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REDACTED



August 30, 2012

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

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

For DN 05937-12, which  
is in locked storage. You must be  
authorized to view this DN.-CLK

RE: Docket No. 120001-EI

Dear Ms. Cole:

Enclosed is Gulf Power Company's Request for Confidential Classification  
pertaining to Schedule CCE-4 of Exhibit RWD-3 to the Direct Testimony of  
Richard W. Dodd dated August 31, 2012.

Regards,

*Susan D. Ritenour*

wb

Enclosures

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

COM \_\_\_\_\_  
AFD I+CD  
APA \_\_\_\_\_  
ECO \_\_\_\_\_  
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DOCUMENT NUMBER-DATE

05936 AUG 31 12

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.: 120001-EI  
Date: August 31, 2012

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-3 to the Direct Testimony of Richard W. Dodd dated August 31, 2012 (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 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.

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.

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FPSC-COMMISSION CLERK

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 30<sup>th</sup> day of August, 2012.



**JEFFREY A. STONE**

Florida Bar No. 325953

**RUSSELL A. BADDERS**

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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

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Docket No.: 120001-EI  
Date: August 31, 2012

**REQUEST FOR CONFIDENTIAL CLASSIFICATION**

**EXHIBIT "A"**

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

EXHIBIT "B"

REDACTED

COM \_\_\_\_\_  
AFD   1    
APA \_\_\_\_\_  
ECO \_\_\_\_\_  
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FPSC-COMMISSION CLERK

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

2 Gulf Power Company  
3 2013 Capacity Contracts

Contract/Counterparty	Term		Contract Type
	Start	End <sup>(1)</sup>	
8 Southern Intercompany Interchange 9 <u>PPAs</u>	5/1/2007	5 Yr Notice	SES Opco
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 <sup>(2)</sup> 13 <u>Other</u>	11/2/2009	5/31/2023	Non-Firm
14 South Carolina PSA	9/1/2003	-	Other

REDACTED

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.

23 Capacity Costs

Contract	January		February		March		April		May		June	
	MW	\$	MW	\$	MW	\$	MW	\$	MW	\$	MW	\$
26 Southern Intercompany Interchange 27 <u>PPAs</u>	0.0	0	0.0	0	0.0	0	0.0	0	0.0	0	0.0	0
28 Coral Power, LLC	[REDACTED]											
29 Southern Power Company	[REDACTED]											
30 Shell Energy N.A. (U.S.), LP	[REDACTED]											
31	[REDACTED]											
32 <u>Other</u>	[REDACTED]											
33 South Carolina PSA	[REDACTED]											
34 Total		2,073,612		2,073,612		1,974,611		1,974,611		2,567,611		7,055,062

DOCUMENT NUMBER-DATE  
05936 AUG 31 2013  
FPSC-COMMISSION CLERK

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

2 Gulf Power Company  
3 2013 Capacity Contracts

Contract/Counterparty	Term		Contract Type
	Start	End <sup>(1)</sup>	
Southern Intercompany Interchange	5/1/2007	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 <sup>(2)</sup>	11/2/2009	5/31/2023	Non-Firm
<u>Other</u>			
South Carolina PSA	9/1/2003	-	Other

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.

23 Capacity Costs

Contract	July		August		September		October		November		December		Total \$
	MW	\$	MW	\$	MW	\$	MW	\$	MW	\$	MW	\$	
Southern Intercompany Interchange	0.0	0	0.0	0	0.0	0	0.0	0	0.0	0	0.0	0	0
<u>PPAs</u>													
Coral Power, LLC	[REDACTED]												
Southern Power Company	[REDACTED]												
Shell Energy N.A. (U.S.), LP	[REDACTED]												
<b>Total PPAs</b>													45,685,478
<u>Other</u>													
South Carolina PSA	[REDACTED]												(39,000)
<b>Total</b>		7,043,894		7,043,893		7,042,893		2,264,893		2,265,893		2,265,893	45,646,478

EXHIBIT "C"

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

**Line(s)/Field(s)**

Page 1 of 2

Lines 28-30; Columns E-P

Line 33; Columns E-P

Page 2 of 2

Lines 28-30, Columns E-Q

Line 33, 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.



BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

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

Docket No.: **120001-EI**

**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 August, 2012 on the following:

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