

Susan D. Ritenour
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and Regulatory Manager

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COMMISSION
CLERK



August 31, 2011

claim of confidentiality
 notice of intent
 request for confidentiality
 filed by OPC

For DN 06303-11, 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. 110001-EI

Enclosed is Gulf Power Company's Request for Confidential Classification
pertaining to Schedule CCA-4 for 2012 in Exhibit RWD-3 and CCE-4 for 2011 in
Exhibit RWD-4 to the Direct Testimony of Richard W. Dodd dated September 1,
2011.

Sincerely,

Susan D. Ritenour

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SRC
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OPC
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mw.

containing request also fwd.
Enclosures

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

DOCUMENT NUMBER-DATE

06302 SEP-1 =

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.: 110001-EI
Date: September 1, 2011

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 two Schedules CCE-4 identified as Exhibits RWD-3 and RWD-4 to the Direct Testimony of Richard W. Dodd dated September 1, 2011 (Schedules CCE-4) on behalf of Gulf Power.¹ As grounds for this request, the Company states:

1. A portion of the information contained in Schedules 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. Schedules 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 between 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 may charge higher prices, if the price terms are made public. The information is entitled to confidential classification pursuant to section 366.093(3)(d) and (e), Florida Statutes.

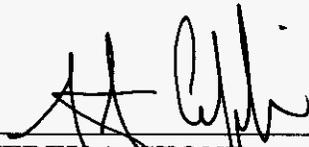
¹ The schedule included in Exhibit RWD-4 contains revised capacity cost projections for year 2011.

2. 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 otherwise been publicly disclosed.

3. Submitted as Exhibit "A" are copies of Schedules CCE-4, on which are 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 Schedules 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 31st day of August, 2011.



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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

Docket No.: 110001-EI
Date: September 1, 2011

REQUEST FOR CONFIDENTIAL CLASSIFICATION

EXHIBIT "A"

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

REDACTED

EXHIBIT "B"

DOCUMENT NUMBER - DATE

06302 SEP -1 =

FPSC-COMMISSION CLERK.

A B C D E F G H I J K L M N O P

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2 Gulf Power Company
3 2012 Capacity Contracts

Contract/Counterparty	Term		Contract Type
	Start	End (1)	
Southern Intercompany Interchange	2/18/2000	5 Yr Notice	SES Opco
<u>PPAs</u>			
Coral Power, LLC	6/1/2009	5/31/2014	Firm
Southern Power Company	6/1/2009	5/31/2014	Firm
Shell Energy N.A. (U.S.), LP (2)	11/2/2009	5/31/2023	Non-Firm
<u>Other</u>			
South Carolina PSA	9/1/2003	-	Other

REDACTED

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17 (1) Unless otherwise noted, contract remains effective unless terminated upon 30 days prior written notice.
18 (2) Contract megawatts become firm no later than June 1, 2014.

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23 Capacity Costs
24 2012

Contract	January		February		March		April		May		June	
	MW	\$	MW	\$	MW	\$	MW	\$	MW	\$	MW	\$
Southern Intercompany Interchange	312.1	734,471	346.8	357,633	116.8	117,159	176.9	94,064	303.0	283,198	175.6	914,022
<u>PPAs</u>												
Coral Power, LLC	[REDACTED]											
Southern Power Company	[REDACTED]											
Shell Energy N.A. (U.S.), LP	[REDACTED]											
<u>Other</u>												
South Carolina PSA	[REDACTED]											
Total		2,308,296		1,931,458		1,589,984		1,566,889		2,353,023		7,186,847

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06302 SEP-1 =
FPSC-COMMISSION CLERK

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 2 Gulf Power Company
 3 2012 Capacity Contracts
 4

Contract/Counterparty	Term		Contract Type
	Start	End (1)	
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 South Carolina PSA	9/1/2003	-	Other

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 17 (1) Unless otherwise noted, contract remains effective unless terminated upon 30 days prior written notice.
 18 (2) Contract megawatts become firm no later than June 1, 2014.

19
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 23 Capacity Costs
 24 2012

Contract	July		August		September		October		November		December		Total \$
	MW	\$	MW	\$	MW	\$	MW	\$	MW	\$	MW	\$	
26 Southern Intercompany Interchange	213.9	3,079,536	107.1	1,515,397	363.1	2,980,616	588.3	463,519	244.7	168,708	9.3	4,364	10,712,687
27 <u>PPAs</u>													
28 Coral Power, LLC													
29 Southern Power Company													
30 Shell Energy N.A. (U.S.), LP													
31 Total PPAs													37,710,000
32 <u>Other</u>													
33 South Carolina PSA													(38,100)
34 Total		9,351,361		7,788,222		9,253,441		1,936,344		1,641,533		1,477,189	48,384,587

A B C D E F G H I J K L M N O P

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2 Gulf Power Company
3 2011 Capacity Contracts
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Schedule CCE-4
Revised September 1, 2011
Page 1 of 2

Contract/Counterparty	Term		Contract Type
	Start	End (1)	
Southern Intercompany Interchange	2/18/2000	5 Yr Notice	SES Opco
<i>PPAs</i>			
Coral Power, LLC	6/1/2009	5/31/2014	Firm
Southern Power Company	6/1/2009	5/31/2014	Firm
Shell Energy N.A. (U.S.), LP (2)	11/2/2009	5/31/2023	Non-Firm
<i>Other</i>			
Alabama Electric Cooperative	1/1/2011	1/14/2011	Other
South Carolina Electric & Gas	5/9/2011	6/1/2011	Other
South Carolina PSA	9/1/2003	-	Other

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

20 (2) Contract megawatts become firm no later than June 1, 2014.

21
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25 Capacity Costs

Contract	January		February		March		April		May		June	
	MW	\$	MW	\$	MW	\$	MW	\$	MW	\$	MW	\$
Southern Intercompany Interchange	321.0	738,310	289.2	295,176	(6.6)	10,576	111.7	41,326	244.5	5,381	0.0	0
<i>PPAs</i>												
Coral Power, LLC	[REDACTED]											
Southern Power Company	[REDACTED]											
Shell Energy N.A. (U.S.), LP	[REDACTED]											
<i>Other</i>												
Alabama Electric Cooperative	[REDACTED]				0.0	0	0.0	0	0.0	0	0.0	0
South Carolina Electric & Gas	0.0	0	0.0	0	0.0	0	0.0	0	[REDACTED]			
South Carolina PSA	[REDACTED]											
Total	2,343,362		1,831,895		1,536,219		1,589,788		2,324,521		7,426,073	

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
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Schedule CCE-4
Revised September 1, 2011
Page 2 of 2

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<u>Other</u>			
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25 Capacity Costs
26 2011

Contract	July		August		September		October		November		December		Total \$
	MW	\$	MW	\$	MW	\$	MW	\$	MW	\$	MW	\$	
Southern Intercompany Interchange	0.0	0	0.0	0	272.8	1,617,956	337.9	145,967	185.9	85,293	(68.9)	(35,537)	2,904,448
<u>PPAs</u>													
Coral Power, LLC	[REDACTED]												
Southern Power Company	[REDACTED]												
Shell Energy N.A. (U.S.), LP	[REDACTED]												
Total PPAs													41,273,111
<u>Other</u>													
Alabama Electric Cooperative	0.0	0	0.0	0	0.0	0	0.0	0	0.0	0	0.0	0	(1,522)
South Carolina Electric & Gas	[REDACTED]				0.0	0	0.0	0	0.0	0	0.0	0	(3,887)
South Carolina PSA	[REDACTED]												(38,057)
Total	7,519,039		7,059,203		7,889,785		1,618,795		1,558,122		1,437,291		44,134,093

1 A B C D E F G H I J K L M N O P

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A B C D E F G H I J K L M N O P

1 Gulf Power Company
 2 2011 Capacity Contracts

Schedule CCE-4
 Revised September 1, 2011
 Page 1 of 2

Contract/Counterparty	Term		Contract Type
	Start	End (1)	
Southern Intercompany Interchange <i>PPAs</i>	2/18/2000	5 Yr Notice	SES Opco
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Capacity Costs

2011

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Southern Power Company	[REDACTED]											
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<i>Other</i>												
Alabama Electric Cooperative					0.0	0	0.0	0	0.0	0	0.0	0
South Carolina Electric & Gas	0.0	0	0.0	0	0.0	0	0.0	0				
South Carolina PSA	[REDACTED]											
Total		2,343,362		1,831,895		1,536,219		1,589,788		2,324,521		7,426,073

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**Gulf Power Company
2011 Capacity Contracts**

Schedule CCE-4
Revised September 1, 2011
Page 2 of 2

Contract/Counterparty	Term		Contract Type
	Start	End (1)	
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**Capacity Costs
2011**

Contract	July		August		September		October		November		December		Total \$
	MW	\$	MW	\$	MW	\$	MW	\$	MW	\$	MW	\$	
Southern Intercompany Interchange	0.0	0	0.0	0	272.8	1,617,956	337.9	145,967	185.9	85,293	(68.9)	(35,537)	2,904,448
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Coral Power, LLC	[REDACTED]												
Southern Power Company	[REDACTED]												
Shell Energy N.A. (U.S.), LP	[REDACTED]												
Total PPA's													41,273,111
<i>Other</i>													
Alabama Electric Cooperative	0.0	0	0.0	0	0.0	0	0.0	0	0.0	0	0.0	0	(1,522)
South Carolina Electric & Gas	[REDACTED]												(3,887)
South Carolina PSA	[REDACTED]												(38,057)
Total	7,519,039		7,059,203		7,889,785		1,618,795		1,558,122		1,437,291		44,134,093

EXHIBIT "C"

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

Line(s)/Field(s)

Justification

Exhibit RWD-3

Page 1 of 2

Lines 28-30 & 33; Columns E-P

Page 2 of 2

Lines 28-30; Columns E-Q

Line 33; Columns E-P

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.

Exhibit RWD-4

Page 1 of 2

Lines 30-32; Columns E-P

Line 35; Columns E-H

Line 36; Columns M-P

Line 37; Columns E-P

Page 2 of 2

Lines 30-32; Columns E-Q

Line 36; Columns E-H

Line 37; Columns E-P

DOCUMENT NUMBER-DATE

06302 SEP-1 =

FPSC-COMMISSION CLERK

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

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

Docket No.: 110001-EI

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true copy of the foregoing was furnished by U.S. mail this 31st day of August, 2011, on the following:

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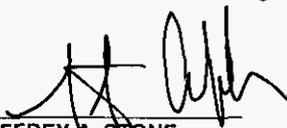
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Lisa Bennett
Office of General Counsel
FL Public Service Commission
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Tallahassee FL 32399-0850
lbennett@psc.state.fl.us

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City Hall
2898 Green Street
Marianna, FL 32446
deanj@cityofmarianna.com


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RUSSELL A. BADDERS
Florida Bar No. 007455
STEVEN R. GRIFFIN
Florida Bar No. 0627569
BEGGS & LANE
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Attorneys for Gulf Power Company