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January 4, 2012

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
_____ filed by OPC 08963-11

For DN 00071-12, which
is in locked storage. You must be
authorized to view this DN.-CLK

RE: Docket No. 110138-EI

Dear Ms. Cole:

Enclosed is an original and seven copies of Gulf Power Company's Request for Confidential Classification pertaining to the 2010 Transmission Plan. Also included is a CD-ROM of Gulf Power's Request for Confidential Classification and Exhibit C in Microsoft Word format as prepared on a Windows XP operating system.

Sincerely,

mw

Enclosures

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

COM _____
APA 1
ECR 2 + 1 CD
GCL 1
RAD 1
SRC 1
ADM _____
OPC _____
CLK 1

DOCUMENT NUMBER-DATE

00070 JAN-5 12

FPSC-COMMISSION CLERK

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In Re: Petition for increase in rates
by Gulf Power Company

Docket No.: 110138-EI
Date: January 5, 2012

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 requests that the Florida Public Service Commission enter an order protecting from public disclosure Gulf Power's 2010 Transmission Plan. As grounds for this request, the Company states:

1. During the course of the evidentiary hearing in the above-styled proceeding, Gulf Power provided the Commission with a copy of its 2010 Transmission Plan ("the Transmission Plan" or "the Plan"). The Transmission Plan was entered into the evidentiary record on December 15, 2011 as Late Filed Exhibit 187 titled "2010 Transmission Planning Study." [Hearing Transcript p. 2544-46] As discussed below, the Transmission Plan constitutes proprietary confidential business information as defined in section 366.093(3), Florida Statutes. Consequently, in accordance with Rule 25-22.006(8)(b), Florida Administrative Code, and Order No. PSC-11-0564-PHO-EI, the Company must file a request for confidential classification within 21 days of the conclusion of the hearing. The hearing was adjourned on December 15, 2011 at 11:50 a.m. [Hearing Transcript p. 2548]

2. The Transmission Plan is updated annually and provides an in-depth study and assessment of the Company's transmission system over a ten year planning horizon. The primary purpose of the Transmission Plan is to ensure that the Company's transmission system is planned such that it could be operated to supply projected customer demands and transmission services under a variety of contingency conditions set forth by the North American Reliability Council ("NERC"). Spanning 122 pages in total, the Plan provides an in-depth review of: (a)

non-public components of Gulf's existing transmission system (including risk assessments relating to the same); (b) internal, proprietary planning guidelines and procedures developed by Gulf and the Southern Company; and (c) detailed recommendations for system upgrades, replacements and additions over the planning horizon along with specific budget recommendations for each project. The information contained in the Plan is entitled to confidential classification pursuant to section 366.093(3), Florida Statutes, for a variety of reasons.

First, the document identifies each transmission project planned over the planning horizon and detailed cost projections for those projects. Disclosure of this information could negatively impact Gulf Power's ability to negotiate favorable pricing terms with equipment vendors and landowners (where real property must be acquired). See § 366.093(3)(e), Fla. Stat.

Second, the document reflects Gulf Power's and the Southern Company's internal procedures and guidelines for transmission planning. The development of these proprietary procedures and guidelines required the expenditure of significant expertise, time and internal resources. This non-public information is of value to the companies' competitors and disclosure of this information publicly would put the companies at a competitive disadvantage. Public disclosure of this information will provide market competitors with access to the companies' internal procedures and facility specifications. Gulf's and the Southern Company's competitors could use this information to optimize their own practices at Gulf Power's expense. See § 366.093(3)(a) and (e), Fla. Stat. Similar Gulf Power procedures were granted confidential classification in Order No. PSC-06-0427-CFO-EI and Order No. PSC-08-0048-CFO-EI.

Third, the document contains internal risk assessments of Gulf's existing transmission system. Public disclosure of this data could negatively impact the Company's ability to engage in wholesale transactions and/or asset sales. See § 366.093(3)(b) and (e), Fla. Stat.

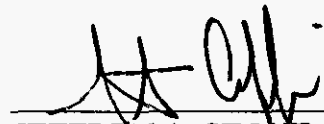
Finally, public disclosure of the document could expose potential vulnerabilities in critical components of the Company's transmission system to potential wrongdoers, thus implicating regional if not national security concerns. See § 366.093(3)(c), Fla. Stat.

3. 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.

4. Submitted as Exhibit "A" is one un-redacted copy of Transmission Plan 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 versions of the Plan 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 Company's Transmission Plan from public disclosure as proprietary confidential business information.

Respectfully submitted this 4th day of January, 2012.



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BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In Re: Petition for increase in rates
by Gulf Power Company

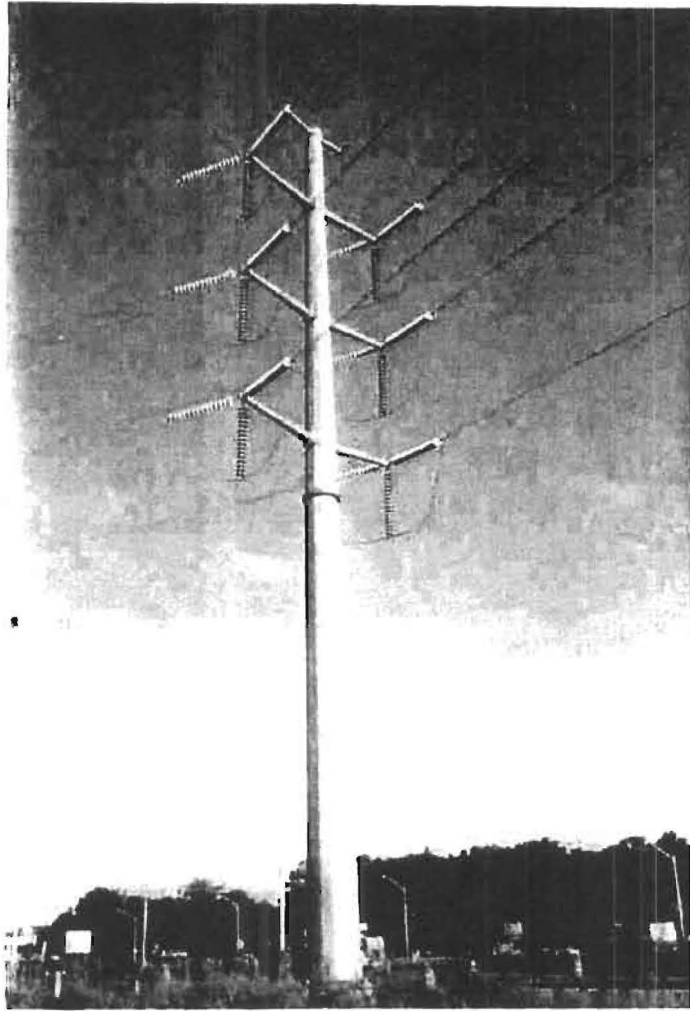
Docket No.: 110138-EI
Date: January 5, 2012

REQUEST FOR CONFIDENTIAL CLASSIFICATION

EXHIBIT "A"

Provided to the Commission Clerk
under separate cover as confidential information.

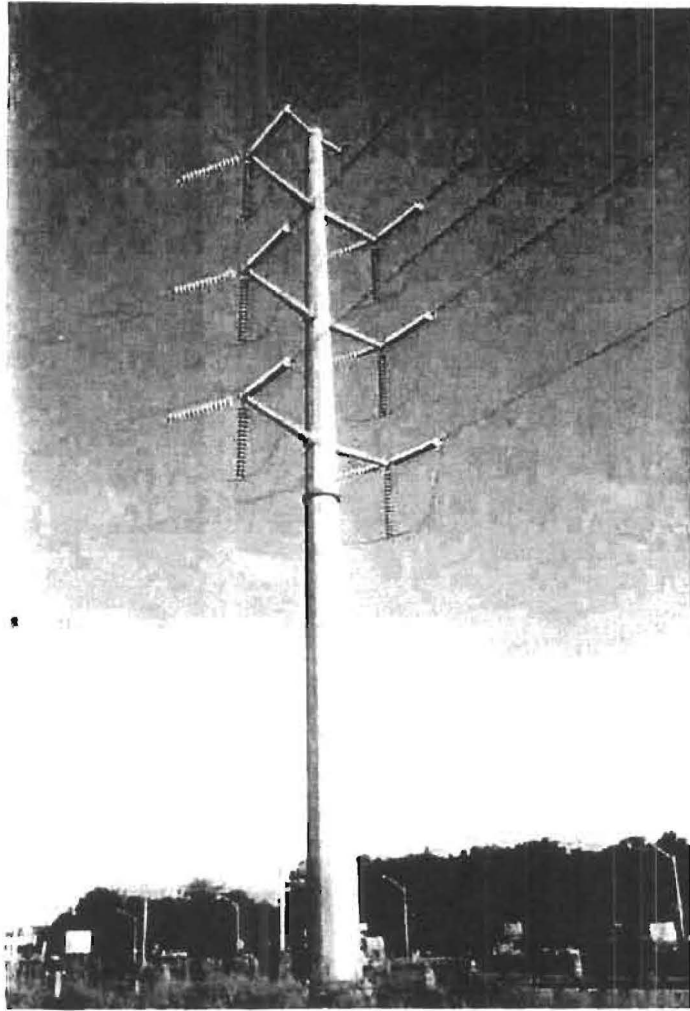
EXHIBIT "B"



2010 Transmission Plan For Gulf Power



Pages 2 through 122 are considered confidential in their entirety.



2010 Transmission Plan For Gulf Power



Pages 2 through 122 are considered confidential in their entirety.

EXHIBIT "C"

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

Line(s)/Field(s)

2010 Transmission Plan
(Confidential in its Entirety)

Justification

This information is entitled to confidential classification pursuant to §366.093(3)(a), (b),(c), and (e), Florida Statutes. The basis for this information being designated as confidential is more fully set forth in paragraph 2.

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

IN RE: Petition for Increase in Rates)
by Gulf Power Company)
)
)
_____)

Docket No. 110138-EI

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true copy of the foregoing was furnished by overnight delivery the 4th day of January, 2012, on the following:

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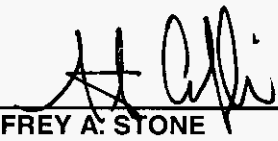
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