

State of Florida



# Public Service Commission

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

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

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**DATE:** April 9, 2020

**TO:** Division of Accounting and Finance, Office of Primary Responsibility

**FROM:** OFFICE OF COMMISSION CLERK

**RE:** CONFIDENTIALITY OF CERTAIN INFORMATION

DOCKET NOS: 202000001-EI DOCUMENT NO: 01856-2020

DESCRIPTION: GPC (Badders) - (CONFIDENTIAL) Highlighted portions of 8/19 through 12/19 hedging activity report. [CLK note: See DN 01752-2020 for request for confidential classification.]

SOURCE: Gulf Power Company

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The above confidential material was filed along with a request of confidential classification. 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.
- The material is confidential business information because it includes:
- (a) Trade secrets;
  - (b) Internal auditing controls and reports of internal auditors;
  - (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 not to be confidential in nature.
- The material is a periodic or recurring filing and each filing contains confidential information.

This response was prepared by /s/Devlin Higgins on 4/13/20    , a copy of which has been sent to the Office of Commission Clerk and the Office of General Counsel.

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

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**DATE:** April 14, 2020  
**TO:** Suzanne Brownless, Special Counsel, Office of the General Counsel  
**FROM:** Devlin Higgins, Public Utility Analyst IV, Division of Accounting & Finance  
**RE:** CONFIDENTIALITY OF CERTAIN INFORMATION

DOCKET NO: 20200001-EI DOCUMENT NO: 01856-2020

DESCRIPTION: GPC (Badders) - (CONFIDENTIAL) Highlighted portions of 8/19 through 12/19 hedging activity report. [CLK note: See DN 01752-2020 for request for confidential classification.]

SOURCE: Gulf Power Company

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Pursuant to Section 366.093, Florida Statutes (F.S.), and Rule 25-22.006, Florida Administrative Code, Gulf Power Company (GPC or Company) requests confidential classification of certain information filed in the above referenced docket, dated April 3, 2020.

The Company is claiming confidentiality of its filing under Section 366.093(3)(d), F.S. Per the Statute, propriety of confidential business information includes, but is not limited to: Subsection (d) “[i]nformation 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.”

The information which GPC is claiming as confidential consists of pricing terms for natural gas hedging transactions between the Company and various counterparties. GPC claims the subject information contained in the Hedging Activity Report constitutes proprietary and commercially sensitive information regarding competitive interests and contractual matters which, if disclosed to the general public, would cause irreparable harm to GPC and its customers.

This request applies to information that has historically been granted confidential classification. In staff’s opinion, the information that is the subject of GPC’s request meets the criteria for confidentiality contained in 366.093(3)(d), F.S.