**Susan D. Ritenour** Secretary and Treasurer and Regulatory Manager

One Energy Place Pensacola, Florida 32520-0781

Tel 850.444.6231 Fax 850.444.6026 SDRITENO@southernco.com



July 30, 20	10
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CLAIM OF CONFIDENTIALITY
NOTICE OF INTENT

X REQUEST FOR CONFIDENTIALITY
FILED BY OPC

FOR DN DU 10 \_\_\_\_\_, WHICH IS IN LOCKED STORAGE. YOU MUST BE AUTHORIZED TO VIEW THIS DN. - CLK

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

Dear Ms. Cole:

Re: Docket No. 100001-El

Enclosed is Gulf Power Company's Requests for Confidential Classification pertaining to:

1. Schedule CCE-4 of Exhibit RWD-2 to the Direct Testimony of Richard W. Dodd dated August 2, 2010.

2. Certain portions of Gulf Power's Risk Management Plan for Fuel Procurement.

Sincerely,

Susan D. Ritenour (lw)

APA L
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GCL L
RAD L
SSC \_\_
ADM \_\_
OPC

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COM

Enclosures

CC:

Beggs & Lane Jeffrey A. Stone, Esq.

C6263 AUG-2 =

FPSC-COMMISSION CLEAR

IN RE: Fuel and Purchased Power Cost Recovery Clause with Generating Performance Incentive Factor

Docket No.: 100001-E1

#### **CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that a true copy of the foregoing was furnished by U.S. Mail this \_\_30<sup>th</sup> day of July, 2010, 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 700 Universe Boulevard Juno Beach FL 33408-0420

John W. McWhirter, Jr., Esq. Attorney for FIPUG McWhirter Reeves & Davidson P.O. Box 3350 Tampa, FL 33601-3350

Paul Lewis, Jr. Progress Energy Florida, Inc. 106 E. College Ave., Ste. 800 Tallahassee FL 32301-7740

Vicki Kaufman Jon Moyle Keefe Anchors Gordon & Moyle PA 118 N. Gadsden St. Taliahassee, FL 32301

Shayla L. McNeill, Capt. USAF Karen S. White AFLSA/JACL-ULT 139 Barnes Drive, Suite 1 Tyndall AFB, FL 32403

Randy B. Miller White Springs Agricultural Chemicals PO Box 300 15483 Southeast 78<sup>th</sup> Street White Springs, FL 32096 Mehrdad Khojasteh Florida Public Utilities Company P. O. Box 3395 West Palm Beach FL 33402-3395

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Wade Litchfield Vice President Florida Power & Light Co. 215 S. Monroe Street, Ste. 810 Tallahassee FL 32301-1859

Paula K. Brown, Administrator Regulatory Coordination Tampa Electric Company P. O. Box 111 Tampa FL 33601

Beth Keating Akerman Senterfit 106 East College Ave. Suite 1200 Tallahassee, Fl 32301

James W. Brew F. Alvin Taylor Brickfield, Burchette, et al., P.C. 1025 Thomas Jefferson St., NW Eighth Floor, West Tower Washington, DC 20007-5201

Robert Scheffel Wright John T. LaVia, III Young van Assenderp, P.A. 225 S. Adams Street, Suite 200 Tallahassee FL 32301

JEPFREY 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 32591-2950
(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.: 100001-EI Date: July 30, 2010

## 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 2, 2010 (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 contains pricing information for capacity purchases between Gulf Power and various counterparties. The pricing information is 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.

DOCUMENT NO. DATE

06263-10 8,2,10

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 30th day of July, 2010.

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.: 100001-EI Date: July 30, 2010

## REQUEST FOR CONFIDENTIAL CLASSIFICATION

## EXHIBIT "A"

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

DOCUMENT NO. DATE

06263-10 812110 FPSC - COMMISSION CLERK

Sulf Power Company   2010 Capacity Contracts   Substitution   Su	1	A B C D	E	F	G	Н	i	J	K	L	М	N	O	P
2010 Capacity Contracts  Term Contract  Contract/Counterparty Start End (1) Type  Southern Intercompany Interchange 2/18/2000 5 Yr Notice SES Opco  PPAs PPAs 16/12009 5/31/2014 Firm  Southern Power Company 6/1/2009 5/31/2014 Firm  Multiple Shell Energy N.A. (U.S.), L.P (1) 11/2010 S/31/2023 Non-Firm  Other  1/1/2010 2/14/2010 Other  South Carolina Electric & Gas 2/1/2010 6/4/2010 Other  South Carolina PSA 9/1/2003 - Other  1/1/2010 2/14/2010 Other  1/1/2010 2/14/2010 Other  South Carolina PSA 9/1/2003 - Other  1/1/2010 2/14/2010 Other  1/1/2010 Other  1/1/2010 2/14/2010 Other  1/1/2010 Other  1/1/2010 2/14/2010 Other  1/1/2010 Other  1/1/2010 Other  1/1/2010 2/14/2010 Other  1/1/2010 Other	,	Gulf Power Company											_	
Term   Contract   Type   Substant   End (1)   Type   SES Opco   PPAs   Southern Intercompany Interchange   2/18/2000   5 Yr Notice   SES Opco   PPAs   Southern Intercompany Interchange   2/18/2000   5 Yr Notice   SES Opco   PPAs   Southern Intercompany Interchange   2/18/2000   5 Yr Notice   SES Opco   PPAs   Southern Power Company   6/1/2009   5/31/2014   Firm   Southern Power Company   6/1/2009   5/31/2014   Firm   Southern Power Company   6/1/2009   5/31/2014   Firm   South Carolina Electric Cooperative   1/1/2010   Other   South Carolina Electric Cooperative   1/1/2010   Other   South Carolina Electric & Gas   2/1/2010   6/1/2010   Other   South Carolina Electric & Gas   2/1/2010   Southern Intercompany Interchange   (9.1)   2/21/2010   Southern Intercompany Interchange   (9.1)   2/21/2010   Southern Power Company   Shell Energy N.A. (U.S.), I.P.   Total PPAs   South Carolina Electric Cooperative   Shell Energy N.A. (U.S.), I.P.   Total PPAs   South Carolina Electric & Gas   O.0   O.		, <del>-</del>												
Tell   Start   End   Type   SES Opco   PPAs	4	2010 Capacity Contracts											Page 1	of 2
Tell   Start   End   Type   SES Opco   PPAs	5													
Contract/Counterparty   Start   End   Type			т	erm		Contract								
8 Southern Intercompany Interchange  PPAs  10 Coral Power, LLC 6/1/2009 5/31/2014 Firm 11 Southern Power Company 6/1/2009 5/31/2014 Firm 12 Shell Energy N.A. (U.S.), LP (2) 11/2009 5/31/2013 Non-Firm 13 Alabama Electric & Gas 2/1/2010 6/4/2010 Other 14 Alabama Electric & Gas 2/1/2010 6/4/2010 Other 15 South Carolina PSA 9/1/2003 - Other 17 Other 18 Other 19 Other 19 Other 19 (1) Unless otherwise noted, contract remains effective unless terminated upon 30 days prior written notice. 19 (2) Contract megawatts are non-firm until June 1, 2014. 20 (2) Contract megawatts are non-firm until June 1, 2014. 21 South Carolina PSA 9/1/2003 - Other 22 Other 19 Other	7	Contract/Counterparty												
PAS   10   Cora Power, LLC   6/1/2009   5/31/2014   Firm	8													
Coral Power, LLC						QCO Opeo								
Southern Power Company 6/1/2009 5/31/2014 Firm    South Energy N.A. (U.S.), LP   LP   11/2/2009 5/31/2023   Non-Firm	10		6/1/2009	5/31/2014		Firm								
11/2/2009   11/2/2009   5/31/2023   Non-Firm	11	Southern Power Company												
Alabama Electric Cooperative 1/1/2010 2/14/2010 Other 50uth Carolina PSA 9/1/2003 - Other 1/1/2010 6/4/2010 Other 50uth Carolina PSA 9/1/2003 - Other 9/1/2003	12	Shell Energy N.A. (U.S.), LP (2)	11/2/2009			Non-Firm								
South Carolina Electric & Gas   2/1/2010   6/4/2010   Other		<del></del>												
South Carolina PSA   9/1/2003   Other		•				Other								
17 18 (1) Unless otherwise noted, contract remains effective unless terminated upon 30 days prior written notice.  (2) Contract megawatts are non-firm until June 1, 2014.  21 22 23 24 25 Capacity Costs 2010				6/4/2010										
19   (1) Unless otherwise noted, contract remains effective unless terminated upon 30 days prior written notice.		South Carolina PSA	9/1/2003	-		Other								
(1) Unless otherwise noted, contract remains effective unless terminated upon 30 days prior written notice.  (2) Contract megawatts are non-firm until June 1, 2014.  (3) Capacity Costs  (4) Capacity Costs  (5) Contract  (6) Contract  (7) Mw  (8) Mw  (9) Mw  (9) Mw  (9) Mw  (9) Mw  (10) May  (10)														
20 (2) Contract megawatts are non-firm until June 1, 2014.  21		was training and a second and a second												
21				ss terminated	upon 30	days prior v	vritten no	tice.						
22		(2) Contract megawatts are non-tirm until June	1, 2014.											
23														
24   25   Capacity Costs   2010   January   February   March   April   May   June   27   Contract   MW   \$														
Capacity Costs   Capacity Costs   Contract   Contract   MW   S														
Description		Canacity Costs												
Contract   MW   \$ MW		• •	Jar	าแสาง	Feb	miary	Ма	rch		muli		I		
28 Southern Intercompany Interchange (9.1) (22,150) 162.9 126,552 (261.9) (260,464) 121.0 45,219 117.8 104,024 289.9 1,298,688  29				\$						e hiii				•
29	28	Southern Intercompany Interchange		(22,150)		126,552		(260,464)		45 219				4 200 600
31 Southern Power Company 32 Shell Energy N.A. (U.S.), LP 33	29		` .	, , ,		, , , , , ,		(,,	,	10,2,10	111.0	107,027	203.3	1,290,686
32 Shell Energy N.A. (U.S.), LP  33	30	Coral Power,LLC												
33	31	Southern Power Company												
34	32	Shell Energy N.A. (U.S.), LP												
35 Alabama Electric Cooperative 0.0 0 0.0 0 0.0 0 0.0 0 36 South Carolina Electric & Gas 0.0 0 0.0 0 0.0 0 37 South Carolina PSA	33	Total PPAs	;		_	···								
36 South Carolina Electric & Gas 0.0 0.0 0 0.0 0 0.0 0 0.0 0 0.0 0 0.0 0 0.0 0 0.0 0 0.0 0 0.0 0 0.0 0.0 0 0.0 0 0.0 0 0.0 0 0.0 0 0.0 0 0.0 0 0.0 0 0.0 0 0.0 0 0.0 0.0 0 0.0 0 0.0 0 0.0 0 0.0 0 0.0 0 0.0 0 0.0 0 0.0 0 0.0 0 0.0 0.0 0 0.0 0 0.0 0 0.0 0 0.0 0 0.0 0 0.0 0 0.0 0 0.0 0 0.0 0 0.0 0.0 0 0.0 0 0.0 0 0.0 0 0.0 0 0.0 0 0.0 0 0.0 0 0.0 0 0.0 0 0.0 0.0 0 0.0 0 0.0 0 0.0 0 0.0 0 0.0 0 0.0 0 0.0 0 0.0 0 0.0 0 0.0 0.0 0 0.0 0 0.0 0 0.0 0 0.0 0 0.0 0 0.0 0 0.0 0 0.0 0 0.0 0 0.0 0.0 0 0.0 0 0.0 0 0.0 0 0.0 0 0.0 0 0.0 0 0.0 0 0.0 0 0.0 0 0.0 0.0 0 0.0 0 0.0 0 0.0 0 0.0 0 0.0 0 0.0 0 0.0 0 0.0 0 0.0 0 0.0 0.0 0 0.0 0 0.0 0 0.0 0 0.0 0 0.0 0 0.0 0 0.0 0 0.0 0 0.0 0 0.0 0														
36 South Carolina Electric & Gas 0.0 0 0.0 0.0 0.0 0 0.0 0 0.0 0 0.0 0 0.0 0 0.0 0 0.0 0 0.0 0 0.0 0 0.0 0 0.0 0.0 0 0.0 0 0.0 0 0.0 0 0.0 0 0.0 0 0.0 0 0.0 0 0.0 0 0.0 0 0.0 0.0 0 0.0 0 0.0 0 0.0 0 0.0 0 0.0 0 0.0 0 0.0 0 0.0 0 0.0 0 0.0 0.0 0 0.0 0 0.0 0 0.0 0 0.0 0 0.0 0 0.0 0 0.0 0 0.0 0 0.0 0 0.0 0.0 0 0.0 0 0.0 0 0.0 0 0.0 0 0.0 0 0.0 0 0.0 0 0.0 0 0.0 0 0.0 0.0 0 0.0 0 0.0 0 0.0 0 0.0 0 0.0 0 0.0 0 0.0 0 0.0 0 0.0 0 0.0 0.0 0 0.0 0 0.0 0 0.0 0 0.0 0 0.0 0 0.0 0 0.0 0 0.0 0 0.0 0 0.0 0.0 0 0.0 0 0.0 0 0.0 0 0.0 0 0.0 0 0.0 0 0.0 0 0.0 0 0.0 0 0.0 0.0 0 0.0 0 0.0 0 0.0 0 0.0 0 0.0 0 0.0 0 0.0 0 0.0 0 0.0 0 0.0 0.0 0 0.0 0 0.0 0 0.0 0 0.0 0 0.0 0 0.0 0 0.0 0 0.0 0 0.0 0 0.0 0.0 0 0.0 0 0.0 0 0.0 0 0.0 0 0.0 0 0.0 0 0.0 0 0.0 0 0.0 0 0.0 0.0 0 0.0 0 0.0 0 0.0 0 0.0 0 0.0 0 0.0 0 0.0 0 0.0 0 0.0 0 0.0 0							0.0	0	0.0	0	0.0	0	0.0	0
38 Total 1.194.149 4.244.000 604.000			0.0	0			0.0	0						
38 Total 1,181,148 1,341,902 691,089 996,772 2,241,584 7,577,711														
	38	Total		1,181,148		1,341,902		691,089		996,772		2,241,584		7.577.711

DOCUMENT NO. DATE

O6263-10 812110 FPSC - COMMISSION CLERK A B C D E F G H I J K L M N O P Q

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2 Gulf Power Company
3 2010 Capacity Contracts
4 Page 2 of 2

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5	

6		Te	Contract	
7	Contract/Counterparty	Start	End <sup>(1)</sup>	Type
8	Southern Intercompany Interchange	2/18/2000	5 Yr Notice	SES Opco
9	<u>PPAs</u>			_
10	Coral Power,LLC	6/1/2009	5/31/2014	Firm
11	Southern Power Company	6/1/2009	5/31/2014	Firm
12	Shell Energy N.A. (U.S.), LP (2)	11/2/2009	5/31/2023	Non-Firm
13	<u>Other</u>			
14	Alabama Electric Cooperative	1/1/2010	2/14/2010	Other
15	South Carolina Electric & Gas	2/1/2010	6/4/2010	Other
16	South Carolina PSA	9/1/2003	•	Other
17				

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- 19 (1) Unless otherwise noted, contract remains effective unless terminated upon 30 days prior written notice.
- 20 (2) Contract megawatts are non-firm until June 1, 2014.

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25	Capacity Costs													
26	2010	Je	ıly	Αi	ugust	Sep	tember	Oc	tober	Nov	ember	Dec	ember	
27	Contract	MW	\$	MW	\$_	MW	\$	MW	\$	MW	\$	MW	\$	Total \$
28	Southern Intercompany Interchange	306.5	3,898,165	197.5	2,498,683	272.8	1,617,956	337.9	145,967	185.9	85,293	(68.9)	(35,537)	
29	<u>PPAs</u>								•		,	(,-,	(55,55.,	0,002,030
30	Coral Power,LLC													
31	Southern Power Company													
32	Shell Energy N.A. (U.S.), LP													
33	Total PF	PAs T			_									38,607,268
34	<u>Other</u>													30,007,268
35	Alabama Electric Cooperative	0.0	0	0.0	0	0.0	0	0.0	0	0.0	O	0.0	١	(4.0.4.40)
36	South Carolina Electric & Gas	0.0	٥	0.0	0	0.0	Q	0.0	Ö	0.0	Ó	0.0	ő	(18,140)
37	South Carolina PSA							010		0.0		U.V		(1,636)
38	Total		40 707 252		0.770.600		7.000.000		4					(41,568)
20	Total		12,707,252		8,778,583		7,896,856		1,625,867		1,565,193	•	1,444,363	48,048,320

1,341,902

691,089

996,772

2,241,584

7,577,711

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Total

1,181,148

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2 Gulf Power Company3 2010 Capacity Contracts

Schedule CCE-4 Page 2 of 2

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6		Te	Contract	
7	Contract/Counterparty	Start	End <sup>(1)</sup>	Туре
8	Southern Intercompany Interchange	2/18/2000	5 Yr Notice	SES Opco
9	<u>PPAs</u>			
10	Coral Power,LLC	6/1/2009	5/31/2014	Firm
11	Southern Power Company	6/1/2009	5/31/2014	Firm
12	Shell Energy N.A. (U.S.), LP (2)	11/2/2009	5/31/2023	Non-Firm
13	<u>Other</u>			
14	Alabama Electric Cooperative	1/1/2010	2/14/2010	Other
15	South Carolina Electric & Gas	2/1/2010	6/4/2010	Other
16	South Carolina PSA	9/1/2003	-	Other
17				

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

20 (2) Contract megawatts are non-firm until June 1, 2014.

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2	น.สกล	CHU	Costs

26	2010	Ju	ıl <del>y</del>	Αu	igust	Sept	ember	Oc	tober	Nove	ember	Dece	mber	
27	Contract	MW	\$	MW	\$	MW	\$	MW	\$	MW	\$	MW	\$	Total \$
28	Southern Intercompany Interchange	306.5	3,898,165	197.5	2,498,683	272.8	1,617,956	337.9	145,967	185.9	85,293	(68.9)	(35,537)	9,502,396
29	<u>PPAs</u>												1	1
30	Coral Power,LLC													
31	Southern Power Company													
32	Shell Energy N.A. (U.S.), LP													
33	Total PPAs	<del></del>												38,607,268
34	<u>Other</u>												ł	
35	Alabama Electric Cooperative	0.0	0	0.0	0	0.0	0	0.0	0	0.0	0	0.0	a l	(18,140)
36	South Carolina Electric & Gas	0.0	0	0.0	0	0.0	0	0.0	0	0.0	0	0.0	ol	(1,636)
37	South Carolina PSA													(41,568)
38	Total	•	12,707,252		8,778,583		7,896,856		1,625,867		1,565,193		1.444,363	48,048,320

### EXHIBIT "C"

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

Page 1 of 2

Lines 30-32; Columns E-P Line 35; Columns E-H Line 36; Columns G-H, M-P Line 37; Columns E-P

Page 2 of 2

Lines 30-32, Columns E-Q Line 37, 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.

OG263-10 8/2/10 FPSC - COMMISSION CLERK

#### State of Florida



# Aublic Service Commission

CAPITAL CIRCLE OFFICE CENTER • 2540 SHUMARD OAK BOULEVARD TALLAHASSEE, FLORIDA 32399-0850

Susan Ritenour One Energy Place Pensacola FL 32520

Re: Acknowledgement of Confidential Filing in Docket No. 100001-El

This will acknowledge receipt by the Florida Public Service Commission,
Office of Commission Clerk, of a CONFIDENTIAL DOCUMENT filed on August 2,
2010, in the above-referenced docket.

Document Numbers 06264-10 and 06265-10 has been assigned to this filing, which will be maintained in locked storage.

If you have any questions regarding this document, please contact Kim Peña, Records Management Assistant, at (850) 413-6393.