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April 27, 2018

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

RE: Docket No. 20140234-EI

Dear Ms. Stauffer:

Attached for official filing is Gulf Power Company's Request for Extended Confidential Classification regarding certain information submitted by Gulf Power in connection with the Commission Staff's review in the above-referenced docket.

Sincerely,

A handwritten signature in blue ink that reads "Rhonda J. Alexander".

Rhonda J. Alexander  
Regulatory, Forecasting and Pricing Manager

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Attachments

cc: Gulf Power Company  
Jeffrey A. Stone, Esq., General Counsel  
Beggs & Lane  
Russell Badders, Esq.

**BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION**

IN RE: Gulf Power Company's request for confidential treatment of certain information contained in reported entitled review of physical security protection of utility substations and control centers

Docket No.: 20140234-EI  
Date: April 27, 2018

**REQUEST FOR EXTENDED 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 extending confidential classification for certain information included in Gulf Power's responses to Commission Staff's data requests and in Commission Staff's workpapers concerning the Commission's Review of Gulf Power Company's Facilities Physical Security (the "Review"). As grounds for this request, the Company states:

1. On December 1, 2014, Gulf Power filed a request for confidential classification of certain information contained in Gulf Power's responses to Commission Staff's data requests and in Commission Staff's workpapers which were generated during the Review. (Document No. 06520-2014)
2. On January 22, 2015, the Commission entered Order No. PSC-15-0059-CFO-EI granting Gulf's request for confidential classification.
3. On July 18, 2016, Gulf Power filed its first request for extended confidential classification of the subject information. (Document No. 05174-2016)
4. On October 31, 2016, the Commission entered Order No. PSC-16-0501-CFO-EI granting Gulf's first request for extended confidential classification.

5. As provided in section 366.093(4), Florida Statutes, and by the Commission's Order, the confidential information will be made public after a period of 18 months unless Gulf or another affected party shows, and the Commission finds, that the confidential information continues to comprise proprietary confidential business information. The 18-month extension period expires on May 1, 2018.

6. Gulf hereby requests that the Commission enter an order extending the confidential classification of the information highlighted on Exhibit "A" of Gulf's original request and identified in line/by line format on Exhibit "C" of Gulf's original request for an additional 18-month period.

7. The information highlighted on Exhibit "A" to Gulf's original request is entitled to continued confidential classification for the same reasons that it was initially classified. As stated in Gulf's original request, the Review addresses Gulf Power's plans and efforts toward preventing, detecting and recovering from deliberate physical attacks on the Company's substations and system control facilities. In connection with the Review, Gulf Power produced detailed data concerning its transmission and distribution infrastructure and its plans and procedures for protecting the same against physical and cyber-attack. Securing and protecting its infrastructure is a top priority for Gulf Power and the Southern Company. The data produced by Gulf reveals information regarding Gulf's security measures, systems and procedures. Moreover, portions of this information fit within the definition of confidential "critical energy infrastructure information" as defined by the Federal Energy Regulatory Commission ("FERC") regulation 338.113. Public disclosure of the subject information would enable potential wrongdoers to identify points of interest for their efforts and potentially undermine the integrity

of Gulf Power's transmission and distribution infrastructure. It is for this reason that information of this nature is entitled to confidential classification under section 366.093(3), Florida Statutes.

8. 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.

**WHEREFORE**, Gulf Power Company respectfully requests that the Commission enter an order protecting the information highlighted on Exhibit "A" to Gulf's original request from public disclosure as proprietary confidential business information

Respectfully submitted this 27<sup>th</sup> day of April, 2018.



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