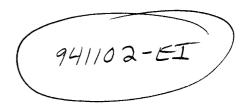


February 12, 1999

Ms. Blanca S. Bayo, Director Division of Records and Reporting Florida Public Service Commission 2540 Shumard Oak Boulevard Tallahassee FL 32399-0870



Dear Ms. Bayo:

RE: Request for Confidential Classification

Quarterly Real Time Pricing Program Report for the Fourth Quarter 1998

Enclosed are an original and fifteen copies of Gulf Power Company's Request for Confidential Classification for the Quarterly Real Time Pricing Program Report for the Fourth Quarter 1998.

Sincerely,

Susan D. Ritenour

Assistant Secretary and Assistant Treasurer

isan P. Ritenour

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cc: Be

Beggs and Lane Russell A. Badders

Tussell A. Daudeis

Florida Public Service Commission

Connie Kummer

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

IN RE: Gulf Power Company Quarterly Real

Time Pricing Program report for the Fourth Ouarter 1998

Docket No.:

941102-EI

Date:

February 15, 1999

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 information, hereafter the Quarterly RTP Report, submitted to the Florida Public Service Commission pursuant to Order No. PSC-95-0256-FOF-EI. As grounds for this request, the Company states:

1. On February 15, 1999, Gulf Power Company submitted to the Florida Public Service Commission Gulf Power Company's Quarterly Real Time Pricing ("RTP") Program report for the Fourth Quarter 1998 as required by Order No. PSC-95-0256-FOF-EI. Gulf Power asserts that the information contained in the Quarterly RTP Report is entitled to confidential classification pursuant to §366.093(3)(e), Florida Statutes, as information, the public disclosure of which would cause irreparable harm to the competitive interests of Gulf Power and those customers taking service under Gulf Power Company's RTP rate schedule. The Quarterly RTP Report contains proprietary and commercially sensitive information that is not otherwise publicly available.

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- 2. The Public disclosure of the information contained in the Quarterly RTP Report would cause irreparable harm to Gulf Power Company and those customers taking service under Gulf Power Company's RTP rate schedule. The Quarterly RTP Report contains proprietary confidential business information that details customer specific information that is regarded as sensitive and confidential by the customers taking service under rate schedule RTP. The public disclosure of this detailed customer information would impact the customers' ability to compete in their native markets. Thus, Gulf Power Company requests that this information be granted confidential classification pursuant to Section 366.093(3)(e), Florida Statutes.
- 3. Submitted as Exhibit "A" is a copy of the Quarterly RTP 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 the Quarterly RTP Report, which may be made available for public review and inspection. Attached as Exhibit "C" to this request is a line-by-line justification for the request for confidential classification.
- 4. The material for which confidential classification is requested is intended to be, and is treated as, confidential by Gulf Power Company and the customers taking service pursuant to rate schedule RTP and 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" from public disclosure as proprietary

confidential business information.

Respectfully submitted this <u>12</u> th day of February 1999,

JEFFREY A. STONE

Florida Bar No. 325953

RUSSELL A. BADDERS

Florida Bar No. 007455

Beggs & Lane

P. O. Box 12950

(700 Blount Building)

Pensacola, FL 32576-2950

(850) 432-2451

Attorneys for Gulf Power Company

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

IN RE: Gulf Power Company Quarterly Real
Time Pricing Program report
for the Third Quarter 1998

Docket No.: 941102-EI
Date: February 15, 1999

EXHIBIT "A"

REQUEST FOR CONFIDENTIAL CLASSIFICATION

The information provided herein should be maintained as proprietary confidential business information pursuant to Section 366.093 and Rule 25-22.006, F.A.C.

EXHIBIT "A"

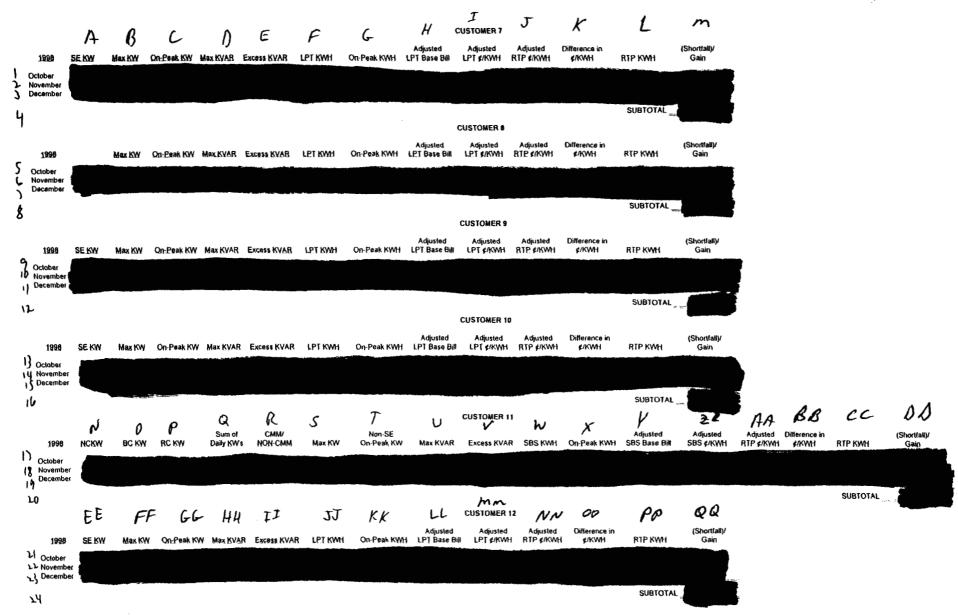
Provided to the Division of Records and Reporting under separate cover as confidential information

EXHIBIT "B"

EXPERIMENTAL RATE RTP QUARTERLY REPORT

| | | | | | | В | ASE RATE RE | VENUE (SHORT | FALLYGAIN | | | | | | | |
|--------------------------------------|--------|-----------|-------------------|-----------------|-----------|----------------------|---|----------------------------|-----------------------|----------------------------|---|-----------------------|------------------------|------------------------|------------|----------------------|
| | o. | C | ۵ | Ē | F | G | H | I CUSTOMER 1 | 5 | K | L | m | N | O | P | Q |
| 7558 ИСКМ ↓ | ВСКМ | RC KW | Sum of Daily KWs | CMM/ NQN:CMM | Max KW | Non-SE On-Peak KW | Max KVAR | Excess KVAR | SBS KWH | On-Peak KWH | Adjusted SBS Base Bill | Adjusted SBS £/KWH | Adjusted RTP #/KW/H | Difference in #/KWH | RTP KWH | (Shortfall)/ Gain |
| October November | | | | | | | | | | | | | | | | |
| 3 December | | | | | | | | | | | | | | | SUBTOTAL _ | - |
| 4 | | | | | | | | CUSTOMER 2 | | | | | | D:# | | |
| 1998 NCKM | BC KW | BC KW | Sum of Daily KW.s | CMM/ NON CMM | Max KW | Non-SE On-Peak KW | Max KVAB | Excess KVAR | SBS KWH | On:Peak KWH | Adjusted SBS Base Bill | Adjusted SBS #/KWH | RTP #/KWH | Difference in ≰/KWH | RTP KWH | (Shortfall)/ Gain |
| S October November | | | | | | | | | | | | | | | | |
| December | | | | | | | X | CUSTOMER 3 | 3 | AA | 38 | C C | | | SUBTOTAL | |
| 8 | R | | T | U | LPT KWH | ₩ On-Peak KWH | Adjusted LPT Base Bill | Adjusted | Adjusted RTP ¢/KWH | Difference in | RTP KWH | (Shortfall)/ Gain | | | | |
| 1998 | Max KW | On-Peak P | W Max KVAR | Excess KVAR | LET KWIT | OHT VENTONIA | ,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,, | | | | | | | | | |
| 9 October 10 November December | | | | | | | | | | | SUBTOTAL | | B | | | |
| 11 | | | | | | | | CUSTOMER 4 | | | SUBTUTAL | | | | | |
| 12 | | | | | | | Adjusted | Adjusted | Adjusted | Difference in | | (Shortfall)/ | | | | |
| 1998 | Max KV | / On-Peak | KW Max KVA | R Excess KVA | R LPTKWH | On Peak KWH | LPT Base Bi | # LPT¢/KWH | RTP ¢/KWł | 4 \$/KWH | RTP KWH | Gain | | | | |
| October November | | | | | | | | | | | | | | | | |
| 15 December | | | | | | | | | | | SUBTOTAL | | | | | |
| 16 | | | | | | | | CUSTOMER | | | | | | | | |
| 1998 | Max K | w On-Pe | ak KW Max KV | AR Excess KV | AR LPT KW | On-Peak KWI | Adjusted I LPT Base E | Adjusted Bill LPT ¢/KWH | Adjusted BTP ¢/KW | | BTE KWH | (Shortfalt)/ Gain | | | | |
| () October | | | | | | | | | | | ,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,, | | | | | |
| 18 November | 1 | | | | | | | | | | SUBTOTAL | | E | | | |
| 20 | | | | | | | | CUSTOMER | 6 | | | | | | | |
| 1996 | Max | KW On:P | eak KW Max K | VAR Excess K | VAR PXTKY | /H On-Peak KW | Adjusted H PXT Base | I Adjusted Bill PXT¢/KW | | Difference in VH \$/KWH | RTE KWH | (Shortfall)/ Gain | | | | |
| 2) October | | | | | | | | | | | | | | | | |
| November December | | | | | | | | | | | SUBTOTA | | | | | |
| 24 | | | | | | | | | | | | | _ | | | |

EXPERIMENTAL RATE RTP QUARTERLY REPORT

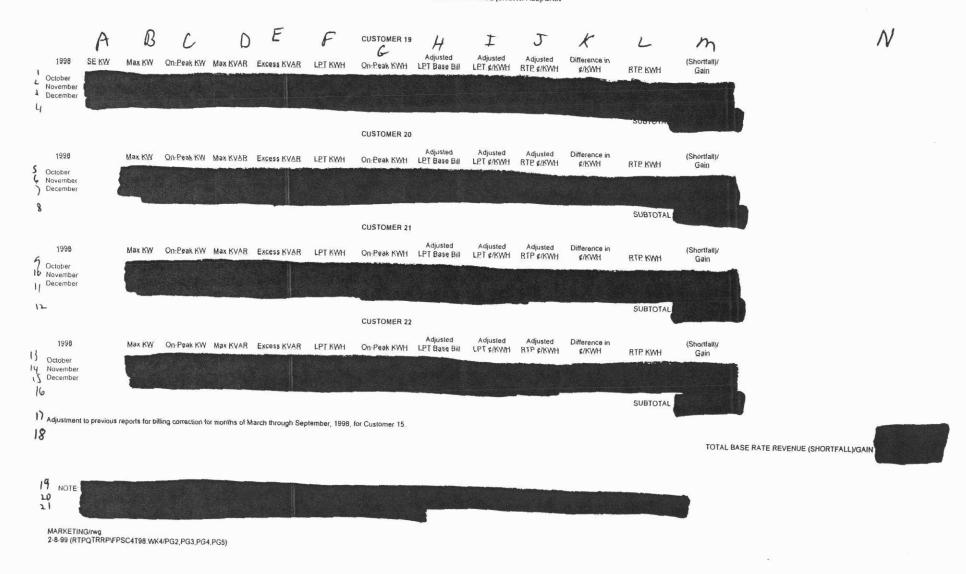


EXPERIMENTAL RATE RTP QUARTERLY REPORT

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|---------------------------|--------------|-------------|----------|-------------|----------|-------------|---------------------------|-----------------------|-----------------------|-------------------------|------------|----------------------|
| | A | B | C | . Ъ | E | CUSTOMER 13 | 6 | 4 | I | J | K | L |
| 1998 October | Max KW | On-Peak KW | Max KVAR | Excess KVAR | LPT KWH | On-Peak KWH | Adjusted LPT Base Bill | Adjusted LPT ¢/KWH | Adjusted RTP #/KWH | Difference in | RTP.KWH | (Shortfall)/ Gain |
| J November | | | | | | | | | | | | |
| Ÿ | | | | | | | | | | | OURTOTAL | |
| | | | | | | CUSTOMER 14 | | | | | SUBTOTAL_ | |
| 1998 October | Max KW | On-Peak KW | Max KVAR | Excess KVAR | LET KWH | On-Peak KWH | Adjusted LPT Base Bill | Adjusted LPT ¢/KWH | Adjusted RTP #/KWH | Difference in \$/KWH | BTP.KWH | (Shortfall)/ Gain |
| November December | | | | | | | | | | | | |
| 8 | | | | | | | | | | | CURTOTAL | |
| | | | | | | CUSTOMER 15 | | | | | SUBTOTAL | |
| 1998 9 October | Max KW | On-Peak KW | Max KVAR | Excess KVAR | LET KWH | On-Peak KWH | Adjusted LPT Base Bill | Adjusted LPT ¢/KWH | Adjusted RTP.¢/KWH | Difference in ≰/KWH | RTP KWH | (Shortfall)/ Gain |
| October November December | | | | | | | | | | | | |
|)/ 1 | | | | | | | | | | | | |
| | | | | | | CUSTOMER 16 | | | | | SUBTOTAL | |
| 1998 } | SE KW Max KW | On-Peak KW | Max KVAR | Excess KVAR | РХТ КУДН | On-Peak KWH | Adjusted PXT Base Bill | Adjusted PXT ¢/KWH | Adjusted RTP ¢/KWH | Difference in | RTP KWH | (Shortfall)/ Gain |
| Ų November | | | | | | | | | | | THE COLUMN | Ogn) |
| IS December | | | | | | | | | | | | |
| | | | | | | CUSTOMER 17 | | | | | SUBTOTAL | |
| 1998 () October | SE KW Max KW | On-Peak KW | Max KVAR | Excess KVAR | LPT KWH | On-Peak KWH | Adjusted LPT Base Bill | Adjusted | Adjusted RTP #/KWH | Difference in ¢/KWH | RTP KWH | (Shortfall)/ |
| November | | | | | | | | | THE PROPERTY | No. CARLO | BTE DAM | Gain |
| 19 | | | | | | | | | | | | |
| | | | | | | CUSTOMER 18 | | | , | | SUBTOTAL | |
| 1998 | Max KW | Qn-Peak Kyy | Max KVAR | Excess KVAR | LPT KWH | On-Peak KWH | Adjusted LPT Base Bill | Adjusted LPT ¢/KWH | Adjusted | Difference in | | (Shortfall)/ |
| October November | | | | | | | | PL 1 3/1/441] | RTP ¢/KWH | ¢/KWH | RTP KWH | Gain |
| 23 December | | | | | | | | | | | | |
| -1 | | | | | | | | | | | SUBTOTAL | |
| | | | | | | | | | | | | |

EXPERIMENTAL RATE RTP QUARTERLY REPORT

BASE RATE REVENUE (SHORTFALL)/GAIN

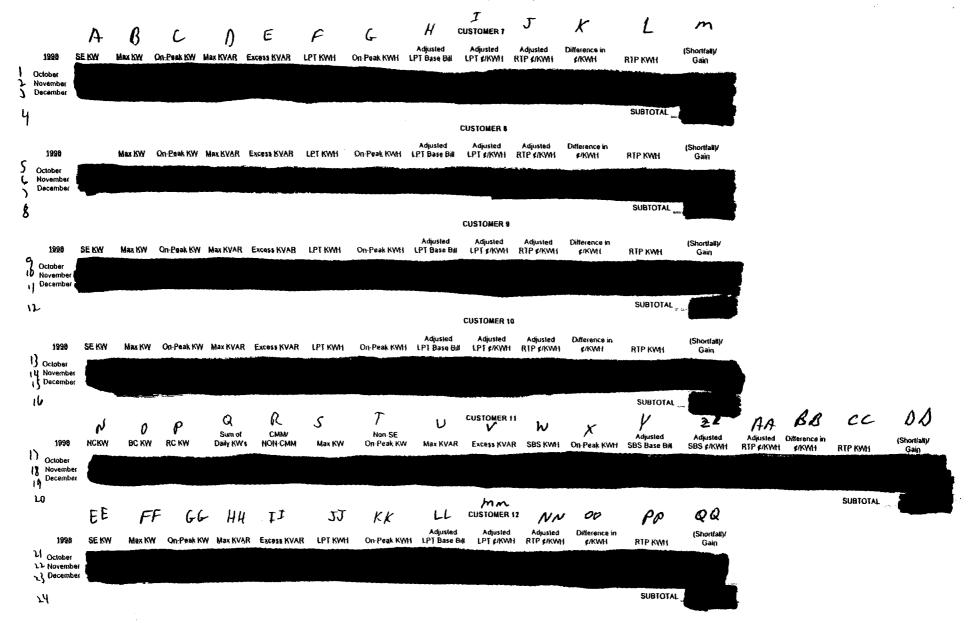


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EXPERIMENTAL RATE RTP QUARTERLY REPORT

| | | | | | | | B | IASE RATE RI | EVENUE (SHOR) | FALLYGAIN | | | | | | | - |
|--------------------------|-----------------|----------|-------------|----------------------|-----------------|---|----------------------|--------------------------|----------------------|------------------------|-----------------|---------------------------|-----------------------|-----------------------|---------------|----------|---------------------|
| | A | В | C | a | Ē | F | G | Н | I CUSTOMER 1 | J | K | L | W | N | 0 | P | Q |
| 1998 | | BC KW | RC KW | Sum of Daily KWs | NON-CMM | Max KW | Non-SE On-Peak KW | Max KVAR | Excess KVAR | SBS KWH | On-Peak KWH | Adjusted SBS Base Bill | Adjusted SBS #/KWH | Adjusted RTP #/KWH | Difference in | B15 KMF | (Shortfall) Gain |
| October Novemb | ber | | | | | | | | | | | | | | | | |
| Decemb | Del | | | | | | | | | | | | | | | SUBTOTAL | |
| 1 | | | | | | | | | CUSTOMER 2 | | | | | | | | |
| 199 | B NCKY | BC KW | RC KW | Sum of Daily KW's | NON CMM | Max KW | Non-SE On-Peak KW | Max KVAR | Excess KVAR | SBS KWH | Qn-Peak KWH | Adjusted SBS Base Bill | Adjusted SBS #/KWH | Adjusted BTP #/KWH | | RTP KWH | (Shortfal Gain |
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| 19 | IGR | Max KM | • | CW Max KVAR | Excess KVAR | LPT KWH | On-Peak KWH | Adjusted LPT Base Bil | Adjusted | Adjusted RTP \$/KWH | Difference in | RTP KWH | (Shortfall)/ Gain | | | | |
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| 10 Nover | | | | | | | | | | | | | | È | | | |
| 12 | | | | | | | | | CUSTOMER 4 | | | SUBTOTAL | - | | | | |
| | | | | | | | | Adjusted | Adjusted | Adjusted | | | (Shortfall)/ | | | | |
| 1! Octo | 998 sher | Max K | N On-Peak | KW Max KVAF | R Excess KVAR | LPTKWH | On Peak KWH | LPI Base B | III LPT ¢/KWH | RTP ¢/kWi | i ¢/KWH | RTP KWH | Gain | | | | |
| Nove | emper emper | | | | | | | | | | | | _ | | | | |
| 16 | | | | | | | | | | | | SUBTOTAL | | | | | |
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| _ | 1998 | Max K | W On-Pea | KW Max KVA | R Excess KVAR | LET KWH | On-Peak KWH | | | | | RTP KWH | Gain | - | | | |
| 18 Nov | tober vember | - 4 | | | | | | | | | | | | | | | |
| 19 Dec | cember | | | | | | | | | | | SUBTOTA | L | | | | |
| ~4 | | | | | | | | | CUSTOMER | 6 | | | | | | | |
| | 1998 | Max | KW Qn-Pea | nk KSVY Max KSV | AB Excess KVAI | R PXTKWH | On-Peak KWI | Adjusted 1 PXT Base | | | | RTP KWH | (Shortfall) Gain | _ | | | |
| 21 0c | ctober | | | | | | | | | There is a second | | | | | | | |
| 23 De | | | | | | | | | | | | PUDTOT | | | | | |
| 24 | | | | | | | | | | | | SUBTOTA | | | | | |

EXPERIMENTAL RATE RTP QUARTERLY REPORT



EXPERIMENTAL RATE RTP QUARTERLY REPORT

| | | | A | ß | C | Ъ | E | CUSTOMER 13 | 6- | Н | I | 5 | K | L |
|-------|---------------------------------|-------|--------|--------------|------------|----------------|---------|-------------|---------------------------|--------------------------|-----------------------|-------------------------|-------------------|-----------------------|
| 19 | 998 | | Max.KW | Qn:Peak KW | Max KVAR | Excess KVAR | LPT KWH | On-Peak KWH | Adjusted LPT Base Bill | Adjusted LPT #/KWH | Adjusted RTP ≰/KWH | Difference in | RTE KWH | (Shortfall)/ Gain |
| | emper emper per | 1 | | | | | | | | | | | | |
| | | | | | | | | CUSTOMER 14 | | | | | SUBTOTAL | |
| (| 1998 | | Max KW | On-Peak KW | Max KVAR | Excess KVAR | LPT KWH | On-Peak KWH | Adjusted LPT Base Bill | Adjusted LPT \$/KWH | Adjusted RTP #/KWH | Diltarence in \$/KWH | BTP KWH | (Shortfall)/ Gain |
| ✓ Nov | lober vember cember | | | | | | | | | | | | | |
| K | | | | | | | | CUSTOMER 15 | | | | | SUBTOTAL | |
| | 1998 | _ | Max KW | On-Peak KW | Max KVAR | Excess KVAR | LET KWH | On-Peak KWH | Adjusted LPT Base Bill | Adjusted LPT ¢/KWH | Adjusted RTP ⊈/KWH | Difference in | B15 KWH | (Shortfall)/ Gain |
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| ı | | | | | | | | CUSTOMER 16 | | | | | SUBTOTAL | |
| } ~ | 1998 | SE KW | Max KW | On-Peak KV | / Max KVAF | Excess KVAR | PXT KWH | | Adjusted PXT Base Bill | Adjusted PXT ¢/KWH | Adjusted RTP ¢/KWH | Difference in | RTP KWH | (Shortfall)/ Gain |
| ų No | ecember ecember | | | | | | | | | | | | The second second | |
| Ų | | | | | | | | CUSTOMER 1 | 7 | | | | SUBTOTAL | |
| 1) | 1998 | SE KW | Max KV | / On-Peak KV | N Max KVA | R Excess KVAR | LPT KWH | On Peak KWH | Adjusted LPT Base Bill | Adjusted LPT ¢/KWH | Adjusted RTP ¢/KWH | Difference in | RTP KWH | (Shortfall)/ Gain |
| IR N | October Vovember December | | | | | | | | | | | | | |
| 70 | | | | | | | | CUSTOMER | 8 | | | | SUBTOTAL | |
| | 1998 | | Max KV | V Qn:Peak K | W Max KVA | IR Excess KVAR | LPT KWH | | Adjusted I LPT Base Bi | Adjusted II LPT ¢/KWł | Adjusted RTP ¢/KWH | Ditterence in | RTP KWH | (Shortfall)/ Gair) |
| 12 1 | October November December | 4 | | | | | | | | | | | | |
| 23 ' | December | | | | | | | | | | | | SUBTOTAL | |

EXPERIMENTAL RATE RTP QUARTERLY REPORT

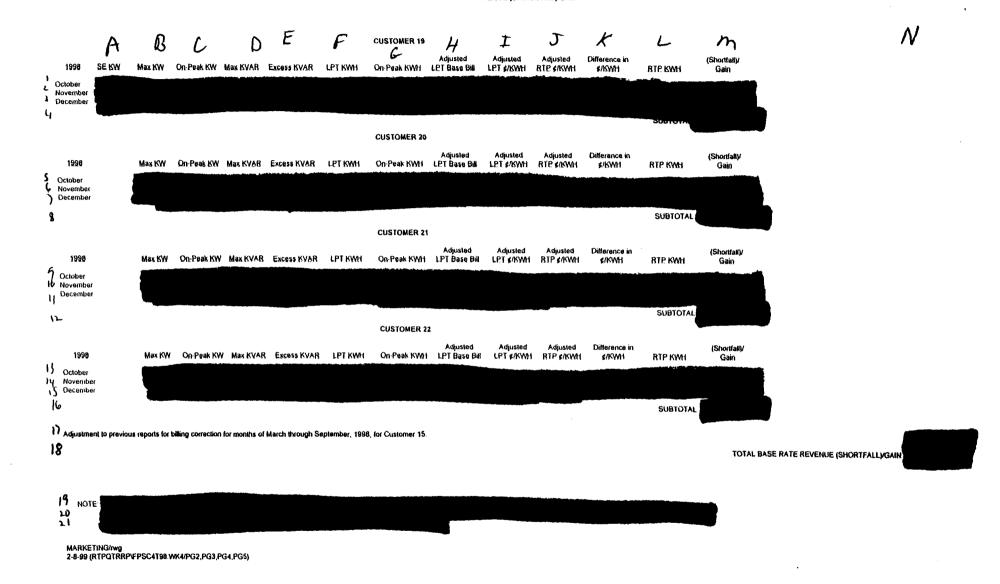


EXHIBIT "C"

Line-by-Line Justification

| Page/Line(s) | Columns | | | | | | |
|---|----------------------|--|--|--|--|--|--|
| Page 2 Lines 1 - 8 | A - Q | | | | | | |
| Lines 9 - 24 | R - CC | | | | | | |
| Page 3 Lines 1 - 16 Lines 17 - 20 Lines 21 - 24 | A - M N - DD EE - QQ | | | | | | |

Justification

This data is proprietary confidential business information that details customer specific information. A limited number of customers take service under rate schedule RTP. One of those customers has ceased taking service pursuant to rate schedule RTP. Removal of this customer from the Quarterly Real Time Pricing Program report reveals that customer's billing determinants, load shape and other customer specific information. This information is regarded as sensitive and confidential by the customer because its public disclosure would impact the customer's ability to compete in its native markets. Thus, Gulf Power Company requests that this information be granted confidential classification pursuant to Section 366.093(3)(e), Florida Statutes.

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Line-by-Line Justification

Page/Line(s) Columns Justification

Page 4 A - L Lines 1 - 24

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Page 5 A - N Lines 1 - 21 This data is proprietary confidential business information that details customer specific information. A limited number of customers take service under rate schedule RTP. One of those customers has ceased taking service pursuant to rate schedule RTP. Removal of this customer from the Quarterly Real Time Pricing Program report reveals that customer's billing determinants, load shape and other customer specific information. This information is regarded as sensitive and confidential by the customer because its public disclosure would impact the customer's ability to compete in its native markets. Thus, Gulf Power Company requests that this information be granted confidential classification pursuant to Section 366.093(3)(e), Florida Statutes.