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COMMISSION
CLERK



November 29, 2011

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

claim of confidentiality
 notice of intent
 request for confidentiality / EXT
 filed by OPC

For DN 02566-10 which
is in locked storage. You must be
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(x-ref. 01711-10)

RE: Docket No. 110001-EI

Dear Ms. Cole:

Enclosed is Gulf Power Company's Request for Extended Confidential
Classification regarding certain information submitted by Gulf Power in
connection with Schedule CCA-4 of Exhibit RWD-1 to the Direct Testimony of
Richard W. Dodd dated March 12, 2010.

Sincerely,

Susan D. Ritenour

nm

Enclosures

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

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ECR _____
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MAD _____
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ADM _____
OPC _____
CLK _____

DOCUMENT NUMBER DATE

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FPSC-COMMISSION CLERK

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

IN RE: Fuel and purchased power cost
recovery clause and generating performance
incentive factor

Docket No.: 110001-EI
Date: November 29, 2011

REQUEST FOR EXTENDED 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 a request that the Florida Public Service Commission enter an order granting extended confidential classification for certain information contained in Schedule CCA-4 of Exhibit RWD-1 to the Direct Testimony of Richard W. Dodd dated March 12, 2010 (Schedule CCA-4) on behalf of Gulf Power. As grounds for this request, the Company states:

1. On March 12, 2010, Gulf Power filed a request for confidential classification of certain information contained in Schedule CCA-4 (the “Original Request”). (Document No. 01710-10).
2. On April 7, 2010, Gulf Power filed an Amended Request for Confidential Classification relating to Schedule CCA-4 (the “Amended Request”). (Document No. 02565-10) Gulf’s Amended Request corrected a scrivener’s error included in Exhibit “C” to Gulf’s Original Request.
3. On June 1, 2010, the Commission entered Order No. PSC-10-0337-CFO-EI granting Gulf’s Original Request. Based on Gulf Power’s review, it does not appear that the Commission entered an order addressing Gulf’s Amended Request.
4. As provided in section 366.093(4), Florida Statutes, and by the Commission’s Order, the confidential documents will be made public after a period of 18 months unless Gulf or another affected party shows, and the Commission finds, that the confidential documents

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FPSC-COMMISSION CLERK

continue to contain proprietary confidential business information. The 18-month extension period expires on December 1, 2011.

5. Gulf hereby requests that the Commission enter an order extending the confidential classification of the information contained in Exhibit "A" of Gulf's Amended Request (Document No. 02566-10) and identified in Exhibit "C" of the Amended Request (Document No. 02565-10) for an additional 18-month period.


6. The subject information contained in Schedule CCA-4 is entitled to continued confidential classification for the same reasons that it was initially classified. As stated in Gulf's initial Request, the subject information is proprietary confidential business information regarding contractual matters which would cause irreparable harm to Gulf Power, the entities with whom it has entered into contracts and most importantly to Gulf's customers, if such information was disclosed to the general public. Schedule CCA-4 contains pricing information for capacity purchases between Gulf Power and counterparties pursuant to purchased power agreements which are still in effect. The contracts are subject to confidentiality provisions and the pricing information is regarded by both Gulf and the counterparties as confidential. Disclosure of this information would negatively impact Gulf's ability to negotiate pricing favorable to its customers in future capacity contracts. In addition, potential counterparties may refuse to enter into contracts with Gulf, or may charge higher prices, if the price terms are made public. The information is entitled to confidential classification pursuant to section 366.093(3) (d) and (e), Florida Statutes.

7. The information filed pursuant to this 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.

8. The confidential information is attached as Exhibit "A" to Gulf's Amended Request and is identified as Document No. 02566-10.

WHEREFORE, Gulf Power Company respectfully requests that the Commission enter an order protecting the information contained in Document No. 02566-10 from public disclosure for an additional period of eighteen (18) months.

Respectfully submitted this 29th day of November, 2011.



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BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

IN RE: **Fuel and Purchased Power Cost**)
Recovery Clause with Generating)
Performance Incentive Factor)

Docket No.: **110001-EI**

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true copy of the foregoing was furnished by U.S. Mail this 29th day of November, 2011, on the following:

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