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March 19, 2015

Ms. Carlotta Stauffer, Commission Clerk  
Florida Public Service Commission  
2540 Shumard Oak Boulevard  
Tallahassee, FL 32399-0850

Re: Docket No. 150035-EI – Petition for approval of energy purchase agreements between Gulf Power Company and Gulf Coast Solar Center I, LLC, Gulf Coast Solar Center II, LLC, and Gulf Coast Solar Center III, LLC

Dear Ms. Stauffer:

Enclosed for filing in the above-referenced docket is Gulf Power Company's Request for Confidential Classification pertaining to certain portions of Gulf's response to Commission Staff's Revised Second Data Request (Nos. 1-24). In addition to the "Confidential" DVD labeled as Exhibit "A", enclosed is a separate DVD containing a copy of Gulf Power's Request for Confidential Classification and Exhibit "B" in Microsoft Word format as prepared on a Windows based system.

Sincerely,

Robert L. McGee, Jr.  
Regulatory and Pricing Manager

COM \_\_\_\_\_  
AFD \_\_\_\_\_  
APA \_\_\_\_\_  
ECO \_\_\_\_\_  
ENG DVD \_\_\_\_\_  
GCL \_\_\_\_\_  
IDM \_\_\_\_\_  
TEL \_\_\_\_\_  
CLK \_\_\_\_\_

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Enclosures

cc: Beggs & Lane  
Jeffrey A. Stone, Esq.

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CLERK

**BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION**

In re: Petition for Approval of Energy  
Purchase Agreements between Gulf Power  
Company and Gulf Coast Solar Center I, LLC,  
Gulf Coast Solar Center II, LLC and Gulf  
Coast Solar Center III, LLC

Docket No. 150035-EI  
Filed: March 20, 2015

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**SUPPLEMENTAL REQUEST FOR CONFIDENTIAL CLASSIFICATION**  
**(COMMISSION STAFF'S SECOND DATA REQUEST)**

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 revised information submitted by Gulf Power in response to Commission Staff's Second Data Request to Gulf Power Company (Nos. 1-24) in the above-referenced docket. Revised confidential information submitted in response to Staff's Second Data Request has been segregated and placed upon the enclosed DVD bearing the label "CONFIDENTIAL." This DVD should be treated as confidential in its entirety. As grounds for this request, the Company states:

1. On March 10, 2015, Gulf Power filed a Request for Confidential Classification for portions of information submitted in response to items 11, 15, 19, 20 and 23 of Commission Staff's Second Data Request to Gulf Power Company in the above-referenced docket.

(Document No. 01352-15)

2. Subsequent to filing Gulf's responses to Staff's Second Data Request and the original Request for Confidential Classification, Gulf discovered a calculation error in the files submitted in response to Item Nos. 19 and 23 of Staff's Second Data Request. These files, titled "DR1-23e.Alternative Fuel Price Forecasts-CONF.xlsx" and "DR2-23 Alternative Fuel Price forecasts Nominal Conf.xlsx," respectively, contain coal and natural gas price forecasts prepared

by parties other than Gulf Power or its agents. The calculation error relates solely to the coal price forecasts. Gulf has corrected this error and is submitting the corrected responses on the enclosed DVD. The remainder of Gulf's response to Staff's Second Data Request remains unaffected and continues to be subject to Gulf's original Request for Confidential Classification. This Supplemental Request for Confidential Classification addresses the corrected data presented herewith in response to Item Nos. 19 and 23.

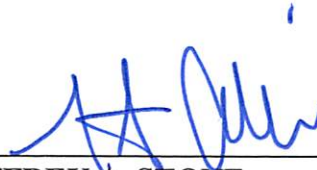
3. As noted in Gulf's original Request for Confidential Classification, information submitted in response to Item Nos. 19 and 23 includes fuel forecasts which were developed by parties other than Southern Company and Charles River Associates and which were purchased by Southern Company Services through a paid subscription service. This information is subject to non-disclosure agreements and is regarded by the vendors as proprietary information. Public disclosure of this information would enable others in the marketplace to capitalize on this data without compensating the vendors for the same and could result in vendors charging higher prices, or refusing to do business with Gulf, out of concern that their data would be publicly disclosed. Public disclosure of this data would impair the competitive business interests of Gulf Power and its vendors and is therefore entitled to confidential classification pursuant to section 366.093(3)(e), Florida Statutes.

4. The information filed pursuant to this Supplemental 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.

5. Attached hereto as Exhibit "A" is a DVD containing Gulf's revised responses to Item Nos. 19 and 23. Attached hereto as Exhibit "B" is a justification for confidential treatment of the Confidential Information.

**WHEREFORE**, Gulf Power Company respectfully requests that the Commission enter an order protecting the information contained within Exhibit "A" from public disclosure as proprietary confidential business information.

Respectfully submitted this 19<sup>th</sup> day of March, 2015.



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**Attorneys for Gulf Power Company**

**REQUEST FOR CONFIDENTIAL CLASSIFICATION**

**EXHIBIT "A"**

DVD provided to the Commission Clerk  
under separate cover as confidential information

**EXHIBIT "B"**

**Line-by-Line/Field-by-Field Justification**

**Line(s)/Field(s)**

**Justification**

**Revised Response to Item #19**

See file titled:  
"Revised DR1-23e.Alternative Fuel Price  
Forecasts-CONF.xlsx"

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

**Revised Response to Item # 23**

See file titled:  
"Revised DR2-23 Alternative Fuel Price  
forecasts Nominal CONF.xlsx"

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

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

IN RE: **Petition for approval of energy purchase** )  
**agreements between Gulf Power Company** )  
**and Gulf Coast Solar Center I, LLC,** )  
**Gulf Coast Solar Center II, LLC, and** )  
**Gulf Coast Solar Center III, LLC** )

Docket No.: 150035-EI

**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that a true copy of the foregoing was furnished by overnight mail this 19th day of March, 2015 to the following:

Office of Public Counsel  
J. R. Kelly/P. Christensen  
Public Counsel  
c/o The Florida Legislature  
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