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February 28, 2017

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

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COMMISSION CLERK

RE: Docket No. 170001-EI

Dear Ms. Stauffer:

Enclosed is Gulf Power Company's Request for Confidential Classification pertaining to Schedule CCA-4 of Exhibit CSB-1 and Schedule 2 of Exhibit CSB-3 to the Direct Testimony of C. Shane Boyett dated March 1, 2017.

Sincerely,

**REDACTED**

Robert L. McGee, Jr.  
Regulatory and Pricing Manager

COM \_\_\_\_\_  
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Enclosures

cc: 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.: 170001-EI  
Date: March 1, 2017

\_\_\_\_\_ )

**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 and Schedule 2 to Exhibit CSB-3 to the Direct Testimony of C. Shane Boyett dated March 1, 2017 on behalf of Gulf Power. As grounds for this request, the Company states:

1. A portion of the information contained in Schedule CCA-4 of Exhibit CSB-1 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 2016. 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. A portion of the information contained in Schedule 2 of Exhibit CSB-3 constitutes proprietary and commercially sensitive information regarding competitive interests and contractual matters of Gulf Power, which, if disclosed to the general public, would cause irreparable harm to Gulf Power. This information is entitled to confidential classification pursuant to section 366.093(3)(d) and (e), Florida Statutes. Schedule 2 contains price terms for Gulf Power's coal purchases in 2016. Gulf and other members of the market in which it competes consider such pricing information to be competitively sensitive. Disclosure of this information would adversely affect Gulf's ability to conduct its coal procurement activities to the benefit of its customers. Disclosure of such cost information would also impair Gulf's ability to enter into future contracts for the benefit of its customers.

3. 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.

4. Submitted as Exhibit "A" are copies of Exhibit CSB-1, Schedule CCA-4 and Exhibit CSB-3, Schedule 2, 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 Exhibit CSB-1, Schedule CCA-4 and Exhibit CSB-3, Schedule 2, 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 28<sup>th</sup> day of February, 2017.



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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.: 170001-EI  
Date: March 1, 2017

\_\_\_\_\_ )

**REQUEST FOR CONFIDENTIAL CLASSIFICATION**

**EXHIBIT "A"**

Provided to Commission Clerk under separate  
cover as confidential information.

EXHIBIT "B"

Schedule CCA-4

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

Gulf Power Company  
2016 Capacity Contracts

Contract/Counterparty	Term		Contract Type
	Start	End <sup>(1)</sup>	
3 Southern Intercompany Interchange	5/1/2007	5 Yr Notice	SES Opco
4 <i>PPAs</i>			
5 Shell Energy N.A. (U.S.), LP	11/2/2009	5/31/2023	Firm
6 <i>Other</i>			
7 Duke Energy	7/26/2016	7/27/2016	Other
8 Cargill Power, LLC	2/13/2016	2/14/2016	Other
9 South Carolina PSA	9/1/2003	12/31/2016	Other
10 South Carolina Electric & Gas	1/2/2016	12/31/2016	Other
11 The Energy Authority	1/5/2016	1/5/2016	Other

12 Capacity Costs (\$)	January <sup>(2)</sup>	February <sup>(3)</sup>	March	April	May <sup>(3)</sup>	June	July	August	September	October	November <sup>(2)</sup>	December <sup>(2)</sup>	Total
13 Southern Intercompany Interchange	(17,016)	1,445	(23,747)	31,189	4,868	0	0	0	0	(2,990)	(648)	(25,920)	(32,819)
14 <i>PPAs</i>													
15 Shell Energy N.A. (U.S.), LP													
16 <i>Other</i>													
17 Duke Energy	0	0	0	0	0	0			0	0	0	0	0
18 Cargill Power, LLC	0		0	0	0	0	0	0	0	0	0	0	
19 South Carolina PSA													(38,496)
20 South Carolina Electric & Gas													(132,744)
21 The Energy Authority		0	0	0	0	0	0	0	0	0	0	0	
22 Total	7,355,068	7,373,491	7,348,530	7,402,799	7,426,478	7,388,259	7,202,997	7,203,819	7,203,408	7,200,418	7,143,834	7,177,488	87,426,589

24 Capacity MW	January	February	March	April	May	June	July	August	September	October	November	December <sup>2</sup>
25 Southern Intercompany Interchange	(23.1)	0.0	(72.7)	157.0	0.0	0.0	0.0	0.0	0.0	(18.3)	(0.8)	(158.8)
26 <i>PPAs</i>												
27 Shell Energy N.A. (U.S.), LP	885.0	885.0	885.0	885.0	885.0	885.0	885.0	885.0	885.0	885.0	885.0	885.0
28 <i>Other</i>												
29 Duke Energy	0.0	0.0	0.0	0.0	0.0	0.0			0.0	0.0	0.0	0.0
30 Cargill Power, LLC	0.0		0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
31 South Carolina PSA												
32 South Carolina Electric & Gas												
33 The Energy Authority		0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0

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

**Schedule 2**

	A	B	C	D	E
1	<b>Gulf Contract Coal Supplies</b>				
2			<b>Received</b>	<b>Actual</b>	<b>Weighted Avg</b>
3	<b>Supplier</b>	<b>Plant</b>	<b>Quantity (tons)</b>	<b>Heating Value</b>	<b>Price \$/MMBTU</b>
4	Foresight Coal Sales	Crist	558,484	11834	
5	<b>Weighted Average</b>	<b>Crist</b>	<b>558,484</b>	<b>11811</b>	
6					
7	<b>Gulf Spot Coal Supplies</b>				
8			<b>Received</b>	<b>Actual</b>	<b>Weighted Avg</b>
9	<b>Supplier</b>	<b>Plant</b>	<b>Quantity (tons)</b>	<b>Heating Value</b>	<b>Price \$/MMBTU</b>
10	Glencore LTD	Crist	247,674	12279	
11	Coal Marketing Corporation	Crist	294,551	12052	
12	Alliance Coal	Crist	114,521	11761	
13	<b>Weighted Average</b>	<b>Crist</b>	<b>656,745</b>	<b>12087</b>	<b>\$3.063</b>
14					
15	Glencore LTD	Smith	5945	11846	
16	<b>Weighted Average</b>	<b>Smith</b>	<b>5945</b>	<b>11846</b>	
17					
18	Arch Coal Sales (Black Thunder)	Daniel (Gulf 50%)	360192	8866	
19	Arch Coal Sales (West Elk)	Daniel (Gulf 50%)	182481	11640	
20	<b>Weighted Average</b>	<b>Daniel (Gulf 50%)</b>	<b>542,672</b>	<b>9799</b>	<b>\$2.817</b>



EXHIBIT "C"

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

**Line(s)/Field(s)**

**Justification**

**CSB-1, Schedule CCA-4**

Line 15, Columns A-M

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.

Line 18, Columns G-H

Line 19, Columns B and M

Lines 20-21, Columns A-L

Line 22, Columns A and M

Line 30, Columns G-H

Line 31, Column B

Lines 32-33, Columns A-L

Line 34, Column A

**CSB-3, Schedule 2**

Column E, lines 4-5, 10-12, 15-16 and 18-19 as marked

This information is entitled to confidential classification pursuant to section 366.093(3)(d) and (e), Florida Statutes. The basis for this information being designated as confidential is more fully set forth in paragraph 2.

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

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

Docket No.: **170001-EI**

**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that a true copy of the foregoing was furnished by overnight mail this 28th day of February, 2017 to the following:

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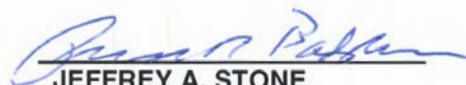
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