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November 20, 2018

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

RE: Docket No. 20180001-EI

Dear Ms. Stauffer:

Attached is Gulf Power Company's Request for Extended Confidential Classification for certain information contained in Gulf Power's Form 423 Fuel Reports for January through March 2017. Also attached is Gulf's Request for Extended Confidential Classification in Microsoft Word format.

Sincerely,

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

C. Shane Boyett  
Regulatory and Cost Recovery Manager

md

Attachments

cc: Gulf Power Company  
Jeffrey A. Stone, Esq., General Counsel  
Beggs & Lane  
Russell Badders, Esq.

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

IN RE: Fuel and purchased power cost  
recovery clause and generating performance  
incentive factor

Docket No.: 20180001-EI  
Date: November 20, 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 enter an order granting extended confidential classification for certain information contained in Gulf Power's Form 423 Fuel Reports for the months of January, February and March, 2017 ("the 423 Reports"). As grounds for this request, the Company states:

1. On April 28, 2017, Gulf Power filed a request for confidential classification of certain information contained in the 423 Reports ("First Request for Confidential Classification"). (Document No. 04495-2017)

2. On May 22, 2017, the Commission entered Order No. PSC-17-0199-CFO-EI granting Gulf's First Request for Confidential Classification.

3. As provided in section 366.093(4), Florida Statutes, and by the Commission's Order, the confidential documents will be made public after a period of 18 months unless Gulf or another affected party shows, and the Commission finds, that the confidential documents continue to contain proprietary confidential business information. The 18-month extension period expires on November 22, 2018.

4. Gulf hereby requests that the Commission enter an order extending the confidential classification of the information highlighted on Exhibit "A" of Gulf's First Request for Confidential Classification (Document No. 04496-2017) and identified in line/by line format on

Exhibit "C" of Gulf's First Request for Confidential Classification for an additional 18-month period.

5. The information highlighted on Exhibit "A" to Gulf's First Request for Confidential Classification is entitled to continued confidential classification for the same reasons that it was initially classified. As stated in Gulf's first request, the subject information is proprietary confidential business information regarding contractual matters which would cause irreparable harm to Gulf Power, the entities with whom it has entered into contracts and most importantly to Gulf's customers, if such information was disclosed to the general public. The subject information consists of pricing data for coal and related transportation purchases by Gulf Power. Contracts forming the basis for this pricing data are still in effect. Disclosure of this information could negatively impact Gulf's ability to negotiate pricing favorable to its customers in future. In addition, potential counterparties may refuse to enter into contracts with Gulf, or may charge higher prices, if the price terms are made public. The information is entitled to confidential classification pursuant to section 366.093(3) (d) and (e), Florida Statutes.

6. 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.

**WHEREFORE**, Gulf Power Company respectfully requests that the Commission enter an order protecting the information highlighted on Exhibit "A" to Gulf's First Request for Confidential Classification from public disclosure for an additional period of eighteen (18) months.

Respectfully submitted this 20<sup>th</sup> day of November, 2018.

A handwritten signature in blue ink, appearing to read "Russell A. Badders", is written over a horizontal line.

**RUSSELL A. BADDERS**

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**Attorneys for Gulf Power Company**

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

IN RE: **Fuel and Purchased Power Cost** )  
**Recovery Clause with Generating** )  
**Performance Incentive Factor** )

Docket No.: **20180001-EI**

**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that a true copy of the foregoing was furnished by electronic mail this 20th day of November, 2018 to the following:

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