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COMMISSION
CLERK

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

For DN 08085-11, which
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November 1, 2011

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

Dear Ms. Cole:

RE: Docket No. 110001-EI

Enclosed is Gulf Power Company's Supplemental Request for Confidential
Classification for Gulf Power Company's Form 423-2 for July, 2011.

Sincerely,

COM _____ nm
APA _____
ECR 1 cp only w/ cover letter Enclosures
GCL _____ cc: Beggs & Lane
RAD _____ Jeffrey A. Stone, Esq.
SRC _____
ADM _____
OPC _____
CLK MM-Lean

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REGISTRATION CENTER

DOCUMENT NUMBER - DATE
8084 NOV -2 =
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: November 1, 2011

SUPPLEMENTAL 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 this request that the Florida Public Service Commission enter an order protecting from public disclosure certain supplemental information submitted by Gulf Power on its FPSC Form 423 Fuel Report for the month of July, 2011. As grounds for this request, the Company states:

1. On September 28, 2011, Gulf Power filed a Request for Confidential Classification pertaining to certain information contained in the Company's FPSC Form 423 Fuel Report for the month of July 2011. (Document No. 07021-11)
2. On October 25, 2011, the Commission entered Order No. PSC-11-0492-CFO-EI granting Gulf Power's request.
3. Subsequent to the issuance of Order No. PSC-11-0492-CFO-EI, Gulf discovered that the Rail Rate used to calculate pricing data for coal deliveries to Plant Scholz in July was incorrect. As a result, Gulf Power is submitting updated information relating fuel purchases for Plant Scholz on Form Nos. 423-2, 423-2(a) and 423-2(b).
4. A portion of the information contained on the foregoing pages constitutes proprietary confidential business information concerning bids and other contractual data, the disclosure of which would impair the efforts of Gulf Power to contract for goods and services on favorable terms. The information is entitled to confidential classification pursuant to section 366.093(3)(d) and(e), Florida Statutes. Specifically, the confidential information consists of pricing for coal and related transportation services purchased by Gulf Power. Gulf Power and the counterparties involved in these transactions consider the foregoing information to be

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FPSC-COMMISSION CLERK

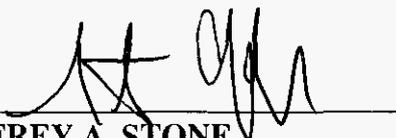
confidential and competitively sensitive. Disclosure of this information could negatively impact Gulf's ability to negotiate pricing favorable to its customers in the future. In addition, potential counterparties may refuse to enter into future contracts with Gulf, or may charge higher prices, if the confidential information is publicly disclosed.

5. To this attorney's knowledge, the pricing information regarding shipments in this month's report has not been otherwise publicly disclosed. This information is intended to be, and is treated as, confidential by Gulf Power.

6. Submitted as Exhibit "A" are copies of the subject documents, 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 the subject documents, 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 November, 2011.



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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: November 1, 2011

SUPPLEMENTAL REQUEST FOR CONFIDENTIAL CLASSIFICATION

EXHIBIT "A"

This information has been provided to the Commission Clerk
under separate cover as confidential information.

REDACTED

EXHIBIT "B"

**MONTHLY REPORT OF COST AND QUALITY OF COAL FOR ELECTRIC PLANTS
ORIGIN, TONNAGE, DELIVERED PRICE, AND AS RECEIVED QUALITY**

1. Reporting Month: JULY Year: 2011 4. Name, Title, & Telephone Number of Contact Person Concerning
Data Submitted on this Form: Ms. J.P. Peters, Fuels Analyst
2. Reporting Company: Gulf Power Company (850)- 444-6332
3. Plant Name: Scholz Electric Generating Plant 5. Signature of Official Submitting Report: Jocelyn P. Peters
6. Date Completed: September 22, 2011

Line No.	Supplier Name	Mine Location			Purchase Type	Transport Mode	Tons	Purchase Price (\$/Ton)	Effective Transport Charges (\$/Ton)	Total FOB Plant Price (\$/Ton)	Sulfur Content (%)	Btu Content (Btu/lb)	Ash Content (%)	Moisture Content (%)
(a)	(b)	(c)			(d)	(e)	(f)	(g)	(h)	(i)	(j)	(k)	(l)	(m)
1	FORESIGHT	10	IL	55	C	RB	11,192.60		82.591	2.11	11,773	7.40	12.39	
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(use continuation sheet if necessary)

**MONTHLY REPORT OF COST AND QUALITY OF COAL FOR ELECTRIC PLANTS
DETAILED PURCHASED COAL INVOICE INFORMATION**

- | | | |
|--|------------|--|
| 1. Reporting Month: JULY | Year: 2011 | 4. Name, Title, & Telephone Number of Contact Person Concerning Data Submitted on this Form: <u>Ms. J.P. Peters, Fuels Analyst</u> |
| 2. Reporting Company: <u>Gulf Power Company</u> | | <u>(850)- 444-6332</u> |
| 3. Plant Name: <u>Scholz Electric Generating Plant</u> | | 5. Signature of Official Submitting Report: Jocelyn P. Peters |
| | | 6. Date Completed: <u>September 22, 2011</u> |

Line No.	Supplier Name	Mine Location			Purchase Type	Tons	FOB Mine Price (\$/Ton)	Shorthaul & Loading Charges (\$/Ton)	Original Invoice Price (\$/Ton)	Retroactive Price increases (\$/Ton)	Base Price (\$/Ton)	Quality Adjustments (\$/Ton)	Effective Purchase Price (\$/Ton)
(a)	(b)	(c)			(d)	(e)	(f)	(g)	(h)	(i)	(j)	(k)	(l)
1	FORESIGHT	10	IL	55	C	11,192.60	██████████	-	██████████	-	██████████	0.611	██████████
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**MONTHLY REPORT OF COST AND QUALITY OF COAL FOR ELECTRIC PLANTS
DETAIL OF TRANSPORTATION CHARGES**

- | | | |
|--|------------|---|
| 1. Reporting Month: AUGUST | Year: 2011 | 4. Name, Title, & Telephone Number of Contact Person Concerning
Data Submitted on this Form: <u>Ms. J.P. Peters, Fuels Analyst</u> |
| 2. Reporting Company: <u>Gulf Power Company</u> | | <u>(850)-444-6332</u> |
| 3. Plant Name: <u>Scholz Electric Generating Plant</u> | | 5. Signature of Official Submitting Report: Jocelyn P. Peters |
| | | 6. Date Completed: <u>October 25, 2011</u> |

Line No.	Supplier Name	Mine Location		Shipping Point	Transport Mode	Tons	Effective Purchase Price (\$/Ton)	Additional Shorthaul & Loading Charges (\$/Ton)	Rail Charges			Waterborne Charges			Other Related Charges (\$/Ton)	Total Transportation charges (\$/Ton)	FOB Plant Price (\$/Ton)
									Rail Rate (\$/Ton)	Other Rail Charges (\$/Ton)	River Barge Rate (\$/Ton)	Trans-loading Rate (\$/Ton)	Ocean Barge Rate (\$/Ton)	Other Water Charges (\$/Ton)			
(a)	(b)	(c)	(d)	(e)	(f)	(g)	(h)	(i)	(j)	(k)	(l)	(m)	(n)	(o)	(p)	(q)	
1	FORESIGHT	10	IL 55	Evansville, IN	RB	21,609.88										82.445	
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(use continuation sheet if necessary)

EXHIBIT "C"

Reporting Month: July

Form 423-2

Plant Names	Column	Justification
Plant Scholz, line 1	(g)	The Effective Purchase Price represents the contract coal commodity price net of Quality Adjustments found in column (k) on form 423-2(a). This information is considered confidential and competitively sensitive by Gulf Power's coal suppliers. Additionally, disclosure of this information, in conjunction with the information disclosed under other columns in this filing, would enable coal suppliers to determine the prices being charged by their competitors. This, in turn, could lead to less competitive pricing and impact Gulf's ability to bargain for price concessions with its coal suppliers. This information is confidential pursuant to section 366.093(3)(d)-(e), Florida Statutes.
Plant Scholz, line 1	(h)	The Effective Transport Charges represent per ton transport charges incurred by Gulf to transport coal to its plants. This information is considered confidential and competitively sensitive by Gulf's transportation providers. Additionally, disclosure of Gulf's Effective Transport Charges in conjunction with the Total FOB Plant Price in column (i) would enable disclosure of the Effective Purchase Price in column (g) by subtracting the Effective Transport Charges in column (h) from the Total FOB Plant Price in column (i). This information is confidential pursuant to section 366.093(3)(d)-(e), Florida Statutes.

Form 423-2(a)

Plant Names	Column	Justification
Plant Scholz, line 1	(f)	The FOB Mine Price is the current contract price of coal purchased by Gulf from each supplier. Disclosure of this information would enable suppliers to compare prices with their competitors which could lead to less competitive coal pricing in future bidding. Disclosure could also result in reduced ability for Gulf Power to bargain for price concessions from individual suppliers. This information is confidential pursuant to section 366.093(3)(d)-(e), Florida Statutes.
Plant Scholz, line 1	(h)	The Original Invoice Price is the same as the FOB Price in column (f) except in cases when the supplier discloses its short haul and loading costs (column (g)), if any, included in the contract price of coal. Disclosure of this information would therefore be detrimental for the same reasons as are articulated above in connection with the FOB Mine Price.
Plant Scholz, line 1	(j)	The Base Price is the same as the Original Invoice Price in column (h), since retroactive pricing adjustments (column (i)) are normally received, if at all, after the reporting month and are included on Form 423-C, if necessary. Disclosure of this information would therefore be detrimental for the same reasons as are articulated above in connection with the FOB Mine Price.
Plant Scholz, line 1	(l)	The Effective Purchase Price represents the Base Price in column (j) adjusted by the Quality Adjustments in column (k). Disclosure of this information would therefore be detrimental for the same reasons as are articulated above in connection with FOB Mine Price.

Form 423-2(b)

Plant Names	Column	Justification
Plant Scholz, line 1	(g)	The Effective Purchase Price, as described above, is contract coal commodity price net of Quality Adjustments found in column (k) on form 423-2(a) and is confidential for the reasons previously stated.
Plant Scholz, line 1	(i)	The Rail Rate is the current rate that Gulf Power pays to transport coal to its plants via rail. This information is considered confidential by Gulf's rail transportation providers. Additionally, disclosure of this information would enable rail transport providers to compare rates with their competitors which, in turn, could lead to less competitive rail rates in future negotiations. Disclosure would also result in reduced ability for Gulf Power to bargain for price concessions from individual providers. This information is confidential pursuant to section 366.093(3)(d), Florida Statutes.
Plant Scholz, line 1	(p)	The Total Transportation Charges represent the total cost reported as transportation charges. Disclosure of this information in conjunction with information disclosed in other columns of Form 423-2(b) could enable third parties to determine individual components of the Total Transportation Charge, such as Rail or River Barge Rates which are confidential for the reasons stated above.

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 overnight delivery and/or U.S. mail this 1st day of November, 2011, on the following:

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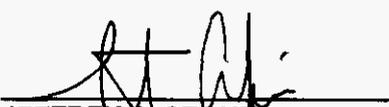
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