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Pensacola, FL 32520

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September 3, 1997

Ms. Blanca S. Bayo, Director
Division of Records and Reporting
Florida Public Service Commission
2540 Shumard Oak Boulevard
Tallahassee FL 32399-0870

Dear Ms. Bayo:

RE: Request for Confidential Classification
Quarterly Real Time Pricing Program Report for the Second Quarter 1997

941102-EI

Enclosed are an original and fifteen copies of Gulf Power Company's Request for Confidential Classification for the Quarterly Real Time Pricing Program Report for the Second Quarter 1997.

Sincerely,

Susan D. Cranmer

Susan D. Cranmer
Assistant Secretary and Assistant Treasurer

lw

cc: Beggs and Lane
Russell A. Badders
Florida Public Service Commission
Connie Kummer

8361

- ACK
- AFA _____
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RECEIVED & FILED
[Signature]
EPSC-BUREAU OF RECORDS

DOCUMENT NUMBER-DATE
08893 SEP-4 97
FPSC-RECORDS/REPORTING

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

IN RE: Gulf Power Company Quarterly Real
Time Pricing Program report
for the Second Quarter 1997

Docket No.: Undocketed
Date: September 3, 1997

REQUEST FOR CONFIDENTIAL CLASSIFICATION

GULF POWER COMPANY ["Gulf Power", "Gulf", or "the Company"], by and through its undersigned attorney 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, hereafter the Quarterly RTP Report, submitted to the Florida Public Service Commission pursuant to Order No. PSC-95-0256-FOF-EI. As grounds for this request, the Gulf Power Company states:

1. On or about August 14, 1997, Gulf Power Company submitted to the Florida Public Service Commission Gulf Power Company's Quarterly Real Time Pricing Program report for the Second Quarter 1997 as required by Order No. PSC-95-0256-FOF-EI.

2. On or about August 14, 1997, Gulf Power Company filed a Notice of Intent to Request Confidential Classification with regard to the Quarterly RTP Report. Gulf Power asserts that the information contained in the Quarterly RTP Report is entitled to confidential classification pursuant to §366.093(3)(e), Florida Statutes, as information, the public disclosure of which would cause irreparable harm to the competitive interests of the Gulf Power and the entity with whom it has negotiated a contract pursuant to CISR. The Quarterly RTP Report contains proprietary and commercially sensitive information that is not otherwise publicly available.

DOCUMENT NUMBER-DATE

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#PSC-RECORDS/REPORTING

3. The Public disclosure of the information contained in the Quarterly RTP Report would cause irreparable harm to Gulf Power Company and the entity with whom it has entered a CSA. The Quarterly RTP Report contains proprietary confidential business information regarding contractual terms and pricing. Public disclosure of this information would impair the ability of Gulf Power Company to negotiate terms and conditions in future CSAs that are the most favorable to Gulf and its general body of customers. Moreover, the public disclosure of this information may prevent Gulf from successfully negotiating CSAs with customers. The information is regarded as sensitive and confidential by the CIS rider customer because its public disclosure would impact the customers' ability to compete in their native markets. In the event such information is made public, future potential CIS rider customers may avoid the risk of public disclosure of their confidential information by refusing to negotiate with Gulf Power. This may lead to uneconomic bypass of Gulf's facilities. Thus, the Companies request that this information be granted confidential classification pursuant to Section 366.093(3)(e), Florida Statutes.

4. Submitted as Exhibit "A" is a copy of the Quarterly RTP Report, 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 Quarterly RTP Report, which may be made available for public review and inspection. Attached as Exhibit "C" to this request is a line-by-line justification for the request for confidential classification.

5. The material for which confidential classification is requested is intended to be, and is treated as, confidential by Gulf Power Company and the entity with whom it has entered a CSA contract and 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" from public disclosure as proprietary confidential business information.

Respectfully submitted this 3 rd day of September 1997,

Russell A. Badders
Russell A. Badders
Florida Bar No. 7455
Beggs & Lane
Post Office Box 12950
Pensacola, Florida 32576-2950
(904) 432-2451
Counsel for Gulf Power Company

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

IN RE: Gulf Power Company Quarterly Real
Time Pricing Program report
for the Second Quarter 1997

Docket No.: Undocketed
Date: September 3, 1997

EXHIBIT "A"

REQUEST FOR CONFIDENTIAL CLASSIFICATION

The information provided herein should be maintained as proprietary confidential business information pursuant to Section 366.093 and Rule 25-22.006, F.A.C.

EXHIBIT "A"

Provided to the Division of Records and Reporting
under separate cover as confidential information

EXHIBIT "B"

GULF POWER COMPANY
 EXPERIMENTAL RATE RTP QUARTERLY REPORT

Program Cost

Tenth Quarterly Report

Report Period: Second Quarter 1997

	A	B	C
	<u>2nd Quarter 1997</u>	<u>Year-To-Date</u>	<u>Project to Date</u>
Revenue (Shortfall)/Gain	██████████	██████████	██████████
Other RTP Program Costs	██████████	██████████	██████████
Impact of Total Costs on Earnings in Terms of Basis Points:	██████████		

Notes to Quarterly Real Time Pricing
 Program Cost Report

This quarterly report is intended to comply with the reporting requirements found on page 3 of Order No. PSC-95-0256-FOF-EI in docket number 941102-EI. As such, the report addresses only costs associated with Gulf Power's Real Time Pricing (RTP) program.

The revenue (shortfall)/gain reported does not represent the differences in base rate revenues which may be attributed to this program. The amount reported is merely the result of calculating, for each month of the quarter, the difference between the base rate revenue in cents per KWH using the previous rate and the RTP base rate revenue in cents per KWH; then summing these monthly amounts to arrive at the reported amount.

GULF POWER COMPANY
 EXPERIMENTAL RATE RTP QUARTERLY REPORT

Program Cost

Tenth Quarterly Report

Report Period: Second Quarter 1997

	A	B	C
	<u>2nd Quarter 1997</u>	<u>Year-To-Date</u>	<u>Project to Date</u>
Revenue (Shortfall)/Gain	██████████	██████████	██████████
Other RTP Program Costs	██████████	██████████	██████████
Impact of Total Costs on Earnings in Terms of Basis Points:	██████████		

Notes to Quarterly Real Time Pricing
 Program Cost Report

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EXHIBIT "C"

Line-by-Line Justification

<u>Line(s)</u>	<u>Columns</u>	<u>Justification</u>
15, 17, 21	A, B, C	<p>This information is proprietary confidential business information regarding contractual terms and pricing. Public disclosure of this information would impair the ability of Gulf Power Company to negotiate terms and conditions in future CSAs that are the most favorable to Gulf and its general body of customers. The result of public disclosure of the pricing information would be price convergence in future CSAs. Moreover, the public disclosure of this information may prevent Gulf from successfully negotiating CSAs with customers. The information is regarded as sensitive and confidential by the CIS rider customer because its public disclosure would impact the customers' ability to compete in their native markets. In the event such information is made public, future potential CIS rider customers may avoid the risk of public disclosure of their confidential information by refusing to negotiate with Gulf Power. This may lead to uneconomic bypass of Gulf's facilities.</p>