One Energy Place Pensacola, Florida 32520

850.444.6111

ORIGINAL



June 2, 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: Docket No. 990325-EI

Enclosed for filing are an original and fifteen copies of Gulf Power Company's Request for Confidential Classification in regards to the Company's supplemental response to interrogatory number 17 of Staff's First Set of Interrogatories to Gulf Power Company (Nos. 1-31).

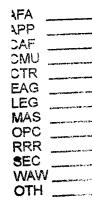
Sincerely,

Ausand Ritenour

Susan D. Ritenour Assistant Secretary and Assistant Treasurer

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Enclosures



cc: Beggs and Lane Jeffrey A. Stone, Esquire Hopping Green Sams & Smith Richard D. Melson, Esquire

DOCUMENT NUMBER-DATE

JUN -3 ଅ

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Petition of Gulf Power Company to Determine Need for Proposed Electrical Power Plant in Bay County, Florida Docket No.: Filed: 990325-EI June 3, 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 the Company's supplemental response to interrogatory number 17 of Commission Staff's 1st Set of Interrogatories to Gulf Power Company (Nos. 1-31). As grounds for this request, the Company states:

1. Gulf's supplemental response to interrogatory number 17 of Commission Staff's 1st Set of Interrogatories to Gulf Power Company (Nos. 1-31) contains proprietary confidential business information regarding competitive interests the disclosure of which would cause irreparable harm to Gulf Power Company and the Southern Company. This information is entitled to confidential classification pursuant to §366.093(3)(d) and (e), Florida Statutes, as information, the public disclosure of which would 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 ratepayers. The information for which confidential classification is sought is intended to be and is treated by Gulf Power Company and the Southern Company as private and is not otherwise publically available.

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DOCUMENT NUMBER-DATE 06863 JUN-38 FESC-RECORDS/REPORTING 2. The supplemental response to interrogatory number 17 provided by Gulf details specific cost information. This information 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. Cost information can be utilized by Gulf's competitors to negatively impact Gulf's ability to compete in electricity markets. Specific cost information of Gulf's competitors' is not publically available. Making Gulf's information public would result in an uneven playing field for Gulf. 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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3. Submitted as Exhibit "A" is a copy of the responses to interrogatories numbered 1 and 17 of Commission Staff's 1st Set of Interrogatories to Gulf Power Company (Nos. 1-31) which has 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 responses 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, the Southern Company and those third parties who submitted proposals in response to Gulf's Request for proposals and has not been otherwise publicly disclosed.

WHEREFORE, Gulf Power Company respectfully requests that the Commission enter an

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order protecting the information highlighted on Exhibit "A" from public disclosure as proprietary

confidential business information.

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Respectfully submitted this 2 m day of June 1999,

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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: Petition of Gulf Power Company to Determine Need for Proposed Electrical Power Plant in Bay County, Florida

Docket No.: Filed: 990325-EI June 3, 1999

REQUEST FOR CONFIDENTIAL CLASSIFICATION

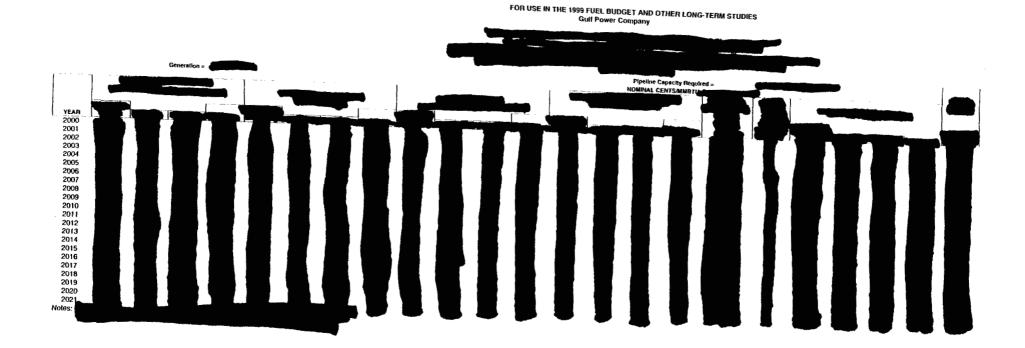
EXHIBIT "A"

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.

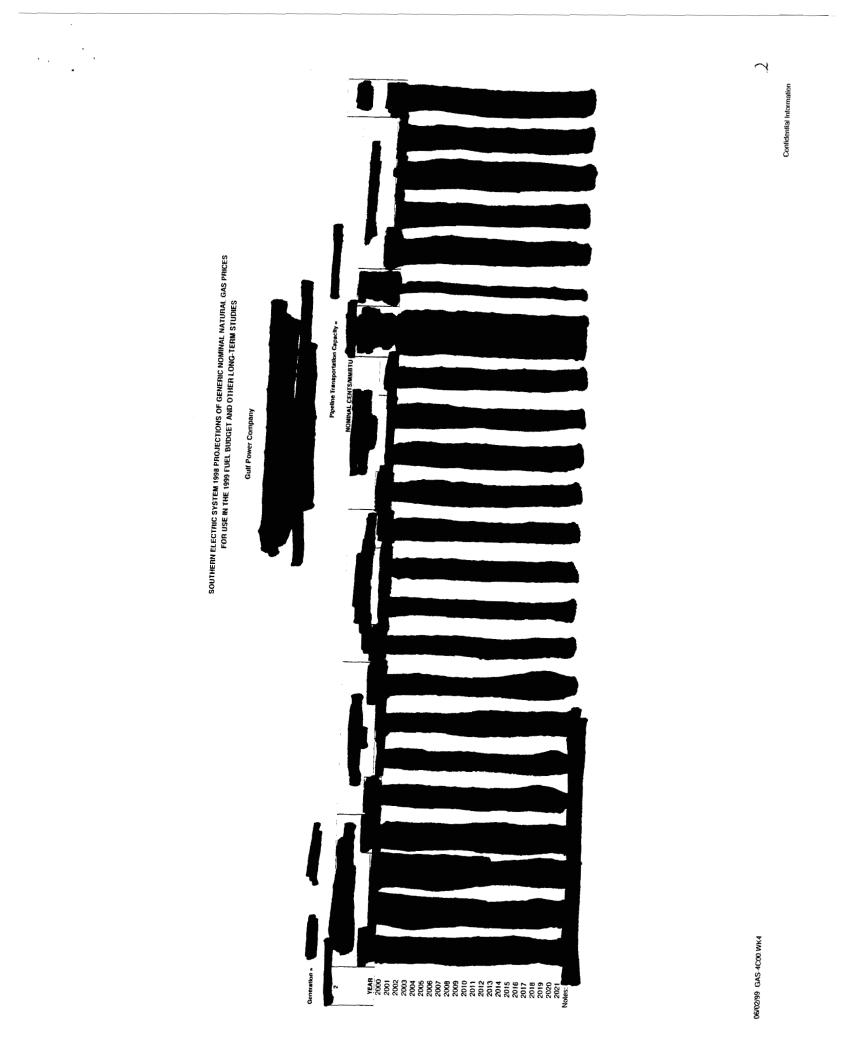
EXHIBIT "A"

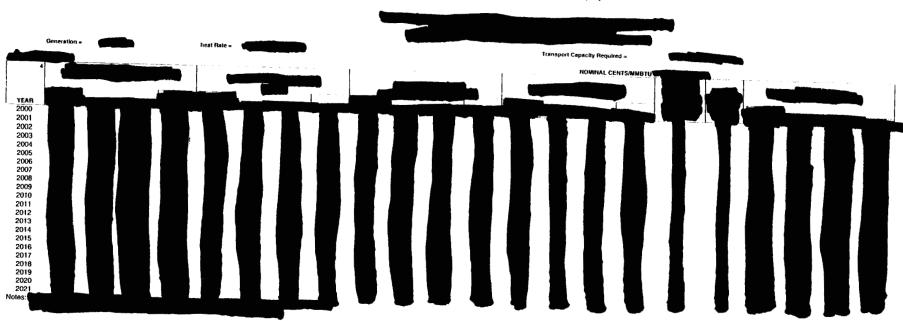
Provided to the Division of Records and Reporting under separate cover as confidential information EXHIBIT "B"

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Confidential Information



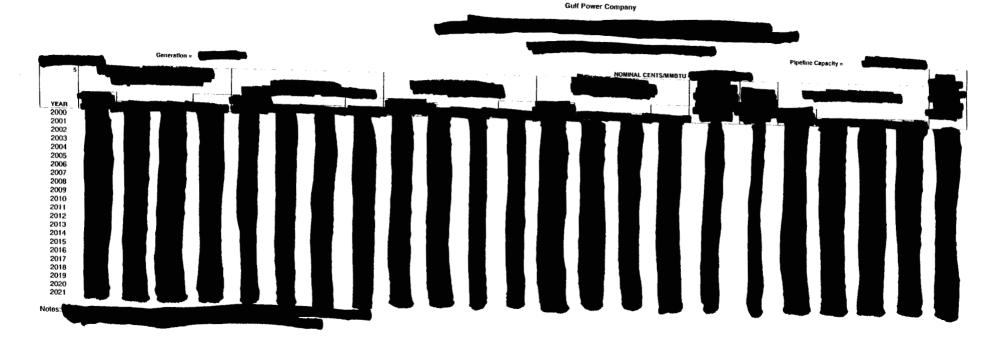


SOUTHERN ELECTRIC SYSTEM 1998 PROJECTIONS OF GENERIC NOMINAL NATURAL GAS PRICES FOR USE IN THE 1999 FUEL BUDGET AND OTHER LONG-TERM STUDIES

Gulf Power Company

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SOUTHERN ELECTRIC SYSTEM 1998 PROJECTIONS OF GENERIC NOMINAL NATURAL GAS PRICES FOR USE IN THE 1999 FUEL BUDGET AND OTHER LONG-TERM STUDIES

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SOUTHERN ELECTRIC SYSTEM 1998 PROJECTIONS OF GENERIC NOMINAL NATURAL GAS PRICES

Gulf Power Company

FOR USE IN THE 1999 FUEL BUDGET AND OTHER LONG-TERM STUDIES

EXHIBIT "C"

Line-by-Line Justification

Page/Line(s)

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Interrogatory 17 Supplemental Response

Pages 1 - 5 Entire chart, headings and footnotes

Justification

This information details specific cost information. This information 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. Cost information can be utilized by Gulf's competitors to negatively affect Gulf's ability to compete in electricity markets. Gulf's competitors' specific cost information is not publically available which, if Gulf's cost information is made public, would result in an uneven playing field for Gulf. Thus, Gulf Power Company requests that this information be granted confidential classification pursuant to Section 366.093(3)(e), Florida Statutes

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Petition of Gulf Power Company to determine need for proposed electrical power plant in Bay County

Docket No. 990325-El

Certificate of Service

I HEREBY CERTIFY that a copy of the foregoing has been furnished this _______ day of June 1999 by U.S. Mail or hand delivery to the following:

Grace A. Jaye, Esquire Staff Counsel FL Public Service Commission 2540 Shumard Oak Boulevard Tallahassee FL 32399-0863

Gail Kamaras LEAF 1114 Thomasville Road, Suite E Tallahassee FL 32303

JEFFREY A. STONE Florida Bar No. 325953 RUSSELL A. BADDERS Florida Bar No. 0007455 Beggs & Lane P. O. Box 12950 Pensacola FL 32576 850 432-2451 Attorneys for Gulf Power Company