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April 2, 2018

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

RE: Docket No. 20180007-EI

**REDACTED**

RECEIVED-FPSC  
2018 APR -3 AM 11:32  
COMMISSION  
CLERK

Dear Ms. Stauffer:

Enclosed is Gulf Power Company's Request for Confidential Classification for certain portions of its Environmental Compliance Program Update to be filed in the above-referenced docket.

Sincerely,

Rhonda J. Alexander  
Regulatory, Forecasting and Pricing Manager

md

Enclosures

cc: Gulf Power Company  
Jeffrey A. Stone, Esq., General Counsel  
Beggs & Lane  
Russell Badders, Esq.

COM \_\_\_  
AFD \_\_\_  
APA \_\_\_  
ECO \_\_\_  
ENG 1 (Exh B) + 1 CD  
GCL \_\_\_  
IDM \_\_\_  
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BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

IN RE: Environmental Cost  
Recovery Clause  
\_\_\_\_\_)

Docket No.: 20180007-EI  
Date: April 3, 2018

**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 portions of its Environmental Compliance Program Update (the “Compliance Program”). As grounds for this request, the Company states:

1. Gulf Power seeks confidential classification for portions of its Compliance Program which is being filed concurrently with this request. The subject information relates to competitive interests, the disclosure of which would impair the competitive business of Gulf Power. For the reasons addressed below, the subject information is entitled to confidential classification pursuant to section 366.093(3), Florida Statutes.

2. Sections III.A.1(b) and (e) of the Compliance Plan address the timing for simulated retirements or repowerings of one or more coal-fired generating units at Gulf’s Plant Crist. As discussed in the Compliance Plan, the retirement timing is a function of transmission planning analyses whereas the repowering timing is a function of construction lead time for firm natural gas transportation construction. Section III.A.1(b) also addresses incremental transmission projects and costs associated with simulated retirements of various units at Plant Crist. The incremental transmission projects, costs, and associated lead-times represent non-public transmission data. In addition, the subject timing and cost information is competitively sensitive insofar as generation wholesalers, power marketers or other vendors could utilize this information to tailor proposals with the intention of pricing products that could undermine the Company’s market position. The disclosure of this information could also negatively impact

Gulf's ability to negotiate pricing for replacement power favorable to its customers in the event that Gulf determined to retire one or more of its generating assets.

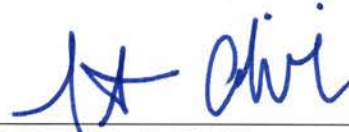
3. Sections III.A.2(a)-(f) of the Compliance Plan contain inputs, analyses and net present value results of the costs and benefits associated with continued operation of Plant Crist generating units under a variety of different scenarios. These inputs and economic viability analyses provide the net benefit results for various alternatives which, in turn, provide insight into competitive data including fuel and avoided cost projections, non-public transmission data and production costs. Additionally, the subject information is used in developing future generation strategies for Gulf. Wholesale competitors as well as suppliers of commodities and services could utilize this information to undermine Gulf's bargaining position in the markets where Gulf must compete to obtain commodities and services or make purchases or sales of wholesale power. This, in turn, would result in Gulf's customers paying higher prices for such purchases.

4. 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.

5. Submitted as Exhibit "A" are highlighted pages from the Compliance Program which contain confidential information. Exhibit "A" should be treated as confidential pending a ruling on this request. Attached as Exhibit "B" are two edited copies of Exhibit "A," 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 2nd day of April, 2018.



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BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

IN RE: Environmental Cost  
Recovery Clause  
\_\_\_\_\_)

Docket No.: 20180007-EI  
Date: April 3, 2018

**REQUEST FOR CONFIDENTIAL CLASSIFICATION**

**EXHIBIT "A"**

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

EXHIBIT "B"

b) *Transmission Planning*

An analysis was performed by Gulf Power's transmission planning group to assess the potential impacts to the transmission system if individual or collective generating units at Plant Crist were to be retired. The analysis used to determine the transmission system impacts, as well as the associated transmission projects and estimated costs, consisted of power flow and dynamic analyses developed with transmission planning models for the years 2019 through 2027. These types of analyses represent the typical primary drivers of transmission expansion for Gulf Power, although operational considerations can also result in additional transmission requirements. The 2017 transmission planning models were used for this analysis, which were the latest models available at the time the analysis was performed. As a result, the generation assumptions of neighboring operating companies within Southern Company, as well as those of neighboring utilities, reflect the latest known forecast for such generation at that time and are subject to change.

Potential operational, thermal, steady-state voltage, and dynamic impacts on the transmission system associated with the simulated retirements of Crist 4, Crist 5, Crist 6, Crist 7, or Crist 4 through 7 were assessed. It was identified that, at a minimum, several currently planned transmission projects across the Southern Company system should first be completed prior to retiring generation units at Crist, either individually or collectively. Until these transmission projects are placed in-service, each of the Crist generating units are expected to continue to contribute towards system reliability. Collectively, the earliest that all of these currently-planned transmission projects could be completed is [REDACTED]. When evaluated on an individual basis, the retirements of Crist 4, 5, or 6 did not identify any incremental transmission projects beyond those currently planned. Consequently, the individual analysis for these units used a retirement date of year [REDACTED] as an input. The retirement of Crist 7 identified the need for at least [REDACTED] additional transmission projects (beyond those currently planned) at a cost of approximately [REDACTED]. Similarly, the retirement of Crist 4 through 7 identified the need for at least [REDACTED] additional transmission projects (beyond those currently planned) at a cost of approximately [REDACTED]. For the Crist 7 and Crist 4 through 7 analyses, the collective incremental transmission projects are estimated to have a [REDACTED] lead time, and therefore, a retirement date of year [REDACTED] was used as an input for both analyses. There are currently no plans to pursue any transmission projects incremental to the latest transmission expansion plan that should be completed to accommodate such retirements.

c) *Environmental Regulations*

Gulf Power develops an environmental strategy aimed at determining the least-cost compliance options that minimize customer impacts while ensuring compliance with all reasonably foreseeable environmental laws and regulations. Of specific interest to the evaluation are the impacts of EPA's CCR, ELG, and 316(b) intake structure regulations. Capital projects that may be driven by these regulations and could not be avoided by a unit retirement are not considered in the evaluation. Based on the current environmental strategy, no avoidable projects are included in the analysis for compliance with the CCR rule. The evaluation includes dry bottom ash projects for each of the units, with expected in-service

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dates of 2023 for compliance with the ELG rule. The evaluation also considers cooling water intake structure modifications for Units 4 and 5, with expected in-service dates of 2025 for compliance with the 316(b) rule. The scope and cost for these projects are based on the best available information at the time of the evaluation, as explained in more detail in Section III.A.4, and will be updated by Gulf Power as more certainty regarding the regulations and new permit requirements are available. While the evaluation does not specifically address the Clean Power Plan, a range of future carbon prices are included to assess the impacts of future greenhouse gas regulation.

*d) Incremental Costs*

In addition to future environmental controls, other incremental costs associated with continued operation of the facility include delivered fuel, operation and maintenance expenses (O&M), maintenance capital, and emissions costs (NO<sub>x</sub>, SO<sub>2</sub>, and CO<sub>2</sub>). O&M encompasses all labor, materials, engineering and support services, and overhead costs necessary to operate the plant. Costs such as delivered fuel, variable O&M, and emissions costs are incorporated in the production cost impacts. The remaining incremental costs and the revenue requirements on the environmental capital costs constitute the total fixed costs associated with the continued operation of Crist over a 30-year study period.

*e) Plant Crist Generation Study Options*

The Plant Crist economic evaluation considers continued operation for a 30-year period, as compared to converting to natural gas or retiring and replacing the entire facility or each of the units individually. The evaluation is based on specific retirement dates for the entire Plant Crist generating facility, as well as each of the Plant Crist generating units individually, as inputs. In selecting retirement dates for the analysis, varying factors were considered, including but not limited to transmission requirements, firm natural gas transportation requirements, environmental restrictions, and construction timelines. Based on these factors, the retirements were assumed to take place at the earliest possible date for each unit based on the transmission evaluation. These dates are [REDACTED] for Units 4, 5, and 6 and [REDACTED] for Unit 7 and Units 4-7 as a whole. The replacement generation was assumed to come online coincident with the retirement based on Gulf Power's expected need for capacity.

For the conversion to natural gas evaluation, the assumed retirement dates were based upon the firm natural gas transportation construction schedule. Units 6, 7, and 4-7 would require capital costs associated with a new gas pipeline lateral. Unit 7 and Units 4-7 would require additional capital investments to retrofit Unit 7 for 100 percent natural gas operation at full load. Optimistically, the pipeline construction and unit retrofit construction was assumed to be completed within [REDACTED] years. Thus, the conversion year assumed for Unit 6, Unit 7, and Units 4-7 is year [REDACTED]. The conversion for Units 4 and 5 was assumed to occur in [REDACTED] since construction for a new gas pipeline lateral would not be required.



The alternatives that were studied include:

- Continued Operation
- Retirement and Replacement with combustion turbines
- Conversion to 100% Natural Gas
- Retirement and Replacement with Solar Capacity
- Retirement and Replacement with a combination of Solar and Natural Gas Capacity
- Retirement and Replacement with a combination of Solar, Natural Gas Capacity, and Battery Storage

The replacement generation was assumed to be a generic unit located on Gulf's system representing the amount of Crist generation being replaced.

**2. Summary of Study Results**

The following tables represent the 30-year net present value (NPV) of benefit associated with either Plant Crist as a whole or each individual Crist Unit. The results are calculated by comparing the existing unit's costs and benefits to the corresponding costs and benefits of the replacement resource. When a positive value is shown for a scenario, the NPV of the existing unit is greater than the NPV for the compared option, meaning that continued operation of the existing unit is the better economic option.

*a) Continued Operation*

The NPV results of the costs and benefits for the continued operation of Crist Unit 4, Crist Unit 5, Crist Unit 6, Crist Unit 7, and Crist Units 4-7 are provided in the tables below. Although no specific replacement assumption is made, capacity is valued at the economic carrying cost of a reliability CT.

Table 1 - Unit 4 NPV Continued Operation

2018 NPV (M\$)	\$0 CO2	\$10 CO2	\$20 CO2
High Gas			
Mod Gas			
Low Gas			

Table 2 - Unit 5 NPV Continued Operation

2018 NPV (M\$)	\$0 CO2	\$10 CO2	\$20 CO2
High Gas			
Mod Gas			
Low Gas			

Table 3 - Unit 6 NPV Continued Operation

2018 NPV (M\$)	\$0 CO2	\$10 CO2	\$20 CO2
High Gas			
Mod Gas			
Low Gas			

Table 4 - Unit 7 NPV Continued Operation

2018 NPV (M\$)	\$0 CO2	\$10 CO2	\$20 CO2
High Gas			
Mod Gas			
Low Gas			

Table 5 - Units 4-7 NPV Continued Operation

2018 NPV (M\$)	\$0 CO2	\$10 CO2	\$20 CO2
High Gas			
Mod Gas			
Low Gas			

b) *Retirement and Replacement with Combustion Turbines*

The NPV results of the costs and benefits for the continued operation of Crist Unit 4, Crist Unit 5, Crist Unit 6, Crist Unit 7, and Crist Units 4-7 compared to replacement with Simple Cycle Technology-Dual Fuel Combustion Turbines are provided in the tables below.

Table 6 - Unit 4 NPV Retire and Replace with CT

2018 NPV (M\$)	\$0 CO2	\$10 CO2	\$20 CO2
High Gas			
Mod Gas			
Low Gas			

Table 7 - Unit 5 NPV Retire and Replace with CT

2018 NPV (M\$)	\$0 CO2	\$10 CO2	\$20 CO2
High Gas			
Mod Gas			
Low Gas			

Table 8 - Unit 6 NPV Retire and Replace with CT

2018 NPV (M\$)	\$0 CO2	\$10 CO2	\$20 CO2
High Gas			
Mod Gas			
Low Gas			

Table 9 - Unit 7 NPV Retire and Replace with CT

2018 NPV (M\$)	\$0 CO2	\$10 CO2	\$20 CO2
High Gas			
Mod Gas			
Low Gas			

Table 10 - Units 4-7 NPV Retire and Replace with CT

2018 NPV (M\$)	\$0 CO2	\$10 CO2	\$20 CO2
High Gas			
Mod Gas			
Low Gas			

c) Conversion to 100% Natural Gas

The NPV results of the costs and benefits for the continued operation of Crist Unit 4, Crist Unit 5, Crist Unit 6, Crist Unit 7, and Crist Units 4-7 compared to converting each unit and the entire facility to 100 percent natural gas operation are provided in the tables below. Units 6, 7, and 4-7 would require capital costs associated with a new gas pipeline lateral. Unit 7 and Units 4-7 would require additional capital investments to retrofit Unit 7 for 100 percent natural gas operation at full load.

Table 11 - Unit 4 NPV Convert to Natural Gas

2018 NPV (M\$)	\$0 CO2	\$10 CO2	\$20 CO2
High Gas			
Mod Gas			
Low Gas			

Table 12 - Unit 5 NPV Convert to Natural Gas

2018 NPV (M\$)	\$0 CO2	\$10 CO2	\$20 CO2
High Gas			
Mod Gas			
Low Gas			

Table 13 - Unit 6 NPV Convert to Natural Gas

2018 NPV (M\$)	\$0 CO2	\$10 CO2	\$20 CO2
High Gas			
Mod Gas			
Low Gas			

Table 14- Unit 7 NPV Convert to Natural Gas

2018 NPV (M\$)	\$0 CO2	\$10 CO2	\$20 CO2
High Gas	[REDACTED]		
Mod Gas			
Low Gas			

Table 15 - Units 4-7 NPV Convert to Natural Gas

2018 NPV (M\$)	\$0 CO2	\$10 CO2	\$20 CO2
High Gas	[REDACTED]		
Mod Gas			
Low Gas			

d) Retirement and Replacement with Solar Capacity

The NPV results of the costs and benefits for the continued operation of Crist Unit 4, Crist Unit 5, Crist Unit 6, Crist Unit 7, and Crist Units 4-7 compared to replacement with fixed-tilt solar capacity are provided in the tables below. The nameplate capacity of the replacement solar generation was assumed to match the recognized capacity of the existing units. However, an average Incremental Capacity Equivalent (ICE) factor of [REDACTED] percent was calculated for each solar replacement option. The capacity shortfall of the ICE solar replacement option was valued at the economic carrying cost of a reliability CT. The solar profile was based on an existing solar facility built within Gulf Power's service area. In addition to the costs to build and operate the solar generation, a cost was included to mitigate the intermittent nature of the solar generation.

Table 16 - Unit 4 NPV Retire and Replace with Solar

2018 NPV (M\$)	\$0 CO2	\$10 CO2	\$20 CO2
High Gas	[REDACTED]		
Mod Gas			
Low Gas			

Table 17 - Unit 5 NPV Retire and Replace with Solar

2018 NPV (M\$)	\$0 CO2	\$10 CO2	\$20 CO2
High Gas	[REDACTED]		
Mod Gas			
Low Gas			

**Table 18 - Unit 6 NPV Retire and Replace with Solar**

2018 NPV (M\$)	\$0 CO2	\$10 CO2	\$20 CO2
High Gas			
Mod Gas			
Low Gas			

**Table 19 - Unit 7 NPV Retire and Replace with Solar**

2018 NPV (M\$)	\$0 CO2	\$10 CO2	\$20 CO2
High Gas			
Mod Gas			
Low Gas			

**Table 20 - Units 4-7 NPV Retire and Replace with Solar**

2018 NPV (M\$)	\$0 CO2	\$10 CO2	\$20 CO2
High Gas			
Mod Gas			
Low Gas			

e) *Retirement and Replacement with a Combination of Solar and Natural Gas Capacity*

The NPV results of the costs and benefits for the continued operation of Crist Unit 4, Crist Unit 5, Crist Unit 6, Crist Unit 7, and Crist Units 4-7 compared to replacement with fixed-tilt solar capacity and natural gas capacity are provided in the tables below. Due to the size and operating characteristics of the units, the appropriate replacement gas capacity was determined to be Simple Cycle F Technology-Dual Fuel Combustion Turbines for Units 4 and 5. For Units 6, 7, and 4-7, the replacement natural gas capacity was determined to be a 2 on 1 Combined Cycle H Technology Unit. The capacity of the replacement natural gas options was based on the difference in capacity of the Crist Units and the ICE capacity of the solar option.

**Table 21 - Unit 4 NPV Retire and Replace with Solar and Natural Gas**

2018 NPV (M\$)	\$0 CO2	\$10 CO2	\$20 CO2
High Gas			
Mod Gas			
Low Gas			

**Table 22 - Unit 5 NPV Retire and Replace with Solar and Natural Gas**

2018 NPV (M\$)	\$0 CO2	\$10 CO2	\$20 CO2
High Gas			
Mod Gas			
Low Gas			

Table 23 - Unit 6 NPV Retire and Replace with Solar and Natural Gas

2018 NPV (M\$)	\$0 CO2	\$10 CO2	\$20 CO2
High Gas	[REDACTED]		
Mod Gas			
Low Gas			

Table 24 - Unit 7 NPV Retire and Replace with Solar and Natural Gas

2018 NPV (M\$)	\$0 CO2	\$10 CO2	\$20 CO2
High Gas	[REDACTED]		
Mod Gas			
Low Gas			

Table 25 - Units 4-7 NPV Retire and Replace with Solar and Natural Gas

2018 NPV (M\$)	\$0 CO2	\$10 CO2	\$20 CO2
High Gas	[REDACTED]		
Mod Gas			
Low Gas			

f) *Retirement and Replacement with a Combination of Solar, Natural Gas Capacity and Battery Storage*

The NPV results of the costs and benefits for the continued operation of Crist Unit 4, Crist Unit 5, Crist Unit 6, Crist Unit 7, and Crist Units 4-7 compared to replacement with fixed-tilt solar capacity, natural gas capacity, and battery storage are provided in the tables below. This option added approximately [REDACTED] percent of the solar nameplate generation in battery storage capacity to offset the impacts associated with the intermittent nature of solar generation.

Table 26 - Unit 4 NPV Retire and Replace with Solar, Natural Gas Capacity and Battery Storage

2018 NPV (M\$)	\$0 CO2	\$10 CO2	\$20 CO2
High Gas	[REDACTED]		
Mod Gas			
Low Gas			

Table 27 - Unit 5 NPV Retire and Replace with Solar, Natural Gas Capacity and Battery Storage

2018 NPV (M\$)	\$0 CO2	\$10 CO2	\$20 CO2
High Gas	[REDACTED]		
Mod Gas			
Low Gas			

Table 28 - Unit 6 NPV Retire and Replace with Solar, Natural Gas Capacity and Battery Storage

2018 NPV (M\$)	\$0 CO2	\$10 CO2	\$20 CO2
High Gas			
Mod Gas			
Low Gas			

Table 29 - Unit 7 NPV Retire and Replace with Solar, Natural Gas Capacity and Battery Storage

2018 NPV (M\$)	\$0 CO2	\$10 CO2	\$20 CO2
High Gas			
Mod Gas			
Low Gas			

Table 30 - Units 4-7 NPV Retire and Replace with Solar, Natural Gas Capacity and Battery Storage

2018 NPV (M\$)	\$0 CO2	\$10 CO2	\$20 CO2
High Gas			
Mod Gas			
Low Gas			

### 3. Study Conclusion

This analysis is preliminary, and environmental control requirements and dates are based on the compliance requirements of currently final, proposed, and/or expected environmental rules and regulations, which are further discussed below. As preliminary or proposed rules are finalized and new permits issued, some of these requirements, dates, and costs may change. This analysis is based on the most recent knowledge and expectations available at the time the analysis was conducted. Once future and pending regulations and any associated permit requirements are finalized, Gulf will update the cost projections and request ECRC recovery of new projects or programs.

### 4. Future Land and Water Regulations

Under the 2015 ELG rule, Plant Crist would be required to eliminate the discharge of bottom ash transport water (BATW) to surface waters. Gulf was working on preliminary engineering and design for dry bottom ash handling and completing construction of two underground injection wells for ELG compliance when EPA announced reconsideration in late 2017 of the 2015 ELG rule. At that time, further work on the Plant Crist ELG projects was placed on hold until after the ELG rulemaking is resolved. The cost projections for the Plant Crist bottom ash project are based on a screening level cost estimate that will be updated after the ELG rule and design is finalized.

EXHIBIT "C"

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

<b><u>Line(s)/Field(s)</u></b>	<b>Justification</b>
<p>Paragraph (b), Page 9: All highlighted information.</p>	<p>This information is entitled to confidential classification pursuant to §366.093(3)(e), Florida Statutes. The basis for this information being designated as confidential is more fully set forth in paragraph 2.</p>
<p>Paragraph (e), Page 10: All highlighted information.</p>	<p>This information is entitled to confidential classification pursuant to §366.093(3)(e), Florida Statutes. The basis for this information being designated as confidential is more fully set forth in paragraph 2.</p>
<p>Paragraph (a), Pages 11-12: All highlighted information.</p>	<p>This information is entitled to confidential classification pursuant to §366.093(3)(e), Florida Statutes. The basis for this information being designated as confidential is more fully set forth in paragraph 3.</p>
<p>Paragraph (b), Pages 12-13: All highlighted information.</p>	<p>This information is entitled to confidential classification pursuant to §366.093(3)(e), Florida Statutes. The basis for this information being designated as confidential is more fully set forth in paragraph 3.</p>
<p>Paragraph (c), Pages 13-14: All highlighted information.</p>	<p>This information is entitled to confidential classification pursuant to §366.093(3)(e), Florida Statutes. The basis for this information being designated as confidential is more fully set forth in paragraph 3.</p>
<p>Paragraph (d), Pages 14-15: All highlighted information.</p>	<p>This information is entitled to confidential classification pursuant to §366.093(3)(e), Florida Statutes. The basis for this information being designated as confidential is more fully set forth in paragraph 3.</p>



<p>Paragraph (e), Pages 15-16: All highlighted information.</p> <p>Paragraph (f), Pages 16-17: All highlighted information.</p>	<p>This information is entitled to confidential classification pursuant to §366.093(3)(e), Florida Statutes. The basis for this information being designated as confidential is more fully set forth in paragraph 3.</p> <p>This information is entitled to confidential classification pursuant to §366.093(3)(e), Florida Statutes. The basis for this information being designated as confidential is more fully set forth in paragraph 3.</p>

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

IN RE: **Environmental Cost** )  
**Recovery Clause** )

Docket No.: **20180007-EI**

**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that a true copy of the foregoing was furnished by overnight mail this 2nd day of April, 2018 to the following:

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