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March 10, 2016

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

RE: Docket No. 160001-EI

Dear Ms. Stauffer:

Attached for official filing is Gulf Power Company's Request for Extended Confidential Classification regarding certain information submitted by Gulf Power in connection with Commission Staff's audit in the above-referenced docket (ACN 14-027-1-1). Also attached is Gulf's Request for Extended Confidential Classification in Microsoft Word format.

Sincerely,

A handwritten signature in blue ink that reads "Robert L. McGee, Jr.".

Robert L. McGee, Jr.
Regulatory and Pricing Manager

md

Attachments

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

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

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

Docket No.: 160001-EI
Date: March 10, 2016

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 this request that the Florida Public Service Commission enter an order extending confidential classification for portions of documents produced by Gulf Power in connection with a review of Gulf Power’s 2013 fuel and purchased power transactions (ACN 14-027-1-1) (the “Review”). As grounds for this request, the Company states:

1. On May 21, 2014, Gulf Power filed a request for confidential classification of certain information produced in connection with the Review. (Document No. 02410-14, Docket No. 140001-EI)
2. On September 11, 2014, the Commission entered Order No. PSC-14-0481-CFO-EI granting Gulf’s request for confidential classification.
3. As provided in section 366.093(4), Florida Statutes, and by the Commission’s Order, the confidential information will be made public after a period of 18 months unless Gulf or another affected party shows, and the Commission finds, that the confidential information continues to comprise proprietary confidential business information. The 18-month extension period expires on March 11, 2016.
4. Gulf hereby requests that the Commission enter an order extending the confidential classification of the information highlighted on Exhibit “A” of Gulf’s original

request and identified in line/by line format on Exhibit “C” of Gulf’s original request for an additional 18-month period.

5. The information highlighted on Exhibit “A” to Gulf’s original request remains confidential and is entitled to continued confidential classification for the same reasons that it was initially classified. As stated in Gulf’s original request, portions of the confidential information relate to pricing data for negotiated purchase power agreements, coal, oil and natural gas transportation/storage. This pricing data is the product of contractual negotiations between Gulf and various counterparties. This information is specific to individual contracts and 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 contracts. In addition, potential counterparties may refuse to enter into contracts with Gulf, or may charge higher prices, if the price terms were made public. In addition, a portion of the confidential information includes customer-specific data and pricing under confidential Contract Services Arrangements (“CSAs”) which were executed under the authority of Gulf’s Commercial/Industrial Service Rider (“CISR”). According to Gulf’s Retail Tariff, the terms of these CSAs are confidential. 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 information is regarded as sensitive and confidential by the CISR customers 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 CISR 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 Company requests that this information be granted

confidential classification pursuant to Section 366.093(3)(d)-(e), Florida Statutes. Finally, a portion of the confidential information includes copies of commercial/industrial customer billing statements reflecting account-specific information such as account numbers, customer names and energy consumption. The disclosure of this information could allow other customers to gain a competitive advantage over the identified customers by analyzing such data. As such, public disclosure of the information contained on these pages would adversely affect the competitive interests of the listed accounts and their ability to contract for goods and services on favorable terms. This information is competitively sensitive and confidential pursuant to section 366.093(3)(e), Florida Statutes.

6. 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 otherwise been publicly disclosed.

WHEREFORE, Gulf Power Company respectfully requests that the Commission enter an order extending confidential classification of the information highlighted on Exhibit "A" and identified in line/by line format on Exhibit "C" of Gulf's original request from public disclosure as proprietary confidential business information.

Respectfully submitted this 9th day of March, 2016.



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Attorneys for Gulf Power Company

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

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

Docket No.: **160001-EI**

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true copy of the foregoing was furnished by electronic mail this 10th day of March, 2016 to the following:

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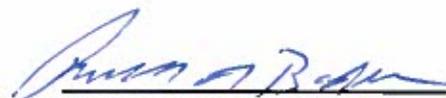
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