FILED MAR 03, 2014 DOCUMENT NO. 01003-14 FPSC - COMMISSION CLERK

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COMMISSION CLERK



February 28, 2014

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



RE: Docket No. 140001-EI

Dear Ms. Stauffer:

Enclosed is Gulf Power Company's Request for Confidential Classification pertaining to Schedule CCA-4 of Exhibit RWD-1 to the Direct Testimony of Richard W. Dodd dated March 3, 2014.

Sincerely,

Robert L. McGee, Jr.
Regulatory and Pricing Manager

md

Enclosures

cc: Beggs & Lane

Jeffrey A. Stone, Esq.

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BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

Docket No.:

Date:

140001-EI

March 3, 2014

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

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 its request that the Florida Public Service Commission enter an order protecting from public disclosure certain information contained in Schedule CCA-4 of Exhibit RWD-1 to the Direct Testimony of Richard W. Dodd dated March 3, 2014, (Schedule CCA-4) on behalf of Gulf Power. As grounds for this request, the Company states:

1. A portion of the information contained in Schedule CCA-4 is proprietary confidential business information regarding contractual matters which would cause irreparable harm to Gulf Power, the entities with whom it has contracted, and most importantly, to Gulf's customers if such information was disclosed to the general public. In addition, the Schedule contains information relating to competitive interests in capacity markets which would cause irreparable harm to Gulf Power and the entities with whom it has contracted if such information was disclosed to the general public. The information is entitled to confidential classification pursuant to section 366.093(3) (d) and (e), Florida Statutes. Schedule CCA-4 provides the price terms for capacity contracts which were active in 2013. The price terms in these contracts are 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 because potential counterparties may refuse to enter into contracts with Gulf, or may charge higher prices if the price terms were made public.

 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" is a copy of Schedule CCA-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 CCA-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 28th day of February, 2014.

JEFFREY A. STONE

Florida Bar No. 325953

RUSSELL A. BADDERS

Florida Bar No. 007455

STEVEN R. GRIFFIN

Florida Bar No. 0627569

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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	Docket No.:	140001-EI
incentive factor	Date:	March 3, 2014
)		

REQUEST FOR CONFIDENTIAL CLASSIFICATION

EXHIBIT "A"

Provided to Commission Clerk under separate cover as confidential information.

EXHIBIT "B"

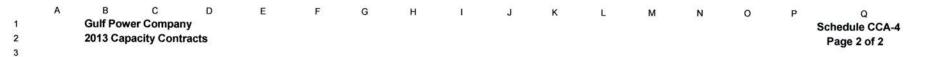
	A	В	C	D	E	F	G	н	1	J	K	L	M	N	0	P
1															Sched	ule CCA-4
2	Gulf Power C	ompany													-	Page 1 of 2
3	2013 Capacit	y Contracts														
4																
5																
6																
7																
8					Te	erm		Contract								
9	Contract/Coun	terparty			Start	End (1)		Туре								
10	Southern Inter	company Inte	rchange		5/1/2007	5 Yr Notice		SES Opco								
11	PPAS	(Confidentia	<u>D</u>													
12	Coral Power,L	LC			6/1/2009	5/31/2014		Firm								
13	Southern Power	er Company			6/1/2009	5/31/2014		Firm								
14	Shell Energy N	.A. (U.S.), LP	(2)		11/2/2009	5/31/2023		Non-Firm								
15	Other	(Confidentia	<u>D</u>													
16	Alabama Elect	ric Cooperativ	ve		11/27/2013	11/29/2013		Other								
17	South Carolina	PSA			9/1/2003			Other								
18	South Carolina	Electric & G	as		1/1/2013	6/30/2013		Other								
19																
20	(1) Unless oth	erwise noted,	contract re	mains eff	ective unless	s terminated u	ipon 3	0 days prior w	ritten no	tice.						
21	(2) Contract m	egawatts bed	ome firm no	later tha	n June 1, 20	14.										

22 23 24 25 Capacity Costs 26 2013

40 41

26	2013		Janu	ary	Feb	ruary	Ma	arch	-	April	N	lay	J	une
27	Contract		MW	\$	MW	\$ (1)	MW	\$	MW	\$	MW	\$ (1)	MW	\$ ⁽¹⁾
28	Southern Intercompany Interchange		177.8	422,287	0.0	(102,074)	370.1	344,833	18.0	45,196	0.0	(1,079)	0.0	8,403
29	PPAs											548 8		
30	Coral Power,LLC													
31	Southern Power Company													
32	Shell Energy N.A. (U.S.), LP													
33														
34	<u>Other</u>													
35	Alabama Electric Cooperative		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				
37	South Carolina PSA													
38		Total		2,380,170		1,898,537		2,389,783		2,045,795	2	2,596,589		6,777,892
39								F 6		S20 %		3 1		250 250

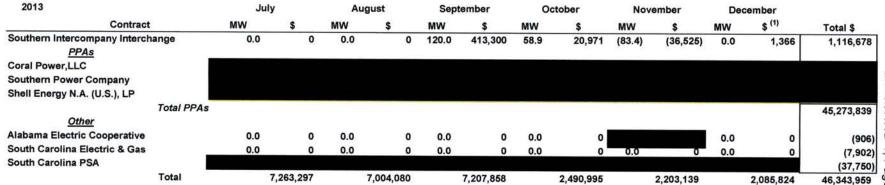
⁽¹⁾ Southern Intercompany Interchange reserve sharing charge consists of prior month true up only



8		Te	Contract	
9	Contract/Counterparty	Start	End ⁽¹⁾	Type
10	Southern Intercompany Interchange	5/1/2007	5 Yr Notice	SES Opco
11	PPAs (Confidential)			Š
12	Coral Power,LLC	6/1/2009	5/31/2014	Firm
13	Southern Power Company	6/1/2009	5/31/2014	Firm
14	Shell Energy N.A. (U.S.), LP (2)	11/2/2009	5/31/2023	Non-Firm
15	Other (Confidential)			
16	Alabama Electric Cooperative	11/27/2013	11/29/2013	Other
17	South Carolina PSA	9/1/2003	=	Other
18	South Carolina Electric & Gas	1/1/2013	6/30/2013	Other

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

 	Caete



(1) Southern Intercompany Interchange reserve sharing charge consists of prior month true up only

EXHIBIT "C"

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

Page 1 of 2 Lines 30-32, 37 Columns E-P Line 36, Columns G-H and M-P

Page 2 of 2 Lines 30-32, Columns E-Q Line 35, Columns M-N 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.

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 Gen	erating)	
Performance Incentive Fac	tor)	Docket No.: 140001-EI

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true copy of the foregoing was furnished by U.S. mail this 28th day of February, 2014 to the following:

Florida Public Utilities Company Cheryl M. Martin 1641 Worthington Road Suite 220 West Palm Beach, FL 33409-6703 Cheryl Martin@fpuc.com PCS Phosphate – White Springs c/o Brickfield Law Firm James W. Brew/F. Alvin Taylor Eighth Floor, West Tower 1025 Thomas Jefferson St, NW Washington, DC 20007 jbrew@bbrslaw.com Duke Energy Florida
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