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



March 1, 2016

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

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RE: Docket No. 160001-EI

Dear Ms. Stauffer:

Enclosed is Gulf Power Company's Request for Confidential Classification pertaining to Schedule CCA-4 of Exhibit CSB-1 to the Direct Testimony of C. Shane Boyett dated March 2, 2016.

Sincerely,

Robert L. McGee, Jr. Regulatory and Pricing Manager

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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.:
 160001-EI

 Date:
 March 2, 2016

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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 CSB-1 to the Direct Testimony of C. Shane Boyett dated March 2, 2016, (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 2015. 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.

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" 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 1st day of March, 2016.

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.: Date: 160001-EI March 2, 2016

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REQUEST FOR CONFIDENTIAL CLASSIFICATION

EXHIBIT "A"

Provided to Commission Clerk under separate

cover as confidential information.

EXHIBIT "B"

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A B C D E F G H I J K L M

Schedule CCA-4 Page 1 of 1

Gulf Power Company 2015 Capacity Contracts

| | | Te | Contract | | | |
|----|-----------------------------------|-----------|-------------|----------|--|--|
| 2 | Contract/Counterparty | Start | End (1) | Туре | | |
| 3 | Southern Intercompany Interchange | 5/1/2007 | 5 Yr Notice | SES Opco | | |
| 4 | <u>PPAs</u> | | | | | |
| 5 | Shell Energy N.A. (U.S.), LP | 11/2/2009 | 5/31/2023 | Firm | | |
| 6 | <u>Other</u> | | | | | |
| 7 | Alabama Electric Cooperative | 1/4/2015 | 7/20/2015 | Other | | |
| 6 | Cargill Power, LLC | 1/7/2015 | 11/23/2015 | Other | | |
| 9 | South Carolina PSA | 9/1/2003 | • | Other | | |
| 10 | South Carolina Electric & Gas | 1/2/2015 | 12/31/2015 | Other | | |
| 11 | The Energy Authority | 9/9/2015 | 10/25/2015 | Other | | |

| 12 Capacity Costs (\$) | | January | February | March | April | May | June | July | August | September | October | November | December* | Totel |
|--|-----|-----------|-----------|-----------|-----------|-----------|-----------|-----------|-----------|-----------|-----------|-----------|-----------------------|--------------------|
| 13 Southern Intercompany Interchange 14 PPAs | | 0 | 0 | 0 | ũ | Ô | 0 | 0 | 0 | 0 | 0 | 0 | (8,431) | (8,431) |
| 15 Shell Energy N.A. (U.S.), LP 16 | | | | | | | | | | | | | | |
| 17 <u>Other</u> | | | | | • | | | | | | | | | |
| 18 Alabama Electric Cooperative 19 Cargill Power, LLC | | | | | 0 | 0 | 0 | | 0 | 0 | 0 | Ô | 0 | (35,623) |
| 20 South Carolina PSA | | | | | | 0 | | | | | | | 0 | 16,040 {39,792} |
| 21 South Carolina Electric & Gas | | | | | | | | | | | | | | (166,338) |
| 22 The Energy Authority | | 0 | 0 | 0 | 0 | G | 0 | 0 | 0 | | | 0 | D | (1,882) |
| 23 To | tal | 7,387,528 | 7,392,119 | 7,387,234 | 7,395,118 | 7,397,373 | 7,423,168 | 7,370,708 | 7,371,907 | 7,370,740 | 7,368,195 | 7,371,946 | 7,361,101 | 88,597,137 |
| | | | | | | | | | | | | | | |
| 24 Capacity MW | | January | February | March | April | May | June | July | August | September | October | November | December ² | |
| 25 Southern Intercompany Interchange 26 <u>PPAs</u> | | 0.0 | 0.0 | 0.0 | 0.0 | 0.0 | 0.0 | 0.0 | 0.0 | 0.0 | 0.0 | 0.0 | (51.7) | |
| 27 Shell Energy N.A. (U.S.), LP 28 | | 685.0 | 885.0 | 885.0 | 885.0 | 885.0 | 885.0 | 885.0 | 685.0 | 685.0 | 885.0 | 885.0 | 885.0 | |
| 29 <u>Other</u> 30 Alabama Electric Cooperative | ł | | | | 0.0 | 0.0 | 0.0 | | 0.0 | 0.0 | 0.0 | 0.0 | 0.0 | п |

Unless otherwise noted, contract remains effective unless terminated upon 30 days prior written notice.
 Southern Intercompany Interchange reserve sharing charge consists of prior month true-up only

31 Cargill Power, LLC

32 South Carolina PSA 33 South Carolina Electric & Gas 34 The Energy Authority Docket No. 160001-EI 2015 Final True-Up Filing Exhibit CSB-1, Page 6 of 202

EXHIBIT "C"

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

Line 15, Columns A-M

Line 18, Columns A-C, and G Line 19, Columns A-D, and F-K Lines 20-21, Columns A-L Line 22, Columns I-J

Line 30, Columns A-C and G Line 31, Columns A-D and F-K Lines 32-33, Columns A-L Line 34, Columns I-J

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

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

Docket No.: 160001-EI

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true copy of the foregoing was furnished by overnight mail this 1st day of March, 2016 to the following:

Florida Public Utilities Company Florida Division of Chesapeake Utilities Corp Mike Cassel, Director Regulatory and Governmental Affairs 1750 SW 14th Street, Suite 200 Fernandina Beach, FL 32034 <u>mcassel@fpuc.com</u> PCS Phosphate – White Springs c/o Stone Mattheis Xenopoulos & Brew, P.C. James W. Brew/Laura A. Wynn Eighth Floor, West Tower 1025 Thomas Jefferson St, NW Washington, DC 20007 ibrew@smxblaw.com law@smxblaw.com Duke Energy Florida John T. Burnett Dianne M. Triplett 299 First Avenue North St. Petersburg, FL 33701 Dianne.triplett@duke-energy.com John.burnett@duke-energy.com

Florida Power & Light Company John T. Butler Maria J. Moncada 700 Universe Boulevard (LAW/JB) Juno Beach, FL 33408-0420 John.Butler@fpl.com Maria.moncada@fpl.com Florida Power & Light Company Kenneth Hoffman 215 South Monroe Street, Suite 810 Tallahassee, FL 32301-1858 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 adaniels@ausley.com jwahlen@ausley.com

Gunster Law Firm Beth Keating 215 South Monroe Street, Suite 601 Tallahassee, FL 32301-1839 <u>bkeating@gunster.com</u> 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

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

Florida Retail Federation Robert Scheffel Wright John T. LaVia c/o Gardner Law Firm 1300 Thomaswood Drive Tallahassee, FL 32308 <u>schef@gbwlegal.com</u> <u>ilavia@gbwlegal.com</u> Tampa Electric Company Ms. Paula K. Brown, Manager Regulatory Coordination P. O. Box 111 Tampa, FL 33601-0111 <u>Regdept@tecoenergy.com</u> Office of the General Counsel Suzanne Brownless 2540 Shumard Oak Blvd Tallahassee, FL 32399-0850 <u>sbrownle@psc.state.fl.us</u> <u>tefarley@psc.state.fl.us</u> <u>ASoete@psc.state.fl.us</u>

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