

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: November 26, 2019

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. On April 27, 2018, Gulf Power filed its second request for extended confidential classification. (Document No. 03279-2018)

6. On May 21, 2018, the Commission entered Order No. PSC-2018-0255-CFO-EI granting Gulf's second request for extended confidential classification.

7. 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.

8. 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.

9. 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. 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.

10. 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 26th day of November, 2019.



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