Robert L. McGee, Jr. Regulatory & Pricing Manager

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FILED JUL 25, 2014 **DOCUMENT NO. 03983-14 FPSC - COMMISSION CLERK**



July 24, 2014

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

RE: Docket No. 140001-EI

REDACTED

Dear Ms. Stauffer:

Enclosed is Gulf Power Company's Request for Confidential Classification regarding information submitted by Gulf Power pertaining to Schedule CCE-4 of Exhibit CSB-1 to the Direct Testimony of C. Shane Boyett dated July 25, 2014.

Sincerely,

Robert L. McGee, Jr.

Regulatory and Pricing Manager

md

COM Enclosures

ECO ENG

TEL CLK

Beggs & Lane

Jeffrey A. Stone, Esq.

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: July 25, 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 contained in Schedule CCE-4 of Exhibit CSB-1 to the Direct Testimony of C. Shane Boyett dated July 25, 2014 (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.
- 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 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 24th day of July, 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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P.O. Box 12950

Pensacola, FL 32591

(850) 432-2451

Attorneys for Gulf Power Company

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

IN RE:	Fuel and purchased power cost
recover	y clause and generating performance
incentiv	re factor

Docket No.:

140001-EI

Date:

July 25, 2014

REQUEST FOR CONFIDENTIAL CLASSIFICATION

EXHIBIT "A"

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

EXHIBIT "B"

	A	В	C	D	E	F	G	H	1	J	K	L	M	N	0
1	Gulf Power Company													Schedule CC	E-4
2	2014 Capacity Contracts	3											3	Page 1 of 2	
3	20.0														
4															
5				To	erm		Contract								
6	Contract/Counterparty			Start	End (1)		Туре								
7	Southern Intercompany In	terchange		5/1/2007	5 Yr Notice	-	SES Opco								
8	PPAs														
9	Coral Power,LLC			6/1/2009	5/31/2014		Firm								
10	Southern Power Company			6/1/2009	5/31/2014		Firm								
11	Shell Energy N.A. (U.S.), L	P (2)		11/2/2009	5/31/2023		Firm								
12	Other			100002000											
13	Alabama Electric Coopera	itive		1/4/2014	6/30/2014		Other								
14	Cargill Power, LLC			1/1/2014	1/23/2014		Other								
15	South Carolina PSA			9/1/2003			Other								
16	South Carolina Electric &	Gas		1/1/2014	6/30/2014		Other								
17	The Energy Authority			4/17/2014	4/17/2014		Other								
18															
19															
20	(1) Unless otherwise note				ss terminated upo	n 30 days pri	or written noti	ce.							
21	(2) Contract megawatts b	ecame fin	m on Ju	ne 1, 2014.											
22															
23															
24															
25															
26	Capacity Costs						440						***		
27	2014				nuary	Februa	ary (1)		arch	Ap		Ma	10.1	June	
28		ntract		WW	\$	MW	\$	MW	\$	MW	\$	MW	\$	MW	\$
29	Southern Intercompany In	nterchange	9	(82.5)	(2,318)	(193.7)	3,659	(34.9)	(1,453)	(217.5)	(7,492)	(119.2)	549	0.0	0
30	PPAs													-	
31				THE RESERVE											SECTION SE
32															TO WELL
33		LP.		TA			and the last					200	100		
34															
35															
36		ative		EDEN!									T. SE	1000	
37				100 I - 1	Later a p	0.0	0	0.0	0	0.0	0	0.0	0	0.0	0
38	South Carolina PSA			TO STATE OF THE	THE PARTY	1000	SIE	Sec.	ELECTION						torio (
39	South Carolina Electric &	Gas		Section 1889											THE REAL PROPERTY.
40	The Energy Authority			0.0	0	0.0	. 0	0.0	0		== 21	0.0	0	0.0	0
41		To	tal	1100	2,262,869		2,313,161		2,214,461		2,157,914		2,781,480		7,388,160
400															

⁴¹ Total 2,262,869 2,313,161
42
43
44 (1) Southern Intercompany Interchange reserve sharing charge consists of prior month true up only

Α	В	C	D	E	F	G	н	1	J	K	L	M	N	0	P	Q
Gulf Power C 2014 Capacit															Schedule CCE-4 Page 2 of 2	

	A	В	•	U	E		G	1.1		
1	Gulf Power	Company								
2	2014 Capaci	ty Contract	s							
3										
4										
5					Т	erm		Contract		
6	Contract/Cou	nterparty			Start	End (1)		Туре		
7	Southern Inte	rcompany I	nterchange		6/1/2007	5 Yr Notice		SES Opco		
8		PPAs								
9	Coral Power,	LLC			6/1/2009	5/31/2014		Firm		
10	Southern Pov	ver Compan	У		6/1/2009	5/31/2014		Firm		
11	Shell Energy	N.A. (U.S.),	LP (2)		11/2/2009	5/31/2023		Firm		
12		Other								
13	Alabama Elec	tric Cooper	ative		1/4/2014	6/30/2014		Other		
14	Cargill Power	, LLC			1/1/2014	1/23/2014	/23/2014			
15	South Carolin	na PSA			9/1/2003	•				
16	South Carolin	na Electric 8	Gas		1/1/2014	6/30/2014		Other		
17	The Energy A	uthority			4/17/2014	4/17/2014		Other		

Ca		

	the circial comment														
18															
9															
20	(1) Unless otherwise noted, contract	remains effe	ctive unless te	rminated upon	30 days pric	r written notice	2.								
1	(2) Contract megawatts became firm	on June 1, 20	014.												
2															
3															
4															
5															
6	Capacity Costs														
7	2014		July	y	Aug	just	Septe	ember	Oc	tober	7	ember		ember	
8	Contract		MW	\$	MW	\$	MW	\$	MW	\$	MW	\$	MW	\$	Total \$
9	Southern Intercompany Interchange		0.0	0	0.0	0	0.0	0	0.0	0	(203.0)	(7,000)	(29.0)	(1,000)	(15,05
0	PPAs													L	
1	Coral Power,LLC		0.0	0	0.0	0	0.0	0	0.0	0	0.0	0	0.0	0	
2	Southern Power Company		0.0	0	0.0	0	0.0	0	0.0	0	0.0	0	0.0	0	
3	Shell Energy N.A. (U.S.), LP		100					and the second							-
4		Total PPAs	We like			10									63,062,28
5	Other														200700700000
6	Alabama Electric Cooperative		1000					William Property		The same of			1700		(114,81
7	Cargill Power, LLC		0.0	0	0.0	0	0.0	0	0.0	0	0.0	0	0.0	0	AS CAPE
В	South Carolina PSA													A 100 M	(39,10
9	South Carolina Electric & Gas									-11		-			(279,71
0	The Energy Authority	_	0.0	0	0.0	0	0.0	0	0.0	0	0.0	0	0.0	0	
1		Total		7,250,781		7,250,781		7,250,781		7,250,781		7,243,781		7,249,781	62,614,73
2															
13															
14															

EXHIBIT "C"

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

Page 1 of 2

Lines 31-33, Columns D – O Line 36, Columns D – O

Line 37, Columns D –E

Lines 38-39, Columns D - O

Line 40, Columns J - K

Page 2 of 2

Lines 31-32, Column Q

Line 33, Columns E –Q

Line 36, Columns E - P

Line 37, Column Q

Lines 38-39, Columns E-P

Line 40, Column Q

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 I	Power Cost)	
Recovery Clause with	h Generating)	
Performance Incentive	ve Factor	Docket No.: 140001-E

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true copy of the foregoing was furnished by overnight mail this 24th day of July, 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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