



July 26, 2019

Mr. Adam Teitzman, Commission Clerk
Florida Public Service Commission
2540 Shumard Oak Boulevard
Tallahassee, FL 32399-0850

RECEIVED-FPSC
2019 JUL 29 AM 10:03
COMMISSION
CLERK

REDACTED

Re: Docket No. 20190002-EG

Dear Mr. Teitzman:

Enclosed is Gulf Power Company's Request for Confidential Classification pertaining to Gulf Power's response to Staff's First Set of Interrogatories (Nos. 1-11) in the above-referenced docket.

Sincerely,

C. Shane Boyett

C. Shane Boyett
Regulatory, Forecasting and Pricing Manager

COM _____
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APA _____
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ENG _____
GCL _____
IDM _____
CLK _____

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Enclosures

cc: Gulf Power Company
Russell Badders, Esq., VP & Associate General Counsel

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Energy Conservation Cost Recovery Clause

DOCKET NO. 20190002-EG

DATED: JULY 29, 2019

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 information contained within the Company’s response to Commission Staff Interrogatory No. 5 contained within Staff’s First Set of Interrogatories to Gulf Power in the above-referenced docket. As grounds for this request, the Company states:

1. A portion of the information contained within Gulf’s response to Staff Interrogatory No. 5 is proprietary confidential business information regarding contractual matters which would cause irreparable harm to Gulf Power, the entity with whom it has entered into contracts and most importantly to Gulf’s customers, if such information was publicly disclosed. Specifically, this response contains information regarding payments made pursuant to contract with Gulf Power’s vendor for technical consulting services associated with the 2020 FEECA Goalsetting process. This information is regarded by both Gulf and its vendor as confidential. The information is specific to the individual contract and is not publicly known. Disclosure of this information would negatively impact Gulf’s ability to effectively negotiate for goods and services in the future. In addition, potential counterparties may refuse to enter into contracts with Gulf, or may charge higher prices, if such terms are publicly disclosed. The information is therefore entitled to confidential classification pursuant to section 366.093(3)(d) and (e), Florida Statutes.

2. 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 otherwise been publicly disclosed.

3. Submitted as Exhibit "A" is a copy of Gulf Power's response to Staff Interrogatory 5, on which is highlighted the information for which confidential classification is requested. Exhibit "A" should be treated as confidential pending a ruling on this request. Attached as Exhibit "B" are two (2) edited copies of the response, 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 26th day of July, 2019.



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BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Energy Conservation Cost Recovery
Clause

Docket No.: 20190002-EG
Date: July 29, 2019

_____)

REQUEST FOR CONFIDENTIAL CLASSIFICATION

EXHIBIT "A"

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

EXHIBIT "B"

5. Are any expenses that are included in the Company's filing associated with the 2020 FEECA Goalsetting Docket? Please explain.

ANSWER:

Yes, the Company did incur consultant expenses associated with performing the Technical Potential and Achievable Potential studies utilized in the 2020 FEECA Goalsetting Docket. For 2018, these expenses totaled [REDACTED]. As with previous DSM goalsetting dockets, Gulf has recovered these expenses as a necessary part of satisfying the Commission requirements for establishing goals that lead to DSM programs.

EXHIBIT "C"

Line-by-Line/Field-by-Field
JustificationLine(s)/Field(s)

Interrogatory No. 5
Page 1 of 1
(All highlighted information)

Justification

This information is entitled to confidential classification pursuant to §366.093(3) (d) and (e), Florida Statutes. The basis for this information being designated as confidential is more fully set forth in paragraph 1.

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

IN RE: Energy Conservation Cost)
Recovery Clause)

Docket No.: 20190002-EG

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true copy of the foregoing was furnished by overnight mail this 26th day of July, 2019 to the following:

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