Susan D. Ritenour Secretary and Treasurer and Regulatory Manager

One Energy Place Pensacola, Florida 32520-0781

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August 1, 2008



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

Dear Ms. Cole:

CC:

RE: Docket No. 080001-EI

Beggs & Lane

Jeffrey A. Stone, Esq.

Enclosed are an original and fifteen copies of Gulf Power Company's Request for Confidential Classification regarding certain information contained in Schedule CCE-4 of Exhibit RWD-2 to the Direct Testimony of Richard W. Dodd dated August 1, 2008 (Schedule CCE-4).

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Enclosures CLK	

DOCUMENT NUMBER-DATE

FPSC-COMMISSION CLERK

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

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

Docket No.: 080001-EI
Date: August 1, 2008

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 contained in Schedule CCE-4 of Exhibit RWD-2 to the Direct Testimony of Richard W. Dodd dated August 4, 2008 (Schedule CCE-4) on behalf of Gulf Power. As grounds for this request, the Company states:

- 1. A portion of the information contained in 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 was disclosed to the general public. Schedule CCE-4 provides the price terms for capacity contracts entered into by Gulf Power for 2008. The price terms in these contracts are regarded by both Gulf and the counterparties as confidential. The pricing, which resulted from negotiations with Gulf and the counterparties, is specific to the individual contracts and is 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. The information is entitled to confidential classification pursuant to section 366.093(3) (d) and (e), Florida Statutes.
- 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

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FPSC-COMMISSION CLERK

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 1st day of August, 2008.

JEFFREY AJSTONE

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

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing was furnished by U. S mail this 151 day of August, 2008, on the following:

John T. Burnett, Esq. Progress Energy Service Co. P. O. Box 14042 St. Petersburg FL 33733-4042

John T. Butler, Esq.
Senior Attorney for Florida
Power & Light Company
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Juno Beach FL 33408-0420

John W. McWhirter, Jr., Esq. Attorney for Florida Industrial Power Users Group McWhirter Reeves & Davidson P. O. Box 3350 Tampa FL 33601-3350

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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	080001-EI August 1, 2008
	_

REQUEST FOR CONFIDENTIAL CLASSIFICATION

EXHIBIT "A"

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

EXHIBIT "B"

ABCDEFGHIJKLMNOPQRSTUVWXYZAABBCC

Gulf Power Company 2008 Capacity Contracts

	Te	Contract	
Contract/Counterparty	Ster:	End (1)	Туре
Southern Intercompany Interchange	2/16/2000	5 Yr Notice	SES Opeo
Alabama Electric Cooperative	1/1/2008		Other
East Kentucky Power Cooperative	1/1/2008		Other
South Carolina Electric & Gas	6/1/2008		Other
Wester Energy, Inc.	1/1/2008	-	Other
South Carolina PSA	9/1/2003	•	Other
Beer Energy, LP	12/1/2007		Other
Calpine Power Services	Varies	-	Other
Cogentrix	7/1/2003	3/31/2008	Other
Coral Power, LLC	5/1/2003	5/31/2008	Other
Effingham County Power, LLC	6/11/2007		Other
Exelon Power Team	1/1/2000	-	Other
FP&L Energy Power Marketing	@1/2003	-	Other
KGEN, LLC	5/1/2005	-	Other
MPC Generating, LLC	6/11/2007	-	Other
Shell Energy N.A. (U.S.)	6/1/2008	-	Other
West Georgia Generating Company	5/11/2000		Other
Williams Energy Power Marketing	5/1/2002	11/30/2007	Other

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

Capacity Costs																		Project	led						
2006	Janu	ary	Feb	ruary	Mar	rch	A	April May		June		July		August			September		October		November		ember	i	
Contract	MW	- \$	MW		MW		MW	<u> </u>	MW		MW	_ 1	MW	\$	MW		NY	\$	MW		MW	\$	MW	. \$	Total \$
Southern Intercompany Interchange	322.1	793,207	469.3	409,097	455.9	468,391	569,7	269,376	632.5	645,798	737.3	470,654	534.0	8,463,282	844.1				Ø.808	395,291	621.5	297,940	574.0	276,196	30,274,453
Confidential Contracts (Projected)				_					_				•	(4.280)	-	(4,28	3) -	(4,280)	•	(4,280)	-	(4,280)	-	(4,280)	
Alabema Electric Cooperative East Kentucky Power Cooperative																			1						(22,189)
South Carolina Electric & Gas																									(68,745)
Wester Energy, Inc.																									(36,663) (177,515)
South Caroline PSA																									(20,484)
Bear Energy, LP (1)	0.0	6	0.6	(51)	0.0	(51)	0.0	(51)	9.0	(51)	0.0	(51)													(255)
Calpine Power Services (1)	0.0	(103)	0.0	(103)	0.0	(103)	0.0	(103)	0.0	(103)	0.0	(103)													(618)
Cogentrix (1)	0.0	(51)	6.0	(51)	0.0	(22)	0.0	0	0.0	0	0.0	. 0	İ												(124)
Coral Power, LLC [1]	0.0	(51)	0.0	(51)	0.0	(51)	0.0	(51)	0.0	(51)	0.0	0													(255)
Effinghem County Power, LLC (1)	0.0	(51)	0.0	(51)	0.0	(51)	0.0	(51)	0.0	(51)	0.0	(51)													(306)
Exelon Power Team ⁽¹⁾	0.0	(51)	0.0	(51)	0.0	(51)	0.0	(51)	0.0	(51)	0.0	(51)													(306)
FP&L Energy Power Marketing (*)	0.0	(51)	0.0	(51)	0.0	(51)	0.0	(51)	0.0	(51)	0.0	(51)													(306)
KGEN, LLC ⁽⁴⁾	0.0	(154)	0.0	(154)	0.0	(154)	0.0	(154)	0.0	(154)	0.0	(154)	1												(924)
MPC Generating, LLC (1)	0.0	(51)	6.0	(51)	0,0	(51)	0.0	(51)	0.0	(51)	0.0	(51)													(306)
Shell Energy N.A. (U.S.) (9)	0.0	0	0.0	0	0.0	0	0.0	0	0.0	0	0.0	(51)													(51)
West Georgia Generating Company (1)	0.0	(52)	0.0	(52)	0.0	(51)	0.0	(51)	0.0	(51)	0.0	(51)	J												(308)
Williams Energy Power Marketing (1)	0.0	(51)	0.0	0	0.0	0	0.0	0	0.0	0	0.0	o													(51)
Total		696,609		403,204		421,229		249,845		806,267		429,763	L	8,459,002		10,052,37	<u> </u>	4,144,283		391,011		293,660		271,916	30,419,167

(1) Generator Balancing Service provides no capacity scheduling emitlements.

EXHIBIT "C"

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

Page 1 of 1 Lines 44-48; Columns E-P

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.

STATE OF FLORIDA

COMMISSIONERS:
MATTHEW M. CARTER II, CHAIRMAN
LISA POLAK EDGAR
KATRINA J. MCMURRIAN
NANCY ARGENZIANO
NATHAN A. SKOP



OFFICE OF COMMISSION CLERK
ANN COLE
COMMISSION CLERK
(850) 413-6770

COMPIDENTES

Public Service Commission

ACKNOWLEDGEMENT

	DATE : August 4, 2008
TO:	Susan D. Ritenour, Gulf Power Company
FROM:	Ruth Nettles, Office of Commission Clerk
RE:	Acknowledgement of Receipt of Confidential Filing

This will acknowledge receipt of a CONFIDENTIAL DOCUMENT filed in Docket Number 080001 or, if filed in an undocketed matter, concerning certain information contained in Schedule CCE-4 of Exhibit RWD-2 to direct testimony of Richard W. Dodd, and filed on behalf of Gulf Power Company. The document will be maintained in locked storage.

If you have any questions regarding this document, please contact Marguerite Lockard, Deputy Clerk, at (850) 413-6770.

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