

Robert L. McGee, Jr.  
Regulatory & Pricing Manager  
One Energy Place  
Pensacola, Florida 32520-0780  
Tel 850.444.6530  
Fax 850.444.6026  
RLMCGEE@southernco.com



January 21, 2015

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

RE: Docket No. 150001-EI

Dear Ms. Stauffer:

Enclosed is Gulf Power Company's Request for Confidential Classification for Gulf Power Company's Form 423 Fuel Report for November, 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

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

Docket No.: 150001-EI  
Date: January 22, 2015

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 on its FPSC Form 423 Fuel Report for the month of November 2014 (the “423 Report”). As grounds for this request, the Company states:

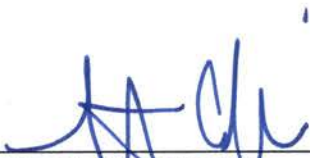
1. A portion of the information contained in Gulf Power’s 423 Report constitutes proprietary confidential business information concerning bids and other contractual data, the disclosure of which would impair the efforts of Gulf Power to contract for goods and services on favorable terms. The information 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 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.

2. 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.

3. 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 21st day of January, 2015.



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**JEFFREY A. STONE**  
Florida Bar No. 325953  
**RUSSELL A. BADDERS**  
Florida Bar No. 007455  
**STEVEN R. GRIFFIN**  
Florida Bar No. 0627569  
**Beggs & Lane**  
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  
recovery clause and generating performance  
incentive factor

Docket No.: 150001-EI  
Date: January 22, 2015

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**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: NOVEMBER Year: 2014      4. Name, Title, & Telephone Number of Contact Person Concerning  
Data Submitted on this Form: Ms. J.P. Peters, Fuels Analyst  
(850)-444-6332

2. Reporting Company: Gulf Power Company

3. Plant Name: Crist Electric Generating Plant      5. Signature of Official Submitting Report: Jocelyn P. Peters

6. Date Completed: January 21, 2015

Line No.	Supplier Name	Mine Location		Purchase Type	Transport Mode	Tons	Effective 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	AMERICAN COAL	10	IL	165	C	RB	8,846.89		77.167	2.54	11,752	8.41	10.39
2	FORESIGHT	10	IL	199	C	RB	60,996.99		73.844	2.80	11,737	9.73	10.18
3	ALPHA COAL SALES	8	WV	99	C	RB	54,323.02		117.829	0.89	12,362	10.05	7.17
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**MONTHLY REPORT OF COST AND QUALITY OF COAL FOR ELECTRIC PLANTS  
DETAILED PURCHASED COAL INVOICE INFORMATION**

- |   |   |
|---|---|
| 1. Reporting Month: <u>NOVEMBER</u> Year: <u>2014</u> | 4. Name, Title, & Telephone Number of Contact Person Concerning<br>Data Submitted on this Form: <u>Ms. J.P. Peters, Fuels Analyst</u><br><u>(850)- 444-6332</u> |
| 2. Reporting Company: <u>Gulf Power Company</u>       |   |
| 3. Plant Name: <u>Crist Electric Generating Plant</u> | 5. Signature of Official Submitting Report: <u>Jocelyn P. Peters</u>  |
|   | 6. Date Completed: <u>January 21, 2015</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	AMERICAN COAL	10	IL 165	C	8,846.89		-		-		(0.193)	
2	FORESIGHT	10	IL 199	C	60,996.99		-		-		0.514	
3	ALPHA COAL SALES	8	WV 99	C	54,323.02		-		-		0.969	
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**MONTHLY REPORT OF COST AND QUALITY OF COAL FOR ELECTRIC PLANTS  
DETAIL OF TRANSPORTATION CHARGES**

1. Reporting Month: NOVEMBER Year: 2014  
 2. Reporting Company: Gulf Power Company  
 3. Plant Name: Crist Electric Generating Plant  
 4. Name, Title, & Telephone Number of Contact Person Concerning  
 Data Submitted on this Form: Ms. J.P. Peters, Fuels Analyst  
 (850)- 444-6332  
 5. Signature of Official Submitting Report: Jocelyn P. Peters  
 6. Date Completed: January 21, 2015

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	AMERICAN COAL	10	IL	165	ASDD	RB	8,846.89	-	-	-	-	-	-	-	-	-	77.167
2	FORESIGHT	10	IL	199	ASDD	RB	60,996.99	-	-	-	-	-	-	-	-	-	73.844
3	ALPHA COAL SALES	8	WV	99	ASDD	RB	54,323.02	-	-	-	-	-	-	-	-	-	117.829
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**MONTHLY REPORT OF COST AND QUALITY OF COAL FOR ELECTRIC PLANTS  
ORIGIN, TONNAGE, DELIVERED PRICE, AND AS RECEIVED QUALITY**

1. Reporting Month: NOVEMBER Year: 2014      4. Name, Title, & Telephone Number of Contact Person Concerning  
Data Submitted on this Form: Ms. J.P. Peters, Fuels Analyst  
(850)- 444-6332

2. Reporting Company: Gulf Power Company

3. Plant Name: Smith Electric Generating Plant      5. Signature of Official Submitting Report: Jocelyn P. Peters

6. Date Completed: January 21, 2015

Line No.	Supplier Name	Mine Location	Purchase Type	Transport Mode	Tons	Effective 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	GLENCORE		S	RB	25,963.10			88.708	0.81	11,750	8.87	9.54
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**MONTHLY REPORT OF COST AND QUALITY OF COAL FOR ELECTRIC PLANTS  
DETAILED PURCHASED COAL INVOICE INFORMATION**

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|-----------------------|---------------------------------|---|---|
| 1. Reporting Month:   | NOVEMBER Year: 2014             | 4. Name, Title, & Telephone Number of Contact Person Concerning<br>Data Submitted on this Form: | Ms. J.P. Peters, Fuels Analyst<br>(850)- 444-6332 |
| 2. Reporting Company: | Gulf Power Company              | 5. Signature of Official Submitting Report:   | Jocelyn P. Peters                                 |
| 3. Plant Name:        | Smith Electric Generating Plant | 6. Date Completed:  | January 21, 2015                                  |

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	GLENCORE		S	25,963.10		-		-		(0.332)	
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**MONTHLY REPORT OF COST AND QUALITY OF COAL FOR ELECTRIC PLANTS  
DETAIL OF TRANSPORTATION CHARGES**

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| <p>1. Reporting Month: <u>NOVEMBER</u> Year: <u>2014</u></p> <p>2. Reporting Company: <u>Gulf Power Company</u></p> <p>3. Plant Name: <u>Smith Electric Generating Plant</u></p> | <p>4. Name, Title, &amp; Telephone Number of Contact Person Concerning<br/>Data Submitted on this Form: <u>Ms. J.P. Peters, Fuels Analyst</u><br/><u>(850)- 444-6332</u></p> <p>5. Signature of Official Submitting Report: <u>Jocelyn P. Peters</u></p> <p>6. Date Completed: <u>January 21, 2015</u></p> |
|--|--|

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	GLENCORE		ASDD	RB	25,963.10		-		-			-	-	-		88.708
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**MONTHLY REPORT OF COST AND QUALITY OF COAL FOR ELECTRIC PLANTS  
ORIGIN, TONNAGE, DELIVERED PRICE, AND AS RECEIVED QUALITY**

1. Reporting Month: NOVEMBER Year: 2014  
 2. Reporting Company: Gulf Power Company  
 3. Plant Name: Daniel Electric Generating Plant  
 4. Name, Title, & Telephone Number of Contact Person Concerning  
 Data Submitted on this Form: Ms. J.P. Peters, Fuels Analyst  
(850)- 444-6332  
 5. Signature of Official Submitting Report: Jocelyn P. Peters  
 6. Date Completed: January 21, 2015

Line No.	Supplier Name	Mine Location		Purchase Type	Transport Mode	Tons	Effective 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	COAL SALES	19	WY	5	S	RR	60.00		56.205	0.21	8,825	4.90	26.80
2	ARCH COAL SALES	19	WY	5	S	RR	13,754.00		56.769	0.32	8,842	5.80	26.80
3	ARCH COAL SALES	17	CO	51	S	RR	36,231.50		84.288	0.59	11,588	6.70	11.20
4	PEABODY COALSALSALES	17	CO	107	C	RR	117.46		83.924	0.47	11,244	9.70	10.50
5	ARCH COAL SALES	19	WY	5	S	RR	13,214.50		56.151	0.41	8,686	6.20	27.80
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**MONTHLY REPORT OF COST AND QUALITY OF COAL FOR ELECTRIC PLANTS  
DETAILED PURCHASED COAL INVOICE INFORMATION**

- |  |   |
|--|---|
| 1. Reporting Month: <b>NOVEMBER</b> Year: <b>2014</b>  | 4. Name, Title, & Telephone Number of Contact Person Concerning<br>Data Submitted on this Form: <u>Ms. J.P. Peters, Fuels Analyst</u><br><u>(850)- 444-6332</u> |
| 2. Reporting Company: <u>Gulf Power Company</u>        | 5. Signature of Official Submitting Report: <u>Jocelyn P. Peters</u>  |
| 3. Plant Name: <u>Daniel Electric Generating Plant</u> | 6. Date Completed: <u>January 21, 2015</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	COAL SALES	19	WY	5	S	60.00		-	-		0.035		
2	ARCH COAL SALES	19	WY	5	S	13,754.00		-	-		0.061		
3	ARCH COAL SALES	17	CO	51	S	36,231.50		-	-		0.478		
4	PEABODY COALSALF	17	CO	107	C	117.46		-	-		0.114		
5	ARCH COAL SALES	19	WY	5	S	13,214.50		-	-		(0.160)		
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**MONTHLY REPORT OF COST AND QUALITY OF COAL FOR ELECTRIC PLANTS  
DETAIL OF TRANSPORTATION CHARGES**

1. Reporting Month: NOVEMBER Year: 2014
2. Reporting Company: Gulf Power Company
3. Plant Name: Daniel Electric Generating Plant
4. Name, Title, & Telephone Number of Contact Person Concerning  
Data Submitted on this Form: Ms. J.P. Peters, Fuels Analyst  
(850)-444-6332
5. Signature of Official Submitting Report: Jocelyn P. Peters
6. Date Completed: January 21, 2015

Line No.	Supplier Name	Mine Location	Shipping Point	Transport Mode	Tons	Effective Purchase Price (\$/Ton)	Additional Shorthaul & Loading Charges (\$/Ton)	Rail Charges			Waterborne Charges				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)	Other Related Charges (\$/Ton)		
(a)	(b)	(c)	(d)	(e)	(f)	(g)	(h)	(i)	(j)	(k)	(l)	(m)	(n)	(o)	(p)	(q)
1	COAL SALES	19 WY 5	NORTH ANTELOF	RR	60.00		-		4.29	-	-	-	-	-		56.205
2	ARCH COAL SALES	19 WY 5	BLACK THUNDER,	RR	13,754.00		-		4.28	-	-	-	-	-		56.769
3	ARCH COAL SALES	17 CO 51	WEST ELK, GUNNISC	RR	36,231.50		-		4.29	-	-	-	-	-		84.288
4	PEABODY COALSALE	17 CO 107	ROUTT COUNTY	RR	117.46		-		4.29	-	-	-	-	-		83.924
5	ARCH COAL SALES	19 WY 5	BLACK THUNDEF	RR	13,214.50		-		4.28	-	-	-	-	-		56.151
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**EXHIBIT “C”**

Reporting Month: November

**Form 423-2**

Plant Names	Column	Justification
Plant Crist, lines 1-3  Plant Smith line 1  Plant Daniel lines 1-5	(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 Crist, lines 1-3  Plant Smith line 1  Plant Daniel lines 1-5	(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 Crist, lines 1-3 Plant Smith line 1 Plant Daniel lines 1-5	(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 Crist, lines 1-3 Plant Smith line 1 Plant Daniel lines 1-5	(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 Crist, lines 1-3 Plant Smith line 1 Plant Daniel lines 1-5	(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 Crist, lines 1-3 Plant Smith line 1 Plant Daniel lines 1-5	(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 Crist, lines 1-3 Plant Smith line 1 Plant Daniel lines 1-5	(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 Crist, lines 1-3 Plant Daniel lines 1-5	(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 Crist, lines 1-3 Plant Smith line 1	(k)	The River Barge Rate is the current rate that Gulf Power pays to transport coal to its plants via barge. This information is considered confidential by Gulf's barge transportation providers. Additionally, disclosure of this information would enable barge transport providers to compare rates with their competitors which, in turn, could lead to less competitive barge rates in future negotiations. Disclosure could 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.



<p>Plant Crist, lines 1-3</p> <p>Plant Smith line 1</p>	<p>(l)</p>	<p>The Transloading Rate is the contract price to unload coal from vessels and trains and reload coal into Gulf's barges at the associated port facilities. The terms of the transloading agreement state that these rates shall remain confidential between the parties of the contract. Revealing this information would harm Gulf's and its suppliers' competitive interests. This information is confidential pursuant to section 366.093(3)(d), Florida Statutes.</p>
<p>Plant Crist, lines 1-3</p> <p>Plant Smith line 1</p> <p>Plant Daniel lines 1-5</p>	<p>(p)</p>	<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.</p>

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

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

Docket No.: **150001-EI**

**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that a true copy of the foregoing was furnished by overnight mail this 21st day of January, 2015 to the following:

Florida Public Utilities Company  
Cheryl M. Martin, Director  
Regulatory Affairs  
911 South 8<sup>th</sup> Street  
Fernandina Beach, FL 32034  
[Cheryl.Martin@fpuc.com](mailto:Cheryl.Martin@fpuc.com)

PCS Phosphate – White Springs  
c/o Brickfield Law Firm  
James W. Brew/Owen J. Kopon  
Laura A. Wynn  
Eighth Floor, West Tower  
1025 Thomas Jefferson St, NW  
Washington, DC 20007  
[jbrew@bbrslaw.com](mailto:jbrew@bbrslaw.com)  
[owen.kopon@bbrslaw.com](mailto:owen.kopon@bbrslaw.com)  
[laura.wynn@bbrslaw.com](mailto:laura.wynn@bbrslaw.com)

Duke Energy Florida  
John T. Burnett  
Dianne M. Triplett  
299 First Avenue North  
St. Petersburg, FL 33701  
[Dianne.triplett@duke-energy.com](mailto:Dianne.triplett@duke-energy.com)  
[John.burnett@duke-energy.com](mailto:John.burnett@duke-energy.com)

Florida Power & Light Company  
John T. Butler  
700 Universe Boulevard (LAW/JB)  
Juno Beach, FL 33408-0420  
[John.Butler@fpl.com](mailto:John.Butler@fpl.com)

Florida Power & Light Company  
Kenneth Hoffman  
215 South Monroe Street,  
Suite 810  
Tallahassee, FL 32301-1858  
[Ken.Hoffman@fpl.com](mailto:Ken.Hoffman@fpl.com)

Ausley Law Firm  
James D. Beasley  
J. Jeffry Wahlen  
Ashley M. Daniels  
Post Office Box 391  
Tallahassee, FL 32302  
[jbeasley@ausley.com](mailto:jbeasley@ausley.com)  
[adaniels@ausley.com](mailto:adaniels@ausley.com)  
[jwahlen@ausley.com](mailto:jwahlen@ausley.com)

Gunster Law Firm  
Beth Keating  
215 South Monroe Street, Suite 601  
Tallahassee, FL 32301-1839  
[bkeating@gunster.com](mailto:bkeating@gunster.com)

Office of Public Counsel  
Patricia A. Christensen  
Associate Public Counsel  
c/o The Florida Legislature  
111 W. Madison Street, Room 812  
Tallahassee, FL 32399-1400  
[Christensen.patty@leg.state.fl.us](mailto:Christensen.patty@leg.state.fl.us)

Duke Energy Florida, Inc.  
Matthew R. Bernier  
Cameron Cooper  
106 East College Avenue,  
Suite 800  
Tallahassee, FL 32301-7740  
[Matthew.bernier@duke-energy.com](mailto:Matthew.bernier@duke-energy.com)  
[Cameron.Cooper@duke-energy.com](mailto:Cameron.Cooper@duke-energy.com)

Florida Industrial Power Users Group  
c/o Moyle Law Firm  
Jon C. Moyle, Jr.  
118 North Gadsden Street  
Tallahassee, FL 32301  
[jmoyle@moylelaw.com](mailto:jmoyle@moylelaw.com)

Tampa Electric Company  
Ms. Paula K. Brown, Manager  
Regulatory Coordination  
P. O. Box 111  
Tampa, FL 33601-0111  
[Regdept@tecoenergy.com](mailto:Regdept@tecoenergy.com)

Office of the General Counsel  
Martha Barrera  
2540 Shumard Oak Blvd  
Tallahassee, FL 32399-0850  
[mbarrera@psc.state.fl.us](mailto:mbarrera@psc.state.fl.us)  
[jqilcher@psc.state.fl.us](mailto:jqilcher@psc.state.fl.us)  
[tefarley@psc.state.fl.us](mailto:tefarley@psc.state.fl.us)  
[ASoete@psc.state.fl.us](mailto:ASoete@psc.state.fl.us)

Florida Retail Federation  
Robert Scheffel Wright  
John T. LaVia  
c/o Gardner Law Firm  
1300 Thomaswood Drive  
Tallahassee, FL 32308  
[schef@gbwlegal.com](mailto:schef@gbwlegal.com)  
[jlavia@gbwlegal.com](mailto:jlavia@gbwlegal.com)



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**JEFFREY A. STONE**  
Florida Bar No. 325953  
[jas@beggslane.com](mailto:jas@beggslane.com)  
**RUSSELL A. BADDERS**  
Florida Bar No. 007455  
[rab@beggslane.com](mailto:rab@beggslane.com)  
**STEVEN R. GRIFFIN**  
Florida Bar No. 0627569  
[srg@beggslane.com](mailto:srg@beggslane.com)  
**BEGGS & LANE**  
P. O. Box 12950  
Pensacola FL 32591-2950  
(850) 432-2451  
**Attorneys for Gulf Power**