Susan D. RitenourSecretary and Treasurer and Regulatory Manager

One Energy Place Pensacola, Florida 32520-0781

Tel 850.444.6231 Fax 850.444.6026 SDRITENO@southernco.com



August 7, 2006

Ms. Blanca S. Bayo, Director Division of the Commission Clerk and Administrative Services Florida Public Service Commission 2540 Shumard Oak Boulevard Tallahassee FL 32399-0870

Dear Ms. Bayo:

RE: Docket No. 060001-EI

Enclosed are an original and fifteen copies of Gulf Power Company's Request for Confidential Classification pertaining to Schedule CCE-4 of Exhibit RJM-2 to the Direct Testimony of Rhonda J. Martin dated August 8, 2006.

Sincerely,

bh

Enclosures

cc:

Beggs & Lane

Jeffrey A. Stone, Esq.

Susan O. Ritenau (lw)

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

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

Docket No.: 060001-EI Date: August 8, 2006

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 files a request that the Florida Public Service Commission enter an order protecting from public disclosure certain information on Schedule CCE-4 of Exhibit RJM-2 to the Direct Testimony of Rhonda J. Martin dated August 8, 2006 (Schedule CCE-4) on behalf of Gulf Power. As grounds for this request, the Company states:

1. A portion of the information on Schedule CCE-4 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 were disclosed to the general public. In addition, the responses contain information relating to competitive interests in capacity markets which would cause irreparable harm to Gulf Power and the entity with whom it has contracted if such information is disclosed to the general public. The information is entitled to confidential classification pursuant to §366.093(3) (d) and (e), Florida Statutes. Schedule CCE-4 provides the actual price terms and counterparty names for capacity contracts entered into by Gulf Power for 2006. The price terms in these contracts are regarded by both Gulf and the counterparty as confidential. The pricing, which resulted from negotiations with Gulf and the counterparty, are specific to the individual contracts and are not publicly known. 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 would charge higher prices if the price terms were made public.

- 2. The information filed pursuant to this Request is intended to be, and is treated as, confidential by the Gulf Power and has not been otherwise publicly disclosed.
- 3. Submitted as Exhibit "A" is a copy of Schedule CCE-4, 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" are two (2) edited copies of Schedule CCE-4, 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 information highlighted on Exhibit "A" from public disclosure as proprietary confidential business information.

Respectfully submitted this day of August, 2006.

JEFFREY A. STONE

Florida Bar No. 325953

RUSSELL A. BADDERS

Florida Bar No. 007455

STEVEN R. GRIFFIN

Florida Bar No. 0627569

Beggs & Lane

P. O. Box 12950

Pensacola, FL 32591

(850) 432-2451

Attorneys for Gulf Power Company

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

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

Docket No.: 060001-EI Date: August 8, 2006

REQUEST FOR CONFIDENTIAL CLASSIFICATION

EXHIBIT "A"

Provided to the Division of Records and Reporting under separate cover as confidential information

EXHIBIT "B"

A B C D E F G H I J K L M N O P Q R S T U V W X Y Z AA BB CC

Gulf Power Company 2006 Capacity Contracts

	Te	Contract	
Contract/Counterparty	Start	End (1)	Туре
Southern Intercompany Interchange	2/18/2000	5 Yr Notice	SES Opco

(1) Unless otherwise noted, contract remains effective unless terminated upon 30 days prior written notice.

Capacity Costs																			Proje	ected						
2006		nuary	Fe	bruary	N	larch		April		May		June	Γ	July		,	August	Se	ptember	0	ctober	No	vember	Dec	cember	
Contract	MW	\$	MW	\$	MW	\$	MW	\$	MW	\$	MW		М		\$	MW	\$	MW	\$	MW	\$	MW	\$	MW	\$	Total \$
Southern Intercompany Interchang		1,720,415	482.1	468,836	542.5	627,491	246.2	115,987	223.2	670,755	613.5	3,764,146	6 466				9,081,302	544.1	4,411,970	425.9			229,750		262,355	29,765,990
Confidential Contracts (Projected)													Ŀ	- (4,350)	-	(4,350)	-	(4,350)	~	(4,350)) -	(4,350) -	(4,350)	(26,100)
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Total		1,688,635		445,165		602,636		104,416		662,264	•	3,759,953	' └	8,17	7,032		9,076,952		4,407,620		227,251		225,400		200,005	29,000,029

(1) Put options sold to counterparty

(2) Generator Balancing Service provides no capacity scheduling entitlements.

COMPANY 2006 CAPACITY CONTRACTS

ABC DE FGHIJKLM NOPQRSTUVW XYZAA BBCC

Gulf Power Company 2006 Capacity Contracts

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	Te	erm	Contract
Contract/Counterparty	Start	End (1)	Туре
Southern Intercompany Interchange	2/18/2000	5 Yr Notice	SES Opco

(1) Unless otherwise noted, contract remains effective unless terminated upon 30 days prior written notice.

Capacity Costs																		Proj	ected						
2006	Jan	uary	Fe	bruary	R	larch		April		May		June		July		lugust	Se	ptember	0	ctober		vember		ember	
Contract	MW	\$	MW	\$	MW	\$	MW	\$	MW	\$	MW	\$	MV		MW	\$	MW	\$	MW	\$	MW	\$	MW	\$	Total \$
Southern Intercompany Interchange	610.0	1,720,415	482.1	468,836	542.5	627,491	246.2	115,987	223.2	670,755	613.5	3,764,146	466	.8 8,181,382	521.7	9,081,302	544.1	4,411,970	425.9	231,601	396.9	229,750		262,355	29,765,990
Confidential Contracts (Projected)														(4,350)) -	(4,350)	-	(4,350)) -	(4,350)) <u>-</u>	(4,350)	-	(4,350)	(26,100
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Total		1,688,635		445,16	5	602,636		104,416	i	662,264	•	3,759,953	' L	8,177,032		9,076,952		4,407,620		227,251		223,400		250,005	20,000,02

(1) Put options sold to counterparty

(2) Generator Balancing Service provides no capacity scheduling entitlements.

EXHIBIT "C"

<u>Line-by-Line/Field-by-Field Justification</u> <u>Line(s)/Field(s)</u>

Page 1 of 1 Lines 7 – 21; Columns A-H Lines 41-55; Columns A-CC

Justification

This information is entitled to confidential classification pursuant to §366.093(3) (d) and (e), Florida Statutes. The basis for this information being designated as confidential is more fully set forth in paragraph 1.

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

IN RE: Fuel and Purchased Power Cost)	
Recovery Clause with Generating)	
Performance Incentive Factor)	Docket No.: 060001-EI
)	

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true copy of the foregoing was furnished by U. S. mail this day of August, 2006, on the following:

Patricia Ann Christensen, Esq. Charles J. Beck, Esq. Joseph A. McGlothlin, Esq. Office of Public Counsel 111 W. Madison St., Room 812 Tallahassee FL 32399-1400	Karen S. White, Lt. Col., USAF Damund E. Williams, Capt., USAF AFCESA/ULT 139 Barnes Drive, Suite 1 Tyndall AFB, FL 32403-5319	Robert Scheffel Wright, Esq. John T. LaVia, III, Esq. Young van Assenderp, P.A. 225 S. Adams St., Suite 200 Tallahassee, FL 32301
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