

Robert L. McGee, Jr.
Regulatory & Pricing Manager

One Energy Place
Pensacola, Florida 32520-0780

Tel 850 444 6530
Fax 850 444 6026
RLMCGEE@southernco.com



August 27, 2015

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

RE: Docket No. 150007-EI

Dear Ms. Stauffer:

On August 24, 2015 Gulf submitted the attached Request for Extended Confidential Classification in connection with Commission Staff's audits in the above-referenced docket (ACN 11-005-1-2) using the Commission's web portal filing process. It has come to Gulf's attention the Request was not successfully received by the Commission. Gulf is hereby resubmitting its Request for Extended Confidential Classification. The Microsoft Word version of Gulf's Request for Extended Confidential Classification was previously provided to the parties.

Sincerely,

C. Shane Boyett for

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: Environmental cost recovery clause
_____)

Docket No.: 150007-EI
Date: August 24, 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 granting extended confidential classification for certain information produced by Gulf Power in connection with a review of Gulf Power's environmental expenditures in Docket No. 110007-EI (ACN 11-005-1-2) (the "Review"). As grounds for this request, the Company states:

1. On June 10, 2011, Gulf Power filed a request for confidential classification of certain information produced in connection with the Review. (Document No. 04035-11)
2. On October 25, 2011, the Commission entered Order No. PSC-11-0498-CFO-EI granting Gulf's request for confidential classification.
3. On October 28, 2011, the Commission entered Order No. PSC-11-0498A-CFO-EI which amended the Commission's original order to correct a scrivener's error in the original order.
4. On April 16, 2013, Gulf Power filed its first Request for Extended Confidential Classification of the confidential information. (Document No. 02009-13) On February 25, 2014, the Commission entered Order No. PSC-14-01111-CFO-EI granting Gulf's first Request for Extended Confidential Classification.
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 documents continue to contain proprietary confidential business information. The 18-month extension period expires on August 25, 2015.

6. Gulf hereby requests that the Commission enter an order extending the confidential classification of the information identified in line-by-line format on Exhibit "C" to Gulf's original Request for Confidential Classification (Document No. 04037-11) for an additional 18-month period.

7. The information identified on Exhibit "C" to Gulf's original request remains sensitive despite the passage of time and is entitled to continued confidential classification for the same reasons that it was initially classified. As stated in Gulf's original request, the subject information concerns:

a. Bids or other contractual data, the disclosure of which would impair the efforts of Gulf Power or its affiliates to contract for goods or services on favorable terms;

b. Competitive interests, the disclosure of which would impair the competitive business of Gulf Power; and

c. Employee personnel information unrelated to compensation, duties, qualifications or responsibilities.


The information at issue provides details concerning Gulf Power's environmental cost activities including specific pricing information; purchase order, customer, and/or project numbers; and personal employee information unrelated to their compensation, duties, qualifications, or responsibilities. Disclosure of this information would impair Gulf Power's ability to protect itself from fraudulent actions, give other market participants a competitive advantage over Gulf, adversely affect Gulf's ability to negotiate contracts to the benefit of its

customers, and subject Gulf to potential litigation over the wrongful disclosure of private information. The information is entitled to confidential classification pursuant to sections 366.093(3)(d), (e), and (f), Florida Statutes.

8. 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 identified on Exhibit "C" of Gulf's original request (Document No. 04037-11) from public disclosure for an additional period of eighteen (18) months.

Respectfully submitted this 24th day of August, 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

IN RE: **Environmental Cost**)
Recovery Clause)

Docket No.: 150007-EI

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true copy of the foregoing was furnished by electronic mail this 24th day of August, 2015 to the following:

Ausley Law Firm
James D. Beasley
J. Jeffry Wahlen
Ashley M. Daniels
Post Office Box 391
Tallahassee, FL 32302
jbeasley@ausley.com
adaniels@ausley.com
jwahlen@ausley.com

PCS Phosphate – White Springs
c/o Stone Law Firm
James W. Brew/Owen J. Kopon
Laura A. Wynn
Eighth Floor, West Tower
1025 Thomas Jefferson St, NW
Washington, DC 20007
jbrew@smxblaw.com
oik@smxblaw.com
laura.wynn@bbrslaw.com

Florida Power & Light Company
Kenneth Hoffman
215 South Monroe Street, Suite 810
Tallahassee, FL 32301-1858
Ken.Hoffman@fpl.com

Florida Industrial Power Users Group
c/o Moyle Law Firm
Jon C. Moyle, Jr.
118 North Gadsden Street
Tallahassee, FL 32301
jmoyle@moylelaw.com

Florida Power & Light Company
John T. Butler
700 Universe Boulevard
Juno Beach, FL 33408-0420
John.Butler@fpl.com

Hopping Green & Sams
Gary V. Perko
P. O. Box 6526
Tallahassee, FL 32314
gperko@hgslaw.com

Office of Public Counsel
J. Kelly/C. Rehwinkel/P. Christensen
c/o The Florida Legislature
111 W. Madison Street, Room 812
Tallahassee, FL 32399-1400
Christensen.patty@leg.state.fl.us

Duke Energy Florida, Inc.
Matthew R. Bernier
Cameron Cooper
106 East College Avenue, Suite 800
Tallahassee, FL 32301
Matthew.bernier@duke-energy.com
Cameron.Cooper@duke-energy.com

Duke Energy Florida, Inc.
John T. Burnett
Dianne M. Triplett
299 First Avenue North
St. Petersburg, FL 33701
Dianne.triplett@duke-energy.com
John.burnett@duke-energy.com

Tampa Electric Company
Ms. Paula K. Brown, Manager
Regulatory Coordination
P. O. Box 111
Tampa, FL 33601-0111
Regdept@tecoenergy.com

Office of the General Counsel
Charles Murphy
2540 Shumard Oak Blvd
Tallahassee, FL 32399-0850
cmurphy@psc.state.fl.us
DLynn@psc.state.fl.us



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