



Russell Badders
Vice President, Associate General Counsel

February 26, 2020

Mr. Adam Teitzman, Commission Clerk
Florida Public Service Commission
2540 Shumard Oak Boulevard
Tallahassee FL 32399-0850

RE: Docket No. 20130140-EI

Dear Mr. Teitzman:

Attached is Gulf Power Company's Request for Extended Confidential Classification pertaining to Commission Staff's audit of Gulf Power Company's request for an increase in rates in the above-referenced docket. Also attached is Gulf's Request for Extended Confidential Classification in Microsoft Word format.

Sincerely,

A handwritten signature in blue ink, appearing to read 'Russell Badders'.

Russell Badders
Vice President & Associate General Counsel
Gulf Power Company

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Attachments

cc: Gunster Law Firm
Richard A. Melson, Esq.

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

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

Docket No.: 20130140-EI
Date: February 26, 2020

REQUEST FOR EXTENDED CONFIDENTIAL CLASSIFICATION

GULF POWER COMPANY [“Gulf Power”, “Gulf”, or the “Company”], by and through its undersigned attorney and pursuant to Rule 25-22.006, Florida Administrative Code, hereby files its request that the Florida Public Service Commission (the “Commission”) enter an order granting extended confidential classification for certain information produced in connection with Commission Staff’s audit (ACN 13-207-1-1) of Gulf Power’s request for an increase in rates in the above-referenced docket (the “Confidential Information”). As grounds for this request, the Company states:

1. On October 30, 2013, Gulf filed its initial Request for Confidential Classification of the Confidential Information. (Document No. 06633-13)
2. On November 26, 2013, the Commission entered an order granting Gulf Power’s request. See, Order No. PSC-13-0627-CFO-EI.
3. On May 26, 2015, Gulf filed its First Request for Extended Confidential Classification. (Document No. 03124-15)
4. On July 20, 2015, the Commission entered an order granting Gulf Power’s request. See, Order No. PSC-15-0292-CFO-EI.
5. On January 20, 2017, Gulf filed its Second Request for Extended Confidential Classification. (Document No. 00731-17)
6. On February 22, 2017, the Commission entered an order granting Gulf Power’s request. See, Order No. PSC-17-0058-CFO-EI.

7. On August 22, 2018, Gulf filed its Third Request for Extended Confidential Classification. (Document No. 05455-2018)

8. On August 28, 2018, the Commission entered an order granting Gulf Power's request. See, Order No. PSC-2018-0438-CFO-EI.

9. 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 February 28, 2020.

10. Gulf hereby requests that the Commission enter an order extending the confidential classification of the Confidential Information identified in Gulf's initial Request for Confidential Classification for an additional 18-month period.

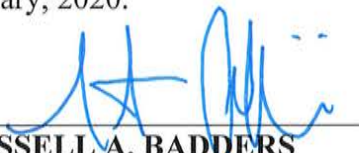
11. The Confidential Information is entitled to continued confidential classification for the same reasons that it was initially classified. As stated in Gulf's initial Request, the Confidential Information entitled to confidential classification pursuant to section 366.093(3)(a), (d) and (e), Florida Statutes, as information, the public disclosure of which could cause irreparable harm to the competitive interests of Gulf Power and the ability of Gulf to enter into contracts on terms favorable to it and its customers. The Confidential Information reflects actual and projected pricing information for capacity payments under power purchase agreements between Gulf Power and various counterparties. Some of the purchase power agreements remain active, while others are not. However, the Confidential Information remains sensitive in its entirety given that disclosure of pricing information for the non-active agreements would enable third parties to back-calculate pricing for the active agreement. This information is regarded by

both Gulf and its counterparty as confidential. Disclosure of this information would negatively impact Gulf Power's ability to negotiate payment terms favorable to its customers in future power purchase agreements. In addition, potential counterparties may refuse to enter into contracts with Gulf, or may charge higher prices, if such pricing information was publicly disclosed.

12. 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 from public disclosure the Confidential Information identified in Gulf's initial request for an additional 18-month period.

Respectfully submitted this 26th day of February, 2020.



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BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

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

Docket No.: 20130140-EI

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true copy of the foregoing has been furnished by electronic mail this 26th day of February, 2020 to the following:


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