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September 11, 2015

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

REDACTED

Re: Docket No. 150001-EI

Dear Ms. Stauffer:

Enclosed is Gulf Power Company's Request for Confidential Classification pertaining to Gulf Power's response to Staff's Fifth Set of Interrogatories (Nos. 18-31) in the above-referenced docket.

Sincerely,

A handwritten signature in black ink, appearing to read "Robert L. McGee, Jr." with a stylized flourish at the end.

Robert L. McGee, Jr.
Regulatory and Pricing Manager

md

Enclosures

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

RECEIVED FPSC
15 SEP 22 AM 11:29
COMMISSION
CLERK

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: September 14, 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 in response to Commission Staff's Fifth Set of Interrogatories to Gulf Power Company (Nos. 18-31). As grounds for this request, the Company states:

1. A portion of the information submitted by Gulf Power in response to interrogatory numbers 18 and 20 of Commission Staff's Fifth Set of Interrogatories constitutes proprietary confidential business information concerning bids or other contractual data the disclosure of which would impair the efforts of Gulf Power to contract for goods and/or services on favorable terms. The information is entitled to confidential classification pursuant to section 366.093(3)(d) and (e), Florida Statutes. Specifically, the information consists of pricing data for natural gas hedging transactions between Gulf Power and various counterparties. Disclosure of the pricing data 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 future contracts with Gulf, or may charge higher prices, if this pricing data were made public.

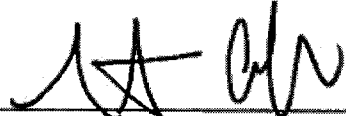
2. The information filed pursuant to this Request is intended to be, and is treated as, confidential by Gulf Power and, to this attorney's knowledge, has not been otherwise publicly disclosed.

3. Submitted as Exhibit "A" are copies of the subject documents, 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 11th day of September, 2015.



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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

Docket No.: 150001-EI
Date: September 14, 2015

REQUEST FOR CONFIDENTIAL CLASSIFICATION

EXHIBIT "A"

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

EXHIBIT "B"

18. For realized (actual) hedging savings and costs for the twelve months beginning August 1, 2014, and ending July 31, 2015, associated with swap contracts for natural gas, please provide the following information in a schedule format:
- the transaction date (the date the swap was entered into) for the swap;
 - the fixed price for the swap;
 - the month or period in the future the swap is covering; and
 - the corresponding NYMEX futures price for the future month or period for natural gas on the transaction date of the swap.

ANSWER:

	(A)	(B)	(C)	(D)	(E)	(F)
	Transaction Date	Fixed Price	Period Begin Date	Period End Date	Average NYMEX Price at Market Close (\$/MMBTU)	% Difference
1	3/7/2011		1/1/2014	12/31/2014	5.505	
2	5/5/2011		1/1/2014	12/31/2014	5.634	
3	5/5/2011		1/1/2015	12/31/2015	5.932	
4	6/3/2011		1/1/2015	12/31/2015	5.848	
5	6/3/2011		1/1/2014	12/31/2014	5.597	
6	6/9/2011		1/1/2015	12/31/2015	5.735	
7	6/9/2011		1/1/2014	12/31/2014	5.512	
8	6/16/2011		1/1/2014	12/31/2014	5.503	
9	6/23/2011		1/1/2014	12/31/2014	5.370	
10	6/23/2011		1/1/2014	12/31/2014	5.370	
11	7/6/2011		1/1/2014	12/31/2014	5.372	
12	7/7/2011		1/1/2014	12/31/2014	5.381	
13	7/29/2011		1/1/2014	12/31/2014	5.367	
14	8/3/2011		1/1/2015	12/31/2015	5.641	
15	8/4/2011		1/1/2014	12/31/2014	5.293	
16	8/4/2011		1/1/2015	12/31/2015	5.523	
17	9/9/2011		1/1/2014	12/31/2014	5.257	
18	9/9/2011		1/1/2015	12/31/2015	5.441	
19	9/22/2011		1/1/2015	12/31/2015	5.310	
20	9/23/2011		1/1/2014	12/31/2014	5.121	

Staff's Fifth Set of Interrogatories
 GULF POWER COMPANY
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	(A)	(B)	(C)	(D)	(E)	(F)
	Transaction Date	Fixed Price	Period Begin Date	Period End Date	Average NYMEX Price at Market Close (\$/MMBTU)	% Difference
21	10/7/2011		1/1/2014	12/31/2014	5.002	
22	11/7/2011		1/1/2014	12/31/2014	4.906	
23	11/9/2011		1/1/2014	12/31/2014	4.839	
24	11/10/2011		1/1/2015	12/31/2015	5.046	
25	11/14/2011		1/1/2014	12/31/2014	4.729	
26	11/16/2011		1/1/2015	12/31/2015	4.946	
27	11/18/2011		1/1/2015	12/31/2015	4.887	
28	11/23/2011		1/1/2014	12/31/2014	4.697	
29	12/6/2011		1/1/2014	12/31/2014	4.731	
30	12/8/2011		1/1/2015	12/31/2015	4.881	
31	12/8/2011		1/1/2014	12/31/2014	4.660	
32	12/9/2011		1/1/2014	12/31/2014	4.548	
33	12/14/2011		1/1/2014	12/31/2014	4.424	
34	1/5/2012		1/1/2014	12/31/2014	4.366	
35	1/13/2012		1/1/2014	12/31/2014	4.202	
36	1/19/2012		1/1/2014	12/31/2014	3.897	
37	1/20/2012		1/1/2015	12/31/2015	4.120	
38	1/26/2012		1/1/2014	12/31/2014	4.030	
39	1/26/2012		1/1/2015	12/31/2015	4.249	
40	1/30/2012		1/1/2014	12/31/2014	4.059	
41	1/31/2012		1/1/2015	12/31/2015	4.227	
42	1/31/2012		1/1/2014	12/31/2014	3.974	
43	2/7/2012		1/1/2014	12/31/2014	4.093	
44	2/28/2012		1/1/2014	12/31/2014	4.034	
45	2/28/2012		1/1/2015	12/31/2015	4.270	
46	3/7/2012		1/1/2014	12/31/2014	3.862	
47	3/7/2012		1/1/2015	12/31/2015	4.096	
48	3/13/2012		1/1/2014	12/31/2014	3.960	
49	4/11/2012		1/1/2015	12/31/2015	4.155	
50	4/17/2012		1/1/2014	12/31/2014	3.793	

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	(A)	(B)	(C)	(D)	(E)	(F)
	Transaction Date	Fixed Price	Period Begin Date	Period End Date	Average NYMEX Price at Market Close (\$/MMBTU)	% Difference
51	4/19/2012		1/1/2014	12/31/2014	3.748	
52	4/19/2012		1/1/2015	12/31/2015	3.976	
53	4/23/2012		1/1/2014	12/31/2014	3.731	
54	4/25/2012		1/1/2015	12/31/2015	3.979	
55	5/10/2012		1/1/2015	12/31/2015	4.165	
56	5/10/2012		1/1/2014	12/31/2014	4.020	
57	5/21/2012		1/1/2014	12/31/2014	3.943	
58	5/29/2012		1/1/2015	12/31/2015	4.085	
59	5/29/2012		1/1/2014	12/31/2014	3.882	
60	6/7/2012		1/1/2015	12/31/2015	4.000	
61	6/7/2012		1/1/2014	12/31/2014	3.811	
62	6/15/2012		1/1/2015	12/31/2015	3.990	
63	6/15/2012		1/1/2014	12/31/2014	3.836	
64	6/21/2012		1/1/2015	12/31/2015	4.005	
65	6/28/2012		1/1/2014	12/31/2014	3.924	
66	7/6/2012		1/1/2014	12/31/2014	3.927	
67	7/6/2012		1/1/2015	12/31/2015	4.090	
68	8/1/2012		1/1/2014	12/31/2014	4.110	
69	8/2/2012		1/1/2014	12/31/2014	3.956	
70	8/2/2012		1/1/2015	12/31/2015	4.123	
71	8/3/2012		1/1/2015	12/31/2015	4.095	
72	8/10/2012		1/1/2014	12/31/2014	4.001	
73	8/10/2012		6/1/2015	8/31/2015	4.113	
74	8/13/2012		1/1/2014	12/31/2014	3.958	
75	8/13/2012		1/1/2015	12/31/2015	4.128	
76	8/16/2012		1/1/2014	12/31/2014	3.924	
77	8/16/2012		1/1/2015	12/31/2015	4.111	
78	8/23/2012		1/1/2014	12/31/2014	3.952	
79	8/23/2012		1/1/2015	12/31/2015	4.123	
80	8/27/2012		1/1/2014	12/31/2014	3.845	

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(A)	(B)	(C)	(D)	(E)	(F)
Transaction Date	Fixed Price	Period Begin Date	Period End Date	Average NYMEX Price at Market Close (\$/MMBTU)	% Difference
81		1/1/2014	12/31/2014	3.894	
82		1/1/2015	12/31/2015	4.074	
83		1/1/2014	12/31/2014	3.832	
84		1/1/2015	12/31/2015	4.019	
85		1/1/2015	12/31/2015	4.370	
86		1/1/2014	12/31/2014	4.238	
87		1/1/2014	12/31/2014	4.246	
88		1/1/2015	12/31/2015	4.378	
89		1/1/2014	12/31/2014	4.246	
90		1/1/2015	12/31/2015	4.293	
91		1/1/2014	12/31/2014	4.144	
92		1/1/2014	12/31/2014	4.116	
93		1/1/2015	12/31/2015	4.338	
94		5/1/2014	9/30/2014	4.174	
95		1/1/2015	12/31/2015	4.243	
96		1/1/2014	12/31/2014	4.137	
97		1/1/2015	12/31/2015	4.215	
98		1/1/2014	12/31/2014	4.092	
99		5/1/2014	11/30/2014	4.047	
100		1/1/2015	12/31/2015	4.200	
101		5/1/2014	11/30/2014	3.991	
102		1/1/2015	12/31/2015	4.150	
103		5/1/2014	11/30/2014	4.005	
104		5/1/2014	11/30/2014	3.946	
105		1/1/2015	12/31/2015	4.151	
106		1/1/2014	12/31/2014	4.020	
107		1/1/2015	12/31/2015	4.200	
108		1/1/2014	12/31/2014	3.989	
109		1/1/2015	12/31/2015	4.181	
110		1/1/2015	12/31/2015	4.181	

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	(A)	(B)	(C)	(D)	(E)	(F)
	Transaction Date	Fixed Price	Period Begin Date	Period End Date	Average NYMEX Price at Market Close (\$/MMBTU)	% Difference
111	3/12/2013		6/1/2014	9/30/2014	4.101	
112	3/12/2013		1/1/2015	12/31/2015	4.279	
113	3/21/2013		1/1/2015	12/31/2015	4.273	
114	3/21/2013		4/1/2014	10/31/2014	4.133	
115	4/8/2013		1/1/2015	12/31/2015	4.265	
116	4/10/2013		1/1/2015	12/31/2015	4.192	
117	4/24/2013		5/1/2015	9/30/2015	4.231	
118	4/26/2013		5/1/2015	9/30/2015	4.209	
119	5/2/2013		1/1/2015	12/31/2015	4.233	
120	5/16/2013		2/1/2014	12/31/2014	4.196	
121	5/22/2013		6/1/2014	9/30/2014	4.292	
122	5/28/2013		6/1/2014	12/31/2014	4.386	
123	5/30/2013		6/1/2014	12/31/2014	4.288	
124	5/30/2013		5/1/2015	9/30/2015	4.264	
125	6/6/2013		1/1/2014	12/31/2014	4.120	
126	6/6/2013		1/1/2015	12/31/2015	4.220	
127	6/14/2013		1/1/2014	12/31/2014	4.048	
128	6/20/2013		1/1/2015	12/31/2015	4.208	
129	6/25/2013		1/1/2015	12/31/2015	4.156	
130	6/27/2013		1/1/2014	12/31/2014	3.960	
131	7/1/2013		1/1/2015	12/31/2015	4.108	
132	7/11/2013		1/1/2014	12/31/2014	3.987	
133	7/11/2013		1/1/2015	12/31/2015	4.163	
134	7/26/2013		7/1/2014	8/31/2014	3.927	
135	7/26/2013		11/1/2014	11/30/2014	4.182	
136	7/26/2013		1/1/2015	12/31/2015	4.117	
137	7/29/2013		1/1/2014	12/31/2014	3.904	
138	7/30/2013		1/1/2015	12/31/2015	4.063	
139	8/5/2013		4/1/2014	12/31/2014	3.835	
140	8/7/2013		1/1/2014	12/31/2014	3.732	

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(A)	(B)	(C)	(D)	(E)	(F)
Transaction Date	Fixed Price	Period Begin Date	Period End Date	Average NYMEX Price at Market Close (\$/MMBTU)	% Difference
141		1/1/2015	12/31/2015	3.963	
142		1/1/2015	12/31/2015	4.130	
143		1/1/2015	12/31/2015	4.062	
144		1/1/2015	12/31/2015	4.051	
145		1/1/2015	12/31/2015	4.073	
146		1/1/2015	3/31/2015	4.046	
147		6/1/2015	9/30/2015	3.983	
148		1/1/2015	3/31/2015	4.015	
149		7/1/2015	9/30/2015	3.959	
150		1/1/2015	12/31/2015	3.982	
151		1/1/2015	12/31/2015	3.935	
152		1/1/2014	12/31/2014	3.639	
153		1/1/2015	12/31/2015	3.831	
154		1/1/2015	12/31/2015	4.141	
155		4/1/2015	8/31/2015	3.958	
156		5/1/2015	12/31/2015	4.051	
157		1/1/2015	12/31/2015	4.115	
158		1/1/2015	12/31/2015	4.187	
159		1/1/2015	12/31/2015	4.134	
160		1/1/2015	12/31/2015	4.186	
161		1/1/2015	12/31/2015	4.186	
162		5/1/2015	9/30/2015	4.004	
163		1/1/2015	3/31/2015	3.927	
164		2/1/2015	3/31/2015	3.863	
165		11/1/2014	11/30/2014	3.937	
166		12/1/2014	12/31/2014	4.080	
167		1/1/2015	2/28/2015	3.943	
168		12/1/2014	12/31/2014	3.951	
169		11/1/2014	11/30/2014	3.863	
170		11/1/2014	2/28/2015	3.754	

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	(A)	(B)	(C)	(D)	(E)	(F)
	Transaction Date	Fixed Price	Period Begin Date	Period End Date	Average NYMEX Price at Market Close (\$/MMBTU)	% Difference
171	12/2/2014		1/1/2015	2/28/2015	3.854	
172	12/8/2014		1/1/2015	2/28/2015	3.601	
173	12/31/2014		2/1/2015	2/28/2015	2.896	

20. For realized (actual) hedging savings and costs for the twelve months beginning August 1, 2014, and ending July 31, 2015, associated with options for natural gas prices, please provide the following information in a schedule format.
- the transaction date for the option;
 - the option price or premium;
 - the type of option;
 - the time to expiration; and
 - the corresponding futures price, forward price, or comparable market price for the period on the transaction date of the option.

ANSWER:

	(A)	(B)	(C)	(D)	(E)	(F)	(G)	(H)	(I)
	Date Deal Was Entered	Strike \$/MMBtu	Option Premium	Portfolio	Put Call	Direction	Period Begin Date	Period End Date	Average NYMEX Price at Market Close (\$/MMBTU)
1	9/24/2013		\$0.00	Collar	Call	Buy	5/1/2014	10/31/2014	3.858
2	9/24/2013		\$0.00	Collar	Put	Sell	5/1/2014	10/31/2014	3.858
3	10/28/2013		\$0.00	Collar	Call	Buy	5/1/2014	11/30/2014	3.846
4	10/28/2013		\$0.00	Collar	Put	Sell	5/1/2014	11/30/2014	3.846
5	10/31/2013		\$0.00	Collar	Call	Buy	2/1/2014	1/31/2015	3.791
6	10/31/2013		\$0.00	Collar	Put	Sell	2/1/2014	1/31/2015	3.791
7	11/4/2013		\$0.00	Collar	Call	Buy	2/1/2014	1/31/2015	3.670
8	11/4/2013		\$0.00	Collar	Put	Sell	2/1/2014	1/31/2015	3.670
9	6/26/2014		\$0.00	Collar	Call	Buy	8/1/2014	10/31/2014	4.428
10	6/26/2014		\$0.00	Collar	Put	Sell	8/1/2014	10/31/2014	4.428
11	6/27/2014		\$0.00	Collar	Call	Buy	8/1/2014	10/31/2014	4.398
12	6/27/2014		\$0.00	Collar	Put	Sell	8/1/2014	10/31/2014	4.398
13	7/7/2014		\$0.00	Collar	Call	Buy	8/1/2014	10/31/2014	4.233
14	7/7/2014		\$0.00	Collar	Put	Sell	8/1/2014	10/31/2014	4.233

EXHIBIT "C"

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

Line(s)/Field(s)

Justification

Response to Interrogatory # 18

Page 1 of 7, Columns B and F, lines 1-20

Page 2 of 7, Columns B and F lines 21-50

Page 3 of 7, Columns B and F, lines 51-80

Page 4 of 7, Columns B and F, lines 81-110

Page 5 of 7, Columns B and F, lines 111-140

Page 6 of 7, Columns B and F, lines 141-170

Page 7 of 7, Columns B and F, lines 171-173

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.

Response to Interrogatory #20

Page 1 of 1, Column B, lines 1-14

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 11th day of September, 2015 to the following:

Florida Public Utilities Company
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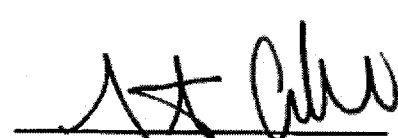
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c/o Moyle Law Firm
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