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April 27, 1995

Ms. Blanca S. Bayo, Director
Division of Records and Reporting
Florida Public Service Commission
101 East Gaines Street
Tallahassee FL 32399-0870

950004-ELL

Dear Ms. Bayo:

RE: Gulf Power Company's Ten-Year Site Plan

The original and fifteen copies of Gulf Power Company's Amended Request for Confidential Classification are submitted for filing in the above matter. Exhibits "A" and "B" to the Amended Motion are contained in FPSC document number 93623-95 which was filed on April 10, 1995 and should be maintained as confidential pursuant to Section 366.093, Fla. Stat. and Rule 25-22.006, F.A.C. Also enclosed is a double sided high density 3.5 inch floppy disk containing this document in WordPerfect for Windows 6.0a format as prepared on a MS-DOS based computer.

Please mark the enclosed extra copy of this letter with the date and time the material was accepted in your office for filing, and return same to the undersigned. Thank you for your assistance in this matter

Very truly yours,

Russell A. Badders

Russell A. Badders
For the Firm

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Enclosures

cc: Florida Public Service Commission
Michael Palecki
Office of Public Counsel
Jack Shreve

DOCUMENT NUMBER-DATE

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BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

IN RE: Gulf Power Company's)
Ten-Year Site Plan)

950004-610
Docket No.: Undocketed

) Filed: April 28, 1995
)

GULF POWER COMPANY'S AMENDED REQUEST
FOR CONFIDENTIAL CLASSIFICATION

Gulf Power Company ("the Company"), by and through its undersigned attorney and pursuant to Rule 25-22.006, Florida Administrative Code hereby amends its request that the Florida Public Service Commission enter an order protecting certain information, submitted in response to two informal data requests from Commission Staff on Gulf Power Company's generation expansion plans, from public disclosure. This amended motion is submitted as a complete replacement for the previous motion. As grounds for this amended motion, the Company states:

1. On April 10, 1995, the Company submitted information on its generation expansion plans, as requested by Commission Staff in two informal data requests dated February 2, 1995, and February 20, 1995, respectively.

2. On April 10, 1995, the Company filed a Request for Confidential Classification with regard to certain portions of the requested information, which if disclosed, would harm the

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ability of Gulf Power Company to contract for capacity, energy, and/or fuel at prices in the best interests of the Company's ratepayers. The Company submits that the information is therefore entitled to confidential classification pursuant to §366.093(3)(e), Florida Statutes.

3. As an amendment to its original request Gulf offers that the public dissemination of fuel projection information would have an adverse impact on the Company's ability to obtain and contract for capacity, energy and fuel needs in the power market at the lowest price for its ratepayers. Gulf is currently in the position where it may have to seek its near-term capacity needs in the power market. Potential power providers know that their proposals will be compared to the Company's internal projections of fuel costs. By having Gulf's projected fuel price information, potential suppliers would be able to bid the capacity at a price just sufficient to beat Gulf's fuel costs. This permits capacity providers to control the capacity market with regard to Gulf. Absent the fuel price projection data, the power providers would have to competitively bid against each other for the Company's capacity needs. Competitive bidding would likely achieve a lower price for capacity for Gulf's ratepayers. Thus, it is vital to Gulf and its customers that the

fuel projection data be granted confidential classification pursuant to Section 366.093(3)(e), Florida Statutes.

4. The fuel projection information, if made public, would impair Gulf's ability to negotiate contracts for fuel at a price favorable to its ratepayers. The price information would enable potential fuel suppliers to determine the price paid for fuel by Gulf and would result in price convergence around the last public price by all suppliers. This eliminates the possibility that a fuel supplier may bid a price for its fuel that is substantially lower than another fuel supplier's price which would have given Gulf the opportunity to provide electricity to its customers at a lower price. Thus, public disclosure of the fuel projection data would completely undermine Gulf's market presence thereby impairing its ability to enter into lower cost fuel contracts for the benefit of its ratepayers.

5. Submitted as Exhibit "A" to document number 03623-95 (filed in an undocketed matter) is a copy of Gulf's response to Staff's request, 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" to document number 03623-95 are two (2) edited copies of Gulf's response to Staff's request,

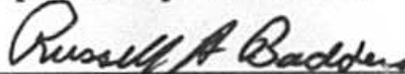
which may be made available for public review and inspection. Attached as Exhibit "C" to this motion is a line-by-line justification for the amended request for confidential classification. Exhibit "C" of document number 03623-95 should be disregarded.

6. The material for which confidential classification is requested is intended to be, and is treated as, confidential by the Company 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" to document number 03623-95 from public disclosure as proprietary confidential business information.

Dated this 27th day of April, 1995.

Respectfully submitted,



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EXHIBIT "C"

Line-by-Line Justification

<u>Page</u>	<u>Line(s)¹</u>	<u>Column(s)</u>	<u>Justification</u>
12	11-30	2-7	This information represents actual data regarding Gulf Power Company's fuel prices, which, if disclosed, would adversely impact Gulf's ability to enter into contracts for capacity, energy and fuel at the lowest price available for its ratepayers. This information is therefore entitled to confidential classification pursuant to § 366.093(3)(e), F.S.
14	11-30	2-7	This information represents actual data regarding Gulf Power Company's fuel prices, which, if disclosed, would adversely impact Gulf's ability to enter into contracts for capacity, energy and fuel at the lowest price available for its ratepayers. This information is therefore entitled to confidential classification pursuant to § 366.093(3)(e), F.S.

¹Line numbers refer to the typewritten numbers inserted at the left margin of the page.

<u>Page</u>	<u>Line(s)²</u>	<u>Column(s)</u>	<u>Justification</u>
15	11-30	2-13	This information represents actual data regarding Gulf Power Company's fuel prices, which, if disclosed, would adversely impact Gulf's ability to enter into contracts for capacity, energy and fuel at the lowest price available for its ratepayers. This information is therefore entitled to confidential classification pursuant to § 366.093(3)(e), F.S.
16	11-30	2-4, 6-8, 10-12	This information represents actual data regarding Gulf Power Company's fuel prices, which, if disclosed, would adversely impact Gulf's ability to enter into contracts for capacity, energy and fuel at the lowest price available for its ratepayers. This information is therefore entitled to confidential classification pursuant to § 366.093(3)(e), F.S.

²Line numbers refer to the typewritten numbers inserted at the left margin of the page.