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ORIGINAL



REDACTED

August 6, 2007

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

RECEIVED-FPSC  
07 AUG -7 AM 9:28  
COMMISSION  
CLERK

Dear Ms. Cole:

Re: Docket No. 070007-EI

Enclosed are an original and fifteen copies of Gulf Power Company's Second Amended Request for Confidential Classification in regard to its Supplemental Petition Regarding its CAIR/CAMR/CAVR Environmental Compliance Program, to be filed in the above referenced docket.

Sincerely,

*Susan D. Ritenour*  
*buh*

CMP \_\_\_\_\_

COM 5

CTR \_\_\_\_\_

ECR \_\_\_\_\_

GCL 1 bh

OPC \_\_\_\_\_ Enclosures

RCA \_\_\_\_\_

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

SCR \_\_\_\_\_

SGA \_\_\_\_\_

SEC \_\_\_\_\_

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DOCUMENT NUMBER DATE

06801 AUG-7 08

FPSC-COMMISSION CLERK

ORIGINAL

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BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

IN RE: Environmental Cost  
Recovery Clause  
\_\_\_\_\_)

Docket No.: 070007-EI  
Date: August 6, 2007

**SECOND AMENDED REQUEST FOR 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 its second amended request that the Florida Public Service Commission enter an order protecting from public disclosure certain information produced in connection with Gulf Power's Supplemental Petition Regarding its CAIR/CAMR/CAVR Environmental Compliance Program. As grounds for this request, the Company states:

1. On March 29, 2007, Gulf Power filed its Supplemental Petition Regarding its CAIR/CAMR/CAVR Environmental Compliance Program and an accompanying Request for Confidential Classification. Gulf Power sought confidential classification for four tables included in Gulf Power's Environmental Compliance Program ("Compliance Program"). The information on the tables is information relating to competitive interests, the disclosure of which would impair the competitive business of Gulf Power and Gulf Power's ability to procure goods and services on a fair and reasonable basis. The information is entitled to confidential classification pursuant to §366.093(3)(d)-(e), Florida Statutes.

2. In its original request, Gulf Power designated the implementation dates on Table 4.3-2 (Page 1 of 2) as confidential. While the remaining data on Table 4.3-2 (Page 1 of 2) is confidential, the dates are not. Consequently, on July 10, 2007, Gulf filed an Amended Request for Confidential Classification in order to provide a properly redacted version of Table 4.3-2.

3. Upon further review, Gulf has discovered that a portion of Table 5.5-1 entitled "Annual Emissions in Excess of Allowances" has been erroneously designated as confidential. Therefore, Gulf hereby files its Second Amended Request for Confidential Classification in

DOCUMENT NUMBER-DATE

06801 AUG-7 5

FPSC-COMMISSION CLERK

order to provide a properly redacted version of Table 5.5-1 as reflected in Exhibit "A."

4. Table 4.3-2 provides the results of an economic viability study by Gulf Power of its generating assets. This shows detailed unit-specific cost data including fuel cost, O&M costs and capital expenditures for many years into the future as well as the near term. Wholesale competitors as well as suppliers of commodities and services could utilize this information to undermine Gulf's bargaining position in the markets where Gulf must compete to obtain such commodities and services or make purchases or sales of wholesale power. In addition, disclosure of this information could negatively impact Gulf's ability to negotiate pricing favorable to its customers in the event that Gulf determined to sell one or more of its generating assets.

5. Table 5.1-1 identifies in detail Gulf Power's projected capital expenditures, by plant, for compliance with the CAIR, CAMR and CAVR. Disclosure of this information could negatively impact Gulf's ability to negotiate pricing favorable to its customers when contracting with vendors of materials needed by Gulf in order to implement its Compliance Program. Similarly, Table 5.1-2 identifies in detail Gulf Power's projected operation and maintenance expenses, by Plant, associated with the CAIR, CAMR and CAVR Compliance Plan. Disclosure of this information could negatively impact Gulf's ability to negotiate pricing favorable to its customers when contracting with vendors of services needed by Gulf in order to implement its Compliance Program.

6. Finally, Table 5.5-1 identifies Gulf Power's projected allowance needs and costs between 2009 and 2017. Disclosure of this information could negatively impact Gulf's ability to negotiate pricing favorable to its customers when contracting for the purchase of allowances.

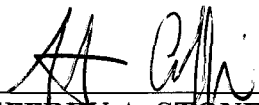
7. The information filed pursuant to this Request is intended to be, and is treated as, confidential by the Gulf Power and, to the best of this attorney's knowledge, has not been otherwise publicly disclosed.

8. Submitted as Exhibit "A" are copies of Tables 4.3-2, 5.1-1, 5.1-2 and 5.5-1, on which are 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 Exhibit "A," which may be made available for public review and inspection. Attached as Exhibit "C" to this request is a line-by-line/field-by-field justification for the request for confidential classification.

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 6<sup>th</sup> day of August, 2007.



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**JEFFREY A. STONE**  
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Florida Bar No. 007455  
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(850) 432-2451  
**Attorneys for Gulf Power Company**

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

IN RE: Environmental Cost  
Recovery Clause

\_\_\_\_\_)

Docket No.: 070007-EI  
Date: August 6, 2007

**AMENDED REQUEST FOR CONFIDENTIAL CLASSIFICATION**

**EXHIBIT "A"**

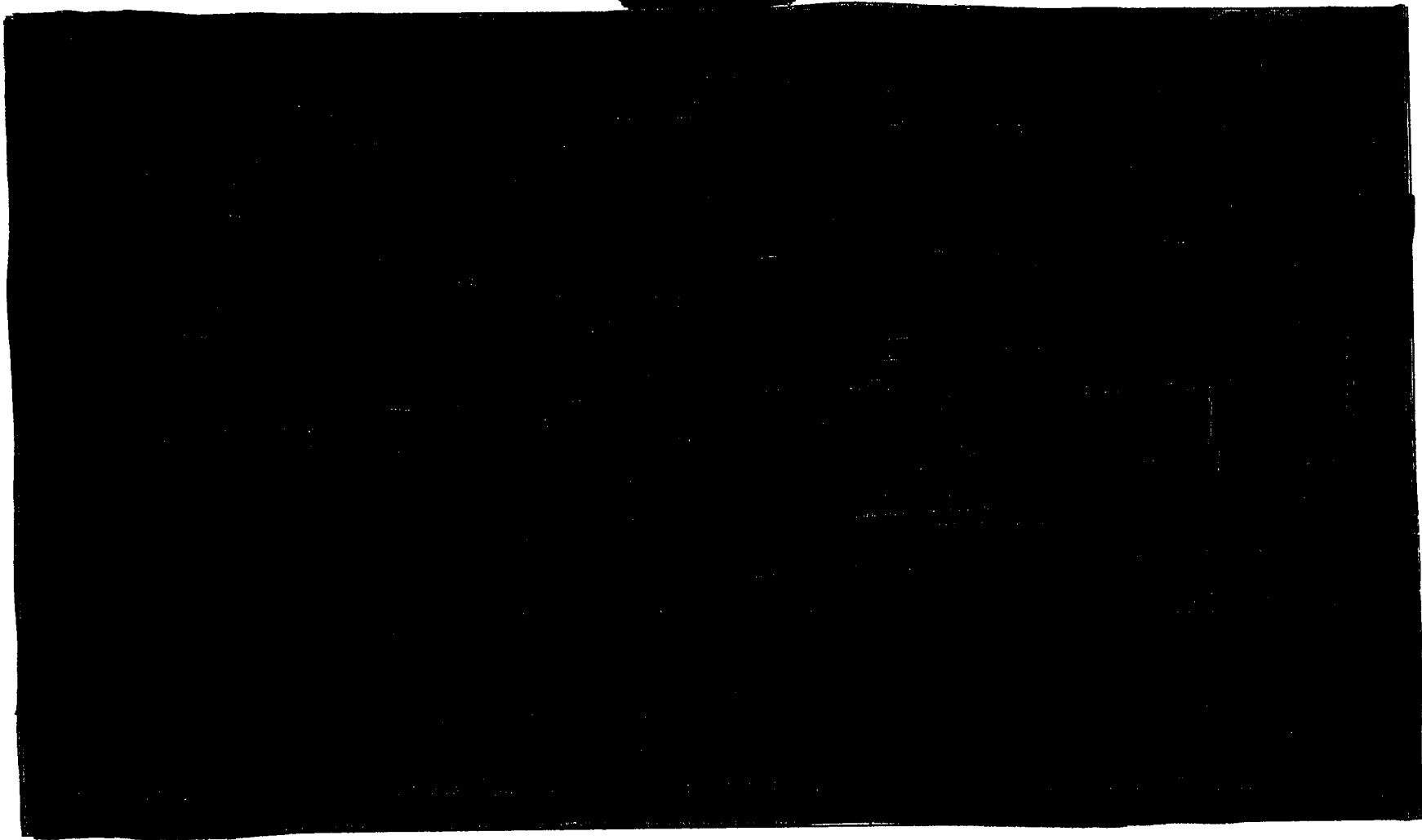
Provided to the Commission Clerk

under separate cover as confidential information.

EXHIBIT "B"

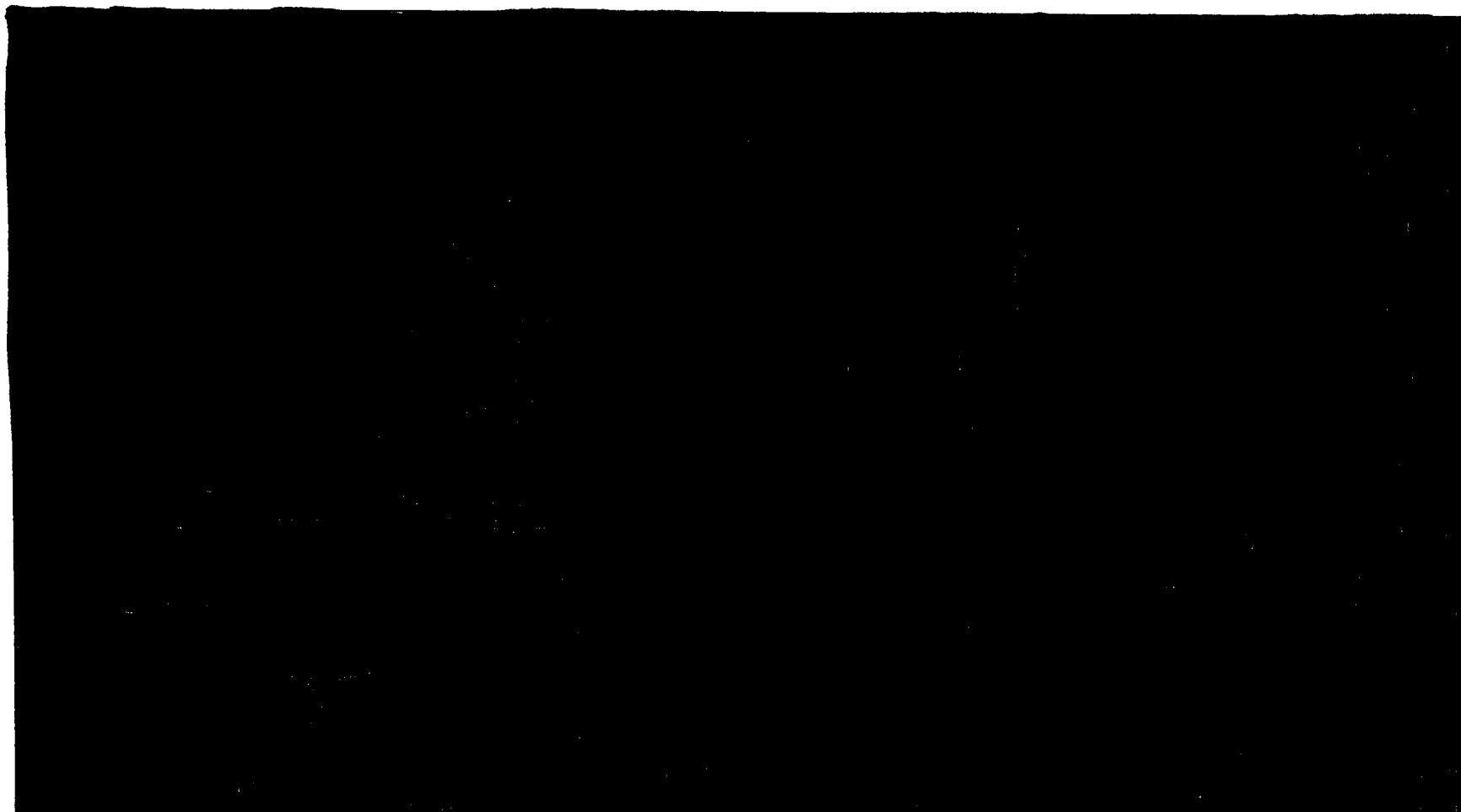


**Table 5.1-1  
Projected CAIR, CAMR and CAVR Capital Expenditures**





**Table 5.1-2**  
**Projected CAIR, CAMR and CAVR Plant O&M Expenses**



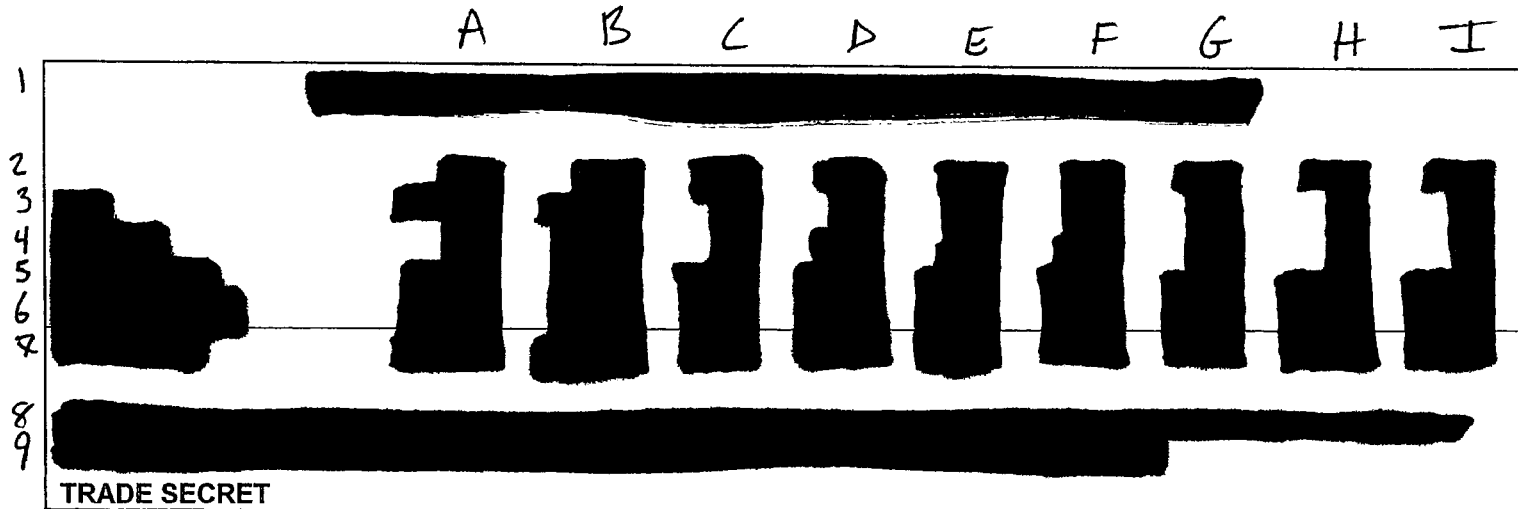
Gulf's environmental O&M budget projection is based on a ten year forecast.  
Expenses presented for Plant Daniel represent Gulf's ownership portion.

\* Project will not be placed in service during the ten year forecast period.

**Table 5.5-1  
Gulf Power Allowance Projection and Costs  
(2009-2017)**

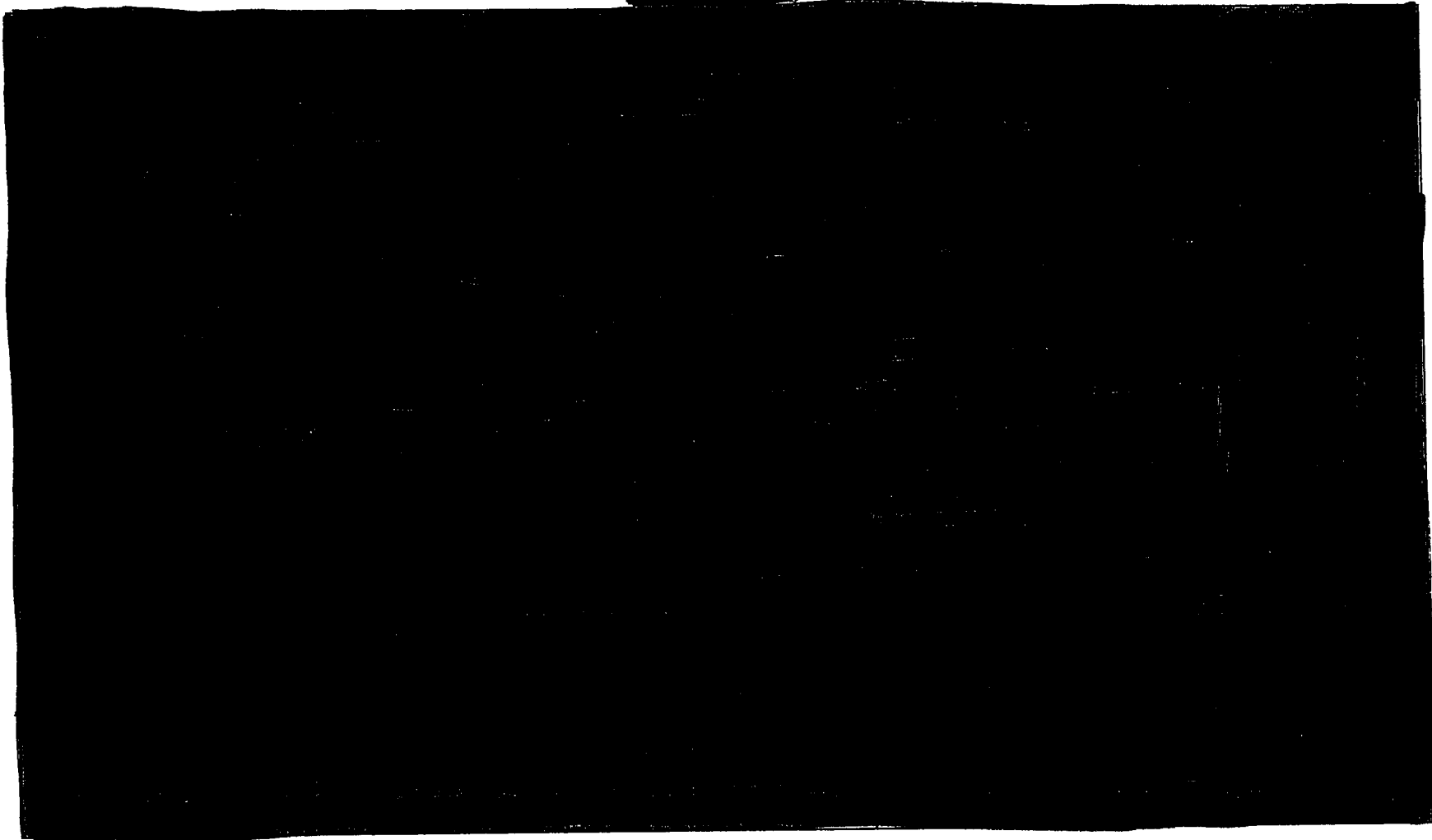
**Annual Emissions in Excess of Allocations**

	<u>2009</u>	<u>2010</u>	<u>2011</u>	<u>2012</u>	<u>2013</u>	<u>2014</u>	<u>2015</u>	<u>2016</u>	<u>2017</u>
SO <sub>2</sub> (tons)	43,650	13,578	0	0	0	0	0	0	0
Mercury (ounces)	N/A	2,111	30	393	540	453	128	0	0
Annual NO <sub>x</sub> (tons)	6,057	5,678	2,176	972	1,358	1,228	2,239	1,705	877
Seasonal NO <sub>x</sub> (tons)	2,476	2,266	607	276	195	219	1,258	1,153	732





**Table 5.1-1  
Projected CAIR, CAMR and CAVR Capital Expenditures**



**Table 5.1-2**  
**Projected CAIR, CAMR and CAVR Plant O&M Expenses**

A large black rectangular redaction covering the entire table content.

Gulf's environmental O&M budget projection is based on a ten year forecast.  
Expenses presented for Plant Daniel represent Gulf's ownership portion.  
\* Project will not be placed in service during the ten year forecast period.

**Table 5.5-1  
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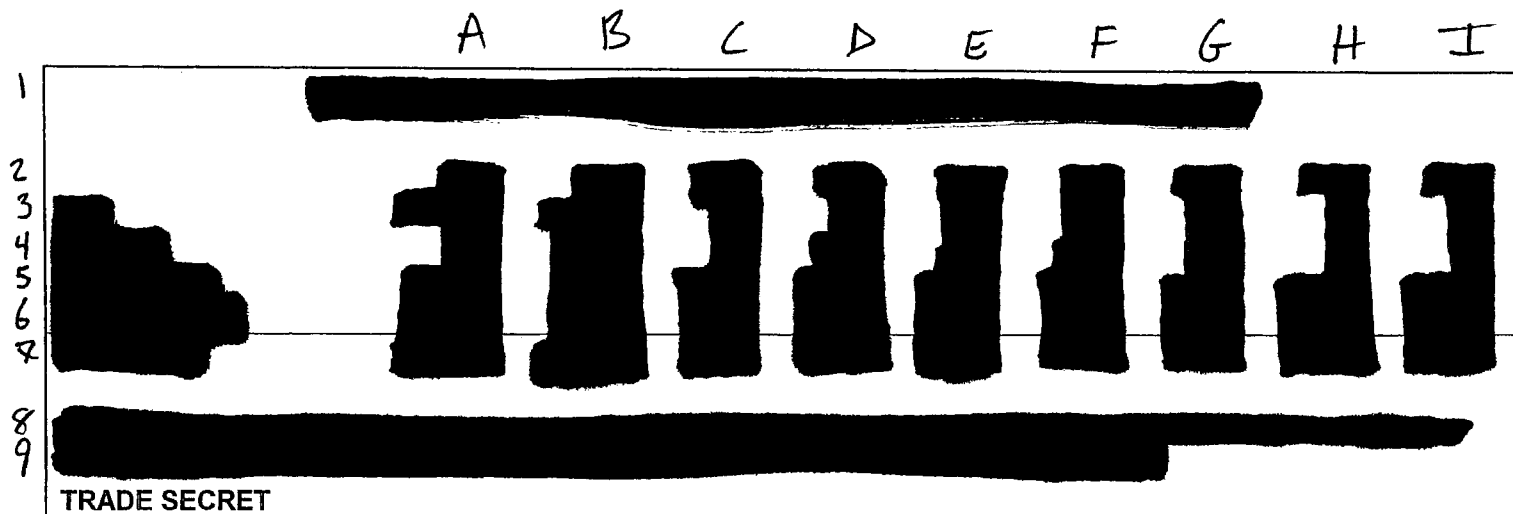


EXHIBIT "C"

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

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

**Justification**

Table 4.3-2  
Page 1 of 2  
Confidential in its entirety, with the exception  
of implementation dates.

This information is entitled to confidential  
classification pursuant to §366.093(3) (d)  
and (e), Florida Statutes. The basis for  
this information being designated as  
confidential is more fully set forth in  
paragraph 4.

Table 5.1-1  
Page 1 of 1  
Confidential in its entirety

This information is entitled to confidential  
classification pursuant to §366.093(3) (d)  
and (e), Florida Statutes. The basis for  
this information being designated as  
confidential is more fully set forth in  
paragraph 5.

Table 5.1-2  
Page 1 of 1  
Confidential in its entirety

This information is entitled to confidential  
classification pursuant to §366.093(3) (d)  
and (e), Florida Statutes. The basis for  
this information being designated as  
confidential is more fully set forth in  
paragraph 6.

Table 5.5-1  
Page 1 of 1  
Lines 1-9, Columns A-I

**CERTIFICATE OF SERVICE**

6<sup>th</sup> I HEREBY CERTIFY that a copy of the foregoing has been furnished this day of August, 2007, by Regular U. S. Mail to the following:

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NANCY ARGENZIANO  
NATHAN A. SKOP

STATE OF FLORIDA



**CONFIDENTIAL**

OFFICE OF COMMISSION CLERK  
ANN COLE  
COMMISSION CLERK  
(850) 413-6770

## Public Service Commission

### ACKNOWLEDGEMENT

DATE: August 7, 2007

TO: S. Ritenour/Gulf Power Company

FROM: Ruth Nettles, Office of Commission Clerk

RE: **Acknowledgement of Receipt of Confidential Filing**

This will acknowledge receipt of a **CONFIDENTIAL DOCUMENT** filed in Docket Number 070007 or, if filed in an undocketed matter, concerning certain information produced in connection with supplemental petition regarding CAIR\CAMR\CAVR Environmental Compliance Program, and filed on behalf of Gulf Power Company. The document will be maintained in locked storage.

If you have any questions regarding this document, please contact Marguerite Lockard, Deputy Clerk, at (850) 413-6770.

DOCUMENT NUMBER - DATE  
06802 AUG-7  
FPSC-COMMISSION CLERK

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