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September 17, 2018

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

RE: Docket No. 20170061-EI

Dear Ms. Stauffer:

Attached for filing is Gulf Power Company's Request for Extended Confidential Classification for the Earnings Surveillance Report, Supplemental 2 for December 2017.

Sincerely,

A handwritten signature in blue ink that reads "C. Shane Boyett".

C. Shane Boyett
Regulatory and Cost Recovery Manager

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Attachments

cc : Gulf Power Company
Jeffrey A. Stone, Esq., General Counsel
Beggs and Lane
Russell Badders, Esq.
Florida Public Service Commission
Bart Fletcher

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In Re: Gulf Power Company
Earnings Surveillance Report,
Supplemental Filing for December 2016

Docket No.: 20170061-EI
Date: September 17, 2018

REQUEST FOR EXTENDED 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 (“Commission”) enter an order extending confidential classification for certain information contained within the December 2016 supplements for Gulf Power Company’s Earnings Surveillance Report which were submitted to the Commission pursuant to Order Nos. PSC-96-1219-FOF-EI, PSC-01-0390-TRF-EI, and PSC-14-0197-PAA-EI (collectively the “CISR Surveillance Filings”). As grounds for this request, the Company states:

1. On February 15, 2017, Gulf Power filed a request for confidential classification of certain information contained within the CISR Surveillance Filings. See, Document No. 01938-2017
2. On March 15, 2017, the Commission entered Order No. PSC-17-0100-CFO-EI granting Gulf’s request for confidential classification.
3. As provided in section 366.093(4), Florida Statutes, and by the Commission’s order granting confidential classification, the confidential information will be made public after a period of 18 months unless Gulf or another affected party shows, and the Commission finds, that the confidential information continues to comprise proprietary confidential business information. The 18-month extension period expires on September 17, 2018.

4. Gulf hereby requests that the Commission enter an order extending the confidential classification of the information contained within Exhibit "A" of Gulf's original request for an additional 18-month period.

5. The information contained with Exhibit "A" to Gulf's original request is entitled to continued confidential classification for the same reasons that it was initially classified. As stated in Gulf's original request, the public disclosure of information contained in the CISR Surveillance Filings would cause irreparable harm to Gulf Power and the entities with which it has entered Contract Service Arrangement ("CSA") contracts under the authority of Gulf Power's Commercial/Industrial Service Rider, many or all of which contracts are still in force. The CISR Surveillance Filings contain proprietary confidential business information regarding pricing under the CSAs. Public disclosure of this information would impair the ability of Gulf Power to negotiate terms and conditions in future CSAs that are the most favorable to Gulf Power and its general body of customers. Moreover, the public disclosure of this information may prevent Gulf from successfully negotiating CSA's with customers. The information is regarded as sensitive and confidential by the CISR customers because its public disclosure would impact the customers' ability to compete in their native markets. In the event such information is made public, future potential CISR customers may avoid the risk of public disclosure of their confidential information by refusing to negotiate with Gulf Power. This may lead to uneconomic bypass of Gulf's facilities. This information is therefore confidential pursuant to section 366.093(3)(d)-(e), Florida Statutes.

6. The information which is the subject of 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.

WHEREFORE, Gulf Power Company respectfully requests that the Commission enter

an order protecting the information contained within Exhibit "A" to Gulf's original request from public disclosure as proprietary confidential business information

Respectfully submitted this 17th day of September, 2018.



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