

JAMES A. MCGEE SENIOR COUNSEL

Ms. Blanco S. Bayo, Director Division of Records and Reporting Florida Public Service Commission 2540 Shumard Oak Blvd. Tallahassee, Florida 32399-0850

> Re: Docket No. 000001-EI

Dear Ms. Bayo:

It has come to our attention that the confidential highlighted copy of the January Form 423(1)(a) was omitted from our filing. Enclosed in a separately marked confidential envelope is the omitted form. The redacted copy of this form was included with the copies originally filed.

December 5, 2000

In addition, also enclosed are revised pages to Attachment A of the Corporation's Request for Confidential Classification for the months of June, July and August.

Very truly yours,

James A. McGee

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JAM:kbd **Enclosures** 

Parties of record cc:

RECEIVED & FILE

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### ATTACHMENT A Page 7 of 9

REPORTING MONTH - JUNE 2000 REVISED 12/4/00

#### **FORM 423-2B**

Plant Name: Line(s)	Column	Justification
Transf. Facility IMT: 1-7	G	(18) See item (10) above.
Crystal River 1&2: 1-4		
Crystal River 4&5: 1-4		
Transf. Facility IMT:	1	(20) The information under Rail Rate is a function of EFC's contract rate with the railroad and the distance
Crystal River 1&2: 1-4		between each coal supplier and Crystal River. Since these distances are readily available, disclosure of the
Crystal River 4&5: 1-4		Rail Rate would effectively disclose the contract rate.  This would impair the ability of a high volume user such as EFC to obtain rate concessions, since railroads would be reluctant to grant concessions that other rail users would then expect.

Transf. Facility IMT: J

N/A

Crystal River 1&2:

1-4

Crystal River 4&5:

1-4

(21)Other Rail Charges consist of EFC's railcar ownership cost. This cost is internal trade secret information which is not available to any party with whom EFC contracts, railroads or otherwise. If this information were disclosed to the railroad, their existing knowledge of EFC's rail rates would allow them to determine EFC's total rail cost and be better able to evaluate EFC's opportunity to economically use competing transportation alternatives.

Transf. Facility IMT:

P

1-7

Crystal River 1&2:

1-4

Crystal River 4&5:

1-4

(25) The figures under Transportation Charges are the same as the Total Transportation Cost under column H on Form 423-2. See item (11) above. In the case of rail deliveries to the Crystal River Plants, these figures represent EFC's current rail transportation rate. In the case of waterborne deliveries to the Crystal River Plants, the figures represent EFC's current Gulf barge transportation rate. In the case of water deliveries to the IMT "Plant", the figures represent EFC's current river transportation rate. Disclosure of these transportation rates would enable coal suppliers to bid a F.O.B. mine price calculated to produce a delivered plant price at or marginally below FPC's current delivered price, which is available on Form 423-2, column I. Without this opportunity to calculate a perceived maximum acceptable price, suppliers would be more likely to bid their best price.

## ATTACHMENT A Page 6 of 8

REPORTING MONTH - JULY 2000 REVISED 12/4/00

#### FORM 423-2B

Plant Name: Line(s)	Column	Justification
Transf. Facility IMT: 1-6 CR1&2 1-5	G	(18) See item (10) above.
CR 4&5 1-5 Transf. Facility IMT: N/A CR1&2 1-5 CR 4&5 1-5	1	(20) The information under Rail Rate is a function of EFC's contract rate with the railroad and the distance between each coal supplier and Crystal River. Since
		these distances are readily available, disclosure of the Rail Rate would effectively disclose the contract rate. This would impair the ability of a high volume user such as EFC to obtain rate concessions, since railroads would be reluctant to grant concessions that other rail users would then expect.

Transf. Facility IMT: N/A
CR1&2
1-5
CR 4&5
1-5

J

(21) Other Rail Charges consist of EFC's railcar ownership cost. This cost is internal trade secret information which is not available to any party with whom EFC contracts, railroads or otherwise. If this information were disclosed to the railroad, their existing knowledge of EFC's rail rates would allow them to

determine EFC's total rail cost and be better able to evaluate EFC's opportunity to economically use competing transportation alternatives.

Transf. Facility IMT: 1-6

Ρ

CR1&2 1-5 CR 4&5 1-5 (25) The figures under Transportation Charges are the same as the Total Transportation Cost under column H on Form 423-2. See item (11) above. In the case of rail deliveries to the Crystal River Plants, these figures represent EFC's current rail transportation rate. In the case of waterborne deliveries to the Crystal River Plants, the figures represent EFC's current Gulf barge transportation rate. In the case of water deliveries to the IMT "Plant", the figures represent EFC's current river transportation rate. Disclosure of these transportation rates would enable coal suppliers to bid a F.O.B. mine price calculated to produce a delivered plant price at or marginally below FPC's current delivered price, which is available on Form 423-2, column I. Without this opportunity to calculate a perceived maximum acceptable price, suppliers would be more likely to bid their best price.

# ATTACHMENT A Page 6 of 8

REPORTING MONTH - AUG. 2000 REVISED 12/4/00

## FORM 423-2B

Plant Name: Line(s)	Column	Justification
Transf. Facility IMT: 1-5 CR1&2	G	(18) See item (10) above.
1-4 CR4&5 1-4		
Transf. Facility IMT: N/A CR1&2 1-4 CR4&5 1-4	ļ	(20) The information under Rail Rate is a function of EFC's contract rate with the railroad and the distance between each coal supplier and Crystal River. Since these distances are readily available, disclosure of the Rail Rate would effectively disclose the contract rate. This would impair the ability of a high volume user such as EFC to obtain rate concessions, since railroads would be reluctant to grant concessions that other rail users would then expect.
Transf. Facility IMT: N/A CR1&2 1-4 CR4&5 1-4	J	(21) Other Rail Charges consist of EFC's railcar ownership cost. This cost is internal trade secret information which is not available to any party with whom EFC contracts, railroads or otherwise. If this information were disclosed to the railroad, their existing knowledge of EFC's rail rates would allow them to determine EFC's total rail cost and be better able to evaluate EFC's opportunity to economically use competing transportation alternatives.

Transf. Facility IMT: 1-5

Ρ

CR1&2 1-4 CR4&5

1-4

(25) The figures under Transportation Charges are the same as the Total Transportation Cost under column H on Form 423-2. See item (11) above. In the case of rail deliveries to the Crystal River Plants, these figures represent EFC's current rail transportation rate. In the case of waterborne deliveries to the Crystal River Plants, the figures represent EFC's current Gulf barge transportation rate. In the case of water deliveries to the IMT "Plant", the figures represent EFC's current river transportation rate. Disclosure of these transportation rates would enable coal suppliers to bid a F.O.B. mine price calculated to produce a delivered plant price at or marginally below FPC's current delivered price, which is available on Form 423-2. column I. Without this opportunity to calculate a perceived maximum acceptable price, suppliers would be more likely to bid their best price.