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Robert L. McGee, Jr. Regulatory & Pricing Manager One Energy Place Pensacola, Florida 32520-0780

Tel 850.444.6530 Fax 850.444.6026 RLMCGEE@southernco.com

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

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Enclosures

cc: Beggs & Lane

Jeffrey A. Stone, Esq.

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### BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

IN RE: Environmental Cost	Docket No.:	150007-EI
Recovery Clause	Date:	April 1, 2015
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### 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.

- 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

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: Environmental Cost		
Recovery Clause	Docket No.:	150007-EI
)	Date:	April 1, 2015

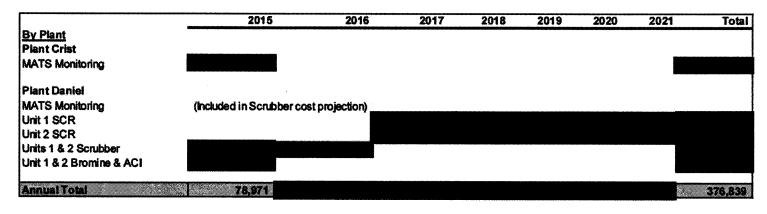
# REQUEST FOR CONFIDENTIAL CLASSIFICATION

# EXHIBIT "A"

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

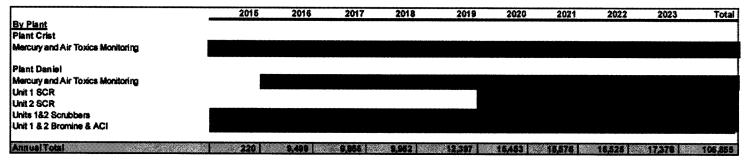
# EXHIBIT "B"

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



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



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

Line(s)/Field(s)	Justification
Table 3.1-1 Page 8, all highlighted information	This information is entitled to confidential classification pursuant to §366.093(3) (d) and (e), Florida Statutes. The basis for this
Table 3.1-2 Page 9, all highlighted information	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:

Ausley Law Firm
James D. Beasley
J. Jeffry Wahlen
Ashley M. Daniels
Post Office Box 391
Tallahassee, FL 32302
jbeasley@ausley.com
adaniels@ausley.com
jwahlen@ausley.com

PCS Phosphate – White Springs c/o Brickfield Law Firm James W. Brew/Owen J. Kopon Laura A. Wynn Eighth Floor, West Tower 1025 Thomas Jefferson St, NW Washington, DC 20007 jbrew@bbrslaw.com owen.kopon@bbrslaw.com laura.wynn@bbrslaw.com

Florida Power & Light Company Kenneth Hoffman 215 South Monroe Street, Suite 810 Tallahassee, FL 32301-1858 Ken.Hoffman@fpl.com

Florida Industrial Power Users Group c/o Moyle Law Firm Jon C. Moyle, Jr. 118 North Gadsden Street Tallahassee, FL 32301 jmoyle@moylelaw.com Florida Power & Light Company John T. Butler 700 Universe Boulevard Juno Beach, FL 33408-0420 John.Butler@fpl.com Hopping Green & Sams Gary V. Perko P. O. Box 6526 Tallahassee, FL 32314 gperko@hgslaw.com

Office of Public Counsel
J. Kelly/C. Rehwinkel/P. Christensen
c/o The Florida Legislature
111 W. Madison Street, Room 812
Tallahassee, FL 32399-1400
Christensen.patty@leg.state.fl.us

Duke Energy Florida, Inc.
Matthew R. Bernier
Cameron Cooper
106 East College Avenue, Suite 800
Tallahassee, FL 32301
Matthew.bernier@duke-energy.com
Cameron.Cooper@duke-energy.com

Duke Energy Florida, Inc.
John T. Burnett
Dianne M. Triplett
299 First Avenue North
St. Petersburg, FL 33701
Dianne.triplett@duke-energy.com
John.burnett@duke-energy.com

Tampa Electric Company Ms. Paula K. Brown, Manager Regulatory Coordination P. O. Box 111 Tampa, FL 33601-0111 Regdept@tecoenergy.com

Office of the General Counsel Charles Murphy 2540 Shumard Oak Blvd Tallahassee, FL 32399-0850 cmurphy@psc.state.fl.us DLynn@psc.state.fl.us

JEFFREY A. STONE
Florida Bar No. 325953
jas@beggslane.com
RUSSELL A. BADDERS
Florida Bar No. 007455
rab@beggslane.com
STEVEN R. GRIFFIN
Florida Bar No. 0627569
srg@beggslane.com
BEGGS & LANE
P. O. Box 12950
Pensacola FL 32591-2950
(850) 432-2451
Attorneys for Gulf Power