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Robert L. McGee, Jr. Regulatory & Pricing Manager One Energy Place Pensacola, Florida 32520-0780

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October 20, 2014

Ms. Carlotta Stauffer, Commission Clerk Florida Public Service Commission 2540 Shumard Oak Boulevard Tallahassee, FL 32399-0850 COMMISSION CLERK 14 OCT 21 AM 9: 41

RE: Docket No. 140001-EI

Dear Ms. Stauffer:

Enclosed is Gulf Power Company's Request for Confidential Classification for Gulf Power Company's Form 423 Fuel Report for August, 2014.

REDACTED

Sincerely,

Robert L. McGee, Jr.
Regulatory and Pricing Manager

md

Enclosures

cc: Begg

Beggs & Lane Jeffrey A. Stone, Esq. AFD Reducted

ECO ____

GCL

IDM ____

TEL ____

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

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

Docket No.: 140001-EI Date: October 21, 2014

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 on its FPSC Form 423 Fuel Report for the month of August 2014 (the "423 Report"). As grounds for this request, the Company states:

- 1. A portion of the information contained in Gulf Power's 423 Report constitutes proprietary confidential business information concerning bids and other contractual data, the disclosure of which would impair the efforts of Gulf Power to contract for goods and services on favorable terms. The information is entitled to confidential classification pursuant to section 366.093(3)(d) and(e), Florida Statutes. Specifically, the confidential information consists of pricing for coal and related transportation services purchased by Gulf Power. Gulf Power and the counterparties involved in these transactions consider the foregoing information to be confidential and competitively sensitive. Disclosure of this information could 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 the confidential information is publicly disclosed.
- To this attorney's knowledge, the pricing information regarding shipments in this
 month's report has not been otherwise publicly disclosed. This information is intended to be,
 and is treated as, confidential by Gulf Power.

3. Submitted as Exhibit "A" are copies of the subject documents, on which are 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 20th day of October, 2014.

JEFFREY A. STONE

Florida Bar No. 325953

RUSSELL A. BADDERS

Florida Bar No. 007455

STEVEN R. GRIFFIN

Florida Bar No. 0627569

Beggs & Lane

P. O. Box 12950

Pensacola, FL 32591

(850) 432-2451

Attorneys for Gulf Power Company

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

IN RE: Fuel and purchased power cost		
recovery clause and generating performance	Docket No.:	140001-EI
incentive factor	Date:	October 21, 2014
1		

REQUEST FOR CONFIDENTIAL CLASSIFICATION

EXHIBIT "A"

This information has been provided to the Commission Clerk under separate cover as confidential information.

EXHIBIT "B"

MONTHLY REPORT OF COST AND QUALITY OF COAL FOR ELECTRIC PLANTS ORIGIN, TONNAGE, DELIVERED PRICE, AND AS RECEIVED QUALITY

Reporting Month:

AUGUST

Year: 2014

4. Name, Title, & Telephone Number of Contact Person Concerning

Data Submitted on this Form:

Ms. J.P. Peters, Fuels Analyst

Reporting Company:

Gulf Power Company

(850)- 444-6332

3. Plant Name:

Crist Electric Generating Plant

5. Signature of Official Submitting Report: Jocelyn P. Peters

6. Date Completed:

October 15, 2014

Line No.		Mine L	ocation		Purchase Type	Transport Mode	Tons	Effective Purchase Price (\$/Ton)		Total FOB Plant Price (\$/Ton)	Sulfur Content (%)	Btu Content (Btu/lb)	Ash Content (%)	Moisture Content (%)	
(a)	(b)	(c)		(d)	(e)	(f)	(g)	(h)	(i)	(i)	(k)	(1)	(m)	
1	FORESIGHT	10	IL	199	С	RB	81,039.96			75.226	2.79	11,839	8.88	10.05	
2	ALPHA COAL SALES	8	WV	99	С	RB	4,502.22			123.333	0.92	12,289	10.29	7.11	
3	GLENCORE	45	IM	999	S	RB	64,531.82	No. of Street	(0.00	90.878	0.80	12,096	7.04	9.31	
4															
5															
6															
7															

MONTHLY REPORT OF COST AND QUALITY OF COAL FOR ELECTRIC PLANTS DETAILED PURCHASED COAL INVOICE INFORMATION

Reporting Month:

AUGUST

Year: 2014

4. Name, Title, & Telephone Number of Contact Person Concerning

Data Submitted on this Form:

Ms. J.P. Peters, Fuels Analyst

2. Reporting Company:

Gulf Power Company

(850)- 444-6332

3. Plant Name:

Crist Electric Generating Plant

5. Signature of Official Submitting Report: Jocelyn P. Peters

6. Date Completed:

October 15, 2014

Line No.	Supplier Name (b)	_	Location (c)	ā	Purchase Type (d)	Tons (e)	FOB Mine Price (\$/Ton) (f)	Shorthaul & Loading Charges (\$/Ton)	Original Invoice Price (\$/Ton) (h)	Retroactive Price increases (\$/Ton)	Base Price (\$/Ton)	Quality Adjustments (\$/Ton) (k)	Effective Purchase Price (\$/Ton)
(4)	(0)		(0)		(4)	(0)	(1)	(9)	(11)	(1)	U)	(K)	(1)
1	FORESIGHT	10	IL	199	С	81,039.96	Service .		N. S.		4-4-5	0.896	No.
2	ALPHA COAL SALES	8	WV	99	С	4,502.22	10.00	140		2		0.533	
3	GLENCORE	45	IM	999	s	64,531.82					DATE N	(1.992)	
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MONTHLY REPORT OF COST AND QUALITY OF COAL FOR ELECTRIC PLANTS **DETAIL OF TRANSPORTATION CHARGES**

1. Reporting Month:

AUGUST

Year: 2014

4. Name, Title, & Telephone Number of Contact Person Concerning

Data Submitted on this Form:

Ms. J.P. Peters, Fuels Analyst

Reporting Company: Gulf Power Company

3. Plant Name:

(850)- 444-6332

Crist Electric Generating Plant

5. Signature of Official Submitting Report: Jocelyn P. Peters

6. Date Completed:

October 15, 2014

										Rail C	harges	1	Vaterborne	Charges				
Line No.	Supplier Name	Mine	Location		Shipping Point	Transport Mode	Tons	Effective Purchase Price (\$/Ton)	Additional Shorthaul & Loading Charges (\$/Ton)	Rail Rate (\$/Ton)	Other Rail Charges (\$/Ton)	River Barge Rate (\$/Ton)	Trans- loading Rate (\$/Ton)	Ocean Barge Rate (\$/Ton)	Other Water Charges (\$/Ton)	Other Related Charges (\$/Ton)	Total Transpor- tation charges (\$/Ton)	FOB Plant Price (\$/Ton)
(a)	(b)		(c)		(d)	(e)	(f)	(g)	(h)	(i)	(i)	(k)	(1)	(m)	(n)	(0)	(p)	(q)
1	FORESIGHT	10	IL	199	ASDD	RB	81,039.96			SE STE	-				5	Ē.	18	75.226
2	ALPHA COAL SALES	8	wv	99	ASDD	RB	4,502.22		2 :			Shirt St.			21	75		123.333
3	GLENCORE	45	IM	999	ASDD	RB	64,531.82		2	- 4		THE REAL PROPERTY.		4	2		100	90.878
4												72		2			77	

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MONTHLY REPORT OF COST AND QUALITY OF COAL FOR ELECTRIC PLANTS ORIGIN, TONNAGE, DELIVERED PRICE, AND AS RECEIVED QUALITY

1. Reporting Month: AUGUST Year: 2014 4. Name, Title, & Telephone Number of Contact Person Concerning

Data Submitted on this Form: Ms. J.P. Peters, Fuels Analyst

Reporting Company: Gulf Power Company (850)- 444-6332

3. Plant Name: Smith Electric Generating Plant 5. Signature of Official Submitting Report: Jocelyn P. Peters

6. Date Completed: October 15, 2014

Line No.	Supplier Name (b)		Location (c)		Purchase Type (d)	Transport Mode (e)	Tons (f)	Effective Purchase Price (\$/Ton)	Total FOB Plant Price (\$/Ton)	Sulfur Content (%)	Btu Content (Btu/lb) (k)	Ash Content (%)	Moisture Content (%) (m)
- 1	ALPHA COAL SALES	8	wv	99	С	RB	30,255.90	3000	123.333	0.92	12,289	10.29	7.11
2							1,0						
3													
4													
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MONTHLY REPORT OF COST AND QUALITY OF COAL FOR ELECTRIC PLANTS DETAILED PURCHASED COAL INVOICE INFORMATION

1.	Reporting Month:	AUGUST	Year:	2014	4.	Name, Title, & Telephone Number of	Contact Person Concerning
						Data Submitted on this Form:	Ms. J.P. Peters, Fuels Analyst
2.	Reporting Company:	Gulf Power Co	mpany			(850)- 444-6332	
3.	Plant Name:	Smith Electric	Generati	ing Plant	5.	Signature of Official Submitting Report	rt: Jocelyn P. Peters

6. Date Completed:

October 15, 2014

Line No.	Supplier Name	Mine	Location		Purchase Type	Tons	FOB Mine Price (\$/Ton)	Shorthaul & Loading Charges (\$/Ton)	Original Invoice Price (\$/Ton)	Retroactive Price increases (\$/Ton)	Base Price (\$/Ton)	Quality Adjustments (\$/Ton)	Effective Purchase Price (\$/Ton)
(a)	(b)		(c)		(d)	(e)	(f)	(g)	(h)	(i)	(j)	(k)	(1)
1 2	ALPHA COAL SALES	8	WV	99	С	30,255.90	10-78	. 1				0.533	
3													
4													
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7													
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(use continuation sheet if necessary)

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MONTHLY REPORT OF COST AND QUALITY OF COAL FOR ELECTRIC PLANTS **DETAIL OF TRANSPORTATION CHARGES**

1. Reporting Month:

AUGUST

Year: 2014

4. Name, Title, & Telephone Number of Contact Person Concerning

Data Submitted on this Form:

Ms. J.P. Peters, Fuels Analyst

Reporting Company: Gulf Power Company

(850)- 444-6332

Plant Name:

Smith Electric Generating Plant

5. Signature of Official Submitting Report: Jocelyn P. Peters

6. Date Completed:

October 15, 2014

										Rail C	harges	Ň	Vaterborne	Charges				
Line No.	Supplier Name	Mine	Location		Shipping Point	Transport Mode	Tons		Additional Shorthaul & Loading Charges (\$/Ton)	Rail Rate (\$/Ton)	Other Rail Charges (\$/Ton)	River Barge Rate (\$/Ton)	Trans- loading Rate (\$/Ton)	Ocean Barge Rate (\$/Ton)	Other Water Charges (\$/Ton)	Other Related Charges (\$/Ton)	Total Transpor- tation charges (\$/Ton)	FOB Plant Price (\$/Ton)
(a)	(b)		(c)		(d)	(e)	(f)	(g)	(h)	(i)	(j)	(k)	(1)	(m)	(n)	(0)	(p)	(p)
1 2 3 4 5 6 7	ALPHA COAL SALES	8	w	99	ASDD	RB	30,255.90				-			-	2	12		123.333
8																		
9 10																		

MONTHLY REPORT OF COST AND QUALITY OF COAL FOR ELECTRIC PLANTS ORIGIN, TONNAGE, DELIVERED PRICE, AND AS RECEIVED QUALITY

1. Reporting Month:

AUGUST

Year: 2014

4. Name, Title, & Telephone Number of Contact Person Concerning

Data Submitted on this Form:

Ms. J.P. Peters, Fuels Analyst

2. Reporting Company:

Gulf Power Company

(850)- 444-6332

3. Plant Name:

Daniel Electric Generating Plant

5. Signature of Official Submitting Report: Jocelyn P. Peters

6. Date Completed:

October 15, 2014

Line No.		Mine	Location		Purchase Type	Transport Mode	Tons		Effective Transport Charges (\$/Ton)	Total FOB Plant Price (\$/Ton)	Sulfur Content (%)	Btu Content (Btu/lb)	Ash Content (%)	Moisture Content (%)
(a)	(b)		(c)		(d)	(e)	(f)	(g)	(h)	(i)	(j)	(k)	(1)	(m)
1	COAL SALES -20MILE	17	со	107	С	RR	293.00			100.476	0.45	11,131	9.60	11.10
2	COAL SALE S -PRB	19	WY	5	S	RR	294.62			57.289	0.20	8,734	4.90	27.50
3	ARCH COAL SALES-PRB	19	WY	5	S	RR	81,421.00			58.029	0.28	8,870	5.40	26.60
4	ARCH COAL SALES	17	co	51	S	RR	30,372.00			82.930	0.46	11,311	8.70	11.10
5										=,				

MONTHLY REPORT OF COST AND QUALITY OF COAL FOR ELECTRIC PLANTS DETAILED PURCHASED COAL INVOICE INFORMATION

Reporting Month:

AUGUST

Year: 2014

4. Name, Title, & Telephone Number of Contact Person Concerning

Data Submitted on this Form:

Ms. J.P. Peters, Fuels Analyst

2. Reporting Company:

Gulf Power Company

(850)- 444-6332

3. Plant Name:

Daniel Electric Generating Plant

5. Signature of Official Submitting Report: Jocelyn P. Peters

6. Date Completed:

October 15, 2014

Line No.	Supplier Name (b)	Mine	Location (c)		Purchase Type (d)	Tons	Price (\$/Ton)	Shorthaul & Loading Charges (\$/Ton)	Original Invoice Price (\$/Ton)	Retroactive Price increases (\$/Ton)	Base Price (\$/Ton)	Quality Adjustments (\$/Ton)	Effective Purchase Price (\$/Ton)
(α)	(6)		(0)		(u)	(e)	(f)	(g)	(h)	(i)	(j)	(k)	(1)
1	COAL SALES -20MILE	17	СО	107	С	293.00				120		(0.274)	
2	COAL SALE S -PRB	19	WY	5	S	294.62		- 1		121		(0.091)	
3	ARCH COAL SALES-PRB	19	WY	5	S	81,421.00	105015	-		~		0.101	
4	ARCH COAL SALES	17	CO	51	S	30,372.00				-		(0.210)	
5										× .		ē	

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MONTHLY REPORT OF COST AND QUALITY OF COAL FOR ELECTRIC PLANTS DETAIL OF TRANSPORTATION CHARGES

1. Reporting Month:

AUGUST

Year: 2014

4. Name, Title, & Telephone Number of Contact Person Concerning

Data Submitted on this Form:

Ms. J.P. Peters, Fuels Analyst

Reporting Company:

Gulf Power Company

(850)- 444-6332

3. Plant Name:

Daniel Electric Generating Plant

5. Signature of Official Submitting Report: Jocelyn P. Peters

6. Date Completed:

October 15, 2014

										Rail C	harges	,	Waterborne	Charges				
Line No.		Mine	Location		Shipping Point	Transport Mode	Tons		Additional Shorthaul & Loading Charges (\$/Ton)	Rail Rate (\$/Ton)	Other Rail Charges (\$/Ton)	River Barge Rate (\$/Ton)	Trans- loading Rate (\$/Ton)	Ocean Barge Rate (\$/Ton)	Other Water Charges (\$/Ton)	Other Related Charges (\$/Ton)	Total Transpor- tation charges (\$/Ton)	FOB Plant Price (\$/Ton)
(a)	(b)		(c)		(d)	(e)	(f)	(g)	(h)	(i)	(j)	(k)	(1)	(m)	(n)	(0)	(p)	(q)
1	COAL SALES -20MILE	17	со	107	ROUTT COUNTY	RR	293.00			Marie Control	3.25	-	(2)	(2)			1000	100.476
2	COAL SALE S -PRB	19	WY	5	CAMPBELL CO, WY	RR	294.62	The same	1925		3.25	120	(2))	221	25	-	HE WILL	57.289
3	ARCH COAL SALES-PRB	19	WY	5	CAMPBELL CO, WY	RR	81,421.00				3.25	2		-	120	1420	11/57/6	58.029
4	ARCH COAL SALES	17	co	51	GUNNISON CO, C	RR	30,372.00	net m			3.25	(2)	-	-	(2)	-	D-201	82.930

EXHIBIT "C"

Reporting Month: August

Form 423-2

Plant Names	Column	Justification
Plant Crist, lines 1-3	(g)	The Effective Purchase Price represents the contract
Plant Smith, line 1		coal commodity price net of Quality Adjustments found in column (k) on form 423-2(a). This information is considered confidential and
Plant Daniel lines 1-4		competitively sensitive by Gulf Power's coal suppliers. Additionally, disclosure of this information, in conjunction with the information disclosed under other columns in this filing, would enable coal suppliers to determine the prices being charged by their competitors. This, in turn, could lead to less competitive pricing and impact Gulf's ability to bargain for price concessions with its coal suppliers. This information is confidential pursuant to section 366.093(3)(d)-(e), Florida Statutes.
Plant Crist, lines 1-3 Plant Smith, line 1	(h)	The Effective Transport Charges represent per ton transport charges incurred by Gulf to transport coal to its plants. This information is considered
Plant Daniel lines 1-4		confidential and competitively sensitive by Gulf's transportation providers. Additionally, disclosure of Gulf's Effective Transport Charges in conjunction with the Total FOB Plant Price in column (i) would enable disclosure of the Effective Purchase Price in column (g) by subtracting the Effective Transport Charges in column (h) from the Total FOB Plant Price in column (i). This information is confidential pursuant to section 366.093(3)(d)-(e), Florida Statutes.

Form 423-2(a)

Plant Names	Column	Justification	
Plant Crist, lines 1-3 Plant Smith, line 1 Plant Daniel lines 1-4	(f)	The FOB Mine Price is the current contract price of coal purchased by Gulf from each supplier. Disclosure of this information would enable suppliers to compare prices with their competitors which could lead to less competitive coal pricing in future bidding. Disclosure could also result in reduced ability for Gulf Power to bargain for price concessions from individual suppliers. This information is confidential pursuant to section 366.093(3)(d)-(e), Florida Statutes.	
Plant Crist, lines 1-3 Plant Smith, line 1 Plant Daniel lines 1-4	(h)	The Original Invoice Price is the same as the FOB Price in column (f) except in cases when the supplier discloses its short haul and loading costs (column (g)), if any, included in the contract price of coal. Disclosure of this information would therefore be detrimental for the same reasons as are articulated above in connection with the FOB Mine Price.	
Plant Crist, lines 1-3 Plant Smith, line 1 Plant Daniel lines 1-4	(j)	The Base Price is the same as the Original Invoice Price in column (h), since retroactive pricing adjustments (column (i)) are normally received, if at all, after the reporting month and are included on Form 423-C, if necessary. Disclosure of this information would therefore be detrimental for the same reasons as are articulated above in connection with the FOB Mine Price.	
Plant Crist, lines 1-3 Plant Smith, line 1 Plant Daniel lines 1-4	(1)	The Effective Purchase Price represents the Base Price in column (j) adjusted by the Quality Adjustments in column (k). Disclosure of this information would therefore be detrimental for the same reasons as are articulated above in connection with FOB Mine Price.	

Form 423-2(b)

Plant Names	Column	Justification		
Plant Crist, lines 1-3 Plant Smith, line 1 Plant Daniel lines 1-4	(g)	The Effective Purchase Price, as described above, is contract coal commodity price net of Quality Adjustments found in column (k) on form 423-2(a) and is confidential for the reasons previously stated.		
Plant Crist, lines 1-2 Plant Smith, line 1	(i)	The Rail Rate is the current rate that Gulf Power pays to transport coal to its plants via rail.		
Plant Daniel lines 1-4		This information is considered confidential by Gulf's rail transportation providers. Additionally, disclosure of this information would enable rail transport providers to compare rates with their competitors which, in turn, could lead to less competitive rail rates in future negotiations. Disclosure would also result in reduced ability for Gulf Power to bargain for price concessions from individual providers. This information is confidential pursuant to section 366.093(3)(d), Florida Statutes.		
Plant Crist, lines 1-3 Plant Smith, line 1	(k)	The River Barge Rate is the current rate that Gulf Power pays to transport coal to its plants via barge. This information is considered confidential by Gulf's barge transportation providers. Additionally, disclosure of this information would enable barge transport providers to compare rates with their competitors which, in turn, could lead to less competitive barge rates in future negotiations. Disclosure could also result in reduced ability for Gulf Power to bargain for price concessions from individual providers. This information is confidential pursuant to section 366.093(3)(d), Florida Statutes.		

Plant Crist, lines 1-3 Plant Smith, line 1	(1)	The Transloading Rate is the contract price to unload coal from vessels and trains and reload coal into Gulf's barges at the associated port facilities. The terms of the transloading agreement state that these rates shall remain confidential between the parties of the contract. Revealing this information would harm Gulf's and its suppliers' competitive interests. This information is confidential pursuant to section 366.093(3)(d), Florida Statutes.
Plant Crist, lines 1-3 Plant Smith, line 1 Plant Daniel lines 1-4	(p)	The Total Transportation Charges represent the total cost reported as transportation charges. Disclosure of this information in conjunction with information disclosed in other columns of Form 423-2(b) could enable third parties to determine individual components of the Total Transportation Charge, such as Rail or River Barge Rates which are confidential for the reasons stated above.

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

IN RE: Fuel and Purchased Power Cost)	
Recovery Clause with Generating)	
Performance Incentive Factor)	Docket No.: 140001-E

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true copy of the foregoing was furnished by overnight mail this 20th day of October, 2014 to the following:

Florida Public Utilities Company Cheryl M. Martin 1641 Worthington Road Suite 220 West Palm Beach, FL 33409-6703 Cheryl Martin@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 Duke Energy Florida
John T. Burnett
Dianne M. Triplett
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Florida Power & Light Company John T. Butler 700 Universe Boulevard (LAW/JB) Juno Beach, FL 33408-0420 John.Butler@fpl.com Florida Power & Light Company Kenneth Hoffman 215 South Monroe Street, Suite 810 Tallahassee, FL 32301-1858 Ken.Hoffman@fpl.com Ausley Law Firm James D. Beasley J. Jeffry Wahlen Ashley M. Daniels Post Office Box 391 Tallahassee, FL 32302 jbeasley@ausley.com adaniels@ausley.com

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Matthew.bernier@duke-energy.com

Florida Industrial Power Users Group c/o Moyle Law Firm Jon C. Moyle, Jr. 118 North Gadsden Street Tallahassee, FL 32301 jmoyle@moylelaw.com

Tampa Electric Company Ms. Paula K. Brown Regulatory Affairs P. O. Box 111 Tampa, FL 33601-0111 Regdept@tecoenergy.com Office of the General Counsel Martha Barrera 2540 Shumard Oak Blvd Tallahassee, FL 32399-0850 mbarrera@psc.state.fl.us jgilcher@psc.state.fl.us tefarley@psc.state.fl.us ASoete@psc.state.fl.us

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