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April 2, 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:

REDACTED

RECEIVED-FPSC
2018 APR -3 AM 11:31
COMMISSION
CLERK

Enclosed is Gulf Power Company's Request for Confidential Classification regarding certain portions of Gulf Power's August-December, 2017 Hedging Activity Report.

Sincerely,

Rhonda J. Alexander
Regulatory, Forecasting and Pricing Manager

md

Enclosures

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

COM _____
AFD 1 (Exh B) + 1 CD
APA _____
ECO _____
ENG _____
GCL _____
IDM _____
CLK _____

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 filed: April 3, 2018

_____)

REQUEST FOR 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 a request that the Florida Public Service Commission enter an order protecting from public disclosure certain portions of Gulf Power's Hedging Information Report. As grounds for this request, the Company states:

1. Pursuant to the Order Establishing Procedure in this docket, Order No. PSC-2018-0079-PCO-EI, Gulf Power is required to file a Hedging Information Report by April 3, 2018 detailing its hedging transactions during the months of August through December of the previous year.

2. A portion of the information in the Hedging Information Report constitutes proprietary and commercially sensitive information regarding competitive interests and contractual matters of Gulf Power which, if disclosed to the general public, would cause irreparable harm to Gulf Power and its customers. This information is entitled to confidential classification pursuant to section 366.093(3)(d), Florida Statutes. Specifically, the information consists of pricing terms for natural gas hedging transactions between Gulf Power and various counterparties. Gulf, its counterparties and other members of the market in which it competes consider this type of information to be competitively sensitive. Disclosure of this information would adversely affect Gulf's ability to contract for goods and services on favorable terms for the benefit of its customers, would impair the competitive interests of Gulf and its vendors, and would place Gulf at a competitive disadvantage when coupled with other information that is publicly available.

3. 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.

4. Submitted as Exhibit "A" is a copy of Gulf Power's Hedging Information Report, on which is highlighted the information for which confidential classification is requested. Exhibit "A" should be treated as confidential pending a ruling on this request. Attached as Exhibit "B" are two (2) edited copies of Gulf's Hedging Information Report which may be made available for public review and inspection. Attached as Exhibit "C" to this request is a line-by-line/field-by-field justification for the request for confidential classification.

WHEREFORE, Gulf Power Company respectfully requests that the Commission enter an order protecting the information highlighted on Exhibit "A" from public disclosure as proprietary confidential business information.

Respectfully submitted this 2nd day of April, 2018.



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Attorney for Gulf Power Company

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: April 3, 2018

_____)

REQUEST FOR CONFIDENTIAL CLASSIFICATION

EXHIBIT "A"

Provided to the Commission Clerk under separate cover as confidential
information.

EXHIBIT "B"

	A	B	C	D	E	F	G	H	I	J	K
	Counterparty	Deal ID	Settlement Type	We Pay Index	Pay Price	They Pay Index	Pay Price	Settlement Source	Hedge Month	Volume	Dollar Amount
1	JPMORG	8062	Swaps	Fixed		Nymex LD HH		NYMEX	09/2017	20,000	
2	BNPP ET	8106	Swaps	Fixed		Nymex LD HH		NYMEX	09/2017	30,000	
3	BMO	8134	Swaps	Fixed		Nymex LD HH		NYMEX	09/2017	30,000	
4	SHELLTRADE	8251	Swaps	Fixed		Nymex LD HH		NYMEX	09/2017	10,000	
5	JPMORG	8307	Swaps	Fixed		Nymex LD HH		NYMEX	09/2017	20,000	
6	SHELLTRADE	8319	Swaps	Fixed		Nymex LD HH		NYMEX	09/2017	20,000	
7	JPMORG	8340	Swaps	Fixed		Nymex LD HH		NYMEX	09/2017	30,000	
8	SHELLTRADE	8348	Swaps	Fixed		Nymex LD HH		NYMEX	09/2017	10,000	
9	CITIGR	8352	Swaps	Fixed		Nymex LD HH		NYMEX	09/2017	10,000	
10	JPMORG	8357	Swaps	Fixed		Nymex LD HH		NYMEX	09/2017	10,000	
11	JPMORG	8387	Swaps	Fixed		Nymex LD HH		NYMEX	09/2017	10,000	
12	JPMORG	8454	Swaps	Fixed		Nymex LD HH		NYMEX	09/2017	10,000	
13	JPMORG	8471	Swaps	Fixed		Nymex LD HH		NYMEX	09/2017	40,000	
14	MERRIL	8480	Swaps	Fixed		Nymex LD HH		NYMEX	09/2017	50,000	
15	BNPP	8536	Swaps	Fixed		Nymex LD HH		NYMEX	09/2017	50,000	
16	SHELLTRADE	8548	Swaps	Fixed		Nymex LD HH		NYMEX	09/2017	50,000	
17	MERRIL	8581	Swaps	Fixed		Nymex LD HH		NYMEX	09/2017	70,000	
18	JPMORG	8604	Swaps	Fixed		Nymex LD HH		NYMEX	09/2017	40,000	
19	CITIGR	8650	Swaps	Fixed		Nymex LD HH		NYMEX	09/2017	40,000	
20	SHELLTRADE	8680	Swaps	Fixed		Nymex LD HH		NYMEX	09/2017	40,000	
21	CIBC	8718	Swaps	Fixed		Nymex LD HH		NYMEX	09/2017	30,000	
22	CITIGR	8719	Swaps	Fixed		Nymex LD HH		NYMEX	09/2017	40,000	
23	CIBC	8750	Swaps	Fixed		Nymex LD HH		NYMEX	09/2017	40,000	
24	JPMORG	8767	Swaps	Fixed		Nymex LD HH		NYMEX	09/2017	50,000	
25	MERRIL	8780	Swaps	Fixed		Nymex LD HH		NYMEX	09/2017	20,000	
26	CITIGR	8784	Swaps	Fixed		Nymex LD HH		NYMEX	09/2017	20,000	
27	BNPP	8791	Swaps	Fixed		Nymex LD HH		NYMEX	09/2017	30,000	
28	JPMORG	8808	Swaps	Fixed		Nymex LD HH		NYMEX	09/2017	40,000	
29	JPMORG	8950	Swaps	Fixed		Nymex LD HH		NYMEX	09/2017	40,000	
30	JPMORG	9017	Swaps	Fixed		Nymex LD HH		NYMEX	09/2017	50,000	
31	MERRIL	9126	Swaps	Fixed		Nymex LD HH		NYMEX	09/2017	50,000	
32	JPMORG	9234	Swaps	Fixed		Nymex LD HH		NYMEX	09/2017	50,000	
33	MACQUARIE	9241	Swaps	Fixed		Nymex LD HH		NYMEX	09/2017	60,000	
34	MERRIL	9259	Swaps	Fixed		Nymex LD HH		NYMEX	09/2017	60,000	
35	CITIGR	9267	Swaps	Fixed		Nymex LD HH		NYMEX	09/2017	60,000	
36	CIBC	9289	Swaps	Fixed		Nymex LD HH		NYMEX	09/2017	50,000	
37	JPMORG	9314	Swaps	Fixed		Nymex LD HH		NYMEX	09/2017	80,000	
38	MERRIL	9337	Swaps	Fixed		Nymex LD HH		NYMEX	09/2017	40,000	
39	SHELLTRADE	9376	Swaps	Fixed		Nymex LD HH		NYMEX	09/2017	50,000	
40	CIBC	9435	Swaps	Fixed		Nymex LD HH		NYMEX	09/2017	50,000	
41	BNPP	9505	Swaps	Fixed		Nymex LD HH		NYMEX	09/2017	40,000	
42	MERRIL	9533	Swaps	Fixed		Nymex LD HH		NYMEX	09/2017	40,000	
43	BNPP	9673	Swaps	Fixed		Nymex LD HH		NYMEX	09/2017	40,000	
44	MACQUARIE	9816	Swaps	Fixed		Nymex LD HH		NYMEX	09/2017	60,000	
45	JPMORG	9837	Swaps	Fixed		Nymex LD HH		NYMEX	09/2017	60,000	
46	MERRIL	9847	Swaps	Fixed		Nymex LD HH		NYMEX	09/2017	60,000	
47	MACQUARIE	9850	Swaps	Fixed		Nymex LD HH		NYMEX	09/2017	60,000	
48	JPMORG	9904	Swaps	Fixed		Nymex LD HH		NYMEX	09/2017	60,000	
49	JPMORG	9924	Swaps	Fixed		Nymex LD HH		NYMEX	09/2017	60,000	
50	JPMORG	9939	Swaps	Fixed		Nymex LD HH		NYMEX	09/2017	20,000	
51	CIBC	9950	Swaps	Fixed		Nymex LD HH		NYMEX	09/2017	20,000	
52	MACQUARIE	9967	Swaps	Fixed		Nymex LD HH		NYMEX	09/2017	30,000	
53	JPMORG	10022	Swaps	Fixed		Nymex LD HH		NYMEX	09/2017	60,000	
54	JPMORG	10419	Swaps	Fixed		Nymex LD HH		NYMEX	09/2017	125,000	
55	CIBC	10421	Swaps	Fixed		Nymex LD HH		NYMEX	09/2017	55,000	
56	MERRIL	10422	Swaps	Fixed		Nymex LD HH		NYMEX	09/2017	70,000	
57	Total										\$2,266,230

	A	B	C	D	E	F	G	H	I	J	K
	Counterparty	Deal ID	Settlement Type	We Pay Index	Pay Price	They Pay Index	Pay Price	Settlement Source	Hedge Month	Volume	Dollar Amount
1	BMO	8134	Swaps	Fixed		Nymex LD HH		NYMEX	11/2017	30,000	
2	SHELLTRADE	8251	Swaps	Fixed		Nymex LD HH		NYMEX	11/2017	10,000	
3	JPMORG	8307	Swaps	Fixed		Nymex LD HH		NYMEX	11/2017	20,000	
4	SHELLTRADE	8319	Swaps	Fixed		Nymex LD HH		NYMEX	11/2017	20,000	
5	JPMORG	8340	Swaps	Fixed		Nymex LD HH		NYMEX	11/2017	30,000	
6	SHELLTRADE	8348	Swaps	Fixed		Nymex LD HH		NYMEX	11/2017	10,000	
7	CITIGR	8352	Swaps	Fixed		Nymex LD HH		NYMEX	11/2017	10,000	
8	JPMORG	8357	Swaps	Fixed		Nymex LD HH		NYMEX	11/2017	10,000	
9	JPMORG	8387	Swaps	Fixed		Nymex LD HH		NYMEX	11/2017	10,000	
10	JPMORG	8454	Swaps	Fixed		Nymex LD HH		NYMEX	11/2017	10,000	
11	JPMORG	8471	Swaps	Fixed		Nymex LD HH		NYMEX	11/2017	40,000	
12	MERRIL	8480	Swaps	Fixed		Nymex LD HH		NYMEX	11/2017	50,000	
13	BNPP	8536	Swaps	Fixed		Nymex LD HH		NYMEX	11/2017	50,000	
14	SHELLTRADE	8548	Swaps	Fixed		Nymex LD HH		NYMEX	11/2017	50,000	
15	MERRIL	8581	Swaps	Fixed		Nymex LD HH		NYMEX	11/2017	70,000	
16	JPMORG	8604	Swaps	Fixed		Nymex LD HH		NYMEX	11/2017	40,000	
17	CITIGR	8650	Swaps	Fixed		Nymex LD HH		NYMEX	11/2017	40,000	
18	SHELLTRADE	8680	Swaps	Fixed		Nymex LD HH		NYMEX	11/2017	40,000	
19	CIBC	8718	Swaps	Fixed		Nymex LD HH		NYMEX	11/2017	30,000	
20	CITIGR	8719	Swaps	Fixed		Nymex LD HH		NYMEX	11/2017	40,000	
21	CIBC	8750	Swaps	Fixed		Nymex LD HH		NYMEX	11/2017	40,000	
22	JPMORG	8767	Swaps	Fixed		Nymex LD HH		NYMEX	11/2017	50,000	
23	MERRIL	8780	Swaps	Fixed		Nymex LD HH		NYMEX	11/2017	20,000	
24	CITIGR	8784	Swaps	Fixed		Nymex LD HH		NYMEX	11/2017	20,000	
25	BNPP	8791	Swaps	Fixed		Nymex LD HH		NYMEX	11/2017	30,000	
26	JPMORG	8808	Swaps	Fixed		Nymex LD HH		NYMEX	11/2017	40,000	
27	JPMORG	8950	Swaps	Fixed		Nymex LD HH		NYMEX	11/2017	40,000	
28	JPMORG	9017	Swaps	Fixed		Nymex LD HH		NYMEX	11/2017	50,000	
29	MERRIL	9126	Swaps	Fixed		Nymex LD HH		NYMEX	11/2017	50,000	
30	JPMORG	9234	Swaps	Fixed		Nymex LD HH		NYMEX	11/2017	50,000	
31	MACQUARIE	9241	Swaps	Fixed		Nymex LD HH		NYMEX	11/2017	60,000	
32	MERRIL	9259	Swaps	Fixed		Nymex LD HH		NYMEX	11/2017	60,000	
33	CITIGR	9267	Swaps	Fixed		Nymex LD HH		NYMEX	11/2017	60,000	
34	CIBC	9289	Swaps	Fixed		Nymex LD HH		NYMEX	11/2017	50,000	
35	JPMORG	9314	Swaps	Fixed		Nymex LD HH		NYMEX	11/2017	80,000	
36	MERRIL	9337	Swaps	Fixed		Nymex LD HH		NYMEX	11/2017	40,000	
37	SHELLTRADE	9376	Swaps	Fixed		Nymex LD HH		NYMEX	11/2017	50,000	
38	CIBC	9435	Swaps	Fixed		Nymex LD HH		NYMEX	11/2017	50,000	
39	BNPP	9505	Swaps	Fixed		Nymex LD HH		NYMEX	11/2017	40,000	
40	MERRIL	9533	Swaps	Fixed		Nymex LD HH		NYMEX	11/2017	40,000	
41	BNPP	9673	Swaps	Fixed		Nymex LD HH		NYMEX	11/2017	40,000	
42	MACQUARIE	9816	Swaps	Fixed		Nymex LD HH		NYMEX	11/2017	60,000	
43	JPMORG	9837	Swaps	Fixed		Nymex LD HH		NYMEX	11/2017	60,000	
44	MERRIL	9847	Swaps	Fixed		Nymex LD HH		NYMEX	11/2017	60,000	
45	MACQUARIE	9850	Swaps	Fixed		Nymex LD HH		NYMEX	11/2017	60,000	
46	JPMORG	9904	Swaps	Fixed		Nymex LD HH		NYMEX	11/2017	60,000	
47	JPMORG	9924	Swaps	Fixed		Nymex LD HH		NYMEX	11/2017	60,000	
48	JPMORG	9939	Swaps	Fixed		Nymex LD HH		NYMEX	11/2017	20,000	
49	CIBC	9950	Swaps	Fixed		Nymex LD HH		NYMEX	11/2017	20,000	
50	MACQUARIE	9967	Swaps	Fixed		Nymex LD HH		NYMEX	11/2017	30,000	
51	JPMORG	10022	Swaps	Fixed		Nymex LD HH		NYMEX	11/2017	60,000	
52	JPMORG	10419	Swaps	Fixed		Nymex LD HH		NYMEX	11/2017	125,000	
53	CIBC	10421	Swaps	Fixed		Nymex LD HH		NYMEX	11/2017	55,000	
54	MERRIL	10422	Swaps	Fixed		Nymex LD HH		NYMEX	11/2017	70,000	
55	Total										\$2,662,970

	A	B	C	D	E	F	G	H	I	J	K
	Counterparty	Deal ID	Settlement Type	We Pay Index	Pay Price	They Pay Index	Pay Price	Settlement Source	Hedge Month	Volume	Dollar Amount
1	BMO	8134	Swaps	Fixed		Nymex LD HH		NYMEX	12/2017	30,000	
2	SHELLTRADE	8251	Swaps	Fixed		Nymex LD HH		NYMEX	12/2017	10,000	
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9	JPMORG	8387	Swaps	Fixed		Nymex LD HH		NYMEX	12/2017	10,000	
10	JPMORG	8454	Swaps	Fixed		Nymex LD HH		NYMEX	12/2017	10,000	
11	JPMORG	8471	Swaps	Fixed		Nymex LD HH		NYMEX	12/2017	40,000	
12	MERRIL	8480	Swaps	Fixed		Nymex LD HH		NYMEX	12/2017	50,000	
13	BNPP	8536	Swaps	Fixed		Nymex LD HH		NYMEX	12/2017	50,000	
14	SHELLTRADE	8548	Swaps	Fixed		Nymex LD HH		NYMEX	12/2017	50,000	
15	MERRIL	8581	Swaps	Fixed		Nymex LD HH		NYMEX	12/2017	70,000	
16	JPMORG	8604	Swaps	Fixed		Nymex LD HH		NYMEX	12/2017	40,000	
17	CITIGR	8650	Swaps	Fixed		Nymex LD HH		NYMEX	12/2017	40,000	
18	SHELLTRADE	8680	Swaps	Fixed		Nymex LD HH		NYMEX	12/2017	40,000	
19	CIBC	8718	Swaps	Fixed		Nymex LD HH		NYMEX	12/2017	30,000	
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21	CIBC	8750	Swaps	Fixed		Nymex LD HH		NYMEX	12/2017	40,000	
22	JPMORG	8767	Swaps	Fixed		Nymex LD HH		NYMEX	12/2017	50,000	
23	MERRIL	8780	Swaps	Fixed		Nymex LD HH		NYMEX	12/2017	20,000	
24	CITIGR	8784	Swaps	Fixed		Nymex LD HH		NYMEX	12/2017	20,000	
25	BNPP	8791	Swaps	Fixed		Nymex LD HH		NYMEX	12/2017	30,000	
26	JPMORG	8808	Swaps	Fixed		Nymex LD HH		NYMEX	12/2017	40,000	
27	JPMORG	8950	Swaps	Fixed		Nymex LD HH		NYMEX	12/2017	40,000	
28	JPMORG	9017	Swaps	Fixed		Nymex LD HH		NYMEX	12/2017	50,000	
29	MERRIL	9126	Swaps	Fixed		Nymex LD HH		NYMEX	12/2017	50,000	
30	JPMORG	9234	Swaps	Fixed		Nymex LD HH		NYMEX	12/2017	50,000	
31	MACQUARIE	9241	Swaps	Fixed		Nymex LD HH		NYMEX	12/2017	60,000	
32	MERRIL	9259	Swaps	Fixed		Nymex LD HH		NYMEX	12/2017	60,000	
33	CITIGR	9267	Swaps	Fixed		Nymex LD HH		NYMEX	12/2017	60,000	
34	CIBC	9289	Swaps	Fixed		Nymex LD HH		NYMEX	12/2017	50,000	
35	JPMORG	9314	Swaps	Fixed		Nymex LD HH		NYMEX	12/2017	80,000	
36	MERRIL	9337	Swaps	Fixed		Nymex LD HH		NYMEX	12/2017	40,000	
37	SHELLTRADE	9376	Swaps	Fixed		Nymex LD HH		NYMEX	12/2017	50,000	
38	CIBC	9435	Swaps	Fixed		Nymex LD HH		NYMEX	12/2017	50,000	
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40	MERRIL	9533	Swaps	Fixed		Nymex LD HH		NYMEX	12/2017	40,000	
41	BNPP	9673	Swaps	Fixed		Nymex LD HH		NYMEX	12/2017	40,000	
42	MACQUARIE	9816	Swaps	Fixed		Nymex LD HH		NYMEX	12/2017	60,000	
43	JPMORG	9837	Swaps	Fixed		Nymex LD HH		NYMEX	12/2017	60,000	
44	MERRIL	9847	Swaps	Fixed		Nymex LD HH		NYMEX	12/2017	60,000	
45	MACQUARIE	9850	Swaps	Fixed		Nymex LD HH		NYMEX	12/2017	60,000	
46	JPMORG	9904	Swaps	Fixed		Nymex LD HH		NYMEX	12/2017	60,000	
47	JPMORG	9924	Swaps	Fixed		Nymex LD HH		NYMEX	12/2017	60,000	
48	JPMORG	9939	Swaps	Fixed		Nymex LD HH		NYMEX	12/2017	20,000	
49	CIBC	9950	Swaps	Fixed		Nymex LD HH		NYMEX	12/2017	20,000	
50	MACQUARIE	9967	Swaps	Fixed		Nymex LD HH		NYMEX	12/2017	30,000	
51	JPMORG	10022	Swaps	Fixed		Nymex LD HH		NYMEX	12/2017	60,000	
52	JPMORG	10419	Swaps	Fixed		Nymex LD HH		NYMEX	12/2017	125,000	
53	CIBC	10421	Swaps	Fixed		Nymex LD HH		NYMEX	12/2017	55,000	
54	MERRIL	10422	Swaps	Fixed		Nymex LD HH		NYMEX	12/2017	70,000	
55	Total										\$1,919,150

EXHIBIT "C"

Line-by-Line/Field-by-Field Justification

<u>Line(s)/Field(s)</u>	<u>Justification</u>
Page 2 of 6 Lines 1-56, Columns E, G and K	This information is entitled to confidential classification pursuant to §366.093(3)(d), Florida Statutes. The basis for this information being designated as confidential is more fully set forth in paragraph 2.
Page 3 of 6 Lines 1-56, Columns E, G and K	
Page 4 of 6 Lines 1-56, Columns E, G and K	
Page 5 of 6 Lines 1-54, Columns E, G and K	
Page 6 of 6 Lines 1-54, Columns E, G and K	

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 overnight mail this 2nd day of April, 2018 to the following:

Florida Public Utilities Company
Florida Division of Chesapeake
Utilities Corp
Mike Cassel, Director
Regulatory and Governmental Affairs
1750 SW 14th Street, Suite 200
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mcassel@fpuc.com

PCS Phosphate – White Springs
c/o Stone Mattheis Xenopoulos
& Brew, P.C.
James W. Brew/Laura A. Wynn
Eighth Floor, West Tower
1025 Thomas Jefferson St, NW
Washington, DC 20007
jbrew@smxblaw.com
law@smxblaw.com

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Dianne M. Triplett
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St. Petersburg, FL 33701
Dianne.triplett@duke-energy.com
John.burnett@duke-energy.com

Florida Power & Light Company
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Maria.moncada@fpl.com

Florida Power & Light Company
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J. Jeffry Wahlen
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jwahlen@ausley.com

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Office of Public Counsel
Patricia A. Christensen
Associate Public Counsel
c/o The Florida Legislature
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