FILED MAY 20, 2016 DOCUMENT NO. 03099-16 FPSC - COMMISSION CLERK

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



May 19, 2016

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



REDACTED

RE: Docket No. 160001-EI

Dear Ms. Stauffer:

Enclosed for filing in the above referenced docket is Gulf Power Company's Request for Confidential Classification and Motion for Temporary Protective Order pertaining to certain information being produced in response to the Office of Public Counsel's First Interrogatories to Gulf Power Company. Also included is a DVD of Gulf Power Company's Request for Confidential Classification and Motion for Temporary Protective Order in Microsoft Word format.

Robert L. McGee, Jr.

md

Enclosures

Sincerely,

cc:

Beggs & Lane

Jeffrey A. Stone, Esq.

AFD Replacted + CD

APA ___

ECO ____

GCL ____

TEL

CLK ____

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:

May 20, 2016

GULF POWER COMPANY'S REQUEST FOR CONFIDENTIAL CLASSIFICATION AND MOTION FOR TEMPORARY PROTECTIVE ORDER

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 the Office of Public Counsel's ("OPC") First Interrogatories (Nos. 1-10) in the above-referenced docket. As grounds for this request, the Company states:

- 1. A portion of the information submitted by Gulf Power in response to item No. 7 of OPC's First Interrogatories constitutes proprietary confidential business information. The information is entitled to confidential classification pursuant to section 366.093(3)(e), Florida Statutes. Specifically, the confidential information relates to Gulf's fuel procurement strategy and consists of the percentage of hedging transactions for 2017 through 2020 which Gulf Power has entered into in accordance with the confidential target hedge percentages in its approved 2016 Risk Management Plan. Disclosure of this element of Gulf's fuel procurement strategy to the market would provide insight into the confidential target hedge percentages in Gulf's Risk Management Plan and impair Gulf's efforts to hedge on the most favorable terms for the benefit of its customers.
- 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 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 19th day of May, 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.:

160001-EI

Date:

May 20, 2016

GULF POWER COMPANY'S REQUEST FOR CONFIDENTIAL CLASSIFICATION AND MOTION FOR TEMPORARY PROTECTIVE ORDER

EXHIBIT "A"

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

EXHIBIT "B"

Citizens' First Set of Interrogatories GULF POWER COMPANY Docket No. 160001-EI May 20, 2016 Item No. 7 Page 1 of 1

- 7. Based upon the Company's Risk Management Plans and forecasted generation needs,
 - a. What percentage of the projected natural gas burn for 2016 has been hedged?
 - b. What percentage, if any, of the projected natural gas burn for 2017 has been hedged?
 - c. What percentage, if any, of the projected natural gas burn for 2018 has been hedged?
 - d. What percentage, if any, of the projected natural gas burn for 2019 has been hedged?
 - e. What percentage, if any, of the projected natural gas burn for 2020 has been hedged?

ANSWER:

a.

b.

C.

d.

e.

EXHIBIT "C"

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

Line(s)/Field(s)

Response to DR #7
Page 1 of 1, as highlighted

Justification

This information is entitled to confidential classification pursuant to §366.093(3), 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.: 160001-E

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true copy of the foregoing was furnished by overnight mail this 19th day of May, 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 mcassel@fpuc.com 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
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 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 imoyle@moylelaw.com Tampa Electric Company
Ms. Paula K. Brown, Manager
Regulatory Coordination
P. O. Box 111
Tampa, FL 33601-0111
Regdept@tecoenergy.com

Office of the General Counsel Suzanne Brownless
John Villafrate
2540 Shumard Oak Blvd
Tallahassee, FL 32399-0850
jvillafr@psc.state.fl.us
sbrownle@psc.state.fl.us
tefarley@psc.state.fl.us
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 jlavia@gbwlegal.com

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