State of Florida



Aublic Service Commission

CAPITAL CIRCLE OFFICE CENTER • 2540 SHUMARD OAK BOULEVARD TALLAHASSEE, FLORIDA 32399-0850

-M-E-M-O-R-A-N-D-U-M-

DATE:

December 3, 2019

TO:

Adria Harper, Senior Attorney, Office of the General Counsel

FROM:

Victor Cordiano, Engineering Specialist II, Office of Auditing & Performance

Analysis Yc

RE:

Docket No. 20140234-EI - Gulf Power Company's request for extension of confidential treatment of the audit work papers for staff's report entitled *Review of*

Physical Security Protection of Utility Substations and Control Centers (December

2014), PA-14-05-003.

Audit staff has reviewed GPC's request for confidentiality in DN 11118-2019 concerning portions of audit staff's work papers in DN 06521-2014. GPC's Exhibit C in DN 06520-2014 remains in effect and contains the justification matrix that identifies the information requested to be classified as confidential under Section 366.093(3)(c), Florida Statutes.

We concur and recommend that the information identified in DN 06521-2014 should be protected as requested. Audit staff also recommends that the same information in DN 00900-2015 should remain confidential and that both DN 06521-14 and DN 00900-2015 be included in the resulting order.

Please contact me if you have any questions.

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-M-E-M-O-R-A-N-D-U-M-

D	A	T	Έ	:	December	3	, 2019

TO: Division of Auditing and Performance Analysis, Office of Primary Responsibility

FROM: OFFICE OF COMMISSION CLERK

RE: CONFIDENTIALITY OF CERTAIN INFORMATION

DOCKET NOS: 20140234-EI DOCUMENT NOS: 06521-2014, 00900-2015

DESCRIPTION: GPC (McGee) - (CONFIDENTIAL) Highlighted information included in responses to staff's data requests and in staff's workpapers (Audit Control No. PA-14-05-003) concerning Commission's review of GPC's physical security of utility substations and control centers. [CLK note: This document moved from Docket 140000-OT to new Docket 140234-EI per DN 06631-14.]

[See DN 00900-15]

SOURCE: Gulf Power Company

The above confidential material was filed along with a <u>request for extension of confidential classification</u>, filed <u>on 11/26/19 (DN 11118-2019)</u>. Please complete the following form by checking all applicable information and forward it to the attorney assigned to the docket, along with a brief memorandum supporting your recommendation.

The document(s) is (are), in fact, what the utility asserts it (them) to be.							
The utility has provided enough details to perform a reasoned analysis of its request.							
The material has been received incident to an inquiry.							
x The material is confidential business information because it includes:							
(a) Trade secrets;							
(b) Internal auditing controls and reports of internal auditors;							
x (c) Security measures, systems, or procedures;							
(d) Information concerning bids or other contractual data, the disclosure of which would impair the efforts of the public utility or its affiliates to contract for goods or services on favorable terms;							
 (e) Information relating to competitive interests, the disclosure of which would impair the competitive business of the provider of information; 							
(f) Employee personnel information unrelated to compensation, duties, qualifications, or responsibilities;							
The material appears to be confidential in nature and harm to the company or its ratepayers will result from public disclosure.							
The material appears <u>not</u> to be confidential in nature.							
The material is a periodic or recurring filing and each filing contains confidential information.							

This response was prepared by Victor Cordiano on December 3, 2019, a copy of which has been sent to the Office of Commission Clerk and the Office of General Counsel.