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December 20, 2018

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

RE: Docket No. 20180001-EI

Dear Ms. Stauffer:

Attached is Gulf Power Company's Request for Extended Confidential Classification regarding certain information submitted by Gulf Power in connection with Commission Staff's audit in the above-referenced docket (ACN17-023-1-2). Also attached is Gulf's Request for Extended Confidential Classification in Microsoft Word.

Sincerely,

A handwritten signature in blue ink that reads "C. Shane Boyett".

C. Shane Boyett  
Regulatory and Cost Recovery Manager

md

Attachments

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

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

IN RE: Fuel and purchased power cost  
recovery clause and generating performance  
incentive factor

Docket No.: 20180001-EI  
Date: December 20, 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 documents produced by Gulf Power in connection with a review of Gulf Power's 2016 capacity expenditures in Docket No. 20170001-EI (ACN 17-023-1-2) (the "Review"). As grounds for this request, the Company states:

1. On June 1, 2017, Gulf Power filed a request for confidential classification of certain information submitted by Gulf pursuant to the Review (the "Original Request"). (Document No. 05143-2017). The subject information is contained within Document No. 05144-2017 (the "Confidential Information").
2. On June 29, 2017, the Commission entered Order No. PSC-17-0253-CFO-EI granting Gulf's Original Request.
3. 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 constitute proprietary confidential business information. The 18-month extension period expires on December 28, 2018.
4. Gulf hereby requests that the Commission enter an order extending the confidential classification of the Confidential Information for an additional 18-month period.

5. The Confidential Information is entitled to continued confidential classification for the same reasons that it was initially classified. As stated in Gulf's Original Request, a portion of the information submitted by Gulf Power in connection with the Review constitutes proprietary confidential business information concerning bids and other contractual data, the disclosure of which would impair the efforts of Gulf Power to contract for goods and services on favorable terms. The information is entitled to confidential classification pursuant to section 366.093(3)(d) and (e), Florida Statutes. Specifically, the Confidential Information consists of pricing information for capacity purchases between Gulf and various counterparties. Contracts forming the basis for this pricing data are still in effect. This information is regarded by both Gulf and the counterparties as confidential. Disclosure of this information would negatively impact Gulf's ability to negotiate pricing favorable to its customers in future contracts. In addition, potential counterparties may refuse to enter into contracts with Gulf, or may charge higher prices, if the price terms were made public.

6. 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 extending confidential classification of the Confidential Information for an additional 18-month period.

Respectfully submitted this 20th day of December, 2018.

A handwritten signature in blue ink, appearing to read "H. Griffin", is written above a horizontal line.

**RUSSELL A. BADDERS**

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**STEVEN R. GRIFFIN**

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**Attorneys for Gulf Power Company**

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

IN RE: **Fuel and Purchased Power Cost** )  
**Recovery Clause with Generating** )  
**Performance Incentive Factor** )

Docket No.: **20180001-EI**

**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that a true copy of the foregoing was furnished by electronic mail this 20th day of December, 2018 to the following:

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