

Terry A. Davis
Assistant Secretary and
Assistant Treasurer

One Energy Place
Pensacola, Florida 32520-0786

Tel 850.444.6664
Fax 850.444.6026
TADAVIS@southernco.com

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COMMISSION
CLERK



October 24, 2011

Ms. Ann Cole
Commission Clerk
Florida Public Service Commission
2540 Shumard Oak Boulevard
Tallahassee FL 32399-0850

[Handwritten notes and stamps]
07856-11
which
is
attached to the DR-CLK

RE: Docket No. 110138-EI

Dear Ms. Cole:

Enclosed herein is Gulf Power Company's Request for Confidential Classification pertaining to the Commission Staff's audit of Gulf Power Company's request for an increase in rates in the above referenced docket.

Sincerely,

Terry A. Davis

nm

Enclosure

cc: Beggs & Lane
Jeffrey A. Stone

- COM _____
- APA _____
- ECR** _____
- GCL _____
- RAD _____
- SRC _____
- ADM _____
- OPC _____
- CLK _____

+ICP containing request

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DOCUMENT NUMBER-DATE

07855 OCT 25 =

FPSC-COMMISSION CLERK

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In Re: Petition for increase in rates by Gulf
Power Company.

Docket No. 110138-EI
Dated: October 24, 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 its request that the Florida Public Service Commission enter an order protecting from public disclosure certain information produced in connection with Commission Staff's audit of Gulf Power Company's request for an increase in rates in the above-referenced matter (ACN 11-200-1-1).

1. A portion of the information submitted by Gulf Power in response to Commission Data Requests and also included in Staff's work papers (Document No. 07210-11) constitutes "proprietary confidential business information" as defined by section 366.093(3), Florida Statutes.

2. As detailed below, the information consists of contractual data and other information, the disclosure of which would impair the competitive business of Gulf Power or entities with which Gulf Power does business. A significant portion of the documents submitted in connection with this request consists of land leases between Gulf Power and various individual lessees. Gulf considers the rental fees negotiated in these leases to be confidential. Disclosure of this information would negatively impact Gulf's ability to negotiate rental fees favorable to its customers in future contracts. Specifically, potential lessees may demand lower rental fees if the terms were made public. This information is entitled to confidential classification pursuant to section 366.093(3)(d), Florida Statutes.

DOCUMENT NUMBER-DATE

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FPSC-COMMISSION CLERK

3. Page number 28.2.2 reflects pricing information for capacity payments under an active power purchase agreement between Gulf Power and a third party. Disclosure of this information would negatively impact Gulf Power's ability to negotiate payment terms favorable to its customers in future power purchase agreements. In addition, potential counterparties may refuse to enter into contracts with Gulf, or may charge higher prices, if such pricing information was publicly disclosed. This information is entitled to confidential classification pursuant to section 366.093(3)(d), Florida Statutes.

4. Page 28-3 contains a listing of property damage claims, amounts owed and the status of each claim. A number of the claims identified on this page are presently under legal review for purposes of collection. Disclosure of this information could impair the Company's efforts to negotiate settlements favorable to its customers and would reveal legal strategies for resolution of these outstanding claims. This information is entitled to confidential classification pursuant to section 366.093(3)(e), Florida Statutes and on the ground that it consists of protected attorney-work product.

5. Pages 45-2.9 and 45-2.10 contain calculated revenue forecasts for wholesale transactions between Gulf and two counterparties. Disclosure of this information would enable third parties to calculate confidential pricing terms under the wholesale contracts. Disclosure of this information would negatively impact Gulf Power's ability to negotiate favorable payment terms in future wholesale transactions. This information is entitled to confidential classification pursuant to section 366.093(3)(d), Florida Statutes.

6. Pages 45-4.1, 45-4.3 and 45-4.4 contain budgeted and forecasted expenses for capacity purchases between Gulf Power and various counterparties. This information is regarded by both Gulf and the counterparties as confidential. Moreover, disclosure of this information

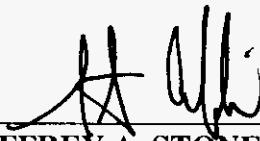
could enable third parties to calculate contractual pricing terms which are specific to the individual contracts and are not publicly known. Disclosure of this information would negatively impact Gulf's ability to negotiate pricing favorable to its customers in future capacity contracts. In addition, potential counterparties may refuse to enter into contracts with Gulf, or may charge higher prices, if the price terms are made public. The information is entitled to confidential classification pursuant to section 366.093(3)(d) and (e), Florida Statutes.

7. The information filed pursuant to this Request is intended to be, and is treated as, confidential by the Gulf Power and, to this attorney's knowledge, has not been otherwise publicly disclosed.

8. Submitted as Exhibit "A" are copies of the subject documents. The information for which confidential classification is requested is highlighted in yellow. 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 24th day of October, 2011.

A handwritten signature in black ink, appearing to read "A. Stone", positioned above a horizontal line.

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

Docket No.: 110138-EI
Date: October 24, 2011

REQUEST FOR CONFIDENTIAL CLASSIFICATION

EXHIBIT "A"

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

EXHIBIT "B"

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

IN RE: Petition for Increase in Rates)
by Gulf Power Company)
_____)

Docket No. 110138-EI

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true copy of the foregoing was furnished by U.S. Mail the 24th day of October, 2011, on the following:

Office of Public Counsel
J. R. Kelly/Joseph A. McGlothlin/Erik Sayler
c/o The Florida Legislature
111 W. Madison Street,
Room 812
Tallahassee, FL 32393-1400
mcglothlin.joseph@leg.state.fl.us
merchant.tricia@leg.state.fl.us
Kelly.jr@leg.state.fl.us
Sayler.erik@leg.state.fl.us

Gunster Law Firm
Charles A. Guyton
215 S. Monroe St.,
Suite 618
Tallahassee, FL 32301
cguyton@gunster.com

Florida Industrial Power
Users Group
Vicki G. Kaufman/
Jon C. Moyle, Jr.
c/o Keefe Law Firm
118 North Gadsden Street
Tallahassee, FL 32301
vkaufman@kagmlaw.com

Caroline Klancke
Keino Young
Martha Barrera
Office of the General Counsel
Florida Public Service Commission
2540 Shumard Oak Boulevard
Tallahassee, FL 32399-0850
mbarrera@psc.state.fl.us
cklancke@psc.state.fl.us
kyoung@psc.state.fl.us

Richard Melson
705 Piedmont Drive
Tallahassee, FL 32312
rick@rmelsonlaw.com

Gardner Law Firm
Robert Scheffel Wright
John T. La Via,
1300 Thomaswood Drive
Tallahassee, FL 32308
schef@gbwlegal.com

Federal Executive Agencies
c/o Major Christopher C.
Thompson
Ms. Karen White
AFLOA/JACL-ULFSC
139 Barnes Drive, Suite 1
Tyndall Air Force Base,
Florida 32403
chris.thompson.2@tyndall.af.mil
karen.white@tyndall.af.mil

Florida Retail Federation
227 South Adams Street
Tallahassee, FL 32301



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 32591-2950

(850) 432-2451

Attorneys for Gulf Power Company