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COMMISSION
CLERK



November 5, 2013

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

REDACTED

RE: Docket No. 130140-EI

Dear Ms. Cole:

Enclosed for filing in the above referenced docket is Gulf Power Company's Request for Confidential Classification pertaining to certain portions of the testimony and exhibits of the Office of Public Counsel's witness Scott Norwood. Enclosed is a copy of Gulf Power's Request for Confidential Classification and Exhibit "A" which is a justification for confidential treatment of the Confidential Information in Microsoft Word format as prepared on a Windows based system.

Sincerely,

Robert L. McGee, Jr.

md

Enclosures

cc: Beggs & Lane
Jeffrey A. Stone, Esq.
Gunster Law Firm
Charles A. Guyton, Esq.
Richard A. Melson, Esq.

COM _____
AFD Exh A + ICD
APA _____
ECO _____
ENG _____
GCL _____
GM _____
GTL _____
TCL _____

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In Re: Petition for increase in rates
by Gulf Power Company

Docket No.: 130140-EI
Date: November 6, 2013

**GULF POWER COMPANY'S
REQUEST FOR CONFIDENTIAL CLASSIFICATION
AND MOTION FOR TEMPORARY PROTECTIVE ORDER**

Gulf Power Company ("Gulf Power" or "the Company"), pursuant to Section 366.093, Florida Statutes, and Rule 25-22.006, Florida Administrative Code, hereby requests confidential classification of certain portions of the testimony of Office of Public Counsel's witness Scott Norwood filed on October 16, 2013. Confidential portions of Mr. Norwood's testimony have been highlighted and placed within the accompanying envelope bearing the label "CONFIDENTIAL" ("Confidential Information"). The contents of this envelope should be treated as confidential.

Notice of Intent to Request Confidential Classification

On October 16, 2013, Gulf Power filed a Notice of Intent to Request Confidential Classification of Mr. Norwood's testimony and exhibits. (Document No. 06268-13). Pursuant to Rule 25-22.0006(3)(a), Florida Administrative Code, Gulf has 21 days from the date of the Notice of Intent to file a formal request for confidential classification. Accordingly, Gulf is filing this Request for Confidential Classification to maintain continued confidential treatment of portions of the information contained in the testimony of Mr. Norwood.

Description of the Document(s)

The Confidential Information relates to Gulf Power's transmission system and multiple planned transmission projects. This information is contained in various portions of Mr.

Norwood's testimony. The Confidential Information is identified with specificity on Exhibit "A" to this Request. In support of this request, the Company states:

1. Subsection 366.093(1), Florida Statutes, provides that any records "found by the Commission to be propriety confidential business information shall be kept confidential and shall be exempt from s. 119.07(1), Florida Statutes [requiring disclosure under the Public Records Act]." Proprietary confidential business information includes, but is not limited to "[i]nformation concerning . . . contractual data, the disclosure of which would impair the efforts of the public utility or its affiliates to contract for goods or services on favorable terms." § 366.093(3)(d), Florida Statutes. Proprietary confidential business information also includes "[i]nformation relating to competitive interests, the disclosure of which would impair the competitive business of the provider of the information" and "security measures, systems, or procedures." § 366.093(3)(c) and (e), Florida Statutes. The Confidential Information that is the subject of this request and motion falls within the statutory categories and, thus, constitutes propriety confidential business information entitled to protection under Section 366.093, Florida Statutes, and Rule 25-22.006, Florida Administrative Code.

2. Attached hereto as Exhibit "A" is a justification for confidential treatment of the Confidential Information.

3. Attached hereto as Exhibit "B" are two public versions of the Document(s) with the Confidential Information redacted, unless previously filed as indicated.

4. The Confidential Information is intended to be and is treated by Gulf Power as private and, to this attorney's knowledge, has not been publicly disclosed.

5. For the same reasons set forth herein in support of its request for confidential classification, Gulf Power also moves the Commission for entry of a temporary protective order

pursuant to Rule 25-22.006(6)(c), Florida Administrative Code, protecting the Confidential Information from public disclosure.

Requested Duration of Confidential Classification

6. Gulf Power requests that the Confidential Information be treated by the Commission as confidential proprietary business information for at least the 18 month period prescribed in Rule 25-22.006(9)(a), Florida Administrative Code. If, and to the extent that the Company is in need of confidential classification of the Confidential Information beyond the 18 month period set forth in the Commission rule, the justification and grounds for such extended confidential treatment are set forth in Exhibit "C" to this request and motion.

WHEREFORE, Gulf Power Company respectfully requests that the Confidential Information that is the subject of this request and motion be accorded confidential classification for the reasons set forth herein and for a minimum period of 18 months, subject to any request for a longer period of confidential classification as may be set forth in Exhibit "C" to this request and motion. The company further moves for the entry of a temporary protective order pursuant to Rule 25-22.006(6)(c), Florida Administrative Code, protecting the Confidential Information from public disclosure.

DATED this 5th day of November, 2013.

Respectfully submitted,



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EXHIBIT "A"

JUSTIFICATION FOR CONFIDENTIAL TREATMENT OF PORTIONS OF TESTIMONY OF OPC WITNESS NORWOOD

	<u>Page and Exhibit Nos.</u>	<u>Detailed Description</u>	<u>Rationale</u>
	Page 8, lines 15 and 17	All highlighted information	(1)
	Page 9, lines 1 and 3	All highlighted information	(1)
	Page 17, line 23	All highlighted information	(2)
	Page 19, lines 1-6 and 9-12; Page 20 line 15; Page 21 lines 7-9 and 13-16; Page 22 lines 1, 5-6, and 14	All highlighted information	(3)
	Exhibit SN-2 "Gulf Power Company Ten Year Transmission Plans."	Confidential in its entirety	(4)
	Exhibit SN-3 "System Control Policy on Generator Must-Run Requirements."	All highlighted information	(1)
	Exhibit SN-6 "Gulf Crist and Smith Update, October 1, 2012"	Confidential in its entirety	(2), (3)

-
- (1) This information relates to certain "Must Run" requirements at Plants Crist and Smith which are necessary to maintain the reliability of Gulf Power's transmission system. These system reliability risks/requirements are considered Critical Energy Infrastructure Information as defined by the Federal Energy Regulatory Commission. Disclosure of this non-public information could pose a security risk to Gulf's system and to the bulk electric system as a whole whether through cyber-attack, physical attack or some combination thereof. This information is subject to confidential classification pursuant to section 366.093(3)(c), Florida Statutes.
 - (2) This information portrays potential fuel cost savings resulting from the elimination of Must-Run requirements at Plant Smith. Wholesale competitors as well as suppliers of commodities and services could utilize this information to undermine Gulf's bargaining position in the markets where Gulf must compete to obtain commodities and services or make purchases or sales of wholesale power. This information is subject to confidential classification pursuant to section 366.093(3)(e), Florida Statutes.
 - (3) This information derives from a preliminary economic analysis concerning MATs compliance options for Plant Smith Units 1 and 2. As noted in Gulf's testimony in this proceeding, Gulf has not made a final decision concerning MATs compliance options at Plant Smith and Gulf's economic analysis is subject to change based upon the impacts of future EPA rulemakings. Premature disclosure of this preliminary information could lead

to unwarranted conclusions throughout the energy marketplace about Gulf's intentions for MATs compliance at Plant Smith. This, in turn, could negatively impact Gulf's ability to compete in the capacity markets. Additionally, this information contains capacity price forecast assumptions. These forecasts are based on non-public data, were developed at significant cost to the Company, and are considered proprietary by Gulf Power, the Southern Company and their consultants. Public disclosure of this information would enable competitors to access and utilize Gulf's forecasts without incurring costs to obtain similar information, thus bestowing an economic advantage upon such competitors. Additionally, public disclosure of this information would enable vendors of commodities and services to tailor their pricing proposals to the Company's projections, resulting in higher costs for the Company and its customers. Finally, generation wholesalers, power marketers or other competitors could utilize this information to tailor proposals with the intention of pricing products that could undermine the Company's market position. This information is subject to confidential classification pursuant to section 366.093(3)(e), Florida Statutes.

- (4) Gulf Power's Ten Year Transmission Plan is a forward looking document which sets forth in great detail potential vulnerabilities in Gulf Power's transmission system along with numerous detailed options for addressing those potential vulnerabilities. The system reliability risks/requirements discussed in this Plan are considered Critical Energy Infrastructure Information as defined by the Federal Energy Regulatory Commission. Disclosure of this non-public information could pose a security risk to Gulf's system and to the bulk electric system as a whole whether through cyber-attack, physical attack or some combination thereof. This information is subject to confidential classification pursuant to section 366.093(3)(c), Florida Statutes. Additionally, premature disclosure of the details surrounding planned equipment purchases and projected capital costs could negatively impact Gulf's ability to obtain favorable pricing with vendors of such equipment. This information is subject to confidential classification pursuant to section 366.093(3)(e), Florida Statutes.

PUBLIC VERSION(S) OF THE DOCUMENT(S)

Attached hereto (unless previously filed as may be noted below) are two public versions of the Document(s) with the Confidential Information redacted.

Public Version(s) of the Document(s) attached X

Public Version(s) of the Document(s) previously filed on _____

1 A. Yes. Gulf installed a flue gas desulfurization system (“scrubber”) in 2009, which
2 serves all four coal units at Plant Crist. Gulf has indicated that with this existing
3 scrubber system the Plant Crist units are capable of meeting MATS requirements,
4 except in instances when the scrubber is out of service. Gulf has also indicated that it
5 would be required to shut down the plant (or add other controls) to meet MATS
6 requirements during such scrubber outage periods.

7

8 **Q. WHICH MATS-RESPONSE OPTIONS DID GULF CONSIDER FOR PLANT**
9 **CRIST IN ITS UPDATED COMPLIANCE PLAN ANALYSIS?**

10 A. Gulf evaluated four MATS-response options for Plant Crist. These options are
11 described in Gulf’s Compliance Report (Vick Exhibit JOV-1, pages 17-18 of 34) as
12 follows:

13

14 Option 1: Conversion of the Crist units along with the addition of a gas pipeline to
15 allow Gulf to produce [REDACTED] MW while burning natural gas;

16

17 Option 2: Conversion to allow production of [REDACTED] MW while burning natural gas (no
18 new gas pipeline), with the addition of activated carbon injection (“ACI”) plus dry
19 sorbent injection (“DSI”) for partially converting to natural gas, along with adding
20 ACI/DSI controls plus the use of ultra-low sulfur coal to achieve MATS compliance;

21

1 Option 3: Conversion to allow production of [REDACTED] MW while burning natural gas (no
2 new gas pipeline), plus certain transmission additions to reduce the Must-Run
3 requirements to [REDACTED] MW; and

4
5 Option 4: Construct the transmission upgrades necessary to eliminate the Must-Run
6 requirements that Gulf applies to the Crist units.

7
8 **Q. WHICH OF THE FOUR RESPONSE ALTERNATIVES EVALUATED BY**
9 **GULF WAS SELECTED AS THE PREFERRED MATS RESPONSE**
10 **STRATEGY FOR PLANT CRIST?**

11 A. Gulf's analysis indicates that Option 4, the "Transmission Only" plan, would achieve
12 what it terms as "MATS compliance" at the lowest reasonable cost of the four options
13 considered (See Revised September 24, 2013 Compliance Report, Table 3.3-1, page
14 20 of 34).

15
16 **Q. WHAT ARE THE TRANSMISSION UPGRADES WHICH GULF PLANS TO**
17 **INSTALL UNDER WHAT IT DESCRIBES AS PLANT CRIST MATS**
18 **COMPLIANCE OPTION 4?**

19 A. The transmission upgrades evaluated in MATS-response Option 4 for Plant Crist
20 include the installation of a new 60-mile, 230 kV transmission line from the
21 Company's Alligator Swamp substation north to the Florida-Alabama state line near
22 Brewton, Alabama, along with a Static Var Compensator ("SVC") and a Capacitor
23 Bank for voltage regulation during contingencies in the Pensacola service area (See

1 Q. WHAT ARE YOUR CONCLUSIONS REGARDING GULF'S ANALYSIS OF
2 THE BENEFITS OF ELIMINATING MUST-RUN OPERATING
3 CONSTRAINTS AT PLANT CRIST AND PLANT SMITH?

4 A. Gulf has not provided an adequate basis to demonstrate that its Must-Run policies for
5 Plant Crist and Plant Smith are reasonable or necessary, or to support the
6 reasonableness of its forecasts of the benefits of eliminating Must-Run constraints as
7 reflected in the Company's environmental compliance analyses.

8

9 For these reasons, the Company has no basis for demonstrating that its Must-
10 Run policies are reasonable or necessary, or that the forecasted Must-Run levels
11 reflected in Gulf's environmental response analyses are reasonable.

12

13 Q. WHY ARE THESE MUST-RUN CRITERIA RELEVANT IN DETERMINING
14 THE PRUDENCE OF WHAT GULF DESCRIBES AS ITS PROPOSED
15 ENVIRONMENTAL COMPLIANCE PLAN EXPENDITURES?

16 A. The primary reason why Gulf's analyses for Plant Crist and Plant Smith indicate that
17 the proposed transmission upgrades are justified is that these upgrades would
18 effectively eliminate the Must-Run operating constraints that apply to these units and,
19 therefore, produce fuel savings by eliminating periods when the plants are operated
20 for Must-Run purposes even though other lower cost resources are available. For
21 example, Gulf's analyses for Plant Smith forecasts that the fuel cost savings benefit
22 resulting from the elimination of the Must-Run requirement will range from [START
23 CONFIDENTIAL] [REDACTED] [END CONFIDENTIAL]

1 Exhibit SN-6). [REDACTED]
2 [REDACTED]
3 [REDACTED] [START
4 CONFIDENTIAL] [REDACTED]
5 [REDACTED]
6 [REDACTED] [END
7 CONFIDENTIAL] For example, on page 9 of this presentation, Gulf notes that the
8 cost of retrofitting Plant Smith in order to achieve compliance with MATS and other
9 EPA regulations could require [START CONFIDENTIAL] [REDACTED]
10 [REDACTED]
11 [REDACTED]
12 [REDACTED] [END
13 CONFIDENTIAL]

14
15 Q. YOU MENTIONED MATS AND "OTHER EPA REGULATIONS." PLEASE
16 DESCRIBE THE "OTHER EPA REGULATIONS" TO WHICH YOU REFER.

17 A. The MATS rule, which addresses standards for mercury and other toxic air emissions,
18 was finalized in early 2012. This is the regulation to which the transmission upgrades
19 and retrofit options described by Gulf witnesses in these proceedings are directed.
20 Utilities must comply with MATS beginning in April 2015.

21
22 The two other significant pending EPA regulations considered by Gulf's
23 October 2012 retirement analysis for Plant Smith are a pending rule to implement

1 Section 316(b) of the Clean Water Act ("CWA"), which would establish standards to
2 minimize the impact of power plant cooling water intake structures on aquatic
3 organisms, and EPA's pending Coal Combustion Residuals ("CCR") rule, which
4 addresses regulation of coal ash and other wastes arising from coal combustion and
5 air pollution control systems, such as scrubbers. The final CCR rule could require
6 significant investments to improve the integrity of on-site storage areas for coal ash
7 and other wastes. The pending rule to implement CWA Section 316(b) could
8 ultimately require that plants add closed cycle cooling water systems, such as cooling
9 towers, in instances where existing power plant cooling water intake structures are
10 found to adversely impact aquatic organisms. Recent industry reports suggest that the
11 pending rule to implement CWA Section 316(b) may be finalized by the end of 2013,
12 while the EPA's CCR rule is expected to be finalized in 2014. Although Gulf's
13 October 2012 retirement analysis indicates that the potential cost of compliance with
14 these two pending environmental rules at Plant Smith could be [START
15 CONFIDENTIAL] [REDACTED] [END
16 CONFIDENTIAL], these pending regulations were not evaluated in the Company's
17 environmental compliance analysis for Plant Smith.

18
19 **Q. DOES GULF'S OCTOBER 2012 PRESENTATION ADDRESS THE**
20 **POTENTIAL IMPACT ON THE ECONOMIC VIABILITY OF SMITH UNITS**
21 **1 AND 2 IF THE FORECASTED COMPLIANCE COSTS FOR THE**
22 **PENDING CCR RULE AND THE PENDING RULE TO IMPLEMENT CWA**

1 **SECTION 316(B) ARE ADDED TO THE MATS COMPLIANCE COSTS FOR**
2 **PLANT SMITH? IF SO, WHAT DOES THE ANALYSIS SHOW?**

3 A. Yes. The October 2012 Gulf presentation indicates that, when forecasted compliance
4 costs for the CCR rule and the pending rule to implement CWA Section 316(b) are
5 added to MATS compliance costs for Plant Smith, along with the proposed
6 transmission upgrade costs, the cost of continued operation of the Smith coal units is
7 **[START CONFIDENTIAL** [REDACTED]
8 [REDACTED]
9 [REDACTED] **[END CONFIDENTIAL]** (See Confidential
10 Exhibit SN-6, pages 6 and 7).

11
12 Moreover, on page 14 of the presentation, Gulf concludes that **[START**
13 **CONFIDENTIAL** [REDACTED]
14 [REDACTED]
15 [REDACTED]
16 [REDACTED] **[END CONFIDENTIAL]** (See Confidential Exhibit SN-6,
17 page 8).

18
19 **Q. IS THERE OTHER EVIDENCE SUGGESTING THAT THE PLANT SMITH**
20 **RETIREMENT OPTION MAY BE A LOWER COST ALTERNATIVE TO**
21 **GULF'S PROPOSED "COMPLIANCE" PLAN?**

22 A. Yes. Gulf's Ten-Year Transmission Plan states that the proposed transmission
23 upgrades for Plant Smith are intended to address **[START CONFIDENTIAL]**

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[REDACTED]
[END CONFIDENTIAL] (See Confidential Exhibit SN-2, Confidential Project Descriptions from Gulf's Current Ten-Year Transmission Plan, as provided in Gulf's response to Citizens' Request for Production of Documents No. 75). [START CONFIDENTIAL] [REDACTED]
[REDACTED] [END CONFIDENTIAL]

Q. DOES GULF'S FAILURE TO EVALUATE PLANT SMITH RETIREMENT OPTIONS RAISE SERIOUS QUESTIONS REGARDING THE PRUDENCE OF THE COMPANY'S PROPOSED TRANSMISSION PROJECT FOR PLANT SMITH?

A. Yes. If approved, the Company's proposed "compliance" plan would provide for Gulf to invest approximately [REDACTED] for emissions controls plus another \$76 million for transmission upgrades for the Plant Smith coal units. Gulf's proposal to incur this level of investment without first evaluating Plant Smith retirement alternatives obviously raises serious prudence and potential stranded investment concerns. Consequently, Gulf has essentially asked the Commission to authorize it to place an expensive cart before the horse.

Q. PLEASE SUMMARIZE YOUR CONCLUSIONS REGARDING GULF'S PROPOSAL TO RECOVER TRANSMISSION UPGRADE COSTS THROUGH THE ECRC.

Docket Nos. 130140-EI, 130151-EI, 130092-EI
Confidential Exhibit SN-2
Transmission Upgrade Project Descriptions

Gulf Power Company
Ten Year Transmission Plans
2012 Assessments for Planning Horizon 2013-2022

Confidential in its entirety

SYSTEM CONTROL POLICY ON GENERATOR UNIT MUST-RUN REQUIREMENTS

SUBJECT

GENERATOR MUST-RUN REQUIREMENTS

PURPOSE:

The purpose of this policy is to ensure that adequate generation is available to maintain system reliability, taking into account both high and low load situations and corresponding contingencies. This policy also provides a process to ensure that proper notification is made to the PCC for communicating with the trading floor for appropriate gas nominations.

Must-Run Rules

Crist Plant:

██████████ at all times - one of which must be ██████████
 *Special arrangements must be made in advance when ██████████ have to be off at the same time.

Smith Plant:

System Load Level	L. Smith unit dispatch		
	LS1	LS2	LS3
85-100	██████████		
70-85	██████████		
60-70	██████████		
50-60	██████████		
<50	██████████		

*System Load Levels are percentages of Summer Gross Weather Normal Loads. Based on Gulf Summer Gross of ██████████ (YR-2013)

*Special arrangements must be made in advance when ██████████ Smith units have to be off at the same time.

Docket Nos. 130140-EI, 130151-EI, 130092-EI
Confidential Exhibit SN-6
October 2012 Plant Smith Retirement Analysis

Gulf Crist and Smith Update
October 1, 2012

Confidential in its entirety

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

IN RE: Petition for Increase in Rates)
By Gulf Power Company)
)

Docket No.: 130140-EI

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true copy of the foregoing has been furnished by overnight delivery this 5th day of November, 2013:

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EXHIBIT "C"

REQUESTED DURATION OF CONFIDENTIAL CLASSIFICATION

Gulf Power requests that the Confidential Information that is the subject of this request be treated as proprietary confidential business information exempt from the Public Records Law for a minimum of 18 months from the date of the order granting such classification. To the extent the company needs confidential protection of the Confidential Information for a period longer than 18 months, the company's justification therefor is set forth below:

n/a

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

IN RE: Petition for Increase in Rates)
By Gulf Power Company)
)

Docket No.: 130140-EI

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true copy of the foregoing has been furnished by overnight delivery this 5th day of November, 2013:

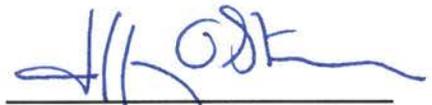
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