



**Florida Power**

A Progress Energy Company

**ORIGINAL**

**JAMES A. MCGEE**

ASSOCIATE GENERAL COUNSEL

November 4, 2002

Ms. Blanca S. Bayó, Director  
Division of the Commission Clerk  
and Administrative Services  
Florida Public Service Commission  
2540 Shumard Oak Boulevard  
Tallahassee, Florida 32399-0850

RECEIVED FPSC  
02 NOV -5 AM 10:59  
COMMISSION CLERK

Re: Docket No. 020001-EI; **Request for Confidential Classification.**

Dear Ms. Bayó:

Enclosed for filing in the subject docket is an original and ten copies of Florida Power Corporation's Request for Confidential Classification. Also enclosed is a sealed envelope containing the document subject to the Request, with the confidential information highlighted. A public copy of the document with the confidential information redacted is attached to the request. **The highlighted portions of the unredacted version should be held as Confidential Information in accordance with Rule 25-22.006, F.A.C.**

Please acknowledge your receipt of the above filing on the enclosed copy of this letter and return to the undersigned. A 3½ inch diskette containing the above-referenced Request in WordPerfect format is also enclosed. Thank you for your assistance in this matter.

Very truly yours,

James A. McGee

JAM/scc  
Enclosure

cc: Parties of record

RECEIVED & FILED

FPSC-BUREAU OF RECORDS

100 Central Avenue • Post Office Box 14042 • St. Petersburg, Florida 33733-4042  
Phone: 727.820.5184 • Fax: 727.820.5519 • Email: james.mcgee@pgnmail.com

DOCUMENT NUMBER - DATE  
12103 NOV -5 02  
DISTRIBUTION CENTER  
02 NOV -5 AM 10:29  
FPSC - COMMISSION CLERK

**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that a true copy of the foregoing has been furnished to the following individuals by regular U.S. Mail the 4th day of November, 2002:

Wm. Cochran Keating, IV, Esquire  
Senior Attorney  
Florida Public Service Commission  
2540 Shumard Oak Blvd.  
Tallahassee, FL 32399-0850


Robert Vandiver, Esquire  
Office of the Public Counsel  
c/o The Florida Legislature  
111 West Madison Street, Room 812  
Tallahassee, FL 32399-1400

Lee L. Willis, Esquire  
James D. Beasley, Esquire  
Ausley & McMullen  
P.O. Box 391  
Tallahassee, FL 32302

John T. Butler, Esquire  
Steel, Hector & Davis  
200 S. Biscayne Blvd., Suite 4000  
Miami, Florida 33131

Jeffrey A. Stone, Esquire  
Beggs & Lane  
P. O. Box 12950  
Pensacola, FL 32576-2950

Vicki Gordon Kaufman, Esquire  
McWhirter, Reeves, et al.  
117 S. Gadsden Street  
Tallahassee, FL 32301

  
\_\_\_\_\_  
Attorney

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

---

In re: Fuel and Purchased Power Cost  
Recovery Clause and Generating  
Performance Incentive Factor.

---

Docket No. 020001-EI

Submitted for filing:  
November 4, 2002

**REQUEST FOR CONFIDENTIAL CLASSIFICATION**

Florida Power Corporation (Florida Power or the Company), pursuant to Section 366.093, F.S., and Rule 25-22.006, F.A.C., hereby requests confidential classification of the highlighted information in Florida Power's responses to Staff Interrogatory Nos. 82, 100 and 101 (the Responses collectively, or Response 80, 100, or 101 individually), which provide competitively sensitive coal transportation and generating unit cost information. The Responses are included with this Request in a separate sealed envelope, with the information for which Florida Power seeks confidential classification highlighted. A public copy of the Responses with the confidential information redacted is attached to this Request. In support of its Request, Florida Power states as follows:

1. Subsection 366.093(1) 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) [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.” Subsection 366.093(3)(d). 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.” Section 366.093(3)(e). The designated portions of the Responses fall within this statutory categories and, thus, constitute propriety confidential business information entitled to protection under Section 366.093 and Rule 25-22.006.

2. With respect to Response 80, the highlighted information identifies Florida Power’s unit costs of rail and water coal transportation. Disclosure of these costs would enable coal suppliers to bid a F.O.B. mine price calculated to produce a delivered plant price at or marginally below Florida Power's current delivered price, which is publicly available. Without an opportunity to use the transportation rates in this manner, suppliers would find it necessary to bid their best price. In addition, disclosure of these transportation costs would allow suppliers of rail transportation to know the cost of waterborne transportation against which they compete. Any such use of this information can only result in higher fuel costs incurred by Florida Power and it customers. Consequently, the effect of disclosure would be to impair the efforts of Florida Power to contract for goods and services on favorable terms for the benefit of its customers.

3. With respect to Response 100 and 101, disclosure of the highlighted information would provide highly sensitive information to suppliers and potential suppliers of wholesale power purchased by Florida Power, many of whom are not subject to regulatory pricing restrictions, regarding hourly marginal cost data for the

Company's generating units individually and its generating system collectively during critical peak demand hours. This information can be utilized by knowledgeable suppliers in the wholesale power market to determine Florida Power's cost structure as a function of load and temperature during the periods when the Company's generating resources are most susceptible to reliability concerns and, as a result, most vulnerable to wholesale power price exploitation by suppliers with market rate authority. In addition, knowledgeable wholesale power suppliers can utilize this information in conjunction with other publicly available information, such as Florida Power's responses to Staff's First Set of Interrogatories regarding load (Interrogatory No. 2), DSM (Interrogatory No. 4), and unit availability (Interrogatory No. 6), to determine the operational circumstances and temperatures at which Florida Power might experience even greater vulnerability to higher market prices to mitigate DSM usage and maintain system reliability. Any such use of this information can only result in higher purchased power costs incurred by Florida Power and its customers. Consequently, the effect of disclosure would be to impair the efforts of Florida Power to contract for goods and services on favorable terms for the benefit of its customers.

4. The highlighted information in Response 82 provides the same or similar price and cost information as that contained in Florida Power's Form 423 monthly filings in this proceeding which is consistently accorded confidential classification by the Commission. The highlighted information in Response 100 and 101 provides the same or similar marginal cost information as that contained in Florida Power's Response to Staff Interrogatory No. 5, which is the subject of the Company's

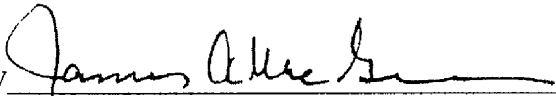
pending request for confidential classification filed October 2, 2002 in this docket (Document Number 10609-02).

5. The designated information for which confidential classification is sought is intended to be and is treated by the Company as private and has not been publicly disclosed.

WHEREFORE, Florida Power respectfully requests that the highlighted information in its responses to Staff Interrogatory Nos. 82, 100 and 101 attached hereto be accorded confidential classification for the reasons set forth above.

Respectfully submitted,

FLORIDA POWER CORPORATION

By 

James A. McGee  
Post Office Box 14042  
St. Petersburg, FL 33733-4042  
Telephone: (727) 820-5184  
Facsimile: (727) 820-5519



100. For Florida Power's projected peak hour in December 2003, please list the queue of generation resources that Florida Power would dispatch to match its projected load. For each generation resource dispatched during that hour, please provide the following information:
1. Name;
  2. Load; and
  3. Marginal cost (\$/MWH).

**Response:**

Name	Load (MWh)	Marginal Cost (\$/MWh)
CR NUC 3	782.00	
Royster	30.80	
Mulberry	79.20	
Cargill	15.00	
Miller UPS	413.00	
Timber Energy	12.50	
Orange Cogen	74.00	
Pasco Cogen	109.00	
Teco Purc	60.00	
CRYSTAL 2	491.00	
CRYSTAL 1	383.00	
CRYSTAL 4	735.00	
LFC (APP)	17.00	
Pinellas County	54.80	
Pasco County	23.00	
Bay County	11.00	
Lake County	12.80	
HINES 2	582.00	
El Dorado(APP)	114.20	
Ridge Gen St	39.60	
Orlando Cogen	79.20	
HINES 1	529.00	
Lake Cogen	110.00	
TIGERBAY 1	223.00	
ANCLOTE 2	522.00	
ANCLOTE 1	522.00	
BARTOW 3	208.00	
BARTOW 2	121.00	
UNIVERS 1	41.00	
BARTOW 1	47.00	
SUWANNEE 1	33.00	



INT CITY 8	94.00	
INT CITY 12	98.00	
INT CITY 13	98.00	
SUWANNEE 2	32.00	
DEBARY 8	93.00	
DEBARY 9	93.00	
INT CITY 14	98.00	
INT CITY 9	94.00	
INT CITY 7	94.00	
DEBARY 7	93.00	
As Avail	5.70	
U S Agrichem	5.60	
Auburn(As Avail)	18.80	
INT CITY 10	94.00	
P SWAN 2	57.00	
PBAYBORO 3	48.00	
PBAYBORO 2	48.00	
INT CITY 11	60.00	
P SWAN 1	30.00	
P SWAN 3	30.00	
DEBARY 10	25.00	
DEBARY 1	25.00	
DEBARY 2	25.00	
INT CITY 5	30.00	
DEBARY 3	20.80	
PBARTOW 3	15.00	
PBARTOW 4	15.00	

101. Assume that Hines Unit 2 becomes unavailable the day before its scheduled commercial in-service date until December 31, 2005. For Florida Power's projected peak hour in December 2003, list the queue of generation resources that Florida Power would dispatch to match its projected load. For each generation resource dispatched during that hour, please provide the following information:
1. Name;
  2. Load; and
  3. Marginal cost (\$/MWH)

**Response:**

Name	Load (MWh)	Marginal Cost (\$/MWh)
CR NUC 3	782.00	
Royster	30.80	
Mulberry	79.20	
Cargill	15.00	
Miller UPS	413.00	
Timber Energy	12.50	
Orange Cogen	74.00	
Pasco Cogen	109.00	
Teco Purc	60.00	
CRYSTAL 2	491.00	
CRYSTAL 1	383.00	
CRYSTAL 4	735.00	
LFC (APP)	17.00	
Pinellas County	54.80	
Pasco County	23.00	
Bay County	11.00	
Lake County	12.80	
El Dorado(APP)	114.20	
Ridge Gen St	39.60	
Orlando Cogen	79.20	
HINES 1	529.00	
Dade On WKD	43.00	
Lake Cogen	110.00	
TIGERBAY 1	223.00	
ANCLOTE 2	522.00	
ANCLOTE 1	522.00	
BARTOW 3	208.00	
BARTOW 1	123.00	
BARTOW 2	121.00	
UNIVERS 1	41.00	
SUWANNEE 3	81.00	
INT CITY 8	94.00	
DEBARY 8	93.00	
SUWANNEE 1	33.00	
INT CITY 12	98.00	
INT CITY 13	98.00	

SUWANNEE 2	32.00	
DEBARY 7	93.00	
INT CITY 14	98.00	
INT CITY 7	94.00	
INT CITY 10	94.00	
PBARTOW 4	60.00	
Auburn(As Avail)	18.80	
U S Agrichem	5.60	
As Avail	5.70	
PBARTOW 2	53.00	
INT CITY 11	120.00	
P SWAN 2	57.00	
PBAYBORO 3	48.00	
PBAYBORO 2	48.00	
INT CITY 3	51.00	
INT CITY 2	51.00	
INT CITY 6	51.00	
PBAYBORO 4	48.00	
PBARTOW 3	30.80	
DEBARY 5	35.00	
DEBARY 6	35.00	
DEBARY 4	35.00	
DEBARY 3	35.00	
DEBARY 2	35.00	
DEBARY 1	35.00	
P SWAN 1	30.00	
INT CITY 1	30.00	
P SWAN 3	30.00	
PTURNER 3	40.00	
DEBARY 10	25.00	
PBARTOW 1	15.00	