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COMMISSION
CLERK



September 28, 2011

claim of confidentiality
 notice of intent
 request for confidentiality
filed by OPC

For DN 07077-11, which
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Ms. Ann Cole, Commission Clerk
Florida Public Service Commission
2540 Shumard Oak Boulevard
Tallahassee, FL 32399-0850

RE: Docket No. 110001-EI

Dear Ms. Cole:

Enclosed is Gulf Power Company's Request for Confidential Classification
pertaining to Gulf Power's response to Staff's Fifth Set of Interrogatories
(Nos. 33-48) in the above referenced docket.

Sincerely,

Susan D. Ritenour

nm

Enclosures -

cc: *HICO and containing request*
Beggs & Lane
Jeffrey A. Stone, Esq.

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OPC _____
CLK 1

DOCUMENT NUMBER-DATE

07076 SEP 29 =

FPSC-COMMISSION CLERK

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

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

Docket No.: 110001-EI
Date: September 29, 2011

REQUEST FOR 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 protecting from public disclosure certain information submitted by Gulf Power in response to Commission Staff’s Fifth Set of Interrogatories to Gulf Power Company (Nos. 33-48). As grounds for this request, the Company states:

1. A portion of the information submitted by Gulf Power in response to interrogatory number 33 of Commission Staff’s Fifth Set of Interrogatories constitutes proprietary confidential business information concerning bids or other contractual data the disclosure of which would impair the efforts of Gulf Power to contract for goods and/or services on favorable terms. The information is entitled to confidential classification pursuant to section 366.093(3)(d) and (e), Florida Statutes. Specifically, the information consists of pricing data for natural gas hedging transactions between Gulf Power and various counterparties. Gulf and other members of the market in which it competes consider this type of information to be competitively sensitive. Disclosure of this information would negatively impact Gulf’s ability to negotiate pricing favorable to its customers in the future. In addition, potential counterparties may refuse to enter into future contracts with Gulf, or may charge higher prices, if these terms were made public.

2. 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.

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3. Submitted as Exhibit "A" are copies of the subject documents, 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 subject documents, 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 28th day of September, 2011.



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BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

IN RE: Fuel and purchased power cost
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EXHIBIT "A"

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