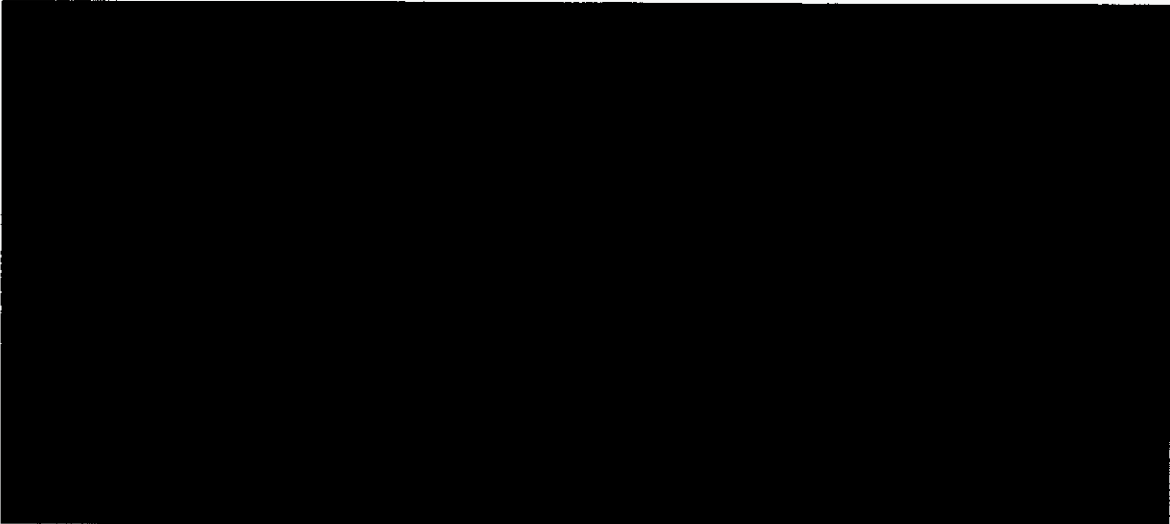
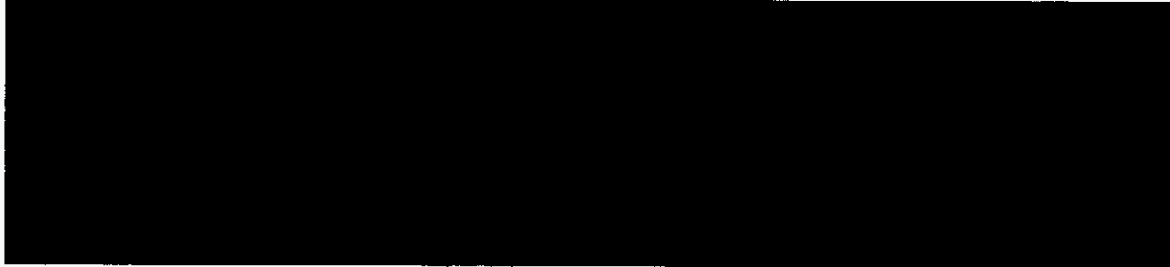


1 amount of future coal generation to continue to become more uncertain. In  
2 addition, weather and economic conditions will continue to impact future coal  
3 burn requirements.

**REDACTED**



28 **Pricing Risk and Strategy**

29 Competing for energy market share with other utilities and power marketers  
30 requires competitive energy pricing. Because more than 50 percent of the cost

1 for coal-fired generation is fuel, competitively priced coal supplies should be  
2 maintained.

3

4 The objective is to have a portfolio of long-term contracts and spot coal supplies  
5 that provide pricing at or below market at any given point in time.

6 Where negotiations allow, mechanisms to achieve this objective include:

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15 Due to the size of our system, the volume of purchases made at a particular time  
16 can impact the market. Ranking bid proposals in order of least cost and  
17 cumulative volume produces a price curve similar to the following:

18

**Fuel Price Curve**

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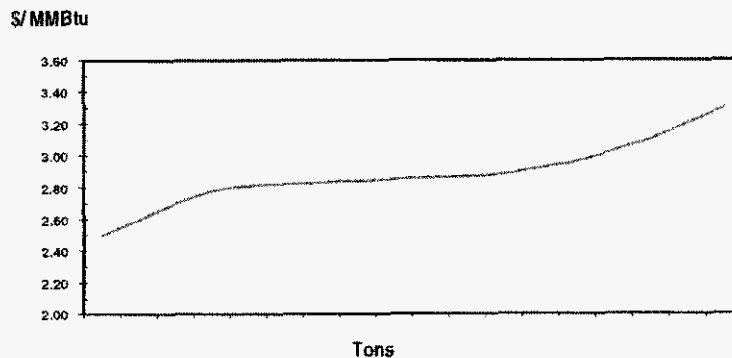
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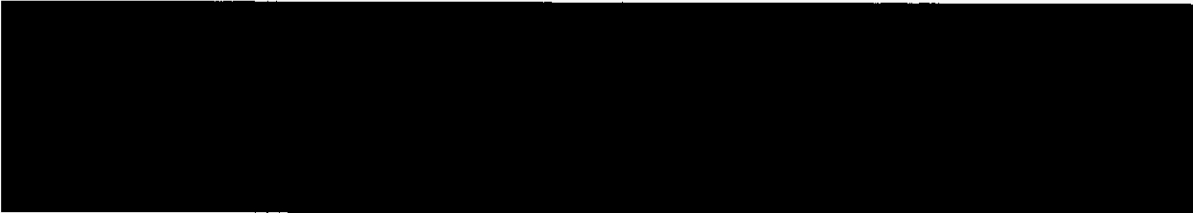
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**Diversity of Supply Risk and Strategy**

There is a risk in relying on one or two large producers from a single region to meet supply needs. Also, having the ability to burn coal from various regions will decrease the availability risk associated with lack of supply in a particular region. Diversifying will also keep the competition strong among the suppliers.

Close involvement with plant personnel will be required to actively pursue alternate sources, including testing and plant modifications if required.

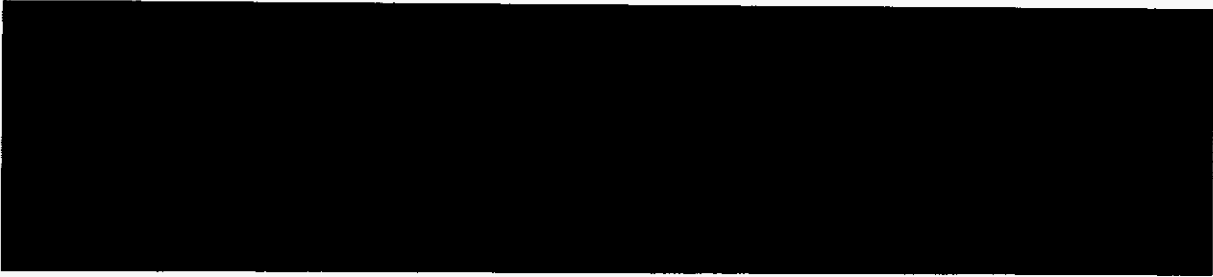
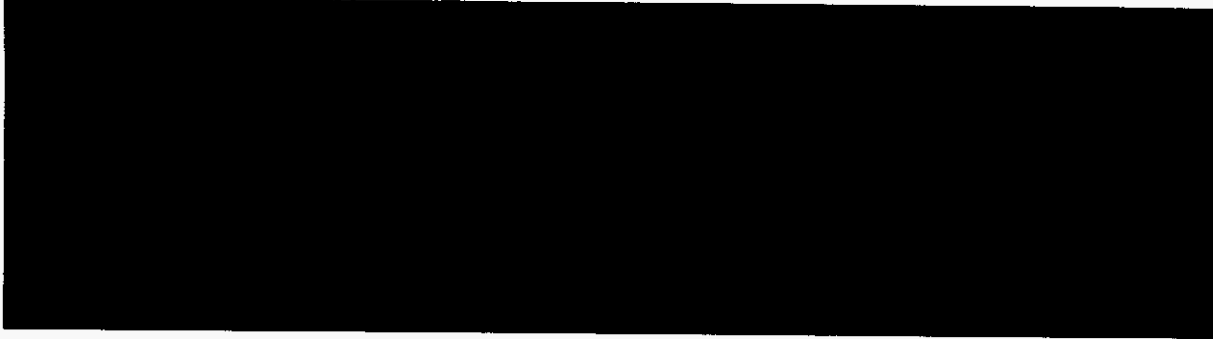


**Reliability Risk and Strategy**

When a supply and demand imbalance occurs in the coal industry, reliability of supply poses a risk. Securing business with producers that have performed well during times of unreliable supply can mitigate that risk. Also, in addition to an economic evaluation, technical and financial evaluations of suppliers are now a required part of the coal procurement process.



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**Environmental Risk and Strategy**

When procuring coal for a term greater than 12 months, a major risk factor is the potential impact from future changes in environmental laws and regulations that may render the burning of coal as non-economic to our system.



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**Strategic Plan**

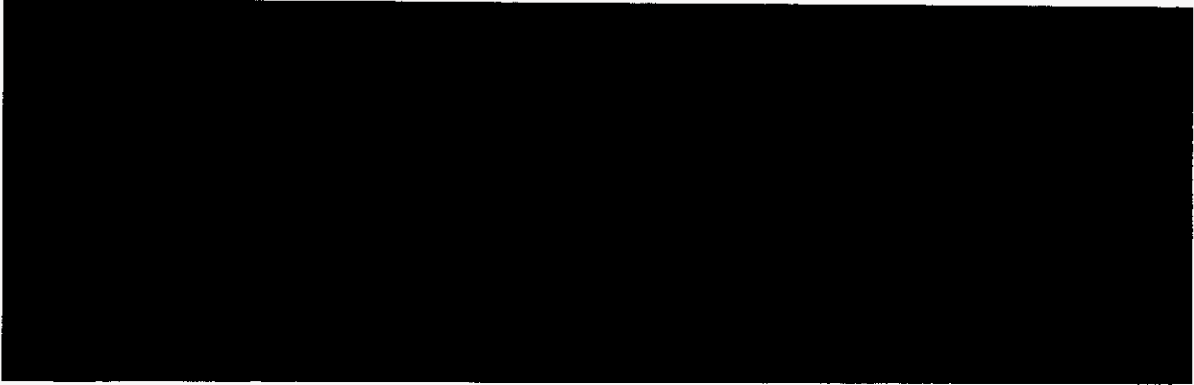
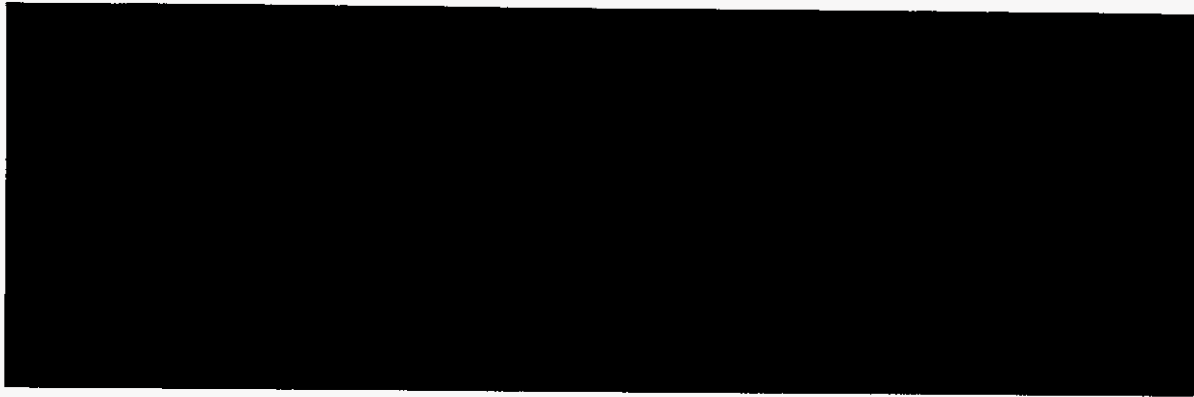
As mentioned above, when procuring coal for Gulf, the Crist and Smith plants will be grouped together because of their common supply source and transportation mode. Diversity of supply and flexibility will be important aspects of their fuel supply strategy.

On the other hand, Scholz can burn similar quality coals, but its transportation mode differs because it is rail served. The co-owned plants, Daniel and Scherer, will be treated individually.

Crist – In 2011, Crist will be served by Marquette Barge Company. Crist burns between 1.5 and 2.5 million tons of coal a year and must comply with a state SO<sub>2</sub> emission limit of 2.1 lbs SO<sub>2</sub>/MMBTU. For the past several years, Crist has burned low sulfur Illinois Basin coal from the Galatia mine. Crist can also burn Colombian import coals, as well as coals from Colorado, Utah and the Central Appalachian regions. Crist is considered an intermediate coal plant with a projected capacity factor of greater than 60 percent.

Smith – In 2011, Smith will also be served by Marquette Barge Company. It burns between 500,000 and 1 million tons of coal a year and must comply with the state SO<sub>2</sub> emission limit of 2.1 lbs SO<sub>2</sub>/MMBTU. Smith can burn a variety of

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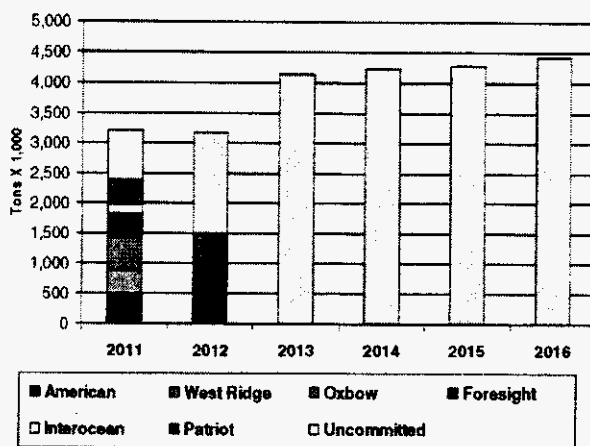
1 **Tactical Plan**

2

3 **Crist and Smith**

4 The chart below shows a breakdown of the current Crist and Smith suppliers and  
5 volume commitments, including options, through 2016.

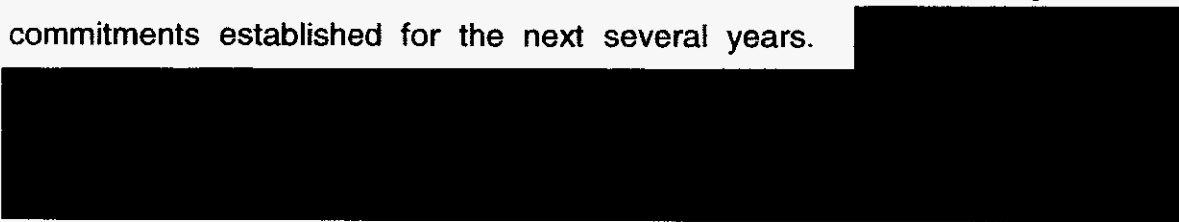
**Gulf Power Company – Crist & Smith  
Fuel Program Status - Supplier Breakdown**



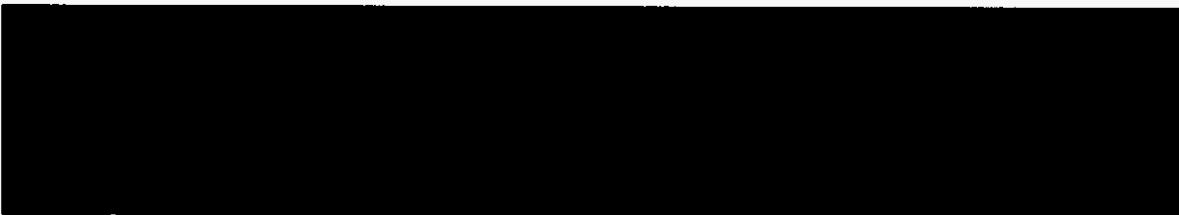
Sources: 2011 & 2012 – GPIF Burn File  
2013 Forward – July 2010 Burn Update

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8 The strategy for the intermediate plants is to have a certain percentage of firm  
9 commitments established for the next several years.



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In recent years, Crist and Smith have undertaken a plan to blend Illinois Basin coal with Colombian coal in order to take advantage of an increased Btu content and decreased sulfur content of a blended coal. This practice of blending Illinois Basin coal with Colombian coal is scheduled to continue through mid-2011. However, beginning in 2011, this plan will change to an Illinois Basin - Central Appalachian coal blend or an Illinois Basin - Colorado/Utah coal blend as the Interocean contract is due to expire on May 31, 2011.

Both Crist and Smith's portfolio currently includes coals from other supply regions such as the Central Appalachian region and the Western bituminous regions of Colorado and Utah. These coals are being delivered by rail to the Alabama State Docks (ASD) in Mobile, Alabama.

In 2009, the ASD upgraded the rail unloading facility at the Bulk Terminal to allow for an increase in volume of rail coal at this facility. Shipments can also be delivered to various ports along the Mississippi River and transloaded into barges for ultimate delivery to Crist and Smith.

Crist and Smith have an uncommitted need of approximately 815,000 tons in 2011. The plan is to issue a spot coal solicitation in the fourth quarter of 2010 to fulfill a portion or, depending on pricing, all of this uncommitted need. Beginning in 2012, Crist and Smith have a combined uncommitted need of approximately 1.7 million tons. This uncommitted need increases to approximately 4.0 million tons for years 2013 through 2016. The plan will be to issue a long-term solicitation in the second quarter of 2011 to fulfill percentages of firm commitments that conform to Gulf's long-term procurement strategy through 2016



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11 As mentioned above, Illinois Basin and Central Appalachian coals must be  
12 blended on a 50/50 basis before delivery to Crist and Smith. This is currently  
13 accomplished by railing both coals to the ASD, blending them for transloading  
14 into barges. This blending process could be performed at other off-site locations  
15 as economics permit.

16

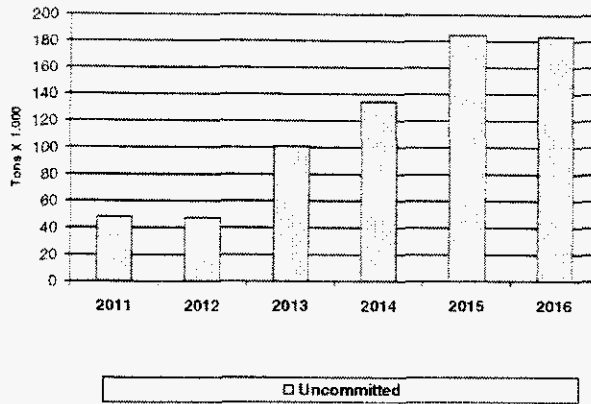
17 Western bituminous coals can either be railed direct to ASD and transloaded into  
18 barges or railed to the Mississippi River and transloaded into barges for ultimate  
19 delivery to Crist and Smith. Currently, no transportation infrastructure  
20 improvements will be necessary for the movement of these coals to Gulf's plants.  
21 At this time, it is unknown whether the plant will need some time to acquire  
22 additional equipment for burning large volumes of the Illinois Basin coals.

23

24 **Scholz**

25 The chart below shows a breakdown of the current Scholz suppliers and volume  
26 commitment, including options, through 2016.

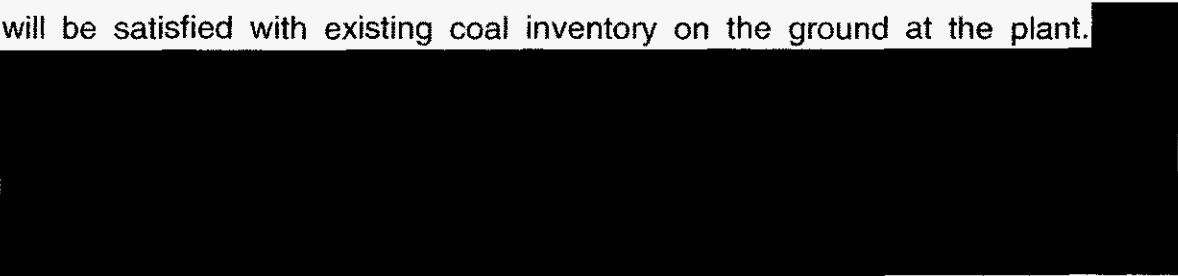
### Gulf Power Company – Scholz Fuel Program Status - Supplier Breakdown



Sources: 2011 & 2012 – GPIF Burn File  
2013 Forward – July 2010 Burn Update

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As mentioned previously, Scholz is served by the CSX Railroad. Scholz’s burn is projected to be 48,000 tons in 2011. These short-term requirements at Scholz will be satisfied with existing coal inventory on the ground at the plant.

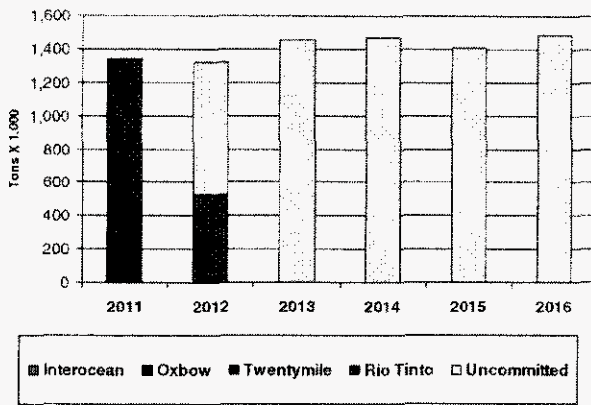


Because Scholz is a peaking plant, its fuel supply will be based on limited-term, firm commitments and/or spot purchases depending on burn projections. Contract commitment terms will be two years or less. If commitments are made for more than 50 percent of projected burn requirements, the contract will match the maximum annual tonnage purchased to the plant burn requirements.

**Daniel**

The chart below shows a breakdown of the current Daniel suppliers and volume commitments, including options, through 2016.

### Gulf Power Company – Daniel Fuel Program Status - Supplier Breakdown



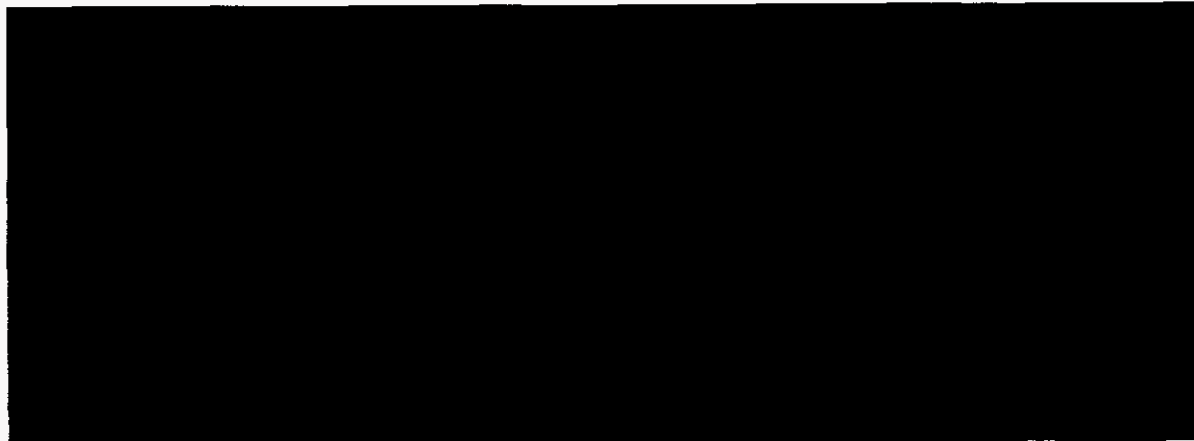
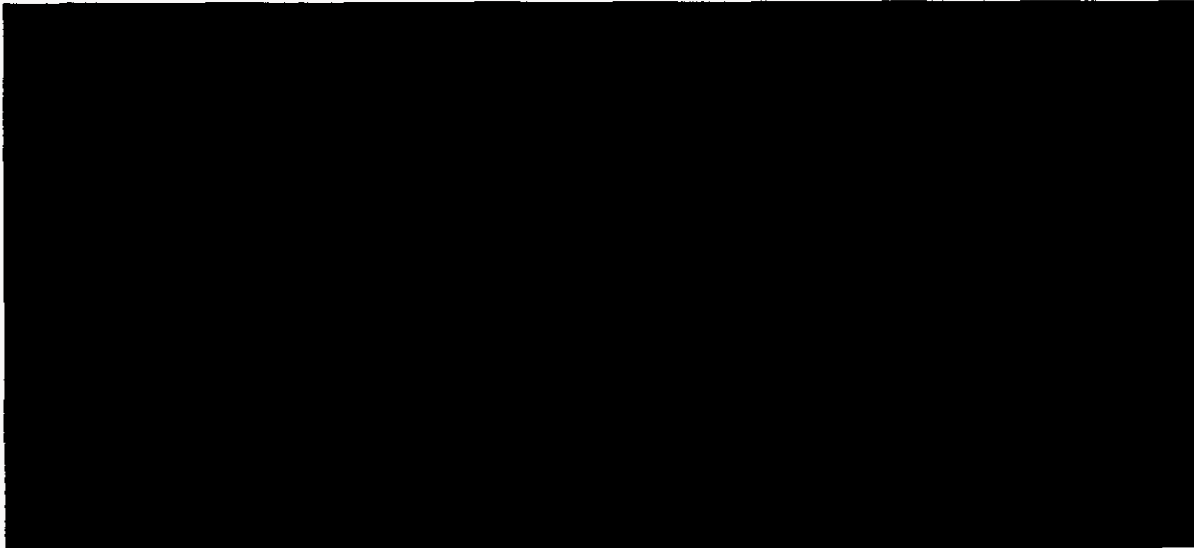
Sources: 2011 & 2012 – GPIF Burn File  
2013 Forward – July 2010 Burn Update

1  
2 As mentioned earlier, the strategy for intermediate plants is to have a certain  
3 percentage of firm commitments established for the next several years. [REDACTED]

4 [REDACTED]  
5 [REDACTED]  
6 [REDACTED]  
7  
8 In 2011 (year one), Daniel is 100 percent committed based on current burn  
9 projections, 40 percent committed in year two and has no committed coal in  
10 years three and four. A long-term solicitation will be issued in 2011 for up to a  
11 four-year term (2012 to 2015) covering the requisite committed percentages for  
12 those years. These contracts will be negotiated using the strategies mentioned  
13 above.

14  
15 For 2011 and forward, the tactical plan consists of continuing to diversify Daniel's  
16 coal supply into two or three regions with one supplier having no more than 30  
17 percent of the plant's commitment. Daniel's portfolio has diversified its coal  
18 supply by taking coal from Colorado, import and PRB regions. For 2014, Daniel  
19 has committed to approximately two-thirds Colorado coal and one-third PRB

1 Both Illinois Basin and Central Appalachian coals can be railed directly to Daniel,  
2 although some infrastructure improvements would be necessary. At this time, it  
3 is uncertain if the plant will need some time to acquire additional plant equipment  
4 necessary for burning Illinois Basin coals. The procurement group will need to be  
5 cognizant of the environmental controls placed on the units and ensure that the  
6 coals purchased will meet the environmental requirements.





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1 for shipment to the plant by the CN and interchange with the MSE. Daniel can  
2 also receive Central Appalachian coal via the CSXT and interchange with the  
3 MSE. Another potential source of Central Appalachian coal is via the NS railroad  
4 through an interchange agreement with the CN railroad. Currently, Daniel  
5 receives Colorado, PRB, and import coal.

6  
7 UP Agreement UP-52624 with UP/CN/MSE provides for rail transportation of  
8 Colorado coal to Daniel through Dec. 31, 2011. The agreement has an annual  
9 minimum volume requirement of 1 million tons and a maximum of 2.2 million tons  
10 of coal that can be shipped.

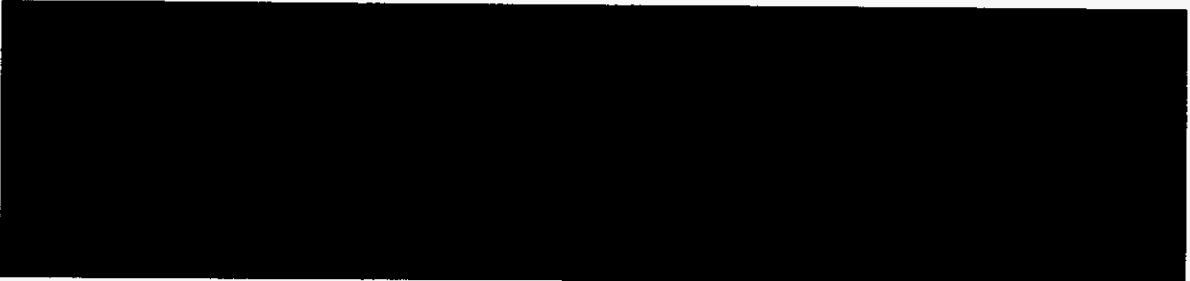
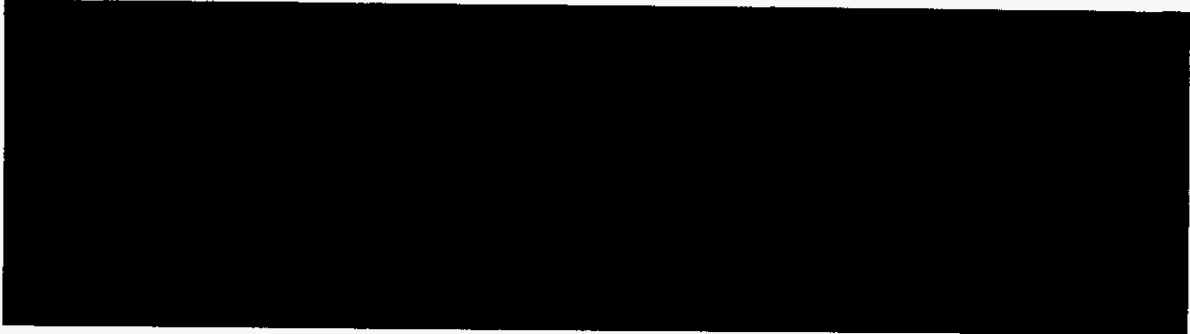
11  
12 BNSF Agreement BNSF-12523 with BNSF/CN/MSE provides for rail  
13 transportation of PRB coal to Daniel through Dec. 31, 2011. The agreement has  
14 an annual minimum volume requirement of 1 million tons and a maximum of 1.3  
15 million tons of coal that can be shipped.

16  
17 CN/MSE Tariff Agreement CN-682227AB provides for rail transportation of  
18 import coal from the Alabama State Docks facility to Daniel. The tariff rate  
19 expires Dec. 31, 2010. The tariff has no minimum volume requirements.

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21 **Budget**



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1 **Coal Transportation Procurement Strategy**

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3 A transportation strategy must address reliability, competitive prices, flexibility in  
4 volume commitments, and the ability to adjust coal movements to changing coal  
5 supply sources. The following information will address the risks associated with  
6 each of these areas and identifies strategies to mitigate them.

7  
8 **RISKS AND RISK MITIGATION STRATEGIES**

9  
10 **Reliability Risk and Strategy**

11  
12 Reliable delivery of coal ensures that fuel will be available to generate electricity.  
13 Term agreements will be negotiated and signed with the transportation carriers  
14 that ensure the barge and rail companies will have available infrastructure and  
15 resources in place to transport the required coal supply. The terms of the  
16 transportation agreements will coincide with the terms of single source coal  
17 supply agreements as closely as possible.



29  
30 Communication between Gulf's coal operating personnel, each plant, Southern  
31 Company Generation Fuel Services, and the various carriers is vital in



1 maintaining reliable and efficient operations. Effective and timely communication  
2 of transportation plans, orders, problems, and maintenance is critical.

3  
4 **Pricing Risk and Strategy**

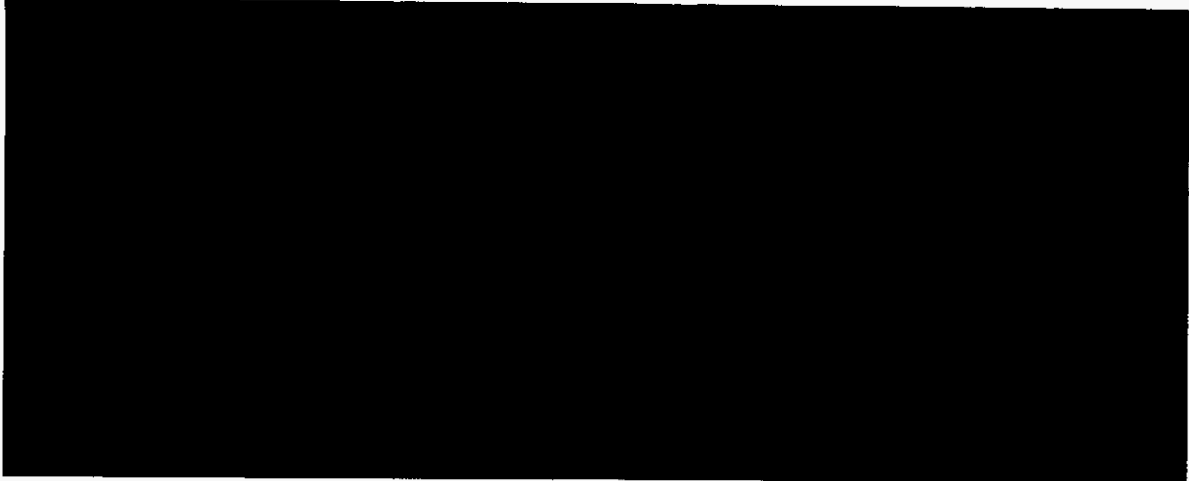
5  
6 Competition is created with diversity of coal supply sources and alternative  
7 transportation modes at each of the plants. Competition is achieved by  
8 periodically bidding transportation alternatives and educating carriers on the  
9 effects of marginal dispatch changes on unit load requirements.



17  
18 **Volume Risk and Strategy**

19  
20 The uncertainty in the amount of coal generation and transportation that will be  
21 needed in the future is still one of the most critical risks that must be addressed  
22 in developing a strategy for long-term transportation procurement. Weather,  
23 natural gas pricing, and economic growth will continue to impact future coal burn  
24 requirements, as will the addition of gas-fired capacity to the Southern Company  
25 system. Over the past two years, the coal industry has become more susceptible  
26 to the influences of the global commodities market. Given the global market  
27 dynamics that occurred during this time frame, the coal market has reacted by  
28 becoming more volatile from both a pricing and volume availability standpoint.  
29 This has, in turn, impacted the dynamics between natural gas and coal, leading  
30 to increased uncertainty in coal burn.

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21 **Supply Risk and Strategy**

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23 It is desirable to have multiple transportation modes and carriers in case there is  
24 a rail and/or barge accident that might disrupt the supply chain. Diversity of  
25 transportation modes and carriers is also vital because the location of coal supply  
26 sources changes as environmental laws and regulations evolve and as coal is  
27 depleted in established regions.

28

29 It is vital to the success of a coal and transportation program to ensure  
30 infrastructure is in place to move the coal from changing locations as this occurs.


1 This may include enhancements to existing facilities or the development of new  
2 facilities.

3  
4 The Alabama State Docks' McDuffie Coal Terminal has the capacity to receive  
5 approximately 16 million tons of import coal per year. In addition, the Alabama  
6 State Docks recently completed the Bulk Unloader Railcar Project at the  
7 Alabama State Docks' Bulk Materials Handling Plant (Bulk Plant). Upgrade of  
8 railcar handling facilities provides the Bulk Plant with the ability to receive an  
9 additional 3 million tons of coal per year by rail.

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11 **Tactical Plan**

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13 **Plants Crist and Smith**

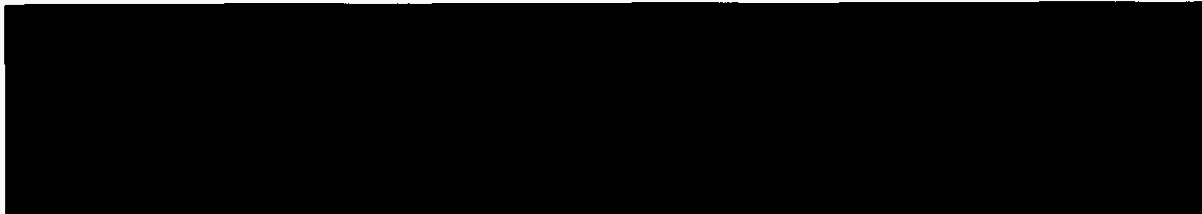
14  
15 UP Agreement UP-53281 provides for rail transportation of Colorado coal to the  
16 Cora Dock terminal on the Mississippi River through Dec. 31, 2010. There are no  
17 annual minimum or maximum volume requirements in this agreement.

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23 UP Agreement UP-53285 with Utah Railway/UP/CN provides for rail  
24 transportation of Utah coal from the Wild Cat loadout to the Alabama State Docks  
25 through Dec. 31, 2010. There is no annual minimum volume requirement in the  
26 agreement; however, the agreement includes a maximum of 600,000 tons of coal  
27 that can be shipped.

1 UP Agreement UP-53286 with UP/CN provides for rail transportation of Colorado  
2 and Utah coal to the Alabama State Docks through Dec. 31, 2011. The  
3 agreement has an annual minimum volume requirement of 1 million tons and a  
4 maximum of 1.8 million tons of coal that can be shipped in 2010. In 2011, the  
5 annual minimum volume requirement is 400,000 tons and the maximum volume  
6 is 1.2 million tons of coal that can be shipped. Per the agreement, tons that are  
7 shipped pursuant to UP-53285 shall count toward the minimum volume  
8 requirement in UP-53286 during the year in which they are shipped.



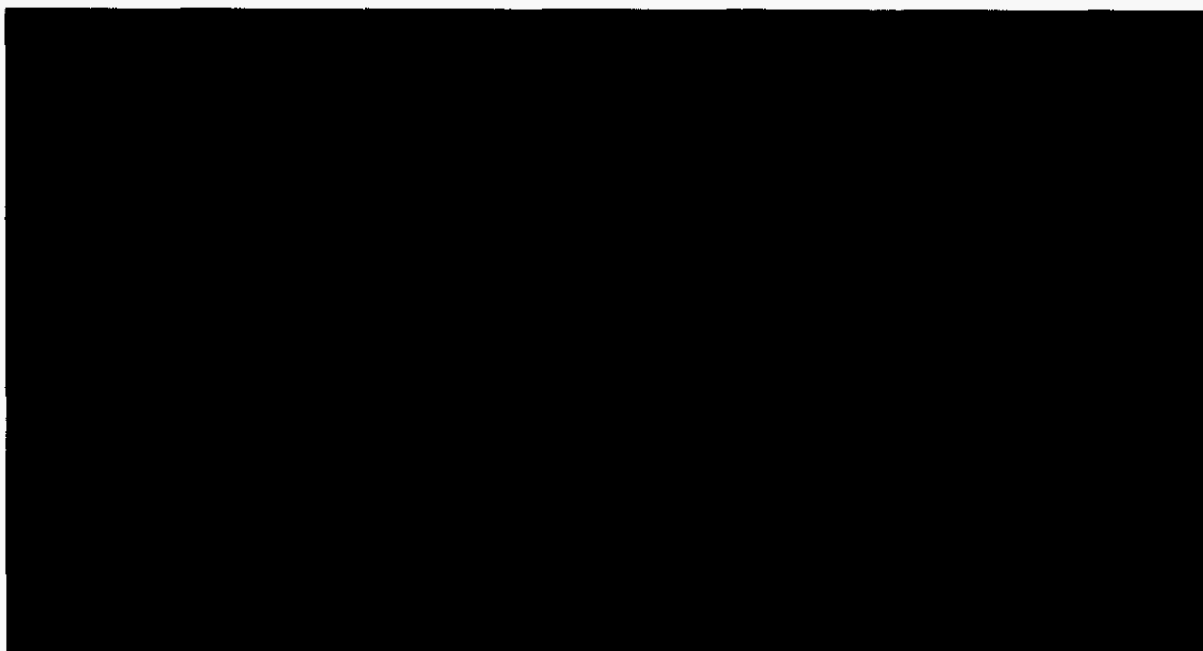
13  
14 Gulf has entered into a contract to purchase Central Appalachian coal from  
15 Patriot Coal Sales beginning Jan.1, 2011. The coal will be transported by rail to  
16 the Alabama State Docks and transloaded to barges for shipment to Crist.



22  
23 Gulf has entered into a contract to purchase Illinois Basin coal from Foresight  
24 Coal Sales beginning Jan.1, 2011. The coal will be transported by rail to the  
25 Alabama State Docks and transloaded to barges for shipment to Crist.



1 Marquette agreement (SC09005-T) provides primary barge transportation of coal  
2 from the Alabama State Docks to Crist and Smith. Marquette agreement  
3 (SC09006-T) and Heartland Barge Management agreement (SC09004-T)  
4 provide a supply of barges to move coal to Crist and Smith. These agreements  
5 expire Dec. 31, 2014.



19 The Crouse agreement (GU10002-B) provides barge transportation of Central  
20 Appalachian and Illinois Basin coals from river terminals located on the Kanawha  
21 and Ohio rivers to the Mobile, Ala area and to Plant Crist. This agreement  
22 expires Dec. 31, 2010.



27 **Plant Scholz**

28  
29 Scholz has an agreement with the CSXT Railroad (CSXT-C-83791) that expires  
30 Dec. 31, 2011.

1 [REDACTED]  
2 [REDACTED]  
3 [REDACTED]  
4 [REDACTED]

5 **Plant Daniel**

6  
7 UP Agreement UP-52624 with UP/CN/MSE provides for rail transportation of  
8 Colorado coal to Daniel through Dec. 31, 2011. The agreement has an annual  
9 minimum volume requirement of 1 million tons and a maximum of 2.2 million tons  
10 of coal that can be shipped.

11 [REDACTED]  
12 [REDACTED]  
13 [REDACTED]  
14 [REDACTED]

15  
16 BNSF Agreement BNSF-12523 with BNSF/CN/MSE provides for rail  
17 transportation of PRB coal to Daniel through Dec. 31, 2011. The agreement has  
18 an annual minimum volume requirement of 1 million tons and a maximum of 1.3  
19 million tons of coal that can be shipped.

20  
21 [REDACTED]  
22 [REDACTED]  
23 [REDACTED]

24  
25 CN/MSE Tariff Agreement CN-665098AB provides for rail transportation of  
26 import coal from the Alabama State Docks facility to Daniel. The tariff rate  
27 expires Dec. 31, 2010.

28  
29 [REDACTED]  
30 [REDACTED]  
31 [REDACTED]

1 year. The following chart shows the total projected gas burn for 2010 through  
2 2013 in MMBTU that these purchases will support:

3

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A B C

PROJECTED NATURAL GAS BURN (MMBTU)

	Month	2010	2011	2012	2013
a	January	25678			
b	February	511248			
c	March	1151522			
d	April	1634771			
e	May	1627560			
f	June	1366728			
g	July	1520126			
h	August	1290826			
i	September	1118224			
j	October	1169487			
k	November	672369			
l	December	330826			
m	<b>TOTAL</b>	<b>12419365</b>			

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1 **Procurement Strategy**

2 Gulf's strategy for gas procurement is to purchase the commodity using long  
3 term and spot agreements at market prices. Fuel purchased at market over a  
4 long period is a low cost option for customers. [REDACTED]

5 [REDACTED]  
6 [REDACTED]  
7 [REDACTED]  
8 [REDACTED]  
9 [REDACTED]  
10 [REDACTED] For Gulf, spot-market contracts have a term of less than one year  
11 and long-term contracts have a term of 1 year or longer. All natural gas,  
12 regardless of whether it is bought under long-term contracts or spot-market  
13 contracts, is purchased at market based prices. While fuel purchased at market  
14 over long periods is a low cost option for customers, it does expose the  
15 customers to short-term price volatility. Since these price fluctuations can be  
16 severe, Gulf Power, at the direction of the Florida Public Service Commission,  
17 will attempt to protect its customers against short-term price volatility by utilizing  
18 hedging tools. It is understood that the cost of hedging will sometimes lead to  
19 fuel costs that are higher than market prices but that this is a reasonable trade-off  
20 for reducing the customers' exposure to fuel cost increases that would result if  
21 fuel prices actually settle at higher prices than when the hedges were placed.



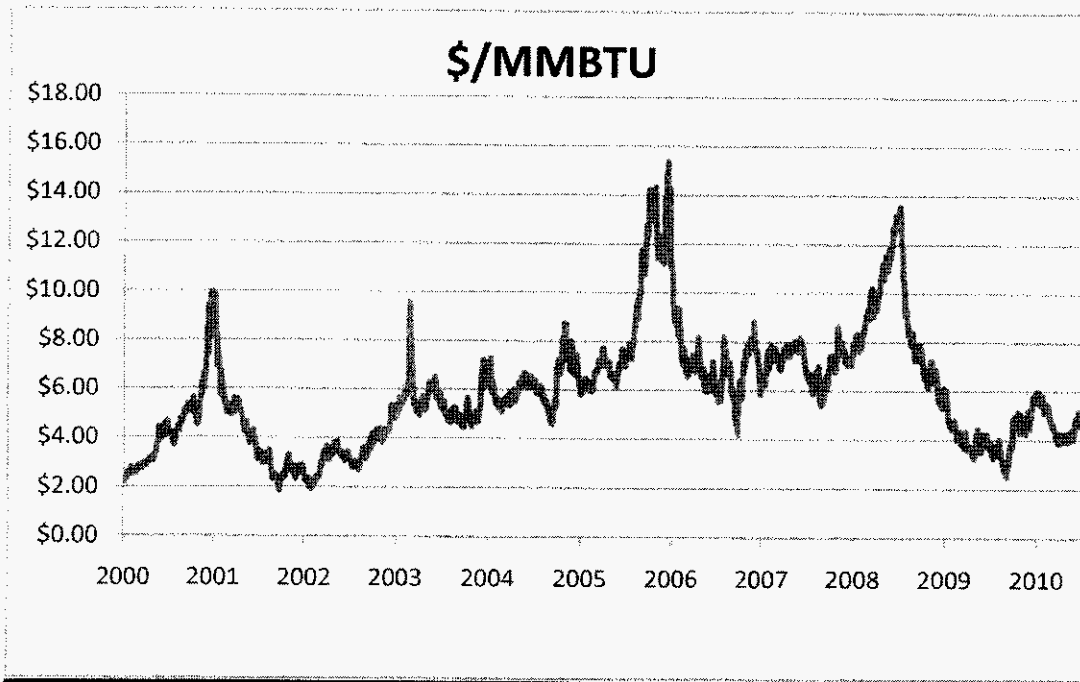
**CONFIDENTIAL**

1 The following graph of actual natural gas prices is an indication of price volatility  
2 in the gas commodity market:

3

4 **Historical Natural Gas Prices - NYMEX**

5



6

7

8 **Pricing Strategy**

9 Gulf Power will continue to purchase gas, both under long-term and spot  
10 contracts at market based prices. However, pursuant to Commission order, Gulf  
11 Power will financially hedge gas prices for some portion, generally between [REDACTED]  
12 [REDACTED] percent of Gulf Power's projected annual gas burn for the current year, in  
13 order to protect against short-term price swings and to provide some level of  
14 price certainty. This [REDACTED] percent hedge range allows Gulf Power to provide  
15 a degree of price certainty and protection against short-term price swings while  
16 still allowing the customers to participate in markets where natural gas prices are

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low. Gulf Power will secure natural gas hedges over a time period not to exceed [redacted] months, per the following schedule:

A B

Period	Min. Hedge %	Upper Target Hedge %
a Prompt Year (2011)	[redacted]	[redacted]
b Year 2 (2012)	[redacted]	[redacted]
c Year 3 (2013)	[redacted]	[redacted]
d Year 4 (2014)	[redacted]	[redacted]
e Year 5 (2015)	[redacted]	[redacted]

Note: The annual hedge percentage is based on the budgeted annual gas burn

Although SCS will target the levels shown in the table above, if extreme market conditions exist, SCS may accelerate or decelerate the plan accordingly. Gulf's hedging targets are expressed on an annual basis due to the potential for large variances in month to month gas consumption. The monthly variance in gas burn is due to Gulf's ownership of only one firm gas fired generating unit that is dispatched on an economic basis with the other generating units in the Southern electric system and the impact of unit outages on Gulf's total gas burn.

SCS, working in partnership with Gulf Power, develops short-term hedge strategies based on current and projected market conditions. [redacted]

[redacted] SCS will employ both technical and fundamental analysis to determine appropriate times to hedge.

**CONFIDENTIAL**

1 However, the objective is not to speculate on market price or attempt to outguess  
2 or “beat the market”. Gulf will utilize fixed priced swaps as its primary financial  
3 gas price hedging instrument but may also utilize options to a lesser degree  
4 when appropriate.

5

6 While the hedging program will protect the customer from short-term price  
7 spikes, hedges can also lead to higher costs when natural gas prices fall  
8 subsequent to entering hedges. Gulf Power will limit the amount of fixed-price  
9 hedges to a maximum of 100 percent of the projected fuel burn for the upcoming  
10 year. In addition, Gulf Power will limit option priced hedges to [REDACTED] percent of its  
11 projected burn. Finally, in order to protect its customers from market exposure in  
12 subsequent years, Gulf Power will take forward hedge positions for up to [REDACTED]  
13 months into the future.

14

### 15 **System Hedges**

16 Because Gulf Power is a part of the Southern Electric System (SES), it indirectly  
17 participates in gas hedging for fuel price indexed power related transactions done  
18 on behalf of the SES. These hedges are referred to as “system hedges.” In  
19 these instances, Southern Company Services utilizes financial hedging  
20 instruments to mitigate fuel price risk related to individual power transactions.  
21 Gulf is allocated its portion of these gas hedges when they occur based on its  
22 peak period load ratio. All system hedges are matched to individual power  
23 transactions and are considered separate from Gulf’s directed hedging program  
24 for gas burn at generating units where it directly purchases natural gas supply.

1 on capital at risk and established credit policies.

2  
3 **II. Purpose**

4 [REDACTED]

5 [REDACTED]

6 [REDACTED]

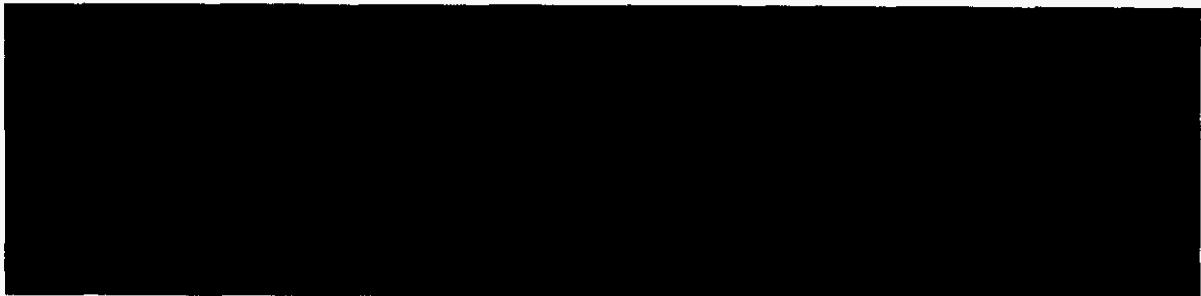
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18 **III. Business Objectives**

19 The Approved Business Objectives for the trading activities performed on the Trading Floors are  
20 defined in Appendix A.

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22 **III. Business Strategies**

23 The business objectives are achieved by entering into transactions involving the approved  
24 commodities shown in Appendix B.

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Various contract types or financial instruments will be used to achieve the Approved Business Objectives. The Approved Risk Management Instruments are listed in Appendix C.

**IV. Authorizations**

Appendix D contains the individuals, boards, and committees authorized to carry out various activities, reviews, and approvals.

**V. Segregation of Duties**



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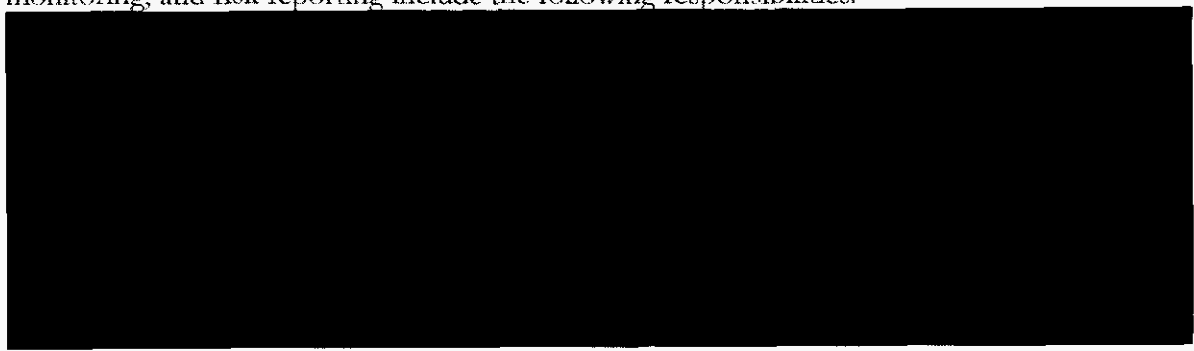


Appendix E represents the functional separation organizationally as specified in this RMP. The following is a summary of the responsibilities of the different functions:

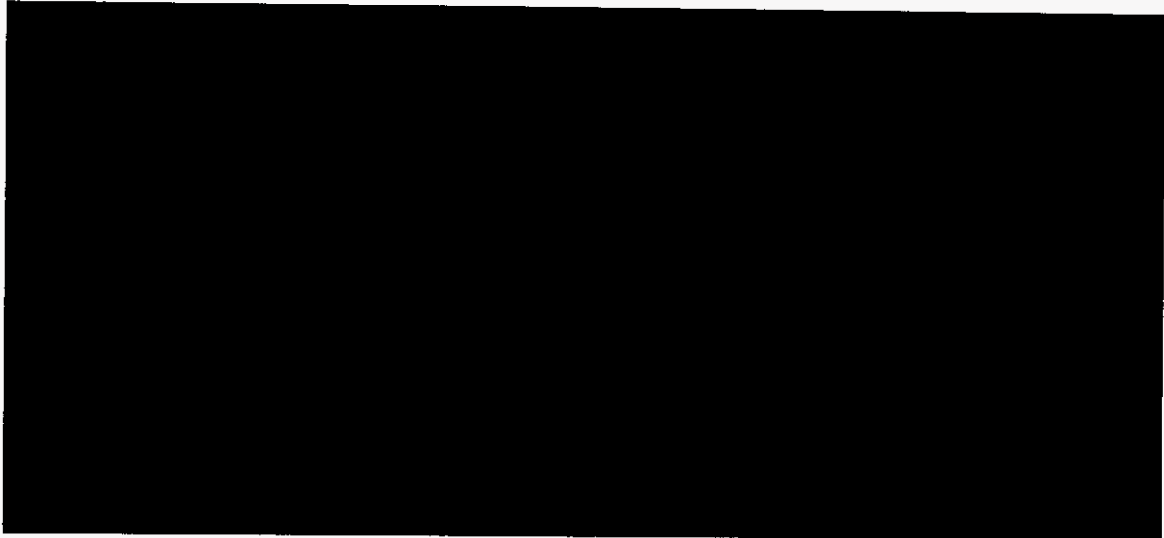
Origination and Structuring: The functions of origination and structuring include the following responsibilities:



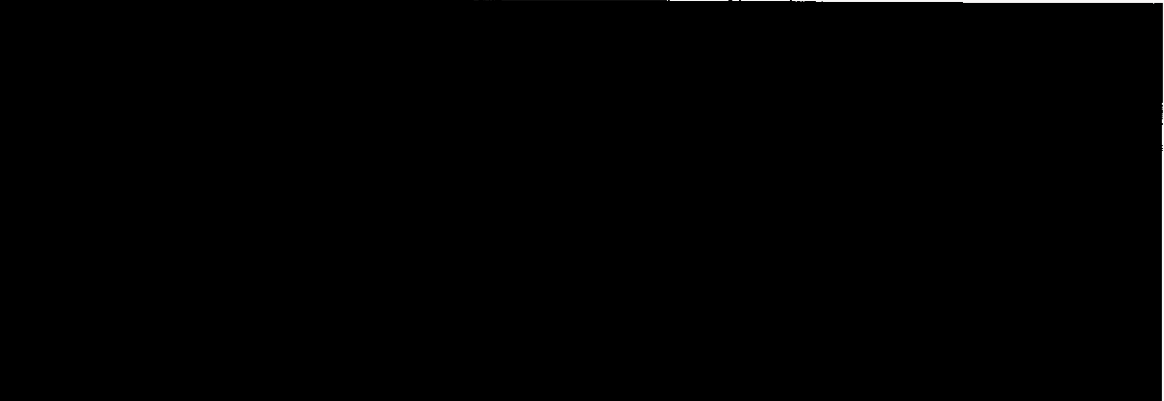
Confirmation, Monitoring, and Reporting: The functions of trade confirmation, risk monitoring, and risk reporting include the following responsibilities:



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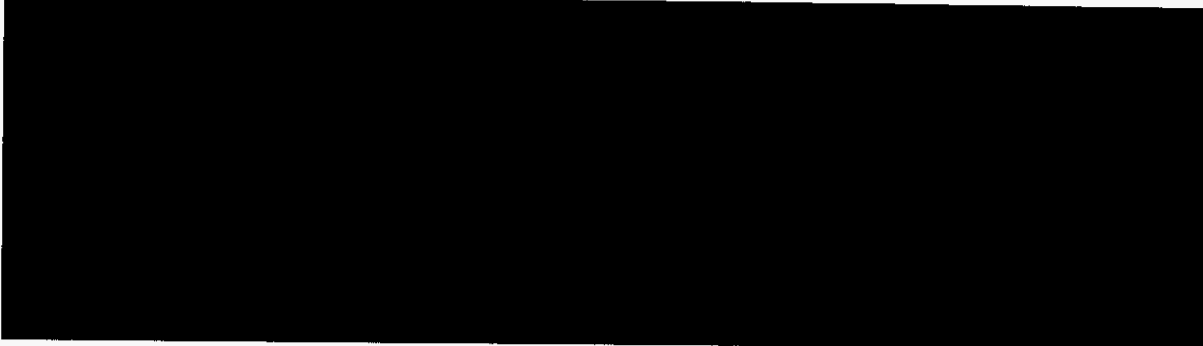
Settlement: The function of settlement includes the following responsibilities:



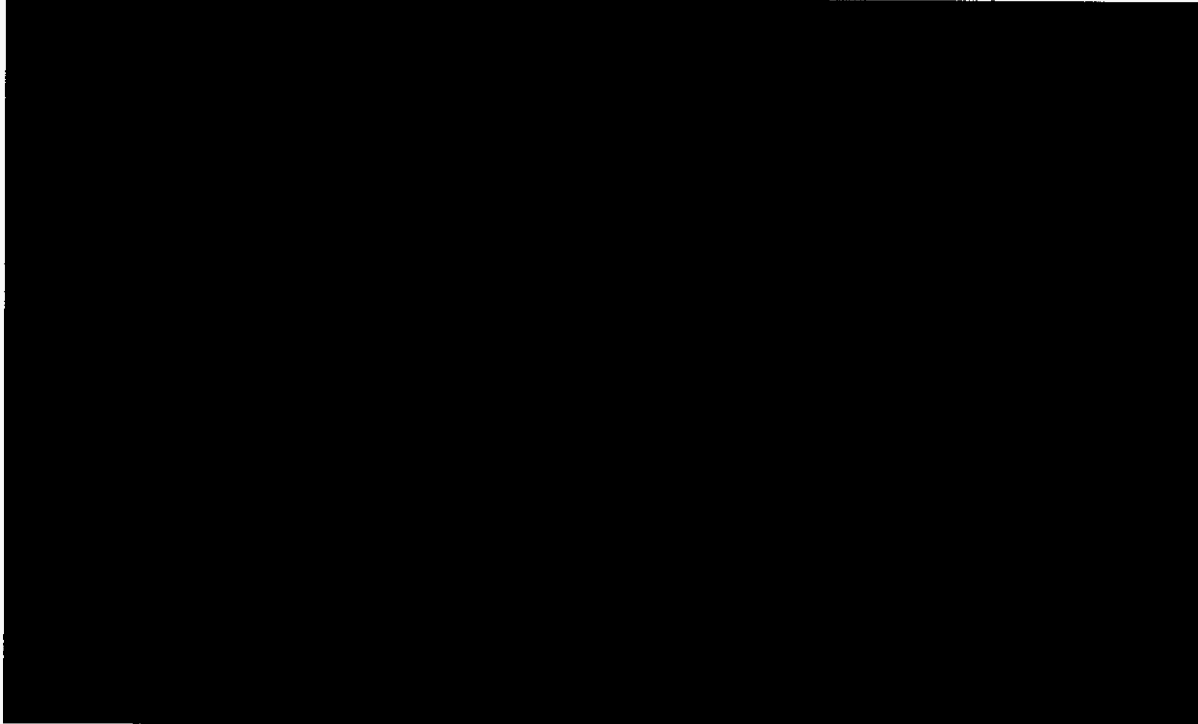
Cash Management: SCS Treasury is responsible for receiving and disbursing all funds from or to counterparties and for the delivery of margin / collateral requirements. SCS Treasury will also be responsible for investment of collateral provided by counterparties.

Accounting: SCS Accounting is responsible for posting transactions to the general ledger and reconciling the subledgers to the general ledger.

1 **VII. Market Risk Identification**



8 **VIII. Market Risk Measurement and Valuation**



21 **IX. Market Risk Limits**

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23 Exposure Limits                      The maximum exposure limits are shown in Appendix H.  
24    the maximum exposure limit for each business objective  
25    should not exceed the limits specified in Appendix H.



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Notification                      Certain notifications to management are required as defined  
in Appendix G.

Limit Excess Reporting        Irrespective of other provisions contained in this RMP, limit  
overages may occur. Each occurrence shall be promptly  
reported by the middle office to individuals identified in  
Appendix G.

**X. Credit Risk**



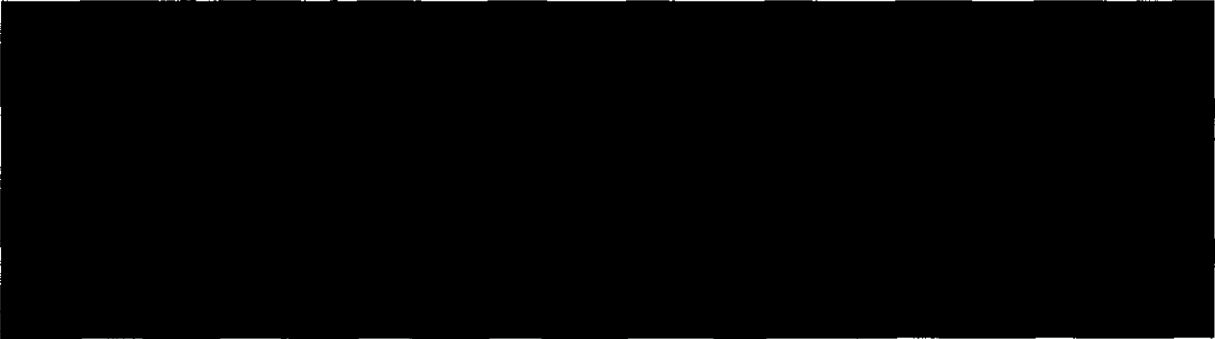
**XI. New Products**



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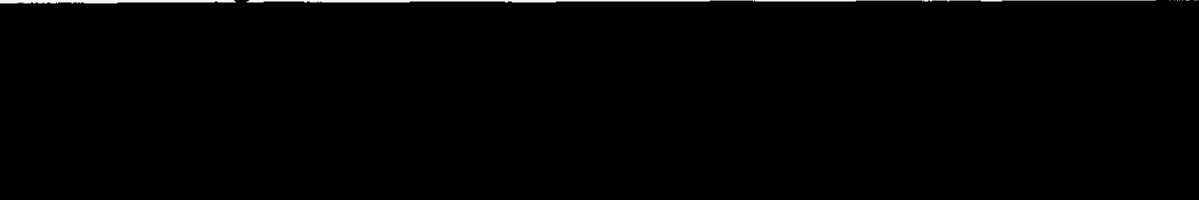
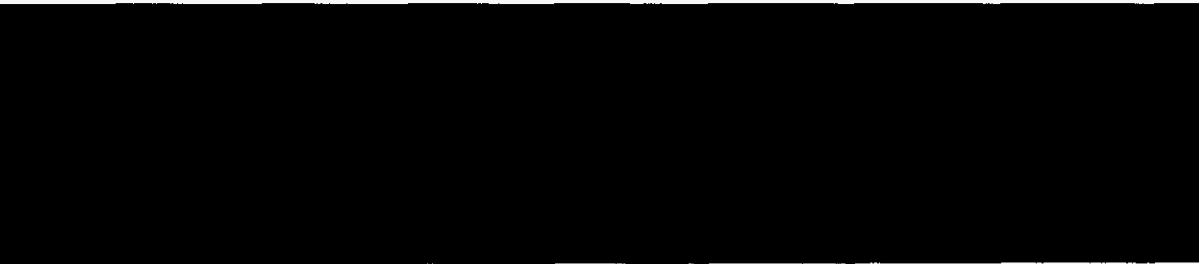
**XII. Funding Liquidity**



**XIII. Operating Procedures and Systems**

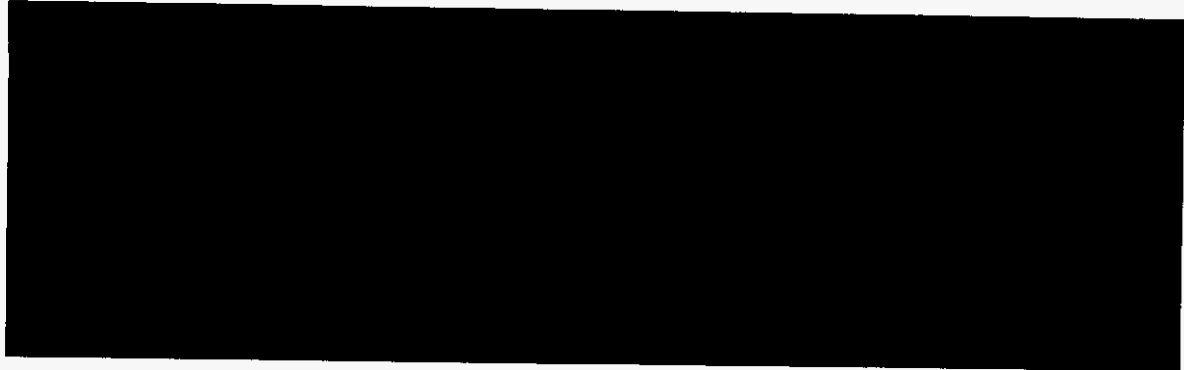


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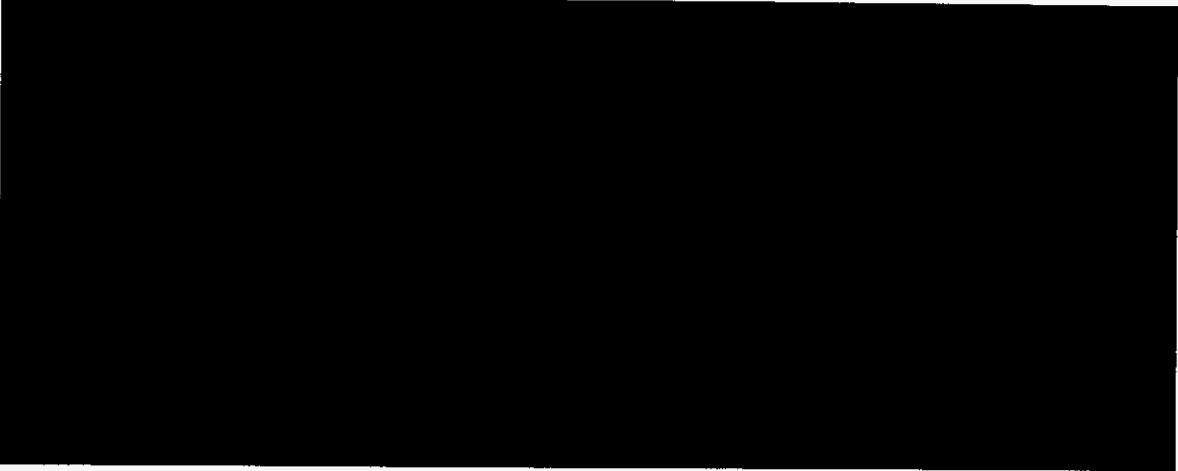


**XIV. Accounting and Tax**

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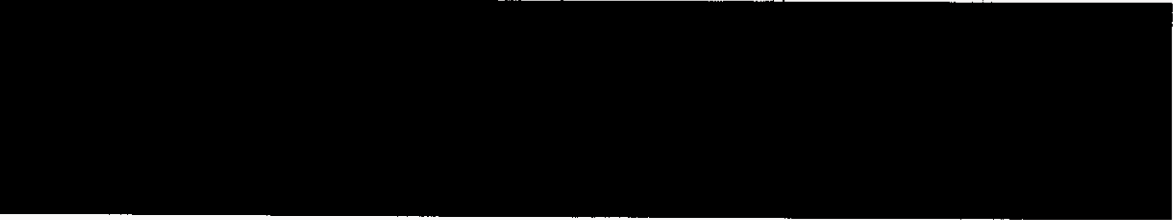


**XV. Legal**



**XVI. Monitoring and Reporting**

Middle Office personnel will calculate and report the following items on a daily basis:



The Portfolio Management group will prepare regular position reports. The back office will report preliminary gross margins or P&L on a daily basis.

1 **XVII. Personal Trading**

2 [Redacted]

3 [Redacted]

4 [Redacted]

5 [Redacted]

6

7 **XVIII. Business Recovery**

8 [Redacted]

9 [Redacted]

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11 **XIX. Compliance**

12 [Redacted]

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15 [Redacted]

16 [Redacted]

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19 [Redacted]

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21 [Redacted]

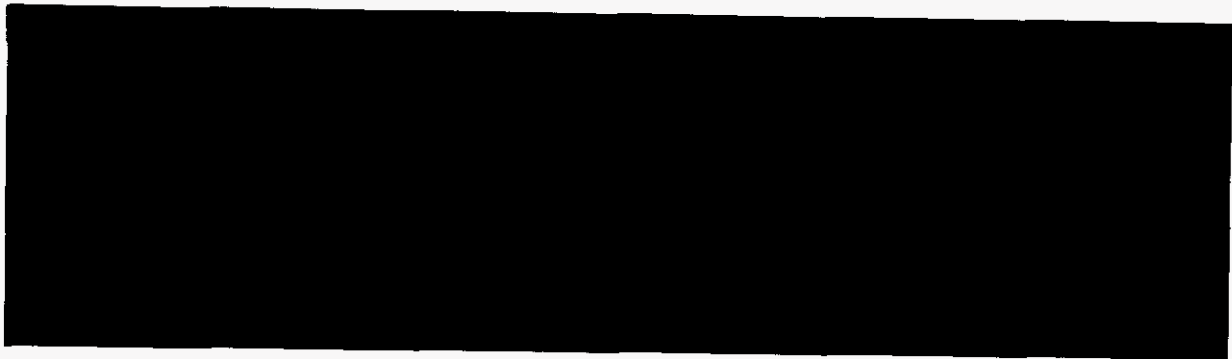
22 [Redacted]

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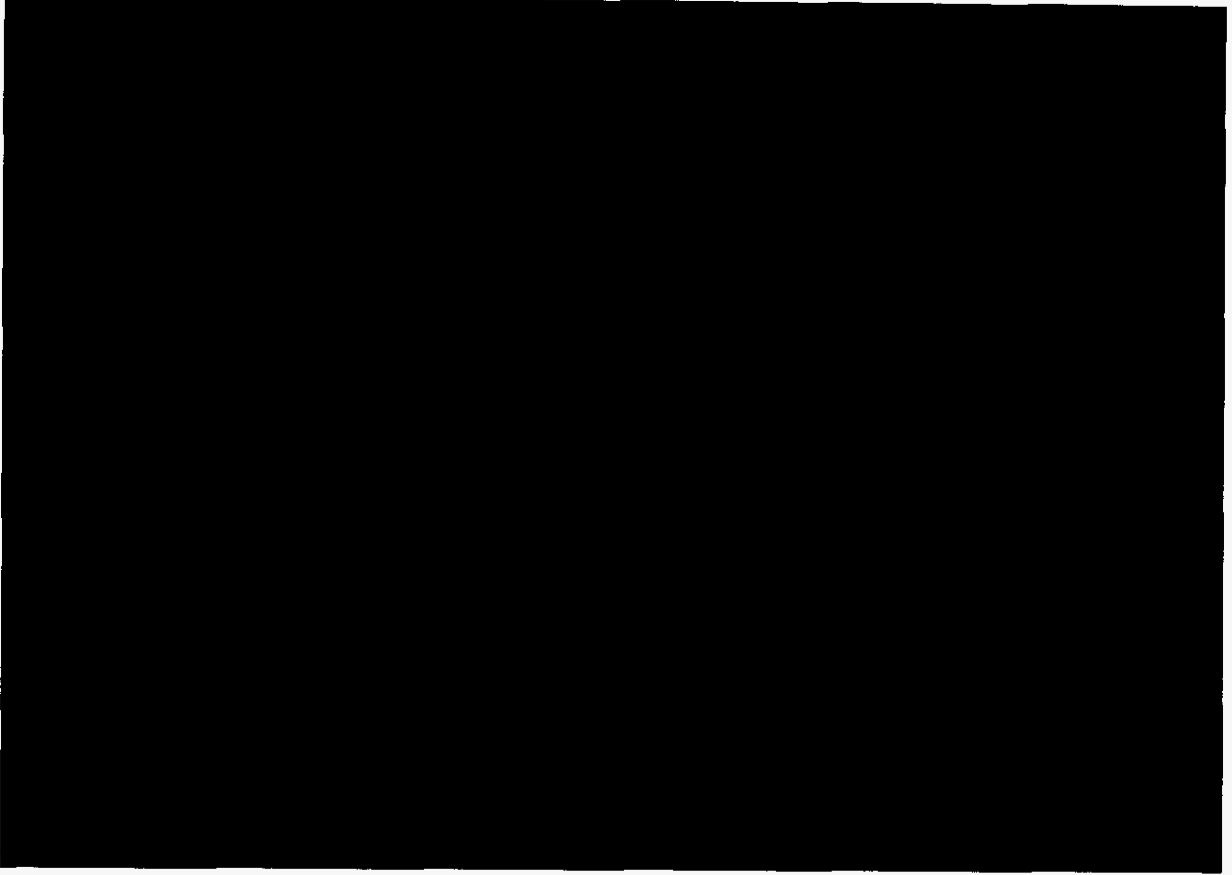
24 **XX. Independent Review**

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**XXI. Policy Amendments**



**XXII. Terminology**

Definitions of terminology used in this RMP are contained in appendix L.

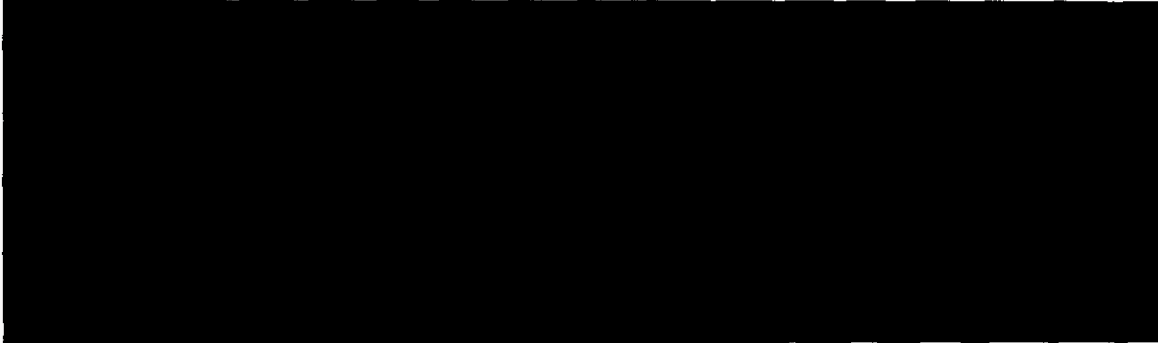
1 APPENDIX A

2 APPROVED BUSINESS OBJECTIVES

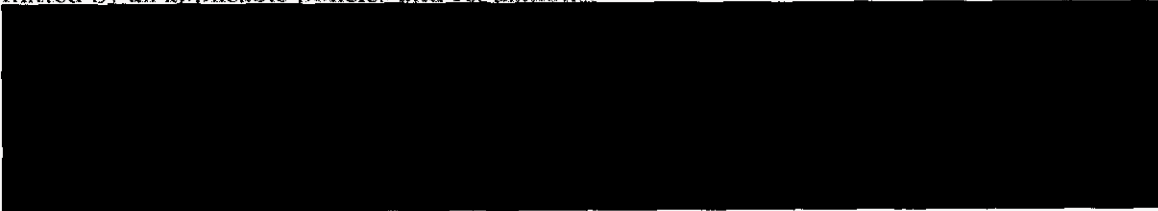
3  
4 ENERGY TRADING AND MARKETING

5 Fleet Operations and Trading

6 The primary objectives of Fleet Operations and Trading are to:

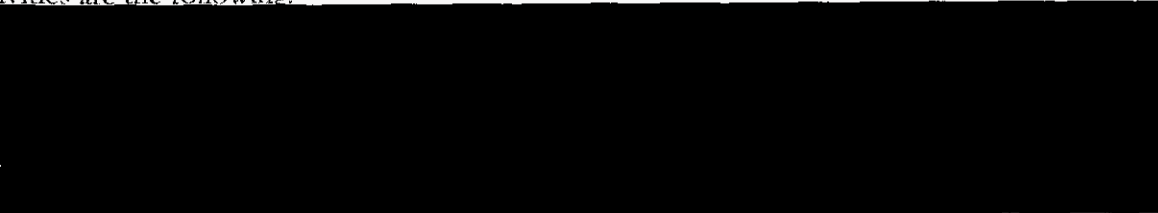


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12 In addition to the primary objectives, Fleet Operations and Trading may execute secondary  
13 activities as limited by Appendix H to achieve the following secondary objectives to the extent  
14 permitted by all applicable policies and regulations:



18  
19 Southern Power Company Trading & Asset Management

20 The primary objectives of the Southern Power Company Trading and Asset Management  
21 activities are the following:



1 FUEL SERVICES

2 Natural Gas Fulfillment Function

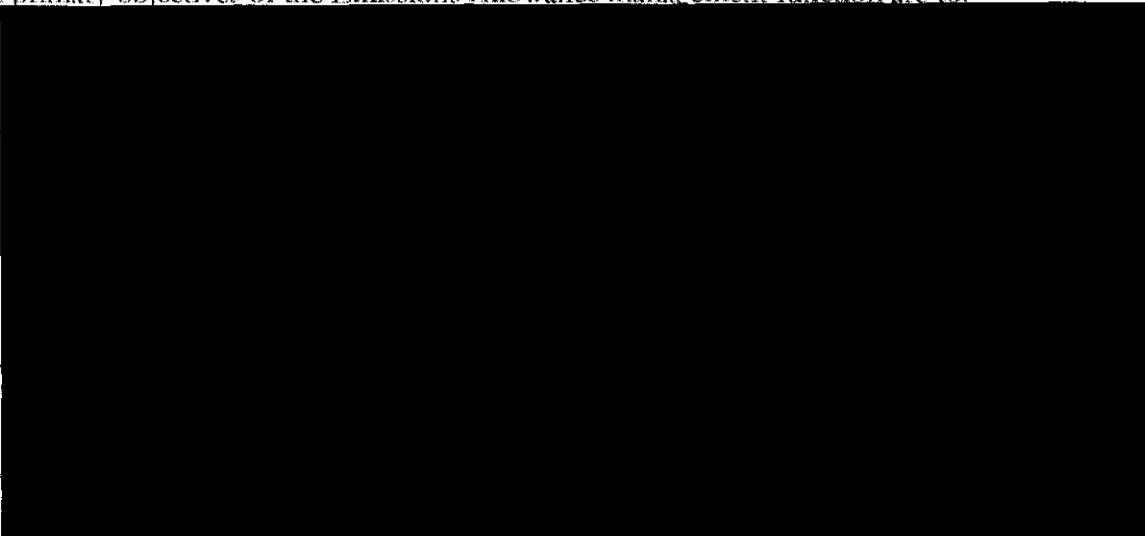
3 The primary objectives of the Natural Gas Fulfillment Function are to:



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10 Secondary activities of the natural gas fulfillment function are restricted to positions intended  
11 to hedge secondary power positions, and which have been requested by Fleet Operations and  
12 Trading.

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14 Emission Allowance Management Function

15 The primary objectives of the Emissions Allowance management function are to:



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25 Secondary activities of the emission allowance management function are restricted to



1 positions intended to hedge secondary power positions, and which have been requested by  
2 Fleet Operations and Trading.

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4 Coal Fulfillment Function

5 The primary objectives of the Coal fulfillment function are to:

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12 Secondary activities of the coal fulfillment function are restricted to positions intended to  
13 hedge secondary power positions, and which have been requested by Fleet Operations and  
14 Trading.

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16 Renewable Energy Credits (REC) Fulfillment Function

17 The primary objectives of the REC fulfillment function are to:

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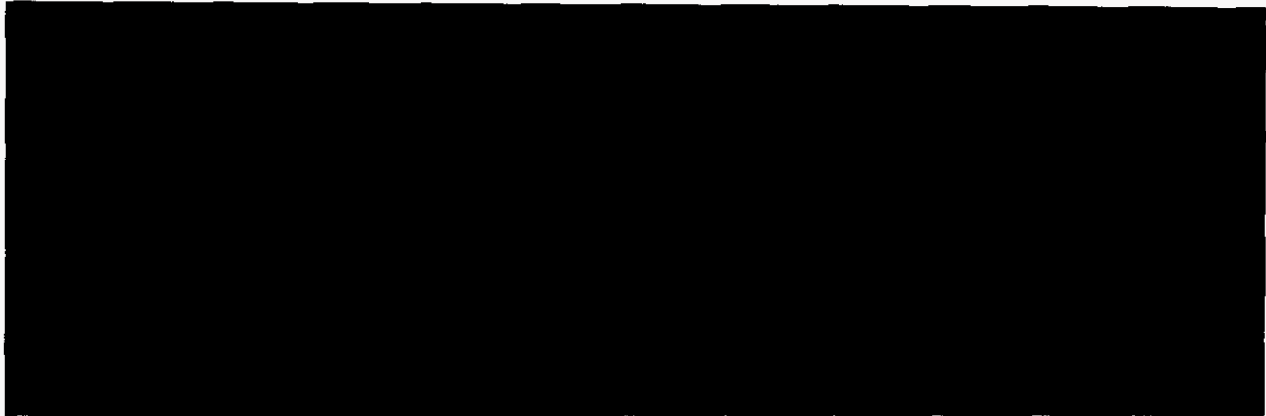
23 Secondary activities of the REC fulfillment function are restricted to positions intended to  
24 hedge secondary power positions, and which have been requested by Fleet Operations and  
25 Trading.

APPENDIX B

APPROVED COMMODITIES

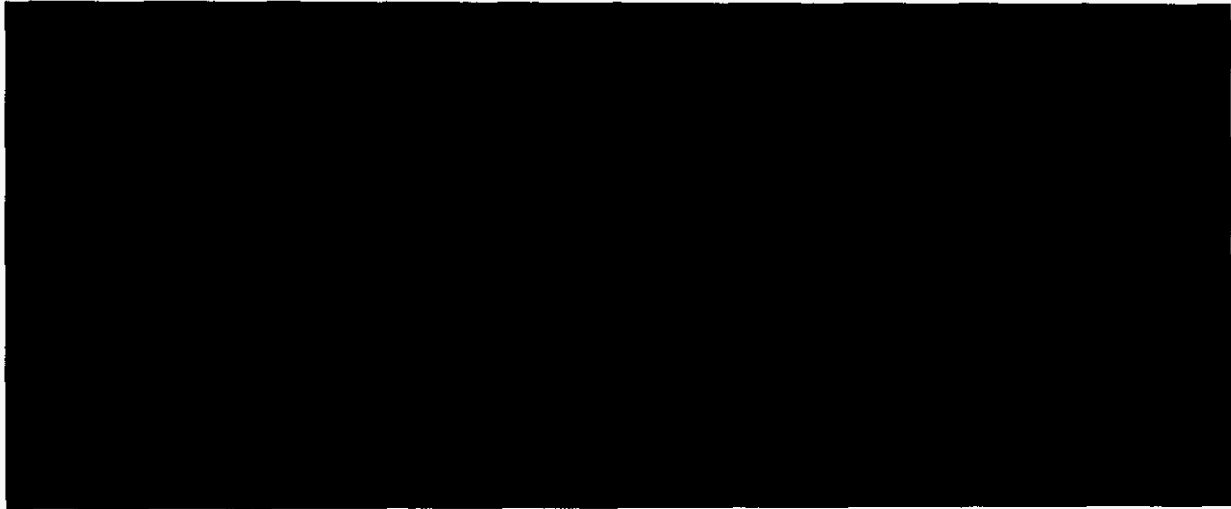
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The approved commodities for this RMP are:



1 APPENDIX C  
2 APPROVED INSTRUMENTS  
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4

5 The approved instruments are:



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APPENDIX D  
AUTHORIZATIONS

A

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Name	Authority
	

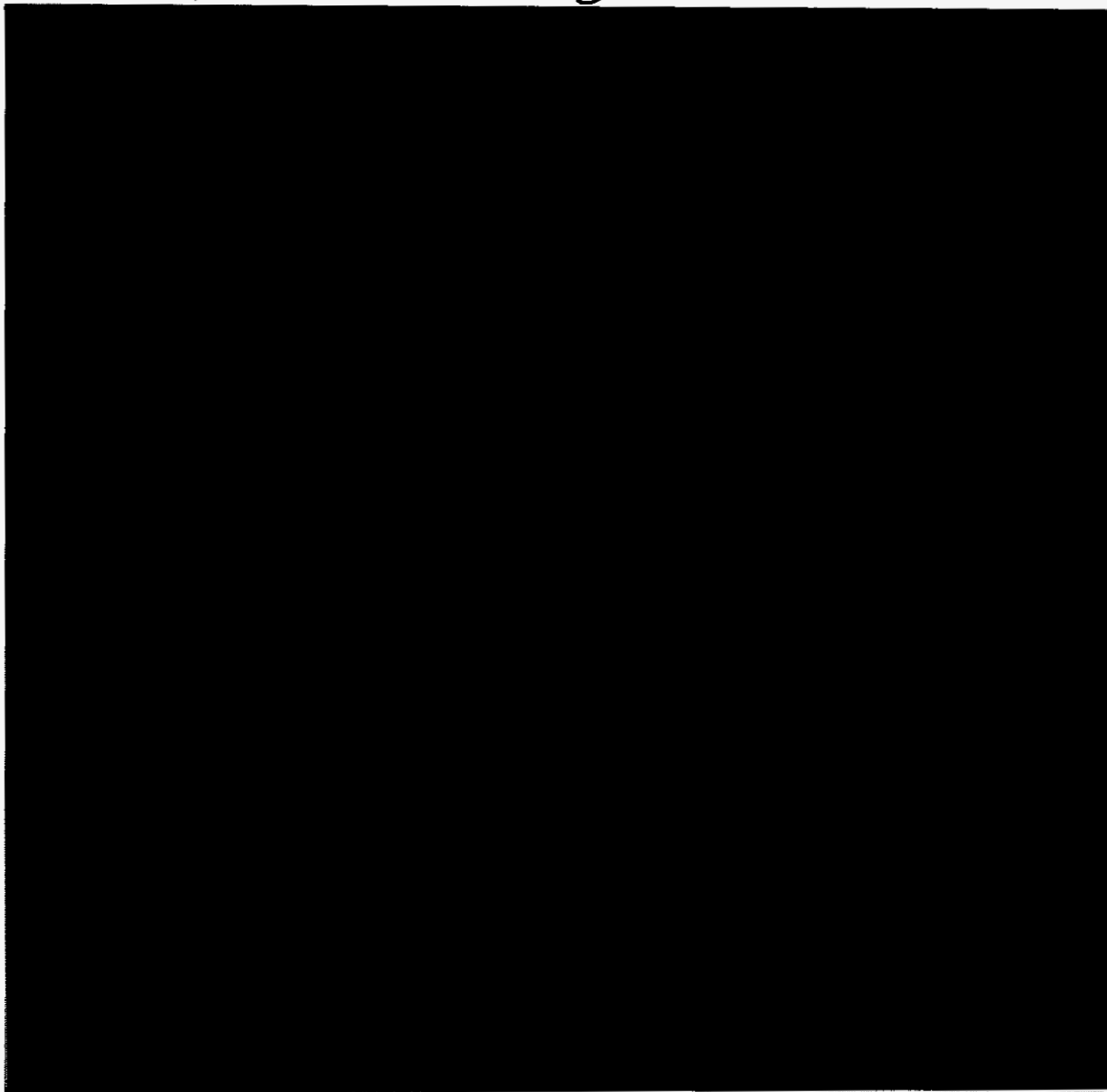
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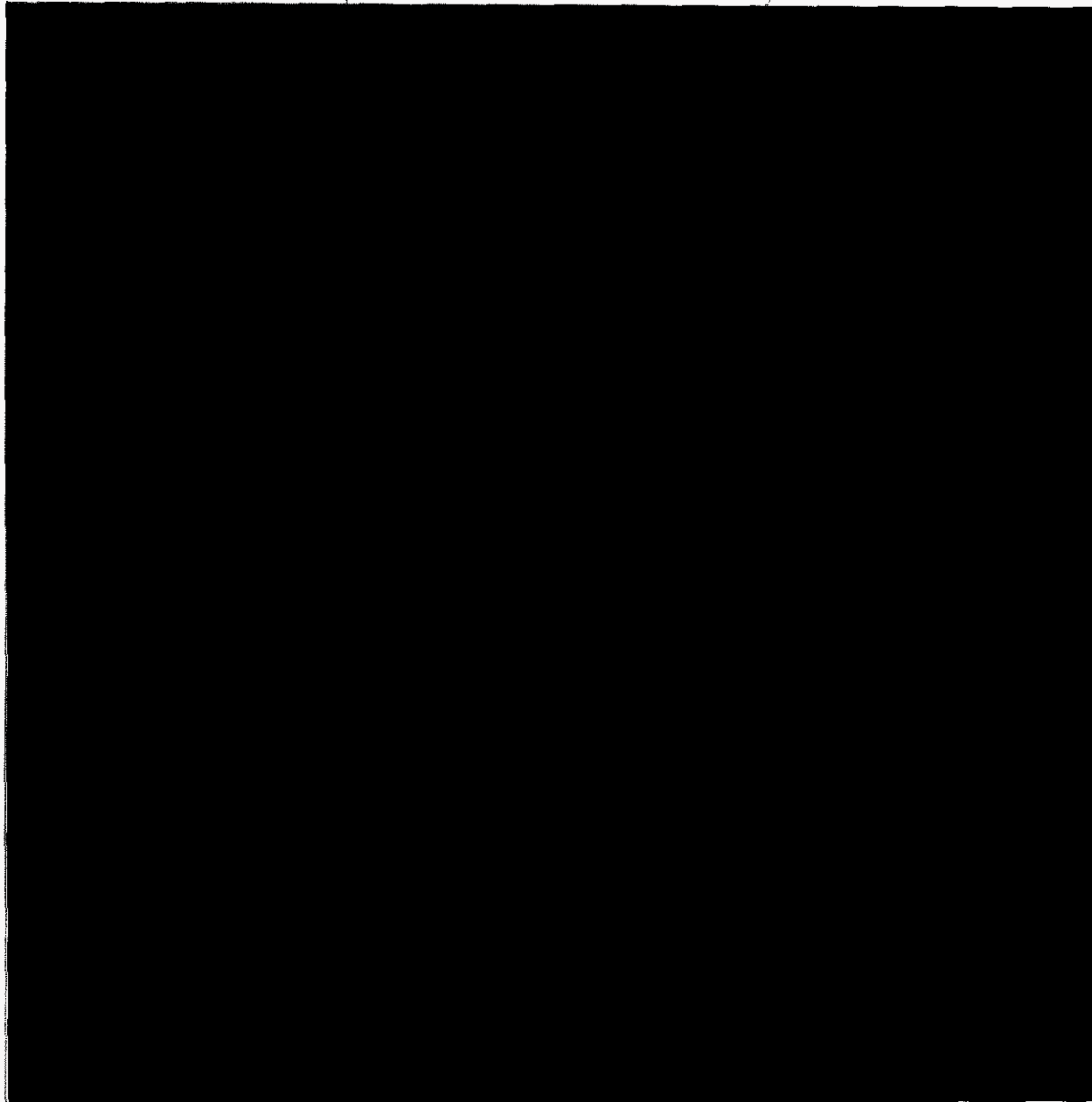
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APPENDIX D  
AUTHORIZATIONS (continued)

Energy Marketing

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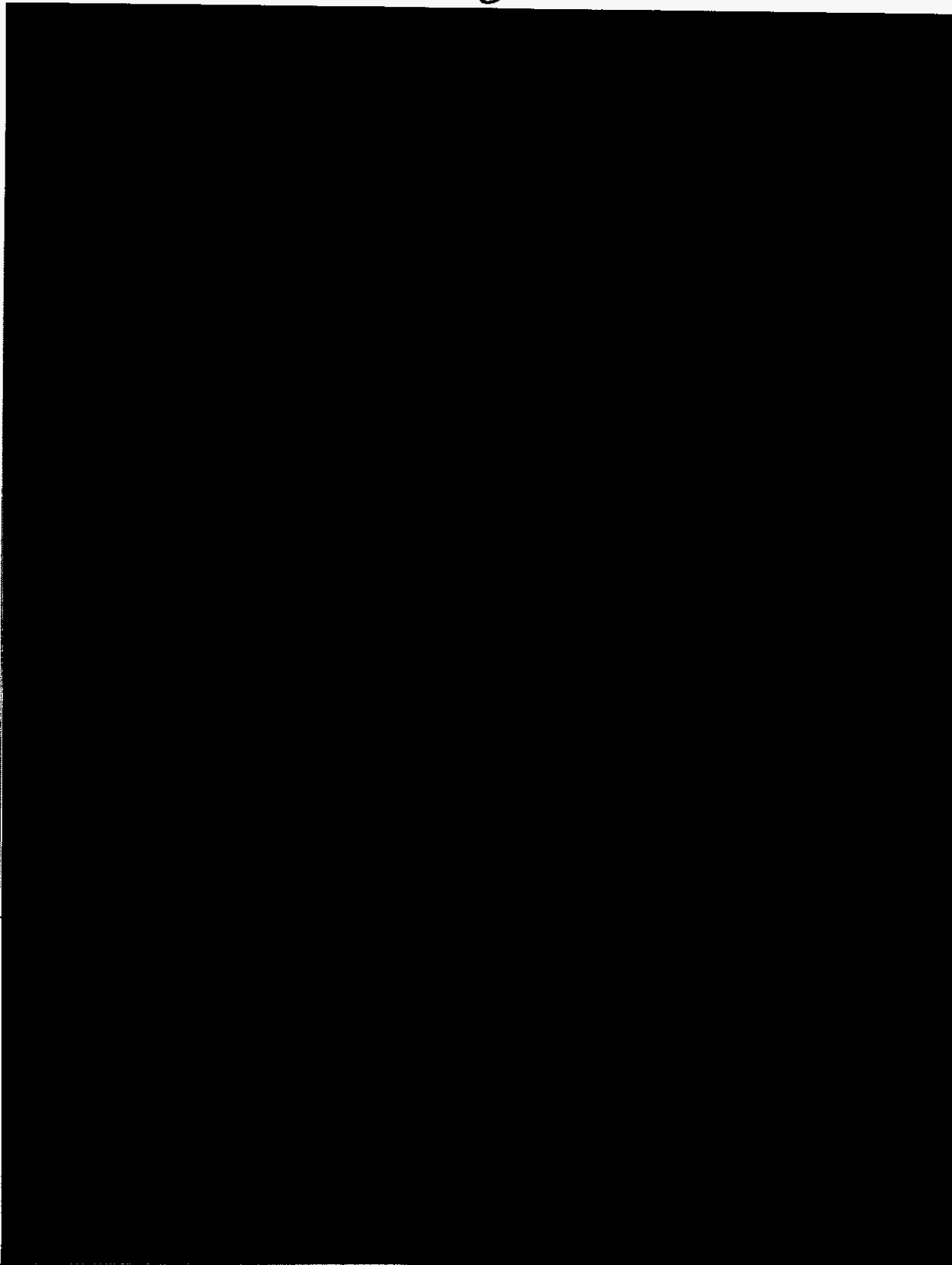
Name	Authority
	

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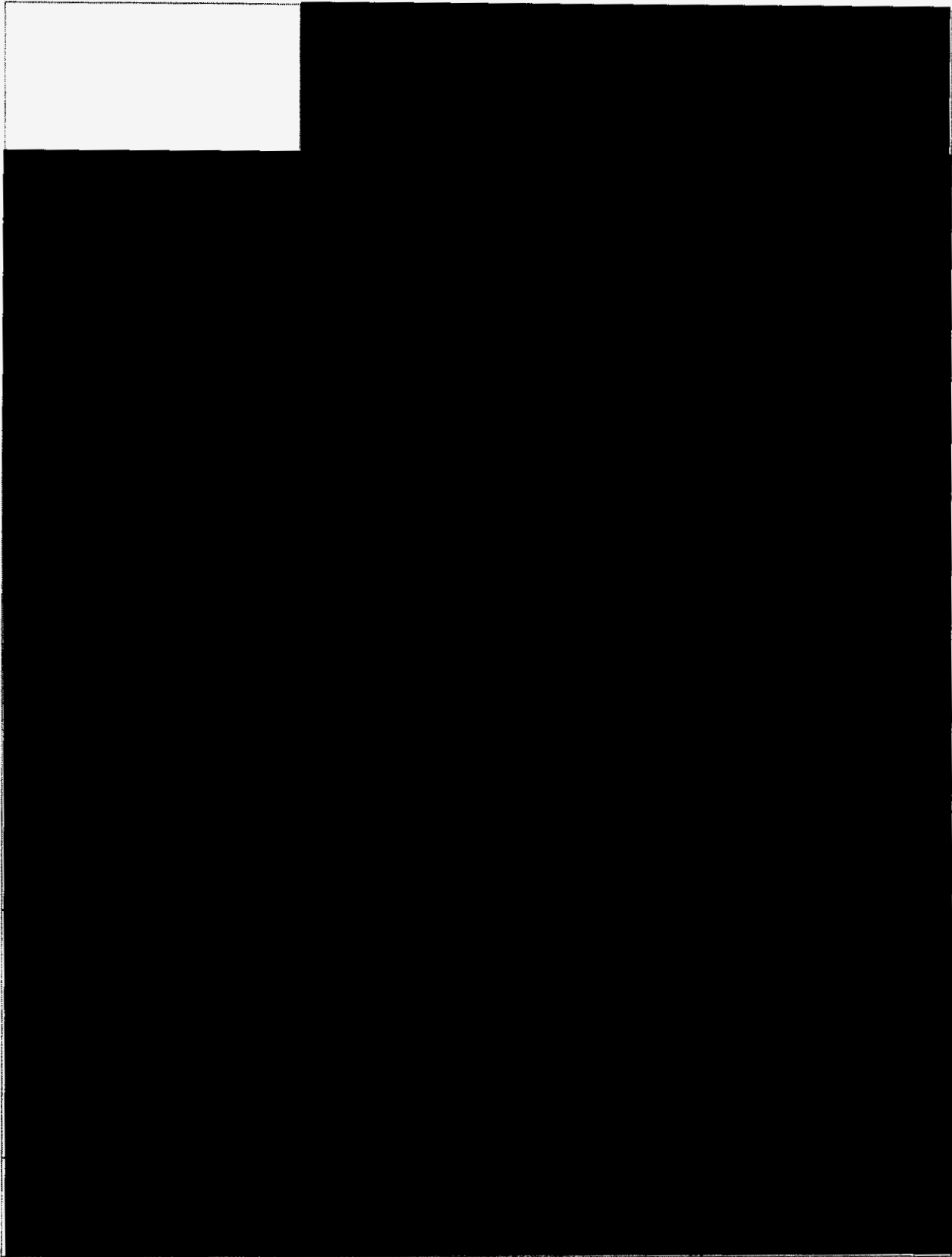
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APPENDIX D  
AUTHORIZATIONS (continued)

SCS Fuel Services

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Name	Authority
[Redacted Content]	

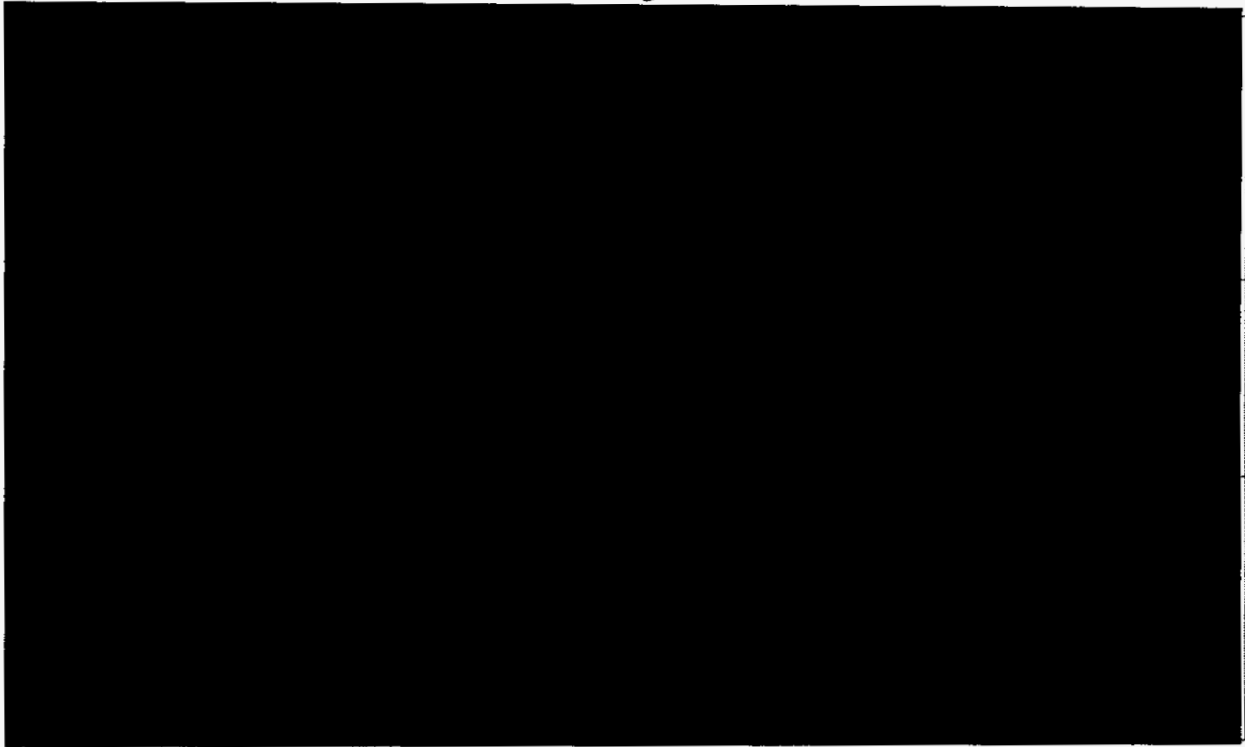
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APPENDIX F  
 MARKET RISK MEASUREMENT

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	Approved Commodities	Value at Risk Method
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Parametric VaR Methodology

Formula Components

Component	Symbol	Comments
Value at Risk	VaR	See Equation Below
Position	PSN	Given in Agreed Measurement Units
Daily Standard Deviation of Price Change	$\Delta P$	Given in \$/Agreed Measurement Units
Holding Period – Business Days	HP	Taken From Parameters Table Shown Below
Confidence Interval Multiplier	CI	For Example: CI = 1.65 for 95-% Confidence Interval

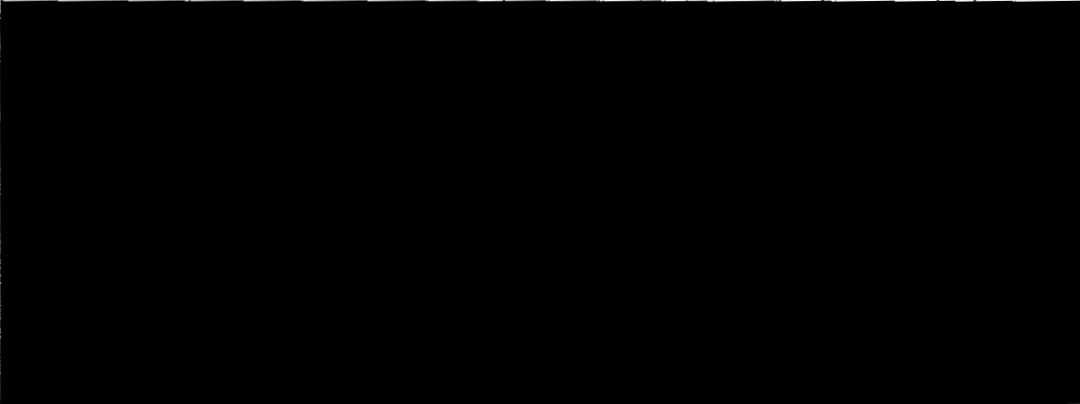
$$VaR = PSN * \Delta P * \sqrt{HP} * CI$$

Equation  
Parameters

A

B

C

	Commodity	Holding Period (HP)	Multiplier (CI)
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APPENDIX F  
STRESS TESTING METHODOLOGY

The purpose of stress testing is to generate percentage price changes for the forward curve that answer this question:

If an extreme event occurs, what can we expect to happen to prices and the portfolio value?

The stress test is designed to capture the expected value of an extreme event as defined by an extreme value distribution. To differentiate, there is a downward and an upward stress test.

Specifically, the expected downward stress is calculated as

$$E[\Delta p/p \mid \Delta p/p < \Theta] = \int_{-\infty}^{\Theta} f(x)xdx$$

and the expected upward stress is calculated as

$$E[\Delta p/p \mid \Delta p/p > \Theta] = \int_{\Theta}^{+\infty} f(x)xdx$$

where theta is the threshold that defines classification as an extreme event, f(x) is an extreme value distribution fitted to a specific contract, and x is a percentage price change.

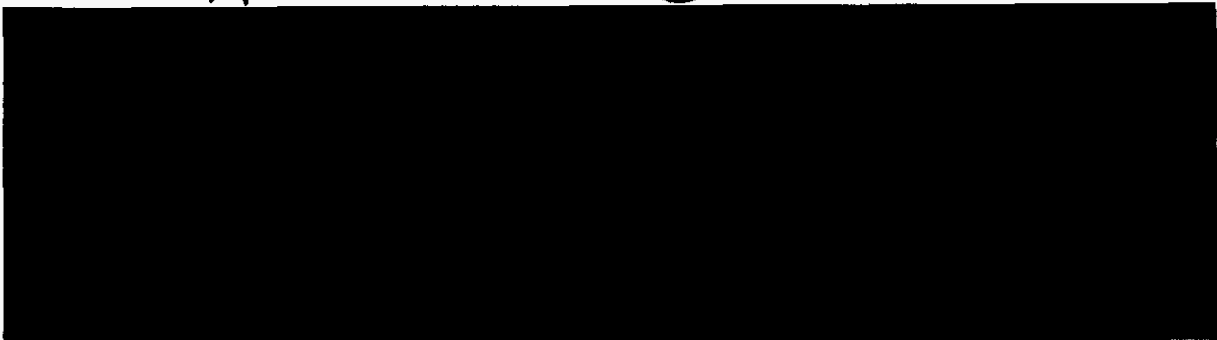
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APPENDIX G  
NOTIFICATION LEVELS

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Position Classification	Income Change	Notify
[Redacted Content]		

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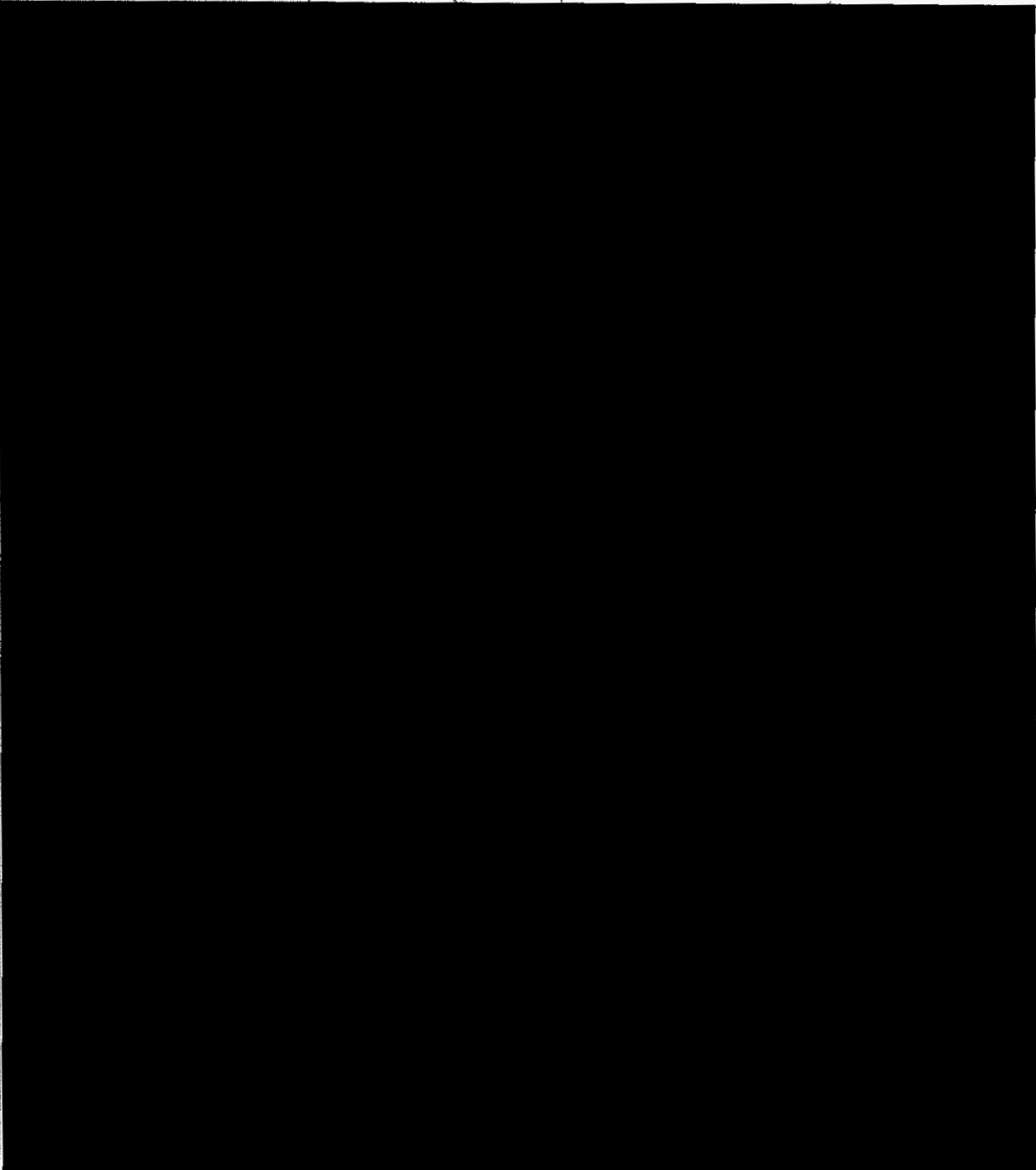

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APPENDIX G  
NOTIFICATION LEVELS

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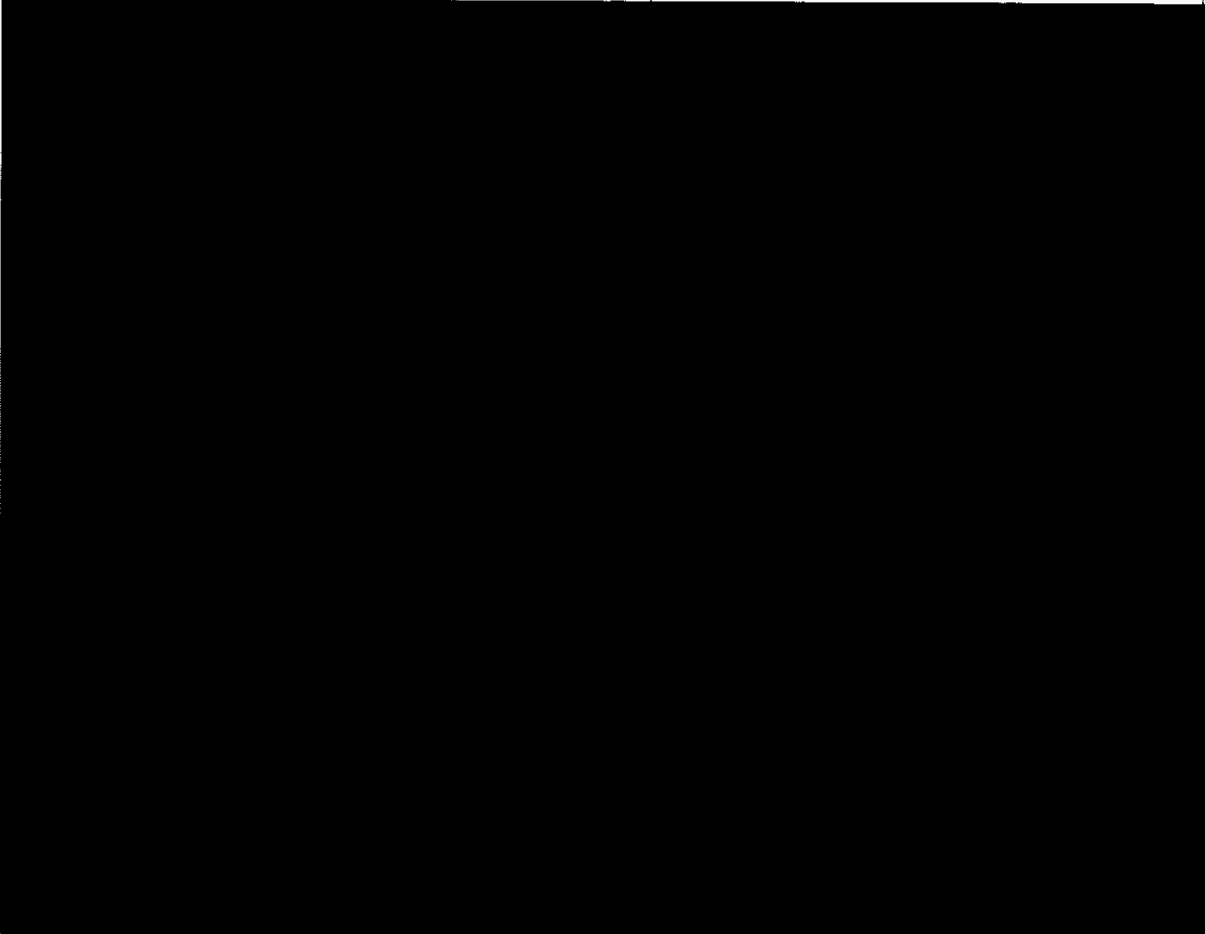
Position Classification	Income Change	Notify
		

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APPENDIX G  
NOTIFICATION LEVELS

A Position Classification	B Value-at-Risk	C Notify
		

NOTE: Recipients of notification events will only receive detailed information pertinent to their business needs, and any correspondence will be in compliance with the Separation Protocol.

APPENDIX G  
NOTIFICATION LEVELS

A

B

C

Position Classification	Income Change	Notify
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2		

Position Classification	Value-at-Risk	Notify
3		

APPENDIX H  
MARKET RISK LIMITS

Net Open Position Limits

	A		B
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NOTE: Although the value-at-risk limit applies to positions marked to market through income, VaR is calculated and monitored for all positions, and there are notification requirements as defined in Appendix G.

**If such open position limits are exceeded, Risk Control will calculate and equitably allocate the responsibilities to bring the positions back into compliance.**

APPENDIX J  
ACCOUNTING AND TAX

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