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COMMISSION
CLERK



March 21, 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 Gulf Power's response to Staff's First Request for Production of Documents (No. 1) in the above referenced docket.

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

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

Docket No.: 140001-EI
Date: March 24, 2014

_____)

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 submitted by Gulf Power in response to Commission Staff's First Request for Production of Documents to Gulf Power Company (No. 1). As grounds for this request, the Company states:


1. The information submitted by Gulf Power in response to request number 1 of Commission Staff's First Request for Production 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 and bank routing information for coal purchases between Gulf Power and Arch Coal Sales Company in 2013. This information is regarded by both Gulf and the counterparty as confidential. The pricing, which resulted from negotiations between Gulf and the counterparty, is specific to individual transactions and is not publicly known. Disclosure of this information would negatively impact Gulf's ability to negotiate pricing favorable to its customers in the future. In addition, potential counterparties may refuse to enter into contracts with Gulf if price or non-price terms such as bank routing information were publicly disclosed.

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 been otherwise publicly disclosed.

3. Submitted as Exhibit "A" are copies of the subject documents in un-redacted form. 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 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 21st day of March, 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
incentive factor

Docket No.: 140001-EI

Date: March 24, 2014

REQUEST FOR CONFIDENTIAL CLASSIFICATION

EXHIBIT "A"

Provided to the Commission Clerk
under separate cover as confidential information

EXHIBIT "B"

MISSISSIPPI POWER COMPANY

2992 West Beach
Gulfport, MS 39501

Seller: Arch Coal Sales Company, Inc. City Place One, Suite 300 St. Louis, Missouri 63141	Operating Company (Purchaser): Mississippi Power Company Purchase Order Number: MP2013-01 Contract Number: N/A
Change Order Number:	Ship to: Plant Daniel

THIS IS A TEST SHIPMENT OF ARCH COAL SALES COMPANY'S BLACK THUNDER POWDER RIVER BASIN COAL PRODUCT. THIS TEST SHIPMENT WILL BE GOVERNED BY THE TERMS AND CONDITIONS OF COAL PURCHASE DATED JUNE 20, 2013.

SELLER CONTACT: Alan Godby (314) 994-2836

TERM: September 1, 2013 through December 31, 2013

QUANTITY: Approximately 36,000 tons (Three unit trains).

SHIPMENT SCHEDULE:

THE FIRST TRAIN SHOULD ARRIVE AT THE PLANT IN THE FIRST WEEK OF OCTOBER. THE REMAINING (2) TRAINS SHOULD ARRIVE (10-11) DAYS APART. ALL THREE TRAINS MUST BE DELIVERED TO PLANT DANIEL PRIOR TO NOVEMBER 1, 2013.

Seller must coordinate the shipping schedule for all shipments with Ellison Key of Southern Company Services (phone 251-300-6795).

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PRICE:



PRODUCER: Arch Coal, Inc.

COAL PROPERTY/MINE: Black Thunder Mines

SEAMS: Various

MINING METHOD: Surface

COUNTY/STATE/COUNTRY: Campbell County , WY, USA

ORIGINATING SHIPPING POINT: Various Black Thunder origins

FREIGHT DISTRICT: SPRB

CARRIERS: BNSF

LOADING CHARACTERISTICS: 4 hours

QUALITY: The Quality of coal on an "as received" basis is quoted by SELLER as follows:

	Monthly Weighted <u>Average Typical</u>	Rejection Limits <u>(per Shipment)</u>
Lbs SO2/mmBtu	.80	>1.2
Calorific Value	8,850	<8,600
Ash	5.5	>7.0
Moisture	27.0%	N/A
Volatiles %	32.1	N/A
Ash Fusion H=W Reducing	2140	N/A
Grindability	63	N/A

SUSPENSION LIMITS: No suspension specifications apply to this Purchase Order

QUALITY ADJUSTMENTS: Per terms stated in the Confirmation dated July 25, 2013

WEIGHING: Mine

SAMPLING: Mine

ANALYSIS: Company Lab

Governing Lab Address

Alabama Power General Testing Lab
 #8 General Services Complex
 744 County Road 87
 Varnons, AL 35040

Seller must Email (or Fax if Email not available) as-loaded analyses and shipping notices within twenty-four (24) hours after completion of loading each shipment to all of the following.

Southern Company Services

Shilonqua Lee

sohiggin@southernco.com
 Fax 205-257-7795

Mississippi Power Company

Plant Daniel

Fax 228-474-3029

UNIT TRAIN PREFIX: MP201301XXX

TRANSPORTATION CONTRACT(S): BN 12677

Sample Identification Directions

Please forward all coal samples to the address provided above clearly marked with:

Vendor Name: **Arch Coal Sales**

Plant and Operating Company destination:

Plant Daniel

Purchase Order Number: **MP2013-01**

Payment Address

All payments should be wired to the following address:

Arch Coal Sales Company, Inc.
 City Place One Suite 350
 PNC bank

- 1 Acct # [REDACTED]
 - 2 ABA # [REDACTED]
- St. Louis, MO 63143

GULF POWER COMPANY

One Energy Place
Pensacola, FL 32520-0328

Seller: Arch Coal Sales Company, Inc. City Place One, Suite 300 St. Louis, Missouri 63141	Operating Company (Purchaser): Gulf Power Company Purchase Order Number: FP1304 Contract Number: N/A
Change Order Number:	Ship to: Plant Smith

THIS IS A TEST SHIPMENT OF ARCH COAL SALES COMPANY'S BLACK THUNDER POWDER RIVER BASIN COAL PRODUCT. THIS TEST SHIPMENT WILL BE GOVERNED BY THE TERMS AND CONDITIONS OF COAL PURCHASE DATED JUNE 20, 2013.

SELLER CONTACT: Alan Godby (314) 994-2836
TERM: October 28, 2013 through December 31, 2013
QUANTITY: Approximately 12,000 tons (one unit train).
SHIPMENT SCHEDULE: **THE TEST COAL SHOULD ARRIVE AT PLANT SMITH IN THE SECOND WEEK OF NOVEMBER 2013.**

Seller must coordinate the shipping schedule for all shipments with Ellison Key of Southern Company Services (phone 251-300-6795).

1 **PRICE:**
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PRODUCER: Arch Coal, Inc.
COAL PROPERTY/MINE: Black Thunder Mines
SEAMS: Various
MINING METHOD: Surface
COUNTY/STATE/COUNTRY: Campbell County , WY, USA
ORIGINATING SHIPPING POINT: Various Black Thunder origins
FREIGHT DISTRICT: SPRB
CARRIERS: BNSF
LOADING CHARACTERISTICS: 4 hours
QUALITY: The Quality of coal on an "as received" basis is quoted by SELLER as follows:

	Monthly Weighted <u>Average Typical</u>	Rejection Limits <u>(per Shipment)</u>
Lbs SO2/mmBtu	.80	>1.2
Calorific Value	8,850	<8,600

Ash	5.5	>7.0
Moisture	27.0%	N/A
Volatiles %	32.1	N/A
Ash Fusion H=W Reducing	2140	N/A
Grindability	63	N/A

SUSPENSION LIMITS: No suspension specifications apply to this Purchase Order

QUALITY ADJUSTMENTS: Per attached terms and conditions dated 6/20/13 except that the actual adjustment factor for Plant Smith that will calculate SO2 will be multiplied by 1 not by 0.25%.

WEIGHING: Mine

SAMPLING: Mine

ANALYSIS: Company Lab

Governing Lab Address

Alabama Power General Testing Lab
#8 General Services Complex
744 County Road 87
Varnons, AL 35040

Seller must Email (or Fax if Email not available) as-loaded analyses and shipping notices within twenty-four (24) hours after completion of loading each shipment to all of the following.

Southern Company Services

Shilonqua Lee

sohiggin@southernco.com
Fax 205-257-7795

Gulf Power Company

Jocelyn Peters

JPPETERS@southernco.com
Fax 850-444-6080

UNIT TRAIN PREFIX: FP1304

TRANSPORTATION CONTRACT(S): Rail BNSF 12676
Barge GU12002-B

Sample Identification Directions

Please forward all coal samples to the address provided above clearly marked with:

Vendor Name: Arch Coal Sales

Plant and Operating Company destination:

Plant Smith

Purchase Order Number: FP1304

Payment Address

All payments should be wired to the following address:

Arch Coal Sales Company, Inc.
City Place One Suite 350
PNC bank

- 1 Acct # [REDACTED]
 - 2 ABA # [REDACTED]
- St. Louis, MO 63143

GULF POWER COMPANY

One Energy Place
Pensacola, FL 32520-0328

Seller: Arch Coal Sales Company, Inc. City Place One, Suite 300 St. Louis, Missouri 63141	Operating Company (Purchaser): Gulf Power Company Purchase Order Number: FP1304 Contract Number: N/A
Change Order Number: 001	Ship to: Plant Smith

The purpose of this change order is to allow Plant Smith to perform a second test burn of Arch Coal Sales Company, Inc.'s Black Thunder mine PRB coal. The test coal should begin arriving at the plant by mid-January 2014. Therefore, please extend the term through March 31, 2014 and add one hundred thousand tons (8 trains) to the quantity of this purchase order. Effective December 15, 2013, the price will change to

1 [REDACTED]

OTHER TERMS AND CONDITIONS SHALL BE GOVERNED BY THE TERMS AND CONDITIONS OF COAL PURCHASE DATED JUNE 20, 2013.

ISSUED BY: Southern Company Services, Agent	APPROVED BY: Southern Company Services as Agent for Gulf Power Company 
DATE:	DATE: 12/4/2013
Entered and Verified in Contract:	Checked in Contract:

EXHIBIT "C"

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

Line(s)/Field(s)

Justification

Response to Request # 1

Page 2 of 8, lines 1-4

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.

Page 3 of 8, lines 1-2

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.

Page 5 of 8, lines 1-4

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.

Page 6 of 8, lines 1-2

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Page 8 of 8, line 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 Generating)
Performance Incentive Factor)

Docket No.: **140001-EI**

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true copy of the foregoing was furnished by U.S. mail this 21st day of March, 2014 to the following:

Florida Public Utilities Company
Cheryl M. Martin
1641 Worthington Road
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c/o Brickfield Law Firm
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