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13 OCT 17 AM 9:33

COMMISSION
CLERK



REDACTED

October 16, 2013

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

Re: Docket No. 130001-EI

Dear Ms. Cole:

Enclosed is Gulf Power Company's Request for Confidential Classification pertaining to Gulf Power's response to Staff's Seventh Set of Interrogatories (Nos. 48-59) in the above referenced docket.

Sincerely,

Robert L. McGee, Jr.
Regulatory and Pricing Manager

md

Enclosures

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

COM _____
AFD LEXH B+ICD
APA _____
ECO _____
ENG _____
GCL _____
DM _____
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: October 17, 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 submitted by Gulf Power in response to Commission Staff’s Seventh Set of Interrogatories to Gulf Power Company (Nos. 48-59). As grounds for this request, the Company states:

1. A portion of the information submitted by Gulf Power in response to interrogatory numbers 48, 50 and 54 of Commission Staff’s Seventh Set of Interrogatories constitutes proprietary confidential business information concerning bids or other contractual data the disclosure of which would impair the efforts of Gulf Power to contract for goods and/or services on favorable terms. The information is entitled to confidential classification pursuant to section 366.093(3)(d) and (e), Florida Statutes. Specifically, the information consists of pricing data for natural gas hedging transactions between Gulf Power and various counterparties. It also includes upper target limits for amounts of natural gas which Gulf intends to hedge in the future. Disclosure of the pricing data would negatively impact Gulf’s ability to negotiate pricing favorable to its customers in the future. In addition, potential counterparties may refuse to enter into future contracts with Gulf, or may charge higher prices, if this pricing data were made public. Moreover, disclosure of the Company’s targeted hedging limits would provide other market participants with valuable insight regarding Gulf’s fuel needs, market positions, and trends it sees in those markets in which it addresses its fuel needs. Gulf and other members of the market in which it competes consider this type of information to be competitively sensitive.

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 been otherwise publicly disclosed.

3. Submitted as Exhibit "A" are copies of the subject documents, 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 the subject documents, 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 16th day of October, 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
_____)

Docket No.: 130001-EI
Date: October 17, 2013

REQUEST FOR CONFIDENTIAL CLASSIFICATION

EXHIBIT "A"

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

EXHIBIT "B"

REDACTED

48. For realized (actual) hedging gains and losses for the twelve months beginning August 1, 2012, and ending July 31, 2013, associated with swap contracts for natural gas, please provide the following information in a schedule format:
- (a) the transaction date (the date the swap was entered into) for the swap;
 - (b) the fixed price for the swap;
 - (c) the month or period in the future the swap is covering; and
 - (d) the corresponding NYMEX futures price for the future month or period for natural gas on the transaction date of the swap.

ANSWER:

	(A)	(B)	(C)	(D)	(E)	(F)
	Transaction Date	Fixed Price	Period Begin Date	Period End Date	Average NYMEX Price at Market Close (\$/MMBTU)	% Difference
1	1/8/2009		2/1/2012	12/1/2012	7.222	
2	1/14/2009		2/1/2012	12/1/2012	7.162	
3	1/23/2009		3/1/2012	12/1/2012	7.002	
4	3/4/2009		4/1/2012	10/1/2012	6.501	
5	6/22/2009		4/1/2012	10/1/2012	6.881	
6	7/13/2009		1/1/2013	12/1/2013	6.935	
7	7/15/2009		4/1/2012	10/1/2012	6.493	
8	8/31/2009		1/1/2013	12/1/2013	6.896	
9	9/3/2009		1/1/2013	12/1/2013	6.747	
10	3/23/2010		4/1/2012	10/1/2012	5.620	
11	8/16/2010		4/1/2012	10/1/2012	5.157	
12	8/26/2010		1/1/2011	12/1/2012	4.969	
13	9/16/2010		1/1/2013	12/1/2013	5.496	
14	9/17/2010		1/1/2012	12/1/2012	5.188	
15	9/21/2010		1/1/2012	12/1/2012	5.086	
16	9/21/2010		1/1/2011	12/1/2012	4.624	
17	11/5/2010		1/1/2012	12/1/2012	4.991	
18	12/16/2010		1/1/2012	12/1/2012	4.879	
19	1/5/2011		1/1/2013	12/1/2013	5.236	
20	1/27/2011		1/1/2012	12/1/2012	4.940	

	(A)	(B)	(C)	(D)	(E)	(F)
	Transaction Date	Fixed Price	Period Begin Date	Period End Date	Average NYMEX Price at Market Close (\$/MMBTU)	% Difference
21	2/7/2011	██████	1/1/2012	12/1/2012	4.878	██████
22	2/9/2011	██████	1/1/2012	12/1/2012	4.827	██████
23	2/16/2011	██████	1/1/2012	12/1/2012	4.709	██████
24	2/17/2011	██████	1/1/2012	12/1/2012	4.707	██████
25	2/23/2011	██████	1/1/2013	12/1/2013	5.126	██████
26	3/2/2011	██████	1/1/2012	12/1/2012	4.713	██████
27	3/10/2011	██████	1/1/2012	12/1/2012	4.725	██████
28	4/5/2011	██████	1/1/2013	12/1/2013	5.369	██████
29	4/6/2011	██████	1/1/2012	12/1/2012	4.932	██████
30	4/18/2011	██████	1/1/2012	12/1/2012	4.868	██████
31	4/18/2011	██████	1/1/2013	12/1/2013	5.281	██████
32	5/5/2011	██████	1/1/2013	12/1/2013	5.287	██████
33	5/5/2011	██████	1/1/2012	12/1/2012	4.899	██████
34	5/9/2011	██████	1/1/2013	12/1/2013	5.217	██████
35	5/17/2011	██████	1/1/2012	12/1/2012	4.868	██████
36	5/26/2011	██████	1/1/2013	12/1/2013	5.266	██████
37	6/3/2011	██████	1/1/2013	12/1/2013	5.333	██████
38	6/23/2011	██████	1/1/2012	12/1/2012	4.698	██████
39	6/27/2011	██████	1/1/2012	12/1/2012	4.721	██████
40	7/6/2011	██████	1/1/2013	12/1/2013	5.087	██████
41	7/6/2011	██████	1/1/2012	12/1/2012	4.738	██████
42	7/7/2011	██████	1/1/2013	12/1/2013	5.064	██████
43	7/28/2011	██████	1/1/2013	12/1/2013	5.102	██████
44	7/29/2011	██████	1/1/2013	12/1/2013	5.047	██████
45	7/29/2011	██████	1/1/2012	12/1/2012	4.641	██████
46	8/3/2011	██████	1/1/2012	12/1/2012	4.614	██████
47	8/3/2011	██████	1/1/2013	12/1/2013	5.053	██████
48	8/4/2011	██████	1/1/2013	12/1/2013	4.959	██████
49	8/29/2011	██████	1/1/2013	12/1/2013	4.901	██████
50	9/9/2011	██████	1/1/2013	12/1/2013	4.930	██████
51	9/15/2011	██████	1/1/2013	12/1/2013	4.927	██████

	(A)	(B)	(C)	(D)	(E)	(F)
	Transaction Date	Fixed Price	Period Begin Date	Period End Date	Average NYMEX Price at Market Close (\$/MMBTU)	% Difference
52	9/29/2011		1/1/2013	12/1/2013	4.821	
53	10/3/2011		1/1/2013	12/1/2013	4.785	
54	10/7/2011		1/1/2013	12/1/2013	4.682	
55	10/18/2011		1/1/2013	12/1/2013	4.615	
56	11/4/2011		1/1/2012	12/1/2012	4.010	
57	11/7/2011		1/1/2013	12/1/2013	4.507	
58	11/7/2011		1/1/2012	12/1/2012	3.917	
59	11/8/2011		1/1/2012	12/1/2012	3.956	
60	11/9/2011		1/1/2012	12/1/2012	3.865	
61	11/9/2011		1/1/2013	12/1/2013	4.452	
62	11/11/2011		1/1/2012	12/1/2012	3.827	
63	11/11/2011		1/1/2013	12/1/2013	4.394	
64	11/14/2011		1/1/2012	12/1/2012	3.758	
65	11/14/2011		1/1/2013	12/1/2013	4.361	
66	11/15/2011		1/1/2012	12/1/2012	3.703	
67	11/16/2011		1/1/2012	12/1/2012	3.633	
68	11/18/2011		5/1/2013	12/1/2013	4.316	
69	11/22/2011		1/1/2012	12/1/2012	3.741	
70	11/22/2011		5/1/2013	12/1/2013	4.351	
71	11/23/2011		5/1/2013	12/1/2013	4.373	
72	11/23/2011		1/1/2012	12/1/2012	3.789	
73	11/28/2011		1/1/2012	12/1/2012	3.746	
74	11/30/2011		1/1/2012	12/1/2012	3.733	
75	12/5/2011		1/1/2013	12/1/2013	4.363	
76	12/9/2011		1/1/2013	12/1/2013	4.162	
77	12/14/2011		5/1/2013	12/1/2013	4.061	
78	12/28/2011		1/1/2013	12/1/2013	4.035	
79	1/5/2012		5/1/2013	12/1/2013	3.960	
80	1/11/2012		6/1/2013	8/1/2013	3.747	
81	1/17/2012		5/1/2013	12/1/2013	3.582	
82	1/19/2012		1/1/2013	12/1/2013	3.398	

	(A)	(B)	(C)	(D)	(E)	(F)
	Transaction Date	Fixed Price	Period Begin Date	Period End Date	Average NYMEX Price at Market Close (\$/MMBTU)	% Difference
83	1/26/2012	██████	5/1/2012	12/1/2012	3.030	██████
84	1/26/2012	██████	1/1/2013	12/1/2013	3.656	██████
85	1/30/2012	██████	1/1/2013	12/1/2013	3.678	██████
86	1/30/2012	██████	5/1/2012	12/1/2012	3.060	██████
87	1/31/2012	██████	5/1/2012	12/1/2012	2.889	██████
88	1/31/2012	██████	1/1/2013	12/1/2013	3.571	██████
89	2/9/2012	██████	1/1/2013	12/1/2013	3.693	██████
90	2/27/2012	██████	5/1/2012	12/1/2012	2.902	██████
91	2/27/2012	██████	1/1/2013	12/1/2013	3.681	██████
92	2/28/2012	██████	1/1/2013	12/1/2013	3.601	██████
93	3/5/2012	██████	6/1/2013	12/1/2013	3.567	██████
94	3/7/2012	██████	1/1/2013	12/1/2013	3.411	██████
95	3/13/2012	██████	1/1/2013	12/1/2013	3.525	██████
96	3/29/2012	██████	1/1/2013	12/1/2013	3.428	██████
97	4/11/2012	██████	1/1/2013	12/1/2013	3.393	██████
98	4/17/2012	██████	1/1/2013	12/1/2013	3.343	██████
99	4/19/2012	██████	1/1/2013	12/1/2013	3.272	██████
100	5/10/2012	██████	6/1/2013	12/1/2013	3.721	██████
101	5/21/2012	██████	6/1/2013	9/1/2013	3.557	██████
102	5/23/2012	██████	6/1/2013	12/1/2013	3.669	██████
103	5/25/2012	██████	6/1/2013	9/1/2013	3.504	██████
104	5/30/2012	██████	1/1/2013	3/1/2013	3.258	██████
105	5/30/2012	██████	5/1/2013	12/1/2013	3.436	██████
106	6/7/2012	██████	1/1/2013	12/1/2013	3.402	██████
107	6/13/2012	██████	1/1/2013	12/1/2013	3.329	██████
108	6/28/2012	██████	1/1/2013	12/1/2013	3.566	██████
109	7/6/2012	██████	1/1/2013	12/1/2013	3.570	██████
110	7/10/2012	██████	11/1/2012	3/1/2013	3.345	██████
111	7/12/2012	██████	6/1/2013	12/1/2013	3.690	██████
112	7/25/2012	██████	11/1/2012	3/1/2013	3.501	██████
113	8/1/2012	██████	11/1/2012	3/1/2013	3.568	██████

	(A)	(B)	(C)	(D)	(E)	(F)
	Transaction Date	Fixed Price	Period Begin Date	Period End Date	Average NYMEX Price at Market Close (\$/MMBTU)	% Difference
114	8/1/2012	██████	6/1/2013	12/1/2013	3.781	██████
115	8/2/2012	██████	11/1/2012	3/1/2013	3.361	██████
116	8/2/2012	██████	6/1/2013	12/1/2013	3.605	██████
117	8/3/2012	██████	11/1/2012	3/1/2013	3.324	██████
118	8/10/2012	██████	11/1/2012	3/1/2013	3.354	██████
119	8/10/2012	██████	5/1/2013	12/1/2013	3.628	██████
120	8/13/2012	██████	5/1/2013	12/1/2013	3.586	██████
121	8/13/2012	██████	11/1/2012	3/1/2013	3.327	██████
122	8/16/2012	██████	11/1/2012	3/1/2013	3.302	██████
123	8/16/2012	██████	5/1/2013	12/1/2013	3.548	██████
124	8/23/2012	██████	11/1/2012	3/1/2013	3.357	██████
125	8/23/2012	██████	6/1/2013	12/1/2013	3.619	██████
126	8/24/2012	██████	11/1/2012	3/1/2013	3.283	██████
127	8/27/2012	██████	6/1/2013	12/1/2013	3.500	██████
128	9/5/2012	██████	1/1/2013	12/1/2013	3.461	██████
129	9/7/2012	██████	11/1/2012	12/1/2012	2.988	██████
130	9/7/2012	██████	1/1/2013	12/1/2013	3.376	██████
131	9/17/2012	██████	11/1/2012	12/1/2012	3.178	██████
132	9/18/2012	██████	1/1/2013	12/1/2013	3.512	██████
133	9/18/2012	██████	11/1/2012	12/1/2012	3.139	██████
134	10/22/2012	██████	11/1/2012	2/1/2013	3.759	██████
135	10/24/2012	██████	11/1/2012	2/1/2013	3.719	██████
136	10/25/2012	██████	11/1/2012	2/1/2013	3.648	██████
137	10/26/2012	██████	11/1/2012	2/1/2013	3.712	██████
138	11/1/2012	██████	12/1/2012	2/1/2013	3.773	██████
139	11/2/2012	██████	4/1/2013	10/1/2013	3.745	██████
140	11/2/2012	██████	12/1/2012	2/1/2013	3.647	██████
141	11/9/2012	██████	4/1/2013	10/1/2013	3.713	██████
142	11/9/2012	██████	12/1/2012	2/1/2013	3.595	██████
143	11/26/2012	██████	12/1/2012	2/1/2013	3.779	██████
144	11/28/2012	██████	12/1/2012	12/1/2012	3.696	██████

	(A)	(B)	(C)	(D)	(E)	(F)
	Transaction Date	Fixed Price	Period Begin Date	Period End Date	Average NYMEX Price at Market Close (\$/MMBTU)	% Difference
145	11/29/2012	██████	1/1/2013	2/1/2013	3.658	██████
146	11/30/2012	██████	4/1/2013	10/1/2013	3.672	██████
147	11/30/2012	██████	1/1/2013	2/1/2013	3.573	██████
148	12/4/2012	██████	1/1/2013	2/1/2013	3.551	██████
149	12/4/2012	██████	7/1/2013	9/1/2013	3.697	██████
150	12/11/2012	██████	6/1/2013	12/1/2013	3.647	██████
151	1/2/2013	██████	6/1/2013	12/1/2013	3.564	██████
152	1/9/2013	██████	6/1/2013	12/1/2013	3.467	██████
153	1/29/2013	██████	2/1/2013	2/1/2013	3.258	██████
154	5/16/2013	██████	6/1/2013	10/1/2013	3.988	██████
155	5/22/2013	██████	6/1/2013	9/1/2013	4.227	██████
156	5/31/2013	██████	6/1/2013	6/1/2013	3.984	██████
157	5/31/2013	██████	7/1/2013	7/1/2013	3.984	██████
158	6/6/2013	██████	7/1/2013	12/1/2013	3.898	██████
159	6/6/2013	██████	6/1/2013	6/1/2013	3.827	██████
160	6/6/2013	██████	7/1/2013	7/1/2013	3.827	██████
161	6/21/2013	██████	7/1/2013	7/1/2013	3.771	██████
162	6/24/2013	██████	8/1/2013	12/1/2013	3.830	██████

50. For realized (actual) hedging gains and losses for the twelve months beginning August 1, 2012, and ending July 31, 2013, associated with options for natural gas prices, please provide the following information:
- the transaction date for the option;
 - the option price or premium;
 - the type of option;
 - the time to expiration; and
 - the corresponding futures price, forward price, or comparable market price for the period on the transaction date of the option.

ANSWER:

	(A)	(B)	(C)	(D)	(E)	(F)	(G)	(H)
	Date Deal Was Entered	Strike Price \$/MMBTU	Option Premium	Portfolio	Put Call	Direction	Period Covered	Average NYMEX Price at Market Close (\$/MMBTU)
1	9/21/2011	████	\$0.09	Collar	Call	Buy	Jan-Dec, 2012	4.374
2	9/21/2011	████	\$0.00	Collar	Put	Sell	Jan-Dec, 2012	4.374
3	9/29/2011	████	\$0.00	Collar	Call	Buy	Jan-Dec, 2012	4.277
4	9/29/2011	████	\$0.00	Collar	Put	Sell	Jan-Dec, 2012	4.277
5	10/3/2011	████	\$0.00	Collar	Call	Buy	Jan-Dec, 2012	4.206
6	10/3/2011	████	\$0.00	Collar	Put	Sell	Jan-Dec, 2012	4.206
7	10/18/2011	████	\$0.00	Collar	Call	Buy	Jan-Dec, 2012	4.087
8	10/18/2011	████	\$0.00	Collar	Put	Sell	Jan-Dec, 2012	4.087
9	11/1/2011	████	\$0.00	Collar	Call	Buy	Jan-Dec, 2012	4.057
10	11/1/2011	████	\$0.00	Collar	Put	Sell	Jan-Dec, 2012	4.057
11	12/5/2011	████	\$0.00	Collar	Call	Buy	Jan-Dec, 2012	3.757
12	12/5/2011	████	\$0.00	Collar	Put	Sell	Jan-Dec, 2012	3.757
13	12/7/2011	████	\$0.00	Collar	Call	Buy	Jan-Dec, 2012	3.724
14	12/7/2011	████	\$0.00	Collar	Put	Sell	Jan-Dec, 2012	3.724
15	12/9/2011	████	\$0.00	Collar	Call	Buy	Jan-Dec, 2012	3.610
16	12/9/2011	████	\$0.00	Collar	Put	Sell	Jan-Dec, 2012	3.610
17	12/22/2011	████	\$0.00	Collar	Call	Buy	Jan-Dec, 2012	3.510
18	12/22/2011	████	\$0.00	Collar	Put	Sell	Jan-Dec, 2012	3.510

54. Please provide a comparison of Gulf's Risk Management Plans for 2013 and 2014. Please describe any changes between these respective plans.

ANSWER:

The table below provides a comparison of the upper target hedge percentages from Gulf's Risk Management Plans for 2013 and 2014. The upper target hedge percentages have been increased in the 2014 Risk Management Plan because of Gulf's increase reliance on natural gas and low forward prices. There were no other changes made to Gulf's Risk Management Plan between 2013 and 2014.

	A	B	C
	Period	2013 Risk Management Plan	2014 Risk Management Plan
1	Prompt Year		
2	Year 2		
3	Year 3		
4	Year 4		
5	Year 5		

EXHIBIT "C"

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

Line(s)/Field(s)

Response to Interrogatory # 48

Page 1 of 6, Columns B and F, lines 1-20
Page 2 of 6, Columns B and F lines 21-51
Page 3 of 6, Columns B and F, lines 52-82
Page 4 of 6, Columns B and F, lines 83-113
Page 5 of 6, Columns B and F, lines 114-144
Page 6 of 6, Columns B and F, lines 145-162

Response to Interrogatory #50

Page 1 of 1, Column B, lines 1-18

Response to Interrogatory #54

Page 1 of 1, Columns B and C, lines 1-5

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 U.S. mail this 16th day of October, 2013 to the following:

Florida Public Utilities Company
Cheryl M. Martin
1641 Worthington Road
Suite 220
West Palm Beach, FL 33409-6703
cyoung@fpuc.com

PCS Phosphate – White Springs
c/o Brickfield Law Firm
James W. Brew/F. Alvin Taylor
Eighth Floor, West Tower
1025 Thomas Jefferson St, NW
Washington, DC 20007
jbrew@bbrslaw.com

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