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February 7, 2017

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

RE: Docket No. 160186-EI

Dear Ms. Stauffer:

Enclosed for filing in the above-referenced docket is Gulf Power Company's Request for Confidential Classification pertaining to certain portions of Schedule 2 of Exhibit RMM-3 to the Rebuttal Testimony of Gulf Witness Richard M. Markey. Also enclosed is a copy of Gulf Power's Request for Confidential Classification and Exhibit "A" which is a justification for confidential treatment of the Confidential Information in Microsoft Word format. A copy of the confidential documents are provided in the enclosed envelope labeled "Confidential".

Sincerely,

Robert L. McGee, Jr.
Regulatory and Pricing Manager

md

Enclosure

cc: Beggs & Lane
Jeffrey A. Stone, Esq.
Gunster Law Firm
Charles A. Guyton, Esq.
Richard A. Melson, Esq.

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BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In Re: Petition for rate increase by Gulf
Power Company.

Docket No. 160186-EI
Dated: February 8, 2017

**GULF POWER COMPANY'S
REQUEST FOR CONFIDENTIAL CLASSIFICATION
AND MOTION FOR TEMPORARY PROTECTIVE ORDER**

Gulf Power Company ("Gulf Power," "Gulf," or the "Company"), pursuant to Section 366.093, Florida Statutes, and Rule 25-22.006, Florida Administrative Code, hereby requests confidential classification of a portion of Exhibit RMM-3 to the Rebuttal Testimony of Richard M. Markey (the "Exhibit"). Confidential information has been segregated and placed in the enclosed envelope bearing the label "CONFIDENTIAL" ("Confidential Information"). This document should be treated as confidential in its entirety.

Description of the Document(s)

The Confidential Information consists of a document produced as Schedule 2 to Exhibit RMM-3 to the Rebuttal Testimony of Richard M. Markey, a Gulf witness. This document is identified with specificity on Exhibit "A" to this Request. In support of this request, the Company states:

1. On February 8, 2017, concurrent to submitting this request, Gulf filed the Rebuttal Testimony of Richard M. Markey.
2. Attached to Mr. Markey's Rebuttal Testimony is Exhibit RMM-3. Schedule 2 to Exhibit RMM-3 contains confidential information.
3. Subsection 366.093(1), Florida Statutes, provides that any records "found by the Commission to be proprietary confidential business information shall be kept confidential and shall be exempt from s. 119.07(1), Florida Statutes [requiring disclosure under the Public

Records Act].” Proprietary confidential business information includes, but is not limited to “[i]nformation concerning . . . contractual data, the disclosure of which would impair the efforts of the public utility or its affiliates to contract for goods or services on favorable terms.” Subsection 366.093(3)(d), Florida Statutes. Proprietary confidential business information also includes “[i]nformation relating to competitive interests, the disclosure of which would impair the competitive business of the provider of the information.” Section 366.093(3)(e), Florida Statutes. The Confidential Information that is the subject of this request and motion falls within the statutory categories and, thus, constitutes proprietary confidential business information entitled to protection under Section 366.093, Florida Statutes, and Rule 25-22.006, Florida Administrative Code.

4. Attached hereto as Exhibit "A" is a justification for confidential treatment of the Confidential Information.

5. Attached hereto as Exhibit "B" is a public version of the Document with the Confidential Information redacted, unless previously filed as indicated.

6. The Confidential Information is intended to be and is treated by Gulf Power as private and, to this attorney’s knowledge, has not been publicly disclosed.

7. For the same reasons set forth herein in support of its request for confidential classification, Gulf Power also moves the Commission for entry of a temporary protective order pursuant to Rule 25-22.006(6)(c), Florida Administrative Code, protecting the Confidential Information from public disclosure.

Requested Duration of Confidential Classification

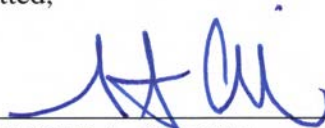
8. Gulf Power requests that the Confidential Information be treated by the Commission as confidential proprietary business information for at least the 18 month period

prescribed in Rule 25-22.006(9)(a), Florida Administrative Code. If, and to the extent that the Company is in need of confidential classification of the Confidential Information beyond the 18 month period set forth in the Commission rule, the justification and grounds for such extended confidential treatment are set forth in Exhibit "C" to this request and motion.

WHEREFORE, Gulf Power Company respectfully requests that the Confidential Information that is the subject of this request and motion be accorded confidential classification for the reasons set forth herein and for a minimum period of 18 months, subject to any request for a longer period of confidential classification as may be set forth in Exhibit "C" to this request and motion. The company further moves for the entry of a temporary protective order pursuant to Rule 25-22.006(6)(c), Florida Administrative Code, protecting the Confidential Information from public disclosure.

DATED this 7th day of February, 2017.

Respectfully submitted,



JEFFREY A. STONE

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Florida Bar No. 007455

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Attorneys for Gulf Power Company

EXHIBIT "A"

**JUSTIFICATION FOR CONFIDENTIAL TREATMENT OF PORTION OF
EXHIBIT RMM-3 TO THE REBUTTAL TESTIMONY OF RICHARD M. MARKEY**

<u>Testimony Exh. No.</u>	<u>File Name</u>	<u>Detailed Description</u>	<u>Rationale</u>
RMM-3	RMM-3 Schedule 2	All highlighted information	(1)

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- (1) The information identified on the listed pages/files contains a wellfield map resulting from a site specific preliminary hydrologic modeling study. This information is being used by Gulf in its permitting activities, including pursuit of a consumptive water use permit for the site. Specifically, the confidential information within Exhibit RMM-3 includes a figure depicting preliminary potential groundwater supply well locations. The potential location of the wells, in addition to the potential number of wells, is sensitive because that information could reveal the amount of water Gulf projects it will need at this site. There is a nearby site for which another consumptive water use permit is being sought, and therefore, the disclosure of Gulf's data prior to filing its permit application could both provide an undue and uncompensated benefit to the other applicant and could harm Gulf's ability to secure its consumptive use permit. Therefore, this proprietary, competitively sensitive information should not be publicly disclosed. This information is confidential pursuant to section 366.093(3)(d)(e), Florida Statutes.

EXHIBIT "B"

PUBLIC VERSION(S) OF THE DOCUMENT(S)

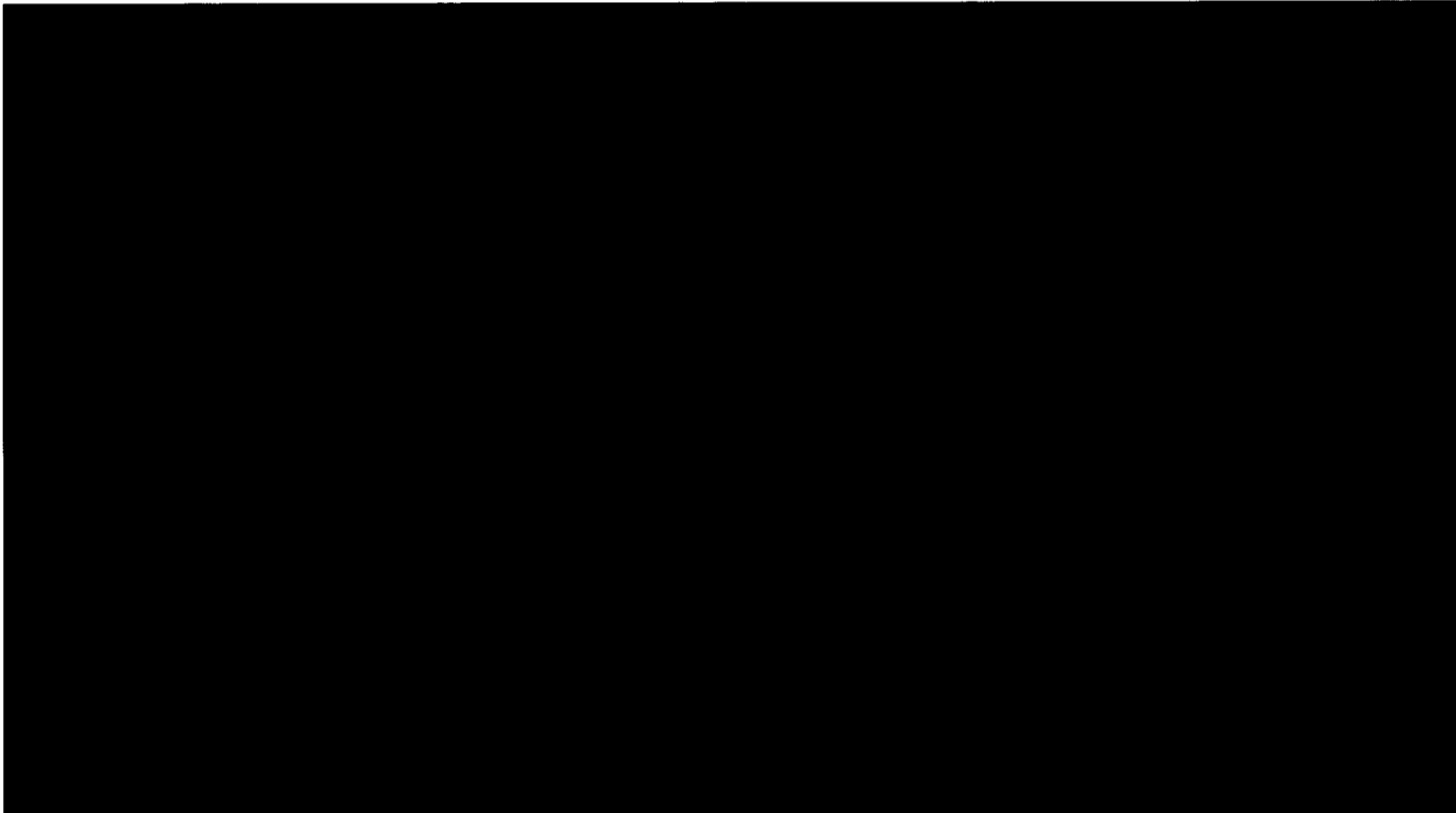
Attached hereto (unless previously filed as may be noted below) are two public versions of the Document(s) with the Confidential Information redacted.

Public Version(s) of the Document(s) attached X

Public Version(s) of the Document(s) previously filed on

Document(s) are confidential in their entirety

Escambia County Site



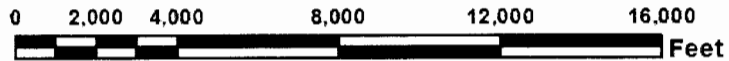
Note:
This map is informational only, and is not a survey.
Boundaries shown hereon are approximate.

Map Projection: Lambert Conformal Conic
Data Sources: Escambia County Property Appraiser,
Florida Department of Revenue, Bing Maps

○ Well

Gulf Power Property

1 inch = 4,000 feet



Florida Public Service Commission
Docket No. 160186-EI
GULF POWER COMPANY
Witness: Richard M. Markey
Exhibit No. ____ (RMM-3)
Schedule 2
Page 1 of 1

EXHIBIT "C"

REQUESTED DURATION OF CONFIDENTIAL CLASSIFICATION

Gulf Power requests that the Confidential Information that is the subject of this request be treated as proprietary confidential business information exempt from the Public Records Law for a minimum of 18 months from the date of the order granting such classification. To the extent the company needs confidential protection of the Confidential Information for a period longer than 18 months, the company's justification therefor is set forth below:

n/a

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

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

Docket No.: 160186-EI

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true copy of the foregoing has been furnished by overnight mail this 7th day of February, 2017 to the following:

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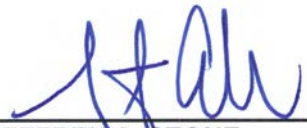
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