Robert L. McGee, Jr. Regulatory & Pricing Manager One Energy Place Pensacola, Florida 32520-0780

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June 12, 2015

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

RE: Docket No. 150001-El

Dear Ms. Stauffer:

Attached for official filing is Gulf Power Company's Request for Extended Confidential Classification regarding certain information submitted by Gulf Power in connection with Commission Staff's audit in the above referenced docket (ACN 11-006-1-2 & ACN11-006-1-1).

Regards,

Robert L. Ml. Serf.

Robert L. McGee, Jr. Regulatory and Pricing Manager

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Attachments

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

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

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

 Docket No.:
 150001-EI

 Date:
 June 12, 2015

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 extending confidential classification for certain documents produced by Gulf Power in connection with a review of Gulf Power's 2010 fuel and capacity expenditures in Docket No. 110001-EI (ACN 11-006-1-2 & ACN 11-006-1-1) (the "Review"). As grounds for this request, the Company states:

 On June 29, 2011, Gulf Power filed a request for confidential classification of certain information submitted by Gulf pursuant to the Review (the "Original Request").
 (Document No. 04474-11). The subject information is contained within Document Nos. 04475-11, 03957-11 and 03959-11 (the "Confidential Information").

2. On March 29, 2012, the Commission entered Order No. PSC-12-0155-CFO-EI granting Gulf's Original Request.

3. On September 25, 2013, Gulf Power filed a request to extend confidential classification of the Confidential Information. See Document No. 05726-13; Docket No. 130001-EI.

4. On December 18, 2013, the Commission entered Order No. PSC-13-0664-CFO-EI granting Gulf's request.

5. As provided in section 366.093(4), Florida Statutes, and by the Commission's Order, 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 constitute proprietary confidential business information. The 18-month extension period expires on June 18, 2015.

6. Gulf hereby requests that the Commission enter an order extending the confidential classification of the Confidential Information for an additional 18-month period.

The Confidential Information is entitled to continued confidential classification 7. for the same reasons that it was initially classified. As stated in Gulf's previous requests, a portion of the information submitted by Gulf Power in connection with the Review constitutes proprietary confidential business information concerning bids and other contractual data, the disclosure of which would impair the efforts of Gulf Power to contract for goods and services on favorable terms. The information is entitled to confidential classification pursuant to section 366.093(3)(d) and (e), Florida Statutes. Specifically, the Confidential Information consists of pricing and bank routing information for fuel, energy and capacity purchases between Gulf Power and various counterparties. Contracts forming the basis for portions of this pricing data are still in effect. This information is regarded by both Gulf and the counterparties as confidential. The pricing, which resulted from negotiations between 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 pricing 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 price terms were made public. The bank routing information consists of private account numbers for various counterparties and remains sensitive. Disclosure of this information would impair the parties' ability to protect themselves from fraudulent actions and could subject Gulf to potential litigation over the wrongful disclosure of private

information. The information is entitled to confidential classification pursuant to section 366.093(3)(e), Florida Statutes.

8. The information which is subject 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 extending confidential classification of the Confidential Information for an additional 18-month period.

Respectfully submitted this 11th day of June, 2015.

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

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

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

Docket No.: 150001-EI

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true copy of the foregoing was furnished by electronic mail this 12th day of June, 2015 to the following:

Florida Public Utilities Company Cheryl M. Martin, Director Regulatory Affairs 911 South 8th Street Fernandina Beach, FL 32034 <u>Cheryl Martin@fpuc.com</u> PCS Phosphate – White Springs c/o Brickfield Law Firm James W. Brew/Owen J. Kopon Laura A. Wynn Eighth Floor, West Tower 1025 Thomas Jefferson St, NW Washington, DC 20007 ibrew@bbrslaw.com owen.kopon@bbrslaw.com laura.wynn@bbrslaw.com Duke Energy Florida John T. Burnett Dianne M. Triplett 299 First Avenue North St. Petersburg, FL 33701 Dianne.triplett@duke-energy.com John.burnett@duke-energy.com

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