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September 14, 2018

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

RE: Docket No. 20160186-EI

Dear Ms. Stauffer:

Attached for official filing is Gulf Power Company's Request for Extension of Temporary Protective Order for information submitted by Gulf Power in response to Sierra Club's First Set of Requests for Production of Documents to Gulf Power (Nos. 1-2) and Sierra Club's Second Set of Interrogatories to Gulf Power (Nos. 15-28) in the above-referenced docket.

Sincerely,

C. Shane Boyett

Regulatory and Cost Recovery Manager

C. Share Boyett

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Attachments

cc: Gi

Gulf Power Company
Jeffrey A. Stone, Esq., General Counsel
Beggs & Lane
Russell Badders, Esq.
Gunster Law Firm
Charles A. Guyton, Esq.
Richard A. Melson, Esq.

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In Re: Petition for Rate Increase by Gulf Power Company

_____)

Docket No. 20160186-EI Filed: September 14, 2018

REQUEST FOR EXTENSION OF TEMPORARY PROTECTIVE ORDER

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 the Sierra Club's First Set of Requests for Production of Documents to Gulf Power (Nos. 1-2) and Sierra Club's Second Set of Interrogatories to Gulf Power (Nos. 15-28) in Docket No. 20160186-EI. As grounds for this request, the Company states:

- 1. On February 27, 2017, Gulf Power filed a Motion for Temporary Protective Order requesting confidential classification of certain information contained within Gulf Power's responses to the Sierra Club's First Set of Requests for Production of Documents to Gulf Power (Nos. 1-2). (Document No. 02287-2017) Copies of Gulf's responses to these discovery requests were served on Sierra Club, the Office of Public Counsel, and other parties.
- 2. On February 27, 2017, Gulf Power filed a Motion for Temporary Protective Order requesting confidential classification of certain information contained within Gulf Power's responses to the Sierra Club's Second Set of Interrogatories to Gulf Power (Nos. 15-28).

 (Document No. 02346-2017) Copies of Gulf's responses to these discovery requests were served on Sierra Club, the Office of Public Counsel, and other parties.
- 3. On March 14, 2017, the Commission entered Order No. PSC-2017-0094-CFO-EI granting each of Gulf's Motions for Temporary Protective Order and protecting the information

subject to the same from disclosure pursuant to Rule 25-22.006(6)(c), Florida Administrative Code.

- 4. As provided in section 366.093(4), Florida Statutes, Gulf's confidential information will be subject to public disclosure after a period of 18 months unless Gulf or another affected party shows, and the Commission finds, that the information continues to comprise proprietary confidential business information. The 18-month extension period expires on September 14, 2018.
- 5. Gulf hereby requests that the Commission enter an order extending its Temporary Protective Order for an additional 18-month period. Despite the passage of time, the information subject to the Temporary Protective Order remains competitively sensitive and is entitled to continued confidential classification for the reasons set forth in Gulf Power's original motions.
- 6. The information which is the subject of 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 extending its Temporary Protective Order for an additional 18-month period.

Respectfully submitted this 14th day of September, 2018.

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Attorneys for Gulf Power

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

IN RE:	Petition for Increase in Rates)	
	By Gulf Power Company)	
)	Docket No.: 20160186-EI
IN RE:	Petition for approval of 2016 depreciation and)	
	dismantlement studies, approval of proposed)	
	depreciation rates and annual dismantlement)	
	accruals and Plant Smith Units 1 and 2 regulatory)	
	asset amortization, by Gulf Power Company	j	Docket No.: 20160170-FI

CERTIFICATE OF SERVICE

1 HEREBY CERTIFY that a true copy of the foregoing has been furnished by electronic mail this 14th day of September, 2018 to the following:

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