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March 31, 2015



Ms. Carlotta Stauffer, Commission Clerk
Florida Public Service Commission
2540 Shumard Oak Boulevard
Tallahassee FL 32399-0850

REDACTED

RE: Docket No. 150007-EI

Dear Ms. Stauffer:

Enclosed is Gulf Power Company's Request for Confidential Classification for certain portions of its Environmental Compliance Program Update to be filed in the above-referenced docket.

Also enclosed is a CD containing the Request for Confidential Classification as well as Exhibit C in Microsoft Word as prepared on a Windows based computer.

Sincerely,

Robert L. McGee, Jr.
Regulatory and Pricing Manager

- COM _____
- AFD _____
- APA _____
- ECO _____
- ENG CD + Redacted
- GCL _____
- IDM _____
- TEL _____
- CLK _____

md

Enclosures

cc: Beggs & Lane
Jeffrey A. Stone, Esq.

COMMISSION
CLERK

15 APR - 1 AM 10: 16

RECEIVED-FPSC
15 APR - 1 AM 10: 16
COMMISSION
CLERK

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

IN RE: Environmental Cost
Recovery Clause

Docket No.: 150007-EI
Date: April 1, 2015

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 portions of its Air Quality Environmental Compliance Program Update for the Clean Air Interstate Rule, National Ambient Air Quality Standards, Mercury and Air Toxics Standards and Clean Air Visibility Rule (the “Compliance Program”). As grounds for this request, the Company states:

1. Gulf Power seeks confidential classification for portions of its Compliance Program which is being filed concurrently with this request. The subject information relates to competitive interests, the disclosure of which would impair the competitive business of Gulf Power and Gulf Power’s ability to procure goods and services on a fair and reasonable basis. The information is therefore entitled to confidential classification pursuant to section 366.093(3)(d)-(e), Florida Statutes.

2. Table 3.1-1 identifies in detail Gulf Power’s projected capital expenditures, by plant and by project, associated with the Compliance Program capital projects that have not yet been placed in service. Table 3.1-2 identifies in detail Gulf Power’s projected operation and maintenance expenses, by plant and by project, associated with the Compliance Program capital projects that have not yet been placed in service. Disclosure of this information could negatively impact Gulf’s ability to negotiate pricing favorable to its customers when contracting with vendors of materials and services needed by Gulf in order to implement its Compliance Program. Specifically, public disclosure of this information would enable vendors of materials and services

to tailor their pricing proposals to the Company's projections, resulting in higher costs for the Company and its customers. For example, if prospective vendors have access to such information, those vendors will view the forecasted costs as the lower limit of what Gulf expects to pay and will offer to supply goods or services at higher prices.

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" are highlighted pages from the Compliance Program which contain confidential information. Exhibit "A" should be treated as confidential pending a ruling on this request. Attached as Exhibit "B" are two edited copies of Exhibit "A," 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 31st day of March, 2015.



JEFFREY A. STONE

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Attorneys for Gulf Power Company

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

IN RE: Environmental Cost
Recovery Clause
_____)

Docket No.: 150007-EI
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REQUEST FOR CONFIDENTIAL CLASSIFICATION

EXHIBIT "A"

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

EXHIBIT "B"

**Table 3.1-1
Compliance Program
Capital Expenditures for Pending Commission-Approved Projects
\$ in Thousands**

	2015	2016	2017	2018	2019	2020	2021	Total
By Plant								
Plant Crist								
MATS Monitoring								
Plant Daniel								
MATS Monitoring		(Included in Scrubber cost projection)						
Unit 1 SCR								
Unit 2 SCR								
Units 1 & 2 Scrubber								
Unit 1 & 2 Bromine & ACI								
Annual Total	78,971							376,839

Expenditures presented for Plant Daniel represent Gulf's ownership portion.
Allowance cost projections are not included in Table 3.1-1

**Table 3.1-2
Compliance Program
O&M Expenses for Pending Commission-Approved Projects
\$ in Thousands**

	2016	2016	2017	2018	2019	2020	2021	2022	2023	Total
By Plant										
Plant Crist										
Mercury and Air Toxics Monitoring										
Plant Daniel										
Mercury and Air Toxics Monitoring										
Unit 1 SCR										
Unit 2 SCR										
Units 1&2 Scrubbers										
Unit 1 & 2 Bromine & ACI										
Annual Total	220	9,499	9,866	9,982	12,397	15,483	18,570	16,528	17,378	106,885

Expenses presented for Plant Daniel represent Gulf's ownership portion.
Allowance cost projections are not included in Table 3.1-2

EXHIBIT "C"

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

<u>Line(s)/Field(s)</u>	Justification
Table 3.1-1 Page 8, all highlighted information Table 3.1-2 Page 9, all highlighted information	This information is entitled to confidential classification pursuant to §366.093(3) (d) and (e), Florida Statutes. The basis for this information being designated as confidential is more fully set forth in paragraph 2.

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

IN RE: **Environmental Cost**)
Recovery Clause)

Docket No.: 150007-EI

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true copy of the foregoing was furnished by overnight mail this 31st day of March, 2015 to the following:

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