

ORIGINAL



RECEIVED-EPSC
07 MAR 19 AM 10:56
COMMISSION
CLERK

March 15, 2007

Ms. Blanca S. Bayo, Director
Division of the Commission Clerk
and Administrative Services
Florida Public Service Commission
2540 Shumard Oak Blvd.
Tallahassee, Florida 32399-0850

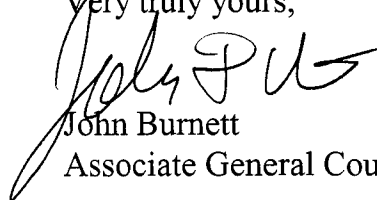
Re: Docket No. 070001-EI-Request for Specified Confidential Treatment

Dear Ms. Bayo:

Enclosed for filing is the original plus 10 copies of Progress Energy Florida, Inc.'s revised Justification Matrices included in its Requests for Specified Confidential Treatment regarding the Company's FPSC 423 Forms for January 2006, February 2006, June 2006, August 2006, September 2006, October 2006, November 2006, December 2006.

Please acknowledge your receipt and filing of the above on the enclosed copy of this letter and return same to me.

Very truly yours,


John Burnett
Associate General Counsel

JB/sc
Enclosures
cc: Parties of record

CMP _____
COM _____
CTR _____
ECR
GCL
OPC _____
RCA _____
SCR _____
SCA _____
SEC _____
OTH _____

07 MAR 19 AM 9:24

DISTRIBUTION CENTER

DOCUMENT NUMBER-DATE

Progress Energy Florida, Inc.

CERTIFICATE OF SERVICE

Docket No. 070001-EI

I HEREBY CERTIFY that a true copy of Progress Energy Florida, Inc.'s revised Request for Specified Confidential Treatment, regarding the FPSC 423 Forms for the months of January, February, June, August, September, October, November and December 2006 have been furnished to the following individuals by regular U.S. Mail this 15th day of March 2007.

John Butler
Florida Power & Light
700 Universe Blvd.
Juno Beach, FL 33408-0420

Jeffrey A. Stone, Esquire
Russell A. Badders, Esquire
Beggs and Lane
P. O. Box 12950
Pensacola, FL 32591

Lee L. Willis, Esquire
James D. Beasley, Esquire
Ausley & McMullen
P. O. Box 391
Tallahassee, FL 32302

Lisa Bennett, Esquire
Office of the General Counsel
Florida Public Service Commission
2540 Shumard Oak Boulevard
Tallahassee, FL 32399-0850

Patricia A. Christensen, Esquire
Office of the Public Counsel
c/o The Florida Legislature
111 West Madison Street
Room 812
Tallahassee, FL 32399-1400

Timothy Perry, Esquire
McWhirter, Reeves
117 S. Gadsden Street
Tallahassee, FL 32301

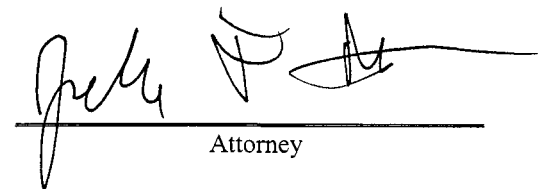
John McWhirter, Jr.
McWhirter, Reeves
400 North Tampa Street
Suite 2450
Tampa, FL 33602

Norman Horton, Jr., Esquire
Messer, Caparello & Self
P. O. Box 15579
Tallahassee, FL 32317

Robert Scheffel Wright, Esquire
John Thomas LaVia, III, Esquire
310 West College Avenue
Tallahassee, FL 32301

Lt. Colonel Karen White
Damond E. Williams, Capt., USAF
AFLSA/JACL-ULT
139 Barnes Drive, Suite 1
Tyndall Air Force Base, FL 32403

Gary V. Perko, Esquire
Hopping, Green & Sams, P.A.
P. O. Box 6526
Tallahassee, FL 32314



Attorney

FORM 423-2A

Plant Name, Lines	Column	Justification
Crystal River 1&2 , 1-8 Crystal River 4&5, 1-7 McDuffie Coal Terminal, 1-2 Transfer Facility – IMT, 1-4	F	(12) §366.093(3)(d) The FOB Mine Price is the current contract price of coal purchased from each supplier by PFC for delivery to PEF. Disclosure of this information would enable suppliers to determine the prices of their competitors, which would likely result in greater price convergence in future bidding. Disclosure would also result in a reduced ability on the part of a major purchaser such as PFC to bargain for price concessions on behalf of PEF, since suppliers would be reluctant or unwilling to grant concessions that other potential purchasers would then expect.
Crystal River 1&2 , 1-8 Crystal River 4&5, 1-7 McDuffie Coal Terminal, 1-2 Transfer Facility – IMT, 1-4	H	(14) §366.093(3)(d) The Original Invoice Price is the same as the FOB Mine Price in column F, except in rare instances when the supplier is willing and able to disclose its short haul and loading costs (column G), if any, included in the contract price of coal. Disclosure would therefore be detrimental for the reasons identified in item (12) above.
Crystal River 1&2 , 1-8 Crystal River 4&5, 1-7 McDuffie Coal Terminal, 1-2 Transfer Facility – IMT, 1-4	J	(16) §366.093(3)(d) The Base Price is the same as the Original Invoice Price in column H, since retroactive price adjustments (column I) are normally received well after the reporting month and are included on Form 423-2C at that time. Disclosure would therefore be detrimental for the reasons identified in item (12) above.
Crystal River 1&2 , 1-7 Crystal River 4&5, 1-5 McDuffie Coal Terminal, 1-2 Transfer Facility – IMT, 1-4	K	(17) §366.093(3)(d) Quality Adjustments are normally received well after the reporting month and are therefore included on Form 423-2C at that time. These adjustments are based on variations in coal quality characteristics (usually BTU content) between contract specifications and actual deliveries. Disclosure of this information would allow the FOB mine price to be calculated using the associated tonnage and available contract BTU specifications.
Crystal River 1&2 , 1-8 Crystal River 4&5, 1-7 McDuffie Coal Terminal, 1-2 Transfer Facility – IMT, 1-4	L	(18) §366.093(3)(d) The Effective Purchase Price is the same as the Base Price in column J, since quality adjustments are normally not reported in column K. Disclosure would therefore be detrimental for the reasons identified in item (12) above.

Justification Matrix

Reporting Month: February 2006

REVISED: FEBRUARY 2006

REVISION DATE: 3/8/07

FORM 423-1A		
Line No.	Column	Justification
1-6	H	(1) §366.093(3)(d) The information under "Invoice Price", identifies the basic component of the contract pricing mechanism. Disclosure of the invoice price, particularly if in conjunction with information under other columns discussed below, would enable suppliers to determine the pricing mechanisms of their competitors. The likely result would be greater price convergence in future bidding. Disclosure would also result in a reduced ability on the part of a major purchaser such as PEF to bargain for price concessions, since suppliers would be reluctant or unwilling to grant concessions that other potential purchasers would then expect.
1-6	I	(2) §366.093(3)(d) Disclosure of the Invoice Amount, when divided by the Volume figure available from column G, would also disclose the Invoice Price in column.
1-6	J	(3) §366.093(3)(d) Disclosure of the Discount, in conjunction with other information under columns K, L, M or N, could also disclose the Invoice Price shown in column H by mathematical deduction. In addition, disclosure of discounts resulting from bargaining concessions would impair the ability of PEF to obtain such concessions in the future for the reasons discussed in item (1) above.
1-6	K	(4) §366.093(3)(d) See item (3) above.
1-6	L	(5) §366.093(3)(d) See item (3) above.
1-6	M	(6) §366.093(3)(d) See item (3) above.
1-6	N	(7) §366.093(3)(d) See item (3) above. This column is particularly sensitive because it is usually the same as or only slightly different from the Invoice Price in column H.
1-6	O	(8) §366.093(3)(d) Disclosure of the Transportation to Terminal Charges, in conjunction with the information under column Q, would also disclose the Effective Purchase Price in column N by subtracting them from the Delivered Price available in column R.
1-6	Q	(9) §366.093(3)(d) See item (8) above.

FORM 423-2

<u>Plant Name, Line No.</u>	<u>Column</u>	<u>Justification</u>
Crystal River 1&2 , 1-7 Crystal River 4&5, 1-8 McDuffie Coal Terminal, 1 Transfer Facility – IMT, 1-7	G	(10) §366.093(3)(d) The Effective Purchase Price is also found on Form 423-2A, column L, and on Form 423-2B, column G. In nearly every case it is the same as the FOB Mine Price found under column F on Form 423-2A, which is the current contract price of coal purchased from each supplier by Progress Fuels Corporation (PFC) for delivery to PEF. Disclosure of this information would enable suppliers to determine the prices of their competitors, which would likely result in greater price convergence in future bidding. Disclosure would also result in a reduced ability on the part of a major purchaser such as PFC to bargain for price concessions on behalf of PEF, since suppliers would be reluctant or unwilling to grant concessions that other potential purchasers would then expect. In addition, disclosure of the Effective Purchase Price would also disclose the Total Transportation Cost in column H by subtracting column G from the FOB Plant Price in column I.
Crystal River 1&2 , 1-7 Crystal River 4&5, 1-8 McDuffie Coal Terminal, 1 Transfer Facility – IMT, 1-7	H	(11) §366.093(3)(d) See item (25) below. In addition, disclosure of the Total Transportation Cost would also disclose the Effective Purchase Price in column G when subtracted from the FOB Plant Price in column I.

FORM 423-2A

Plant Name, Lines	Column	Justification
Crystal River 1&2 , 1-7 Crystal River 4&5, 1-8 McDuffie Coal Terminal, 1 Transfer Facility – IMT, 1-7	F	(12) §366.093(3)(d) The FOB Mine Price is the current contract price of coal purchased from each supplier by PFC for delivery to PEF. Disclosure of this information would enable suppliers to determine the prices of their competitors, which would likely result in greater price convergence in future bidding. Disclosure would also result in a reduced ability on the part of a major purchaser such as PFC to bargain for price concessions on behalf of PEF, since suppliers would be reluctant or unwilling to grant concessions that other potential purchasers would then expect.
Crystal River 1&2 , 1-7 Crystal River 4&5, 1-8 McDuffie Coal Terminal, 1 Transfer Facility – IMT, 1-7	H	(14) §366.093(3)(d) The Original Invoice Price is the same as the FOB Mine Price in column F, except in rare instances when the supplier is willing and able to disclose its short haul and loading costs (column G), if any, included in the contract price of coal. Disclosure would therefore be detrimental for the reasons identified in item (12) above.
Crystal River 1&2 , 1-7 Crystal River 4&5, 1-8 McDuffie Coal Terminal, 1 Transfer Facility – IMT, 1-7	J	(16) §366.093(3)(d) The Base Price is the same as the Original Invoice Price in column H, since retroactive price adjustments (column I) are normally received well after the reporting month and are included on Form 423-2C at that time. Disclosure would therefore be detrimental for the reasons identified in item (12) above.
C Crystal River 1&2 , 1-7 Crystal River 4&5, 1-8 McDuffie Coal Terminal, 1 Transfer Facility – IMT, 1-7	K	(17) §366.093(3)(d) Quality Adjustments are normally received well after the reporting month and are therefore included on Form 423-2C at that time. These adjustments are based on variations in coal quality characteristics (usually BTU content) between contract specifications and actual deliveries. Disclosure of this information would allow the FOB mine price to be calculated using the associated tonnage and available contract BTU specifications.
Crystal River 1&2 , 1-7 Crystal River 4&5, 1-8 McDuffie Coal Terminal, 1 Transfer Facility – IMT, 1-7	L	(18) §366.093(3)(d) The Effective Purchase Price is the same as the Base Price in column J, since quality adjustments are normally not reported in column K. Disclosure would therefore be detrimental for the reasons identified in item (12) above.

FORM 423-2B

Plant Name, Lines	Column	Justification
Crystal River 1&2 , 1-7 Crystal River 4&5, 1-8 McDuffie Coal Terminal, 1 Transfer Facility – IMT, 1-7	G	(19) §366.093(3)(d) See item (10) above.
Crystal River 1&2 , 1-7 Crystal River 4&5, 1-6	I	(20) §366.093(3)(d) The information under Rail Rate is a function of PFC's contract rate with the railroad and the distance between each coal supplier and Crystal River. Since these distances are readily available, disclosure of the Rail Rate would effectively disclose the contract rate. This would impair the ability of a high volume user such as PFC to obtain rate concessions, since railroads would be reluctant to grant concessions that other rail users would then expect.
Crystal River 1&2 , 1-7 Crystal River 4&5, 1-6	J	(21) §366.093(3)(d) Other Rail Charges consist of PFC's railcar ownership cost. This cost is internal information which is not available to any party with whom PFC contracts, railroads or otherwise. If this information were disclosed to the railroad, their existing knowledge of PFC's rail rates would allow them to determine PFC's total rail cost and be better able to evaluate PFC's opportunity to economically use competing transportation alternatives.
Transfer Facility – IMT, 1, 5, 6	K	(22) §366.093(3)(d) The figures under River Barge Rate are a portion of the total cost reported in the Transportation Charges under column P on Form 423-2B. See item (26) below. In the case of waterborne deliveries to the Crystal River Plants, the figures represent PFC's current river barge transportation rate. Disclosure of these transportation rates would enable coal suppliers to bid a FOB mine price calculated to produce a delivered plant price at or marginally below PEF's current delivered price, which is available on Form 423-2, column I. Without this opportunity to calculate a perceived maximum acceptable price, suppliers would be more likely to bid their best price.
McDuffie Coal Terminal, 1 Transfer Facility – IMT, 1-7	L	(23) §366.093(3)(d) The figures under Transloading Rate are a portion of the total cost reported in the Transportation Charges under column P on Form 423-2B. See item (26) below. In the case of waterborne deliveries to the Crystal River Plants, the figures represent PFC's current transloading rate. Disclosure of these transportation rates would enable coal suppliers to bid a FOB mine price calculated to produce a delivered plant price at or marginally below PEF's current delivered price, which is available on Form 423-2, column I. Without this opportunity to calculate a perceived maximum acceptable price, suppliers would be more likely to bid their best price.

REVISED JUNE 2006

REVISION DATE: 3/8/07

FORM 423-2C

Plant Name, Line No.	Column	Justification
Crystal River 1&2, 1-17 Crystal River 4&5, 1-4, 8, 12, 13 Transfer Facility-IMT, None	J	(27) The type of information under this column and column K relates to the particular column on Form 423-2, 2A, or 2B to which the adjustment applies (identified in column I). The column justifications above also apply to the adjustments for those column reported on Form 423-2C. In particular, see item (14), Retroactive Price Increases, and item (16), Quality Adjustments, which apply to the majority of the adjustments on Form 423-2C.
Crystal River 1&2, 1-17 Crystal River 4&5, 1-4, 8 12, 13 Transfer Facility-IMT, None	K	(28) See item (27) above.

FORM 423-2A

Plant Name, Lines	Column	Justification
Crystal River 1&2 , 1-8 Crystal River 4&5, 1-8 McDuffie Coal Terminal, 1 Transfer Facility – IMT, 1-5	F	(12) §366.093(3)(d) The FOB Mine Price is the current contract price of coal purchased from each supplier by PFC for delivery to PEF. Disclosure of this information would enable suppliers to determine the prices of their competitors, which would likely result in greater price convergence in future bidding. Disclosure would also result in a reduced ability on the part of a major purchaser such as PFC to bargain for price concessions on behalf of PEF, since suppliers would be reluctant or unwilling to grant concessions that other potential purchasers would then expect.
Crystal River 1&2 , 1-8 Crystal River 4&5, 1-8 McDuffie Coal Terminal, 1 Transfer Facility – IMT, 1-5	H	(14) §366.093(3)(d) The Original Invoice Price is the same as the FOB Mine Price in column F, except in rare instances when the supplier is willing and able to disclose its short haul and loading costs (column G), if any, included in the contract price of coal. Disclosure would therefore be detrimental for the reasons identified in item (12) above.
Crystal River 1&2 , 1-8 Crystal River 4&5, 1-8 McDuffie Coal Terminal, 1 Transfer Facility – IMT, 1-5	J	(16) §366.093(3)(d) The Base Price is the same as the Original Invoice Price in column H, since retroactive price adjustments (column I) are normally received well after the reporting month and are included on Form 423-2C at that time. Disclosure would therefore be detrimental for the reasons identified in item (12) above.
Crystal River 1&2 , 1-8 Crystal River 4&5, 1-6 McDuffie Coal Terminal, 1 Transfer Facility – IMT, 1-5	K	(17) §366.093(3)(d) Quality Adjustments are normally received well after the reporting month and are therefore included on Form 423-2C at that time. These adjustments are based on variations in coal quality characteristics (usually BTU content) between contract specifications and actual deliveries. Disclosure of this information would allow the FOB mine price to be calculated using the associated tonnage and available contract BTU specifications.
Crystal River 1&2 , 1-8 Crystal River 4&5, 1-8 McDuffie Coal Terminal, 1 Transfer Facility – IMT, 1-5	L	(18) §366.093(3)(d) The Effective Purchase Price is the same as the Base Price in column J, since quality adjustments are normally not reported in column K. Disclosure would therefore be detrimental for the reasons identified in item (12) above.

Crystal River 4&5, 7-8		<p>are a portion of the total cost reported in the Transportation Charges under column P on Form 423-2B. See item (26) below. In the case of waterborne deliveries to the Crystal River Plants, the figures represent PFC's current transloading rate. Disclosure of these transportation rates would enable coal suppliers to bid a FOB mine price calculated to produce a delivered plant price at or marginally below PEF's current delivered price, which is available on Form 423-2, column I. Without this opportunity to calculate a perceived maximum acceptable price, suppliers would be more likely to bid their best price.</p>
<p>Crystal River 1&2 , None Crystal River 4&5, 7-8</p>	N	<p>(25) §366.093(3)(d) The figures under Other Water Charges are a portion of the total cost reported in the Transportation Charges under column P on Form 423-2B. See item (26) below. In the case of waterborne deliveries to the Crystal River Plants, the figures represent PFC's current transloading rate. Disclosure of these transportation rates would enable coal suppliers to bid a FOB mine price calculated to produce a delivered plant price at or marginally below PEF's current delivered price, which is available on Form 423-2, column I. Without this opportunity to calculate a perceived maximum acceptable price, suppliers would be more likely to bid their best price.</p>
<p>Crystal River 1&2 , 1-8 Crystal River 4&5, 1-8 McDuffie Coal Terminal, 1 Transfer Facility – IMT, 1-5</p>	P	<p>(26) §366.093(3)(d) The figures under Transportation Charges are the total cost reported as transportation charges. In the case of waterborne deliveries to the Crystal River Plants, the figures represent PFC's current transloading rate. Disclosure of these transportation rates would enable coal suppliers to bid a FOB mine price calculated to produce a delivered plant price at or marginally below PEF's current delivered price, which is available on Form 423-2, column I. Without this opportunity to calculate a perceived maximum acceptable price, suppliers would be more likely to bid their best price.</p>

FORM 423-2A		
Plant Name, Lines	Column	Justification
Crystal River 1&2 , 1-7 Crystal River 4&5, 1-9 McDuffie Coal Terminal, 1 Transfer Facility – IMT, 1-5	F	(12) §366.093(3)(d) The FOB Mine Price is the current contract price of coal purchased from each supplier by PFC for delivery to PEF. Disclosure of this information would enable suppliers to determine the prices of their competitors, which would likely result in greater price convergence in future bidding. Disclosure would also result in a reduced ability on the part of a major purchaser such as PFC to bargain for price concessions on behalf of PEF, since suppliers would be reluctant or unwilling to grant concessions that other potential purchasers would then expect.
Crystal River 1&2 , 1-7 Crystal River 4&5, 1-9 McDuffie Coal Terminal, 1 Transfer Facility – IMT, 1-5	H	(14) §366.093(3)(d) The Original Invoice Price is the same as the FOB Mine Price in column F, except in rare instances when the supplier is willing and able to disclose its short haul and loading costs (column G), if any, included in the contract price of coal. Disclosure would therefore be detrimental for the reasons identified in item (12) above.
Crystal River 1&2 , 1-7 Crystal River 4&5, 1-9 McDuffie Coal Terminal, 1 Transfer Facility – IMT, 1-5	J	(16) §366.093(3)(d) The Base Price is the same as the Original Invoice Price in column H, since retroactive price adjustments (column I) are normally received well after the reporting month and are included on Form 423-2C at that time. Disclosure would therefore be detrimental for the reasons identified in item (12) above.
C Crystal River 1&2 , 1-7 Crystal River 4&5, 1-7 McDuffie Coal Terminal, 1 Transfer Facility – IMT, 1-5	K	(17) §366.093(3)(d) Quality Adjustments are normally received well after the reporting month and are therefore included on Form 423-2C at that time. These adjustments are based on variations in coal quality characteristics (usually BTU content) between contract specifications and actual deliveries. Disclosure of this information would allow the FOB mine price to be calculated using the associated tonnage and available contract BTU specifications.
Crystal River 1&2 , 1-7 Crystal River 4&5, 1-9 McDuffie Coal Terminal, 1 Transfer Facility – IMT, 1-5	L	(18) §366.093(3)(d) The Effective Purchase Price is the same as the Base Price in column J, since quality adjustments are normally not reported in column K. Disclosure would therefore be detrimental for the reasons identified in item (12) above.

FORM 423-2B

Plant Name, Lines	Column	Justification
Crystal River 1&2 , 1-7 Crystal River 4&5, 1-6 McDuffie Coal Terminal, 1 Transfer Facility – IMT, 1-4	G	(19) §366.093(3)(d) See item (10) above.
Crystal River 1&2 , 1-7 Crystal River 4&5, 1-4	I	(20) §366.093(3)(d) The information under Rail Rate is a function of PFC's contract rate with the railroad and the distance between each coal supplier and Crystal River. Since these distances are readily available, disclosure of the Rail Rate would effectively disclose the contract rate. This would impair the ability of a high volume user such as PFC to obtain rate concessions, since railroads would be reluctant to grant concessions that other rail users would then expect.
Crystal River 1&2 , 1-7 Crystal River 4&5, 1-4	J	(21) §366.093(3)(d) Other Rail Charges consist of PFC's railcar ownership cost. This cost is internal information which is not available to any party with whom PFC contracts, railroads or otherwise. If this information were disclosed to the railroad, their existing knowledge of PFC's rail rates would allow them to determine PFC's total rail cost and be better able to evaluate PFC's opportunity to economically use competing transportation alternatives.
Transfer Facility – IMT, 1, 3-4	K	(22) §366.093(3)(d) The figures under River Barge Rate are a portion of the total cost reported in the Transportation Charges under column P on Form 423-2B. See item (26) below. In the case of waterborne deliveries to the Crystal River Plants, the figures represent PFC's current river barge transportation rate. Disclosure of these transportation rates would enable coal suppliers to bid a FOB mine price calculated to produce a delivered plant price at or marginally below PEF's current delivered price, which is available on Form 423-2, column I. Without this opportunity to calculate a perceived maximum acceptable price, suppliers would be more likely to bid their best price.
McDuffie Coal Terminal, 1 Transfer Facility – IMT, 1-4	L	(23) §366.093(3)(d) The figures under Transloading Rate are a portion of the total cost reported in the Transportation Charges under column P on Form 423-2B. See item (26) below. In the case of waterborne deliveries to the Crystal River Plants, the figures represent PFC's current transloading rate. Disclosure of these transportation rates would enable coal suppliers to bid a FOB mine price calculated to produce a delivered plant price at or marginally below PEF's current delivered price, which is available on Form 423-2, column I. Without this opportunity to calculate a perceived maximum acceptable price, suppliers would be more likely to bid their best price.
Crystal River 4&5 , 5-6	M	(24) §366.093(3)(d) The figures under Ocean Barge Rate

FORM 423-2A

Plant Name, Lines	Column	Justification
Crystal River 1&2 , 1-5 Crystal River 4&5, 1-7 McDuffie Coal Terminal, 1 Transfer Facility – IMT, 1-5	F	(12) §366.093(3)(d) The FOB Mine Price is the current contract price of coal purchased from each supplier by PFC for delivery to PEF. Disclosure of this information would enable suppliers to determine the prices of their competitors, which would likely result in greater price convergence in future bidding. Disclosure would also result in a reduced ability on the part of a major purchaser such as PFC to bargain for price concessions on behalf of PEF, since suppliers would be reluctant or unwilling to grant concessions that other potential purchasers would then expect.
Crystal River 1&2 , 1-5 Crystal River 4&5, 1-7 McDuffie Coal Terminal, 1 Transfer Facility – IMT, 1-5	H	(14) §366.093(3)(d) The Original Invoice Price is the same as the FOB Mine Price in column F, except in rare instances when the supplier is willing and able to disclose its short haul and loading costs (column G), if any, included in the contract price of coal. Disclosure would therefore be detrimental for the reasons identified in item (12) above.
Crystal River 1&2 , 1-5 Crystal River 4&5, 1-7 McDuffie Coal Terminal, 1 Transfer Facility – IMT, 1-5	J	(16) §366.093(3)(d) The Base Price is the same as the Original Invoice Price in column H, since retroactive price adjustments (column I) are normally received well after the reporting month and are included on Form 423-2C at that time. Disclosure would therefore be detrimental for the reasons identified in item (12) above.
Crystal River 1&2 , 1-5 Crystal River 4&5, 1-5 McDuffie Coal Terminal, 1 Transfer Facility – IMT, 1-5	K	(17) §366.093(3)(d) Quality Adjustments are normally received well after the reporting month and are therefore included on Form 423-2C at that time. These adjustments are based on variations in coal quality characteristics (usually BTU content) between contract specifications and actual deliveries. Disclosure of this information would allow the FOB mine price to be calculated using the associated tonnage and available contract BTU specifications.
Crystal River 1&2 , 1-5 Crystal River 4&5, 1-7 McDuffie Coal Terminal, 1 Transfer Facility – IMT, 1-5	L	(18) §366.093(3)(d) The Effective Purchase Price is the same as the Base Price in column J, since quality adjustments are normally not reported in column K. Disclosure would therefore be detrimental for the reasons identified in item (12) above.

FORM 423-2B

Plant Name, Lines	Column	Justification
Crystal River 1&2 , 1-5 Crystal River 4&5, 1-7 McDuffie Coal Terminal, 1 Transfer Facility – IMT, 1-5	G	(19) §366.093(3)(d) See item (10) above.
Crystal River 1&2 , 1-5 Crystal River 4&5, 1-5	I	(20) §366.093(3)(d) The information under Rail Rate is a function of PFC's contract rate with the railroad and the distance between each coal supplier and Crystal River. Since these distances are readily available, disclosure of the Rail Rate would effectively disclose the contract rate. This would impair the ability of a high volume user such as PFC to obtain rate concessions, since railroads would be reluctant to grant concessions that other rail users would then expect.
Crystal River 1&2 , 1-5 Crystal River 4&5, 1-5	J	(21) §366.093(3)(d) Other Rail Charges consist of PFC's railcar ownership cost. This cost is internal information which is not available to any party with whom PFC contracts, railroads or otherwise. If this information were disclosed to the railroad, their existing knowledge of PFC's rail rates would allow them to determine PFC's total rail cost and be better able to evaluate PFC's opportunity to economically use competing transportation alternatives.
Transfer Facility – IMT, 1, 4-5	K	(22) §366.093(3)(d) The figures under River Barge Rate are a portion of the total cost reported in the Transportation Charges under column P on Form 423-2B. See item (26) below. In the case of waterborne deliveries to the Crystal River Plants, the figures represent PFC's current river barge transportation rate. Disclosure of these transportation rates would enable coal suppliers to bid a FOB mine price calculated to produce a delivered plant price at or marginally below PEF's current delivered price, which is available on Form 423-2, column I. Without this opportunity to calculate a perceived maximum acceptable price, suppliers would be more likely to bid their best price.
McDuffie Coal Terminal, None Transfer Facility – IMT, 1-5	L	(23) §366.093(3)(d) The figures under Transloading Rate are a portion of the total cost reported in the Transportation Charges under column P on Form 423-2B. See item (26) below. In the case of waterborne deliveries to the Crystal River Plants, the figures represent PFC's current transloading rate. Disclosure of these transportation rates would enable coal suppliers to bid a FOB mine price calculated to produce a delivered plant price at or marginally below PEF's current delivered price, which is available on Form 423-2, column I. Without this opportunity to calculate a perceived maximum acceptable price, suppliers would be more likely to bid their best price.
Crystal River 4&5, 6-7	M	(24) §366.093(3)(d) The figures under Ocean Barge Rate

FORM 423-2A

Plant Name, Lines	Column	Justification
Crystal River 1&2 , 1-8 Crystal River 4&5, 1-5 McDuffie Coal Terminal, 1 Transfer Facility – IMT, 1-6	F	(12) §366.093(3)(d) The FOB Mine Price is the current contract price of coal purchased from each supplier by PFC for delivery to PEF. Disclosure of this information would enable suppliers to determine the prices of their competitors, which would likely result in greater price convergence in future bidding. Disclosure would also result in a reduced ability on the part of a major purchaser such as PFC to bargain for price concessions on behalf of PEF, since suppliers would be reluctant or unwilling to grant concessions that other potential purchasers would then expect.
Crystal River 1&2 , 1-8 Crystal River 4&5, 1-5 McDuffie Coal Terminal, 1 Transfer Facility – IMT, 1-6	H	(14) §366.093(3)(d) The Original Invoice Price is the same as the FOB Mine Price in column F, except in rare instances when the supplier is willing and able to disclose its short haul and loading costs (column G), if any, included in the contract price of coal. Disclosure would therefore be detrimental for the reasons identified in item (12) above.
Crystal River 1&2 , 1-8 Crystal River 4&5, 1-5 McDuffie Coal Terminal, 1 Transfer Facility – IMT, 1-6	J	(16) §366.093(3)(d) The Base Price is the same as the Original Invoice Price in column H, since retroactive price adjustments (column I) are normally received well after the reporting month and are included on Form 423-2C at that time. Disclosure would therefore be detrimental for the reasons identified in item (12) above.
Crystal River 1&2 , 1-7 Crystal River 4&5, 1-3 McDuffie Coal Terminal, 1 Transfer Facility – IMT, 1-6	K	(17) §366.093(3)(d) Quality Adjustments are normally received well after the reporting month and are therefore included on Form 423-2C at that time. These adjustments are based on variations in coal quality characteristics (usually BTU content) between contract specifications and actual deliveries. Disclosure of this information would allow the FOB mine price to be calculated using the associated tonnage and available contract BTU specifications.
Crystal River 1&2 , 1-8 Crystal River 4&5, 1-5 McDuffie Coal Terminal, 1 Transfer Facility – IMT, 1-6	L	(18) §366.093(3)(d) The Effective Purchase Price is the same as the Base Price in column J, since quality adjustments are normally not reported in column K. Disclosure would therefore be detrimental for the reasons identified in item (12) above.

FORM 423-2B

Plant Name, Lines	Column	Justification
Crystal River 1&2 , 1-8 Crystal River 4&5, 1-5 McDuffie Coal Terminal, 1 Transfer Facility – IMT, 1-6	G	(19) §366.093(3)(d) See item (10) above.
Crystal River 1&2 , 1-7 Crystal River 4&5, 1-3	I	(20) §366.093(3)(d) The information under Rail Rate is a function of PFC's contract rate with the railroad and the distance between each coal supplier and Crystal River. Since these distances are readily available, disclosure of the Rail Rate would effectively disclose the contract rate. This would impair the ability of a high volume user such as PFC to obtain rate concessions, since railroads would be reluctant to grant concessions that other rail users would then expect.
Crystal River 1&2 , 1-7 Crystal River 4&5, 1-3	J	(21) §366.093(3)(d) Other Rail Charges consist of PFC's railcar ownership cost. This cost is internal information which is not available to any party with whom PFC contracts, railroads or otherwise. If this information were disclosed to the railroad, their existing knowledge of PFC's rail rates would allow them to determine PFC's total rail cost and be better able to evaluate PFC's opportunity to economically use competing transportation alternatives.
Transfer Facility – IMT, 1, 5	K	(22) §366.093(3)(d) The figures under River Barge Rate are a portion of the total cost reported in the Transportation Charges under column P on Form 423-2B. See item (26) below. In the case of waterborne deliveries to the Crystal River Plants, the figures represent PFC's current river barge transportation rate. Disclosure of these transportation rates would enable coal suppliers to bid a FOB mine price calculated to produce a delivered plant price at or marginally below PEF's current delivered price, which is available on Form 423-2, column I. Without this opportunity to calculate a perceived maximum acceptable price, suppliers would be more likely to bid their best price.
McDuffie Coal Terminal, None Transfer Facility – IMT, 1-6	L	(23) §366.093(3)(d) The figures under Transloading Rate are a portion of the total cost reported in the Transportation Charges under column P on Form 423-2B. See item (26) below. In the case of waterborne deliveries to the Crystal River Plants, the figures represent PFC's current transloading rate. Disclosure of these transportation rates would enable coal suppliers to bid a FOB mine price calculated to produce a delivered plant price at or marginally below PEF's current delivered price, which is available on Form 423-2, column I. Without this opportunity to calculate a perceived maximum acceptable price, suppliers would be more likely to bid their best price.
Crystal River 1&2, 8	M	(24) §366.093(3)(d) The figures under Ocean Barge Rate