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REDACTED

August 1, 2013

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

RECEIVED  
13 AUG - 2 AM 10: 20  
COMMISSION  
CLERK

RE: Docket No. 130001-EI

Dear Ms. Cole:

Enclosed is Gulf Power Company's Request for Confidential Classification regarding information submitted by Gulf Power pertaining to Schedule CCE-4 of Exhibit RWD-2 to the Direct Testimony of Richard W. Dodd dated August 2, 2013.

Sincerely,

Robert L. McGee, Jr.  
Regulatory and Pricing Manager

md

Enclosures

cc: Beggs & Lane  
Jeffrey A. Stone, Esq.

COM \_\_\_\_\_  
AFD LFICD  
APA \_\_\_\_\_  
ECO \_\_\_\_\_  
ENG \_\_\_\_\_  
GCL \_\_\_\_\_  
IDM \_\_\_\_\_  
TEL \_\_\_\_\_  
CLK \_\_\_\_\_

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

IN RE: Fuel and purchased power cost  
recovery clause and generating performance  
incentive factor

Docket No.: 130001-EI  
Date: August 2, 2013

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 information contained in Schedule CCE-4 of Exhibit RWD-2 to the Direct Testimony of Richard W. Dodd dated August 1, 2013 (Schedule CCE-4) on behalf of Gulf Power. As grounds for this request, the Company states:

1. A portion of the information contained in Schedule CCE-4 is proprietary confidential business information regarding contractual matters which would cause irreparable harm to Gulf Power, the entities with whom it has entered into contracts and most importantly to Gulf's customers, if such information was disclosed to the general public. Schedule CCE-4 contains pricing information for capacity purchases between Gulf Power and various counterparties. The pricing information is regarded by both Gulf and the counterparties as confidential. The pricing, which resulted from negotiations between Gulf and the counterparties, is specific to the individual contracts and is not publicly known. Disclosure of this information would negatively impact Gulf's ability to negotiate pricing favorable to its customers in future capacity contracts. In addition, potential counterparties may refuse to enter into contracts with Gulf, or may charge higher prices, if the price terms are made public. The information is entitled to confidential classification pursuant to section 366.093(3)(d) and (e), Florida Statutes.
2. The information filed pursuant to this Request is intended to be, and is treated as, confidential by Gulf Power and, to this attorney's knowledge, has not otherwise been publicly disclosed.

3. Submitted as Exhibit "A" is a copy of Schedule CCE-4, on which is highlighted the information for which confidential classification is requested. Exhibit "A" should be treated as confidential pending a ruling on this request. Attached as Exhibit "B" are two (2) edited copies of Schedule CCE-4, 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 1st day of August, 2013.



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**Attorneys for Gulf Power Company**

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

IN RE: Fuel and purchased power cost  
recovery clause and generating performance  
incentive factor

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Docket No.: 130001-EI  
Date: August 2, 2013

**REQUEST FOR CONFIDENTIAL CLASSIFICATION**

**EXHIBIT "A"**

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

EXHIBIT "B"

A B C D E F G H I J K L M N O P  
 1 Gulf Power Company  
 2 2013 Capacity Contracts

Contract/Counterparty	Term		Contract Type
	Start	End <sup>(1)</sup>	
Southern Intercompany Interchange	5/1/2007	5 Yr Notice	SES Opco
<u>PPAs</u>			
Coral Power, LLC	6/1/2009	5/31/2014	Firm
Southern Power Company	6/1/2009	5/31/2014	Firm
Shell Energy N.A. (U.S.), LP <sup>(2)</sup>	11/2/2009	5/31/2023	Non-Firm
<u>Other</u>			
South Carolina PSA	9/1/2003	-	Other
South Carolina Electric & Gas	1/1/2013	6/30/2013	Other

12 (1) Unless otherwise noted, contract remains effective unless terminated upon 30 days prior written notice.  
 13 (2) Contract megawatts become firm no later than June 1, 2014.

Contract	January		February		March		April		May		June	
	MW	\$	MW	\$ <sup>(1)</sup>	MW	\$	MW	\$	MW	\$ <sup>(1)</sup>	MW	\$ <sup>(1)</sup>
Southern Intercompany Interchange	177.8	422,287	0.0	(102,074)	370.1	344,833	18.0	45,196	0.0	(1,079)	0.0	8,403
<u>PPAs</u>												
Coral Power, LLC	[REDACTED]											
Southern Power Company	[REDACTED]											
Shell Energy N.A. (U.S.), LP	[REDACTED]											
<u>Other</u>												
South Carolina PSA	[REDACTED]											
South Carolina Electric & Gas	0.0	0			0.0	0	0.0	0				
<b>Total</b>		2,380,170		1,898,537		2,389,783		2,045,794		2,596,589		6,777,892

26 (1) Southern Intercompany Interchange reserve sharing charge consists of prior month true up only

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

1 Gulf Power Company  
 2 2013 Capacity Contracts

Schedule CCE-4  
 Page 1 of 2

3 Contract/Counterparty	Term		Contract Type
	Start	End <sup>(1)</sup>	
4 Southern Intercompany Interchange	5/1/2007	5 Yr Notice	SES Opco
5 <u>PPAs</u>			
6 Coral Power,LLC	6/1/2009	5/31/2014	Firm
7 Southern Power Company	6/1/2009	5/31/2014	Firm
8 Shell Energy N.A. (U.S.), LP <sup>(2)</sup>	11/2/2009	5/31/2023	Non-Firm
9 <u>Other</u>			
10 South Carolina PSA	9/1/2003	-	Other
11 South Carolina Electric & Gas	1/1/2013	6/30/2013	Other

12 (1) Unless otherwise noted, contract remains effective unless terminated upon 30 days prior written notice.  
 13 (2) Contract megawatts become firm no later than June 1, 2014.

14 Capacity Costs  
 15 2013

16 Contract	January		February		March		April		May		June	
	MW	\$	MW	\$ <sup>(1)</sup>	MW	\$	MW	\$	MW	\$ <sup>(1)</sup>	MW	\$ <sup>(1)</sup>
17 Southern Intercompany Interchange	177.8	422,287	0.0	(102,074)	370.1	344,833	18.0	45,196	0.0	(1,079)	0.0	8,403
18 <u>PPAs</u>												
19 Coral Power,LLC												
20 Southern Power Company												
21 Shell Energy N.A. (U.S.), LP												
22 <u>Other</u>												
23 South Carolina PSA												
24 South Carolina Electric & Gas	0.0	0			0.0	0	0.0	0				
25 Total		2,380,170		1,898,537		2,389,783		2,045,794		2,596,589		6,777,892

26 (1) Southern Intercompany Interchange reserve sharing charge consists of prior month true up only

1 Gulf Power Company  
 2 2013 Capacity Contracts

Contract/Counterparty	Term		Contract Type
	Start	End <sup>(1)</sup>	
Southern Intercompany Interchange	5/1/2007	5 Yr Notice	SES Opco
<u>PPAs</u>			
Coral Power, LLC	6/1/2009	5/31/2014	Firm
Southern Power Company	6/1/2009	5/31/2014	Firm
Shell Energy N.A. (U.S.), LP <sup>(2)</sup>	11/2/2009	5/31/2023	Non-Firm
<u>Other</u>			
South Carolina PSA	9/1/2003	-	Other
South Carolina Electric & Gas	1/1/2013	6/30/2013	Other

12 (1) Unless otherwise noted, contract remains effective unless terminated upon 30 days prior written notice.  
 13 (2) Contract megawatts become firm no later than June 1, 2014.

14 Capacity Costs  
 15 2013

Contract	July		August		September		October		November		December		Total \$
	MW	\$	MW	\$	MW	\$	MW	\$	MW	\$	MW	\$	
Southern Intercompany Interchange	0.0	0	0.0	0	0.0	0	0.0	0	0.0	0	0.0	0	717,566
<u>PPAs</u>													
Coral Power, LLC													
Southern Power Company													
Shell Energy N.A. (U.S.), LP													
<b>Total PPA's</b>													45,441,114
<u>Other</u>													
South Carolina PSA													(38,374)
South Carolina Electric & Gas	0.0	0	0.0	0	0.0	0	0.0	0	0.0	0	0.0	0	(7,902)
<b>Total</b>	7,267,649		7,018,398		7,017,398		2,239,398		2,240,398		2,240,398		46,112,404



EXHIBIT "C"

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

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

Page 1 of 2

Lines 19-21 and line 23; Columns E-P

Line 24, Columns G - H, and M-P

Page 2 of 2

Lines 19-21, Columns E-Q

Line 23, Columns E-P

**Justification**

This information is entitled to confidential classification pursuant to §366.093(3) (d) and (e), Florida Statutes. The basis for this information being designated as confidential is more fully set forth in paragraph 1.

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

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

Docket No.: **130001-EI**

**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that a true copy of the foregoing was furnished by overnight mail this 1st day of August, 2013 to the following:

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