	Entire document	(12)
	2015 Budget Income Statement Without COR – 1Q v5 – For Wendy	Entire document	(12)
	Board Cash Flow March 2015 04 17 15 (2)	Entire document	(12)
	FINAL DRAFT – External Affairs (Fletcher) April 2015 BoD ms	Entire document	(12)
	Safety Update April 2015	Entire document	(12)
	Teel 1Q 2015 BOD Presentation v2 wb	Entire document	(12)

POD	Bates Pages or File Names	<u>Detailed Description</u>	Rationale
Request			
<u>No.</u>			
	302 Internal Controls for BOD – April 24 2015	Entire document	(12)
	404 Internal Controls for BOD – April 24 2015	Entire document	(12)
	Compliance Officer Dsiclosure – 1Q 2015.april	Entire document	(12)
	FINAL DRAFT – Compliance Officer (Fletcher) April 2015 CCC wb3	Entire document	(12)
	Gulf 1st Qtr 2015 Results page 5 to 9	Entire document	(12)
	IA Results for Gulf CCC Q1 2015 page 1 to 4	Entire document	(12)
	1 Safety.wb4	Entire document	(12)
	4 FPSC Order 2015	Entire document	(12)
	5 2014 foundation report	Entire document	(12)
	6.1 Fund Inc – Board mtg update 2 20 15	Entire document	(12)
	6.2 Site Certification Map_rev (2)	Entire document	(12)
	9.1 Burroughs Feb 2015 (2) (2)wb2	Entire document	(12)
	9.2 Teel 4Q BOD Presentation v14.wb	Entire document	(12)
	9.3 FINAL DRAFT – External Affairs (Jim) Feb 2015 BoD.wb3	Entire document	(12)
	11.2 Board Cash Flow December 2014 02 11 15wb	Entire document	(12)
	2014 Budget Income Statement Without COR – 4Q v3 - wb	Entire document	(12)
	8 CCC Dashboard.2	Entire document	(12)
	302 Internal Controls for BOD – February 26 2015 FINALwb	Entire document	(12)
	404 Internal Controls for BOD – February 26 2015 FINALwb	Entire document	(12)
	2015 Audit Plan for Gulf CCC 2wb	Entire document	(12)
	CCC Presentation February 2015wb	Entire document	(12)
	Compliance Officer Disclosure Statement 4Q 2014	Entire document	(12)
	Deloitte FPC 2014 CCC Communication FINALwb	Entire document	(12)
	IA Operations for 2014 page 6 updatedwb	Entire document	(12)
	Gulf2015FINAL	Entire document	(12)
	1. Gulf Power BOD-July2015-Stan-safety wb4	Entire document	(12)
	2. Risk Map – Ritneour July 2015.wb2	Entire document	(12)

POD	Bates Pages or File Names	Detailed Description	Rationale
Request			
No.			
	3. BOD Financial Update – Xia v7 – add – saj	Entire document	(12)
	4. FINAL – External Affairs (Fletcher) July 2015 BoD.saj5	Entire document	(12)
	5. 2015 Gulf Board Tom Wilson 7 23 15	Entire document	(12)
	6. Board Income Statement June 2015	Entire document	(12)
-	7. Board Cash Flow June 2015 07 15 15	Entire document	(12)
	4. Compliance Officer Disclosure 2Q 2015	Entire document	(12)
	5. CCC Presentation (Fletcher) July 2015.wb2	Entire document	(12)
	6. 302 Internal Controls for BOD – July 23 2015	Entire document	(12)
	7. 404 Internal Controls for BOD – July 23 2015	Entire document	(12)
	8. IA Results for Gulf CCC Q2 2015 pages 1-4 (2).wb	Entire document	(12)
	9. FPC 2nd Qtr 2015 Results pages 5-8 (2)	Entire document	(12)
	17. BOD Presentation (Liu) Financial Update October 19 2015 v8.nabb	Entire document	(12)
	19. Key Beliefs – Make Move Sell – 2015 Oct BOD – Bulleted MSL edits – v7	Entire document	(12)
	20. 2015 Budget Income Statement Without COR – 3Q v4	Entire document	(12)
	21. Board Cash Flow September 2015 10 15 15	Entire document	(12)
	BOD Presentation (Connally) Safety October 19 2015 wb2	Entire document	(12)
	BOD Presentation (Fletcher) External Affairs October 19 2015 wb2	Entire document	(12)
	BOD Presentation (Terry) CVB October 19 2015A jlt	Entire document	(12)
	4. 3Q Compliance Officer Disclosure Report	Entire document	(12)
	5. CCC Presentation (Fletcher) October 19 2015 wb2	Entire document	(12)
	6. 302 Internal Controls for BOD – October 19 2015 v2	Entire document	(12)
	7. 404 Internal Controls for BOD – October 19 2015 v1	Entire document	(12)
	8. CCC Presentation (Hodnett) Red Flag Rules October 19 2015 (3)2	Entire document	(12)

POD	Bates Pages or File Names	Detailed Description	Rationale
Request			
<u>No.</u>			
	9. GULF CCC Presentation Q3 2015	Entire document	(12)
	10. GULF Summary of IA Results Q3	Entire document	(12)
	2015		
	11. 2014 External Quality Assessment	Entire document	(12)
	Update		
	12. IA 2015 Quality Update	Entire document	(12)
	13. Gulf 2015 Audit Plan – DRAFT 9 30	Entire document	(12)
	15 (FINAL) (2)		
	GULF Operation Performance – April	Entire document	(12)
	2016		
	GULF Operation Performance – Aug 2016	Entire document	(12)
	GULF Operation Performance – July 2016	Entire document	(12)
	GULF Operation Performance – June 2016	Entire document	(12)
	GULF Operation Performance – March	Entire document	(12)
	2016		
	GULF Operation Performance – May 2016	Entire document	(12)
	GULF Operation Performance – Sept 2016	Entire document	(12)
	2. BOD Presentation (Safety) April 4 4	Entire document	(12)
	16.wb		
	3. BOD Presentation (Liu) v4	Entire document	(12)
	4. DRAFT #3 – BOD Presentation	Entire document	(12)
	(Fletcher) April 4 18 16		
	5. BOD Presentation (Davis)REVISED 04	Entire document	(12)
	21 16 (004)		
	6. BOD Presentation (Generation	Entire document	(12)
	Diversity) v7 – No Appendix		
	7. Board Cash Flow March 2016 04 21 16	Entire document	(12)
	8. 2016 Budget Income Statement Without	Entire document	(12)
	COR – 1Q v5 For Board		
	4. 1Q 2016 Compliance Officer Disclosure	Entire document	(12)
	Statement		
	5. CCC Presentation (Fletcher).Final	Entire document	(12)
	6. 302 & 404 – Comptroller report	Entire document	(12)
	042916.FINAL		
	7. GULF CCC Presentation Q1 2016 Part I	Entire document	(12)
	8. Gulf 1st Qtr Results – 2016 Part II	Entire document	(12)
	5. OpComm Presentation (CCR).Final	Entire document	(12)
	6. OpComm	Entire document	(12)
	Presentation.CustomerTouchpoint.Final		
	2015 Budget Income Statement Without	Entire document	(12)
	COR – 4Q		

POD	Bates Pages or File Names	Detailed Description	Rationale
Request	·		
<u>No.</u>			
	2015 foundation report rev FEB 12	Entire document	(12)
	2016 PSC Approval for FA	Entire document	(12)
	Board Cash Flow December 2015 02 16 16	Entire document	(12)
	BOD Presentation (Boles) Media	Entire document	(12)
	Relations1.bb		
	BOD Presentation (Connally) Safety 2016	Entire document	(12)
	rev2 Feb 3 – kb.bb		
	BOD Presentation (External Affairs)	Entire document	(12)
	Template February 25 2016 saj.bb		
	BOD Presentation (Financial) 2015 4Q	Entire document	(12)
	v13.bb		
	Fund Inc – Board mtg update 2-16.bb	Entire document	(12)
	9. GULF CCC Presentation Matrix Q4	Entire document	(12)
	2015		
	10. Internal Auditing Operations Results	Entire document	(12)
	for 2015 UPDATED 02082016		
	11. GULF CCC 2016 Audit Plan	Entire document	(12)
	12. Tab VI – FPC – 2015 CCC Year End	Entire document	(12)
	Communication Materials – FINAL		
	2015 Annual CCC Report Full.Signed	Entire document	(12)
	CCC Presentation (Fletcher) February 25	Entire document	(12)
	2016.bb		
	Compliance Officer Disclosure Statement	Entire document	(12)
	4Q 2015		
	Tab IV – 302 Internal Controls for BOD –	Entire document	(12)
	February 25 2016		
	Tab IV – 404 Internal Controls for BOD –	Entire document	(12)
	February 25 2016		
	GulfPower2016 v3	Entire document	(12)
	Board Cash Flow June 2016 as of 7-18-	Entire document	(12)
	2016.FINAL		
	BOD Presentation (Fletcher) July 28,	Entire document	(12)
	2016.cs3 FINAL		
	BOD Presentation (Liu) 2Q July 28 2016	Entire document	(12)
	v8 FINAL		
	BOD Presentation (Ritenour) Jul 2016 v7	Entire document	(12)
	07.20.2016 FINAL Board Room		
	BOD Presentation (Safety) July 28	Entire document	(12)
	2016.FINAL		
	PIS to Plan June 2016.FINAL	Entire document	(12)

POD	Bates Pages or File Names	Detailed Description	Rationale
Request			
No.	CCC Presentation (Fletcher) July 28 2016.cs3 FINAL	Entire document	(12)
	Compliance Officer Disclosure Statement – 2Q 2016 FINAL	Entire document	(12)
	Comptroller report 072816 FINAL	Entire document	(12)
	GULF CCC – IA Summary Q2 2016.FINAL	Entire document	(12)
	OpCOmm Presentation (Environmental) July 27, 2016.cs6 FINAL	Entire document	(12)
	OpComm Presentation (Terry) July 27 2016 ED.cs4 FINAL	Entire document	(12)
	OpComm Presentation (Transmission) July 27 2016 v3 FINAL	Entire document	(12)
	3rd Quarter 2016 Prelim – Board Income Statement 10172016.xlsx	Entire document	(12)
	bentina BOD Presentation (Young) CVB October 28 2016.Final	Entire document	(12)
	BOD Cash Flow as of 10-17-2016	Entire document	(12)
	BOD Presentation (Fletcher) October 28, 2016 lr10142016	Entire document	(12)
	BOD Presentation (Liu) October 28 2016 v8	Entire document	(12)
	BOD Presentation (Safety) October 28 2016 rev saj 10202016	Entire document	(12)
	Bill Ray – Scanned from a Xerox Multifunction Device	Entire document	(12)
	CCC Presentation (Fletcher) October 28 2016 rev1.wb	Entire document	(12)
	CCC Presentation (Hodnett) Red Flag Rules October 28 2016 Updated v2	Entire document	(12)
	Comptroller report 102816	Entire document	(12)
	GULF CCC Presentation Q3 2016	Entire document	(12)
	Gulf Power 3rd Qtr 2016 Results	Entire document	(12)
	Gulf Power Company Audit Service Plan Final v2	Entire document	(12)
	IA 2016 Quality Update	Entire document	(12)
	OpComm Presentation (Distribution) October 28 2016 saj 10212016v2	Entire document	(12)
	OpComm Presentation (Generation) October 28 2016mlb2FINAL	Entire document	(12)

POD	Bates Pages or File Names	<u>Detailed Description</u>	Rationale
Request			
<u>No.</u>			
	OpComm Presentation (Terry) October 28	Entire document	(12)
	2016 (Jodys Updates 9-26-16)		(0.1)
39	CONF 2015 CS&S Goals	Entire document	(21)
	CONF 2016 CS&S Goals	Entire document	(21)
40	OPC POD 040 CONF IA Affiliate	Entire document	(7)
	Transactions Audit Reports Issued in 2014-		
	2016_CONF		
41	OPC POD 041 CONF IA Affiliate	Entire document	(7)
	Transactions Audit Reports Issued in 2013-		
	2016		
42	OPC POD 042 CONF IA Audit Reports	Entire document	(7)
	Issued in 2014		
	OPC POD 042 CONF IA Audit Reports	Entire document	(7)
	Issued in 2015		.=
	OPC POD 042 CONF IA Audit Reports	Entire document	(7)
	Issued in 2016		
43	Attachment OPC POD 43 CONF	Entire document	(4)
			(14)
	Plant Daniel Accounting Procedure CONF	Entire document	(4)
4.4	ODG DOD 44 GOVE 44 1		(14)
44	OPC POD 44 – CONF – Attachment A	Entire document	(4)
	OPC POD 44(A)_CONF- Attachment B	Entire document	(4)
	OPC POD 44(A)_CONF- Attachment C	Entire document	(4)
	OPC POD 44(A)_CONF – Attachment D	Entire document	(4)
	(2014-2016)		(4)
	OPC POD 44(A)_CONF – Attachment E	Entire document	(4)
	(Test Year 2017)		(4)
	OPC_POD_44(B)_CONF_2015 SCS	Entire document	(4)
	Allocations	Entire de consent	(4)
	OPC_POD_44(B)_CONF_2015 SCS Bill	Entire document	(4)
	OPC_POD_44(B)_CONF_Corporate	Entire document	(4)
	Services Allocation Rates 2016, 2015 and		
45	2014 OPC_POD_45_CONF_Plt Daniel	Entire document	(1)
43		Entire document	(1)
	Operating Agreement OPC_POD_45_CONF_Power Secure	Entire document	(1)
	Energy Services	Entire document	(1)
	OPC_POD_45_CONF_Southern Linc	Entire document	(1)
	Amendment No. 1	Entire document	(1)
	Amendment No. 1		

POD	Bates Pages or File Names	Detailed Description	Rationale
Request	-	_	
<u>No.</u>			
	OPC_POD_45_CONF_ Southern Linc	Entire document	(1)
	Amendment No. 2		
	OPC_POD_45_CONF_Southern Linc	Entire document	(1)
	OPC_POD_45_CONF_Exhibit O	Entire document	(1)
	OPC_POD_45_CONF_Intercompany	Entire document	(1)
	Interchange Contract		
	OPC_POD_45_CONF_ Scherer Operating	Entire document	(1)
	Agreement		
	OPC_POD_45_CONF_Scherer Purchase	Entire document	(1)
	Agreement		
	OPC_POD_45_CONF_Southern	Entire document	(1)
	Communications Amendment 1		
	OPC_POD_45_CONF_Southern	Entire document	(1)
	Communications		
	OPC_POD_45_CONF_Southern Company	Entire document	(1)
	Services Amendment 2		
	OPC_POD_45_CONF_Southern Company	Entire document	(1)
	Services Amendment 3		
	OPC_POD_45_CONF_Southern Company	Entire document	(1)
	Services		
46	OPC_POD_46 CONF_Power Secure	Entire document	(1)
	Subcontract		
49	2014 Material Sales to APC_CONF	Entire document	(15)
	2014 Material Sales to GPC_CONF	Entire document	(15)
	2014 Material Sales to MPC_CONF	Entire document	(15)
	APC Material Purchases 2014_CONF	Entire document	(15)
	GPC Material Purchases 2014_CONF	Entire document	(15)
	MPC Material Purchases 2014_CONF	Entire document	(15)
54	2015-2016 OPCO Allocation	Entire document	(15)
	Billings_CONF		
	2015-2016 SCS Allocation Billings_CONF	Entire document	(15)
	2015-2016 Gulf to Affiliate Manual	Entire document	(15)
	Invoices – No BANK Accts_CONF		

POD	Bates Pages or File Names	Detailed Description	Rationale
Request			
<u>No.</u>			
	2015-2016 Material Sales to ACP – No	Entire document	(15)
	BANK Accts_CONF	Entine de serve	(15)
	2015-2016 Material Sales to GPC – No BANK Accts_CONF	Entire document	(15)
	2015-2016 Material Sales to MPC_No	Entire document	(15)
	BANK Accts_CONF	Entire document	(13)
55	2015 – 2016 YTD Joint Owner	Entire document	(15)
	Allocations_CONF		
	Material Purchases from GPC 2015-	Entire document	(15)
	2016_CONF		
	Material Purchases from APC 2015-	Entire document	(15)
	2016_CONF		
	Material Purchases from MPC 2015-	Entire document	(15)
	2016_CONF		
	APC to FPC Invoices 2015-2016 – No	Entire document	(15)
	Bank Accts_CONF		
	GPC to FPC Invoices 2015-2016 – No	Entire document	(15)
	Bank Accts_CONF		
	MPC to FPC Invoices 2015-2016 – No	Entire document	(15)
	Bank Accts_CONF		(4.5)
	SCS to FPC Invoices 2015-2016 – No	Entire document	(15)
	Bank Accts_CONF	E 1	(15)
	LINC to FPC Invoices 2015-2016 – No	Entire document	(15)
	Bank Accts_CONF	Entire de coment	(15)
	2015-2016 OPCO Billings to Gulf_CONF	Entire document	(15)
	2015-2016 Pool Bill Invoices_CONF	Entire document	(15)
	2015 - 2016 SCS Allocation Billings_CONF	Entire document	(15)
	2015 and 2016 Interconnection Bill CONF	Entire document	(15)
	Transmission Net Settlement Bills	Entire document	(15)
	2015_CONF		
	Transmission Net Settlement Bills	Entire document	(15)
	2016_CONF		
56	Gulf Power 2015 RA Supplemental	Entire document	(5)
	Presentation – Final CONF		
	Gulf Power 2015 Rating Agency	Entire document	(5)
	Presentation – FINAL CONF		

POD	Bates Pages or File Names	Detailed Description	Rationale
Request			
<u>No.</u>			
	Gulf Power 2016 RA Presentation – Final CONF	Entire document	(5)
	Gulf Power 2016 RA Supplemental	Entire document	(5)
	Presentation CONF		
60	Rating Agency Correspondence – CONF	Entire document	(1)
			(5)
			(17)
61	2015Q4 AHIC Capital Market	Entire document	(10)
	Assumptions (30 Year)_CONF		(16)

- (1) The information identified on the listed pages/files contains confidential pricing and non-price information pertaining to contractual agreements between Gulf and various counterparties. Such contractual agreements include purchased power agreements, wholesale agreements, long term service agreements, tax-sharing agreements, consulting agreements, lines of credit, right of way leases, land purchases, and facility leases. This information is regarded by both Gulf and the counterparties as confidential. The information, which resulted from negotiations with Gulf and the counterparties, is specific to individual contracts and is not publicly known. Disclosure of this information would negatively impact Gulf's ability to negotiate contract terms favorable to its customers in future contracts. In addition, potential counterparties may refuse to enter into contracts with Gulf, or may charge higher prices, if the information is publicly disclosed. The disclosure of this information would therefore be harmful to Gulf's competitive interests, and as such, the information is entitled to confidential classification pursuant to Section 366.093(3)(d) and (e), Florida Statutes.
- (2) The information identified on the listed pages/files contains confidential employee and director data, including names, positions, salaries, stock options, projected income, transfer and/or promotion status. Public disclosure of this information could provide Gulf's competitors with an advantage in acquiring and obtaining qualified employees and directors, increase Gulf's employee turnover and associated training costs, and give existing and prospective employees and directors an advantage in negotiating compensation packages, leading to increases in the overall amount paid to employees and directors. This information is confidential pursuant to section 366.093(3)(e), Florida Statutes. See Florida Power & Light v. Florida Public Service Commission, 31 So.3d 860 (Fla. 1st DCA 2010).
- (3) The information identified on the listed pages/files contains policies and strategies of Gulf, its affiliates, and its parent company related to the companies' methods of fossil fuel procurement and operations. The policies relate to contracting for supplies, storage, and transportation, daily fossil fuel operations, and bid and procurement strategies. Disclosure of this information would negatively impact Gulf's ability to negotiate

contract terms favorable to its customers in future contracts, and it would harm Gulf's competitive interests. If Gulf'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 competitively sensitive and confidential pursuant to Section 366.093(3)(d) and (e), Florida Statutes.

- (4) The information identified on the listed pages/files contains allocation factors for affiliate transactions. These factors could be used by competitors of Gulf to gain confidential details regarding the Company's internal cost allocation methodologies. These methodologies have been developed over time and through the expenditure of significant resources. Access to such methodologies would bestow on competitors of the Company an unfair advantage to the extent that such competitors would not similarly be required to expend such resources to develop similar methodologies. This would, in turn, confer an unfair advantage on such companies. In addition, access to the information would provide insight into the costs of the Company, which could also undermine the Company's position. The Company's competitors are not similarly required to disclose such information and access to such cost information would harm the Company and could result in competitors manipulating the market by artificially setting prices based on such information. This information is confidential pursuant to section 366.093(3)(d) and (e), Florida Statutes.
- (5) The information identified on the listed pages/files contains confidential presentations made by Gulf to certain financial rating agencies, and/or drafts of confidential presentations and correspondence related thereto. These presentations include forward looking financial data such as projected capital expenditures, environmental compliance costs, financing needs, credit profiles, and other commercially sensitive financial and operational information, the disclosure of which could harm the competitive interest of the Company. This information is confidential pursuant to Section 366.093(3)(e), Florida Statutes.
- (6) The information identified on the listed pages/files contains confidential financial data and results generated by a proprietary Gulf financial model. The model is utilized by Gulf, in part, to perform cost-effectiveness analyses for Gulf's demand-side management measures and plans. The model utilizes various inputs, including but not limited to Company-specific avoided costs relating to fuel, generation, transmission, and distribution. The model and the information it contains is subject to substantial procedures to maintain its secrecy. Only select Gulf and Southern Company Services personnel and their legal counsel are granted access to it, and those personnel receive access only on a "need to know" basis. More specifically, public disclosure of the information would provide other utilities, independent power producers, and vendors of demand-side management services details related to the Company's avoided cost components and the calculations used in the Company's model that determine pricing and cost effectiveness of marketing programs, individual customer loads, and certain supply-side and demand-side options. The information would bestow an unfair advantage on such entities with respect to resource planning, projected generation costs, and DSM program development and contracting. If suppliers had access to such information, it would place Gulf at an economic disadvantage and provide an economic

advantage to its competitors and/or bidders who have access to such information, which could increase costs to Gulf and result in higher rates to customers. Gulf's ability to negotiate the optimum price and contract terms and conditions would be undermined if competitors and suppliers were given access to the company's costs through disclosure of this information. Finally, Gulf's competitors are not required to disclose their avoided cost components. This information is confidential pursuant to Section 366.093(3)(e), Florida Statutes.

- (7) The information identified on the listed pages/files contains internal auditing reports prepared by Southern Company Services on behalf of Gulf and other affiliates. Internal auditing controls and reports of internal auditors are specifically designated as proprietary confidential business information pursuant to Section 366.093(3)(b), Florida Statutes. The Commission has previously recognized the such reports are confidential in their entirety. See PSC Order No. 21102 (Docket No. 881167-EI); PSC Order No. 12-0035-CFO-EI.
- (8) The information identified on the listed pages/files contains copies of incentive compensation plans which include non-public employee compensation data. Specifically, the confidential information consists of target percentage awards for incentive compensation by salary grade. Public disclosure of this information could provide Gulf's competitors with an advantage in acquiring and obtaining qualified employees, increase Gulf's employee turnover and associated training costs, and give existing and prospective employees an advantage in negotiating compensation packages, leading to increases in the overall amount paid to employees. This information is entitled to confidential classification pursuant to section 366.093(3)(e), Florida Statutes. See Florida Power & Light v. Florida Public Service Commission, 31 So.3d 860 (Fla. 1st DCA 2010).
- (9) The information identified on the listed pages/files contains Gulf's internal analyses regarding generation planning, including the financial viability of future generation resource additions and the retirements of Plants Smith and Scholz. The confidential internal evaluations include information and examination of operating costs, asset valuation, environmental compliance, capacity, and other strategic factors. This information includes both current and projected data such as projected capital expenditures, environmental compliance costs, financing needs, and other commercially sensitive financial and operational information, the disclosure of which could harm the competitive interests of the Company. This information is confidential pursuant to Section 366.093(3)(e), Florida Statutes.
- (10) The information identified on the listed pages/files contains analyses which were performed by Gulf's outside consultant. The disclosure of this information could allow duplication of the consultant's work without compensation for the consultant's efforts to gather and update information and develop methods of analysis. This information is the proprietary work product of the consultant. It constitutes information relating to competitive interests the disclosure of which could impair the consultant's competitive position in the market by diminishing demand for its proprietary work product. Public

disclosure could also harm Gulf's competitive interest in that disclosure could result in the consultant either charging higher prices for its services, or even refusing to conduct business with Gulf in the future. This information is competitively sensitive and confidential pursuant to Section 366.093(3)(e), Florida Statutes.

- (11) The information identified on the listed pages/files contains data from the Company's General Ledger. The General Ledger is an extremely voluminous database which contains, among other things, competitively sensitive information including purchased power expenditures, wholesale sales and revenues, audit related transactions, personnel data, and vendor data. This information is competitively sensitive and confidential pursuant to Section 366.093(3)(d), (e), and (f), Florida Statutes.
- (12) The information identified on the listed pages/files contains minutes of board of directors meetings, board of directors committee meetings, and/or reports and presentations made by and to Gulf's board of directors. These documents contain competitively sensitive information including projected revenues, sales forecasts, operations plans, and strategic plans. This information is competitively sensitive and confidential pursuant to Section 366.093(3)(e), Florida Statutes.
- (13) The information identified on the listed pages/files contains confidential contracts and terms between Gulf (and/or its counsel) and outside consultants. This information is regarded by both Gulf and the counterparties as confidential. The information, which resulted from negotiations with the counterparties, is specific to individual contracts and is not publicly known. Disclosure of this information would negatively impact Gulf's ability to negotiate contract terms favorable to its customers in future contracts. In addition, potential counterparties may refuse to enter into contracts with Gulf, or may charge higher prices, if the information is publicly disclosed. The disclosure of this information would therefore be harmful to Gulf's competitive interests, and as such, the information is entitled to confidential classification pursuant to Section 366.093(3)(d) and (e), Florida Statutes.
- (14) The information identified on the listed pages/files contains complete copies of multiple internal policies, procedures, and manuals addressing affiliate transactions. These internal documents could be used by Gulf's competitors to gain confidential details regarding the Company's internal cost allocation methodologies. These methodologies have been developed over time and through the expenditure of significant resources. Access to such methodologies would bestow on Gulf's competitors an unfair advantage to the extent such competitors would not similarly be required to expend such resources to develop similar methodologies. This would, in turn, confer an unfair advantage on such companies. In addition, access to the information would provide insight into the costs of the Company, which could also undermine Gulf's position. Gulf's competitors are not similarly required to disclose such information, and therefore, access to such cost information would harm Gulf and could result in its competitors manipulating the market by artificially setting prices based on such information. This information is confidential pursuant to Section 366.093(3)(d) and (e), Florida Statutes.

- (15) The information identified on the listed pages/files contains invoices between Gulf and its affiliates as well as billing information related to transactions between Gulf and its affiliates. These invoices include credit card numbers, personal identifiable information of employees and third parties, and pricing and revenue data for goods and services associated with confidential contracts. This information is competitively sensitive and confidential pursuant to Section 366.093(3)(d), (e), and (f), Florida Statutes.
- Gulf's outside consultant, Aon Hewitt, which contains the consultant's long-term (30 year) outlook for the United States capital market. This information is the proprietary work product of Aon Hewitt. The disclosure of this information could allow duplication of Aon Hewitt's work without compensation for its efforts to gather and update information and develop methods of analysis. It constitutes information relating to competitive interests the disclosure of which could impair Aon Hewitt's competitive position in the market by diminishing demand for its proprietary work product. Public disclosure could also harm Gulf's competitive interests in that disclosure could result in Aon Hewitt either charging higher prices for its services, or even refusing to conduct business with Gulf in the future. This information is confidential pursuant to Section 366.093(3)(e), Florida Statutes.
- (17) The information identified on the listed pages/files contains credit rating letters from Moody's Investor's Service. These letters are subject to Moody's confidentiality restrictions which prohibit their disclosure on a non-confidential basis. Failure by Gulf to honor Moody's restrictions could result in Moody's charging Gulf higher prices for its services, or refusing to conduct business with Gulf in the future. This information is confidential pursuant to Section 366.093(3)(d) and (e), Florida Statutes.
- (18) The information identified on the listed pages/files contains 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.
- (19) The information identified on the listed pages/files contains information about Gulf's parent company's competitive interests. This information includes its forecasted capital structure, forecasted income statement, competitive cost components, and interest expense. This information is competitively sensitive and confidential pursuant to Section 366.093(3)(e), Florida Statutes.
- (20) The information identified on the listed pages/files contains information regarding Gulf's customers, prospective customers, and economic development opportunities. This information includes names and identifying information, account information, billing information, financial information, and other confidential information. Gulf does not

have permission to release this information and would risk its customer relationships by releasing its customers' confidential information. This information is competitively sensitive and confidential pursuant to Section 366.093(3)(d), (e), and (f), Florida Statutes.

- (21) The information identified on the listed pages/files contains policies, strategies, and goals regarding Gulf Power's customer service and sales efforts. This information is competitively sensitive and confidential pursuant to Section 366.093(3)(e), Florida Statutes.
- (22) The information identified on the listed pages/files contains detailed operation and maintenance costs for Gulf generating units, including fuel, variable O&M, SO<sub>2</sub>, NO<sub>x</sub>, and fuel handling. Public disclosure of these costs would place Gulf and its customers at an economic and competitive disadvantage when negotiating wholesale and economy energy sales. This information is entitled to confidential classification pursuant to Section 366.093(3)(e), Florida Statutes.
- (23) The information identified on the listed pages/files contains confidential information pertaining to the timing of planned outages of Gulf Power's generating units. Public disclosure of this information could negatively impact Gulf Power's ability to procure replacement power on competitive terms, if necessary. Advanced knowledge of this information would enable power marketers to tailor their pricing proposals in light of the timing and magnitude of Gulf Power's need. This information is confidential pursuant to Section 366.093(3)(e), Florida Statutes.

# PUBLIC VERSION(S) OF THE DOCUMENT(S)

Attached hereto (unless previously filed as may be noted below) are two public versions of the Document(s) with the Confidential Information redacted.
Public Version(s) of the Document(s) attached X
Public Version(s) of the Document(s) previously filed on

#### **EXHIBIT "C"**

## REQUESTED DURATION OF CONFIDENTIAL CLASSIFICATION

Gulf Power requests that the Confidential Information that is the subject of this request be treated as proprietary confidential business information exempt from the Public Records Law for a minimum of 18 months from the date of the order granting such classification. To the extent the company needs confidential protection of the Confidential Information for a period longer than 18 months, the company's justification therefor is set forth below:

n/a

#### BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

IN RE: Petition for Increase in Rates	)	
By Gulf Power Company	)	
	)	Docket No.: 160186-E

#### CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true copy of the foregoing has been furnished by overnight mail this 14th day of November, 2016 to the following:

Office of Public Counsel
J. R. Kelly/Stephanie A. Morse
Public Counsel
c/o The Florida Legislature
111 W. Madison Street, Room 812
Tallahassee, FL 32399-1400
kelly.jr@leg.state.fl.us
morse.stephanie@leg.state.fl.us

Office of the General Counsel Theresa Tan Kelley Corbari 2540 Shumard Oak Blvd Tallahassee, FL 32399-0850 <a href="mailto:ltm:ref">ltm@psc.state.fl.us</a> kcorbari@psc.state.fl.us

JEFFREY A. STONE
Florida Bar No. 325953
jas@beggslane.com
RUSSELL A. BADDERS
Florida Bar No. 007455
rab@beggslane.com
STEVEN R. GRIFFIN
Florida Bar No. 0627569
srg@beggslane.com
BEGGS & LANE
P. O. Box 12950
Pensacola FL 32591-2950
(850) 432-2451
Attorneys for Gulf Power