Stan D. Ritenour Secretary and Treasurer and Regulatory Manager

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One Energy Place Pensacola, Florida 32520-0781

Tel 850.444.6231 Fax 850.444.6026 SDRITENO@southernco.com



August 29, 2008

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

Dear Ms. Cole:

RE: Docket No. 080001-EI

Enclosed are an original and fifteen copies of Gulf Power Company's Request for Confidential Classification pertaining to Schedule CCE-4 of Exhibit RWD-3 to the Direct Testimony of Richard W. Dodd dated September 2, 2008.

Sincerely,

Jusan P. Riteroun

COM ECB GCL 2 OPC RCP SSC SGA	mv Enclosures cc: Beggs & Lane
SGA ADM CLK	Jeffrey A. Stone, Esq.

DOCUMENT NUMBER-DATE

08005 SEP-2 8

FPSC-COMHISSION CLERK

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

Docket No.: 080001-EI

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true copy of the foregoing was furnished by U. S. mail this _____ day of August, 2008, on the following:

John T. Burnett, Esq. Progress Energy Service Co. P. O. Box 14042 St. Petersburg FL 33733-4042

John T. Butler, Esq. Senior Attorney for Florida Power & Light Company 700 Universe Boulevard Juno Beach FL 33408-0420

John W. McWhirter, Jr., Esq. Attorney for Florida Industrial Power Users Group McWhirter Reeves & Davidson P.O. Box 3350 Tampa, FL 33601-3350

Paul Lewis, Jr. Progress Energy Florida, Inc. 106 E. College Ave., Ste. 800 Tallahassee FL 32301-7740

Michael B. Tworney Attorney for AARP P. O. Box 5256 Tallahassee FL 32314-5256

Karin S. Torain PCS Administration (USA), Inc. Skokie Boulevard, Ste. 400 Northbrook IL 60062 Mehrdad Khojasteh Florida Public Utilities Company P. O. Box 3395 West Palm Beach FL 33402-3395

R. Wade Litchfield, Esq. Associate General Counsel for Florida Power & Light Company 700 Universe Boulevard Juno Beach FL 33408-0420

Lee L. Willis, Esq. James D. Beasley, Esq. Attorneys for Tampa Electric Co. Ausley & McMullen P. O. Box 391 Tallahassee FL 32302

Patricia Ann Christensen, Esq. Office of Public Counsel 111 W. Madison St., Room 812 Tallahassee FL 32399-1400

Cecilia Bradley Senior Assisttant Attorney General Office of the Attorney General The Capitol-PL01 Tallahassee FL 32399-1050

Florida Retail Federation 100 East Jefferson Street Tallahassee FL 32301 Lisa Bennett, Esq. FL Public Service Commission 2540 Shumard Oak Boulevard Tallahassee FL 32399-0863

Jeffrey S. Bartel Vice President Florida Power & Light Co. 215 S. Monroe Street, Ste. 810 Tallahassee FL 32301-1859

Paula K. Brown, Administrator Regulatory Coordination Tampa Electric Company P. O. Box 111 Tampa FL 33601

Norman H. Horton, Jr., Esq. Messer, Caparello & Self, P.A. P. O. Box 15579 Tallahassee FL 32317

James W. Brew Brickfield, Burchette, et al., P.C. 1025 Thomas Jefferson St., NW Eighth, West Tower Washington DC 20007-5201

Robert Scheffel Wright John T. LaVia, III Young van Assenderp, P.A. 225 S. Adams Street, Suite 200 Tallahassee FL 32301

JEFFRÈY 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 32591-2950 (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 incentive factor

Docket No.: 080001-EI Date: August 29, 2008

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-3 to the Direct Testimony of Richard W. Dodd dated September 2, 2008 (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 with 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 would charge higher prices, if the price terms were 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 the Gulf Power and has not been otherwise publicly disclosed.

3. Submitted as Exhibit "A" is a copy of Schedule CCE-4, on which is highlighted

0000MENT NUMBER-DATE 08005 SEP-2 8 FPSC-COMMISSION CLERK 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 29th day of August, 2008.

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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 incentive factor

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Docket No.: 080001-EI Date: August 29, 2008

REQUEST FOR CONFIDENTIAL CLASSIFICATION

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EXHIBIT "A"

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

EXHIBIT "B"

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3 2009 Capacity Contracts	_																								
4		me		Contract																					
5 Contract/Counterparty	Start	End (1)		Type_																					
6 Southern Intercompany Interchange				SES Opco																					
7 Coral Power,LLC	6/1/2009	5/31/2014		Firm																					
8 Southern Power Company	6/1/2009	5/31/2014		Finn																					
9 South Carolina PSA	9/1/2003	-		Other																					
10 JP Morgan Ventures Energy	9/2/2008	-		Other																					
11 Calpine Power Services	Varies	-		Other																					
12 Effingham County Power, LLC	6/11/2007	-		Other																					
13 Exelon Power Team	1/1/2000	-		Other																					
14 FP&L Energy Power Marketing	6/1/2003	•		Other																					
15 KGEN, LLC	5/1/2005	-		Other																					
16 MPC Generating, LLC	6/11/2007	-		Other																					
17 Shell Energy N.A. (U.S.)	6/1/2008	-		Other																					
18 West Georgia Generating Company	5/11/2000	•		Other																					
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23 (1) Unless otherwise noted, contrac	t remains e	ffective unle	ss termi	nated upon	30 days	s prior writ	ten notio	ce.																	
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38 Southern Intercompany Interchange		1,012,645	667.6	662,192				317,878	603.2		291.9	1,332,489	271.5	3,258,284	210,1	2,606,444	253.0	1,624,791	423.3	162,180	154.4	68,953	207.9	84,784	12,274,756
39 Coral Power,LLC	0.0	0	0.0	0	0.0	0	0.0	0	0.0	0															10,032,000
40 Southern Power Company	0.D	0	0.0	0	0.0	0	0.0	0	0.0	0															12,975,000
41 South Carolina PSA						_																			(42,000)
							0.0	(52)	0.0	(52)	0.0	(52)	0.0	(52)	0.0	(52)	0,0	(52)	0.0	(52)	0.0	(52)	0.0	(52)	
42 JP Morgan Ventures Energy (**	0.0	(52)		(52)		(52)																10.01			(624)
43 Calpine Power Services (1)	0.0	(104)	0.0	(104)	0.0	(104)	0.0	(104)	0.0	(104)	0.0	(104)	0.0	(104)		(104)	0.0	(104)	0.0	(104)		(104)	0.0	(104)	(624) (1,248)
43 Calpine Power Services ⁽¹⁾ 44 Effingham County Power, LLC ⁽¹⁾	0.0 0.0	(104) (52)	0.0 0.0	(104) (52)	0.0 0.0	(104) (52)	0.0 0.0	(104) (52)	0.0	(52)	0.0	(104) (52)	0.0	(52)	0.0	(52)	0.0	(52)	0.0	(62)					
43 Calpine Power Services ⁽¹⁾ 44 Effingham County Power, LLC ⁽¹⁾ 45 Exelon Power Team ⁽¹⁾	0.0 0.0 0.0	(104) (52) (52)	0.0 0.0 0.0	(104) (52) (52)	0.0 0.0 0.0	(104) (52) (52)	0.0 0.0 0.0	(104) (52) (52)	0.0 0.0	(52) (52)	0.0 0.0	(104) (52) (52)	0.0 0.0	(52) (52)	0.0 0.0	(52) (62)		(52) (52)			0.0	(104)	0.0	(104)	(1,248)
43 Calpine Power Services ⁽¹⁾ 44 Effingham County Power, LLC ⁽¹⁾ 45 Exelon Power Team ⁽¹⁾ 46 FP&L Energy Power Marketing ⁽¹⁾	0.0 0.0 0.0 0.0	(104) (52) (52) (52)	0.0 0.0 0.0 0.0	(104) (52) (52) (52)	0.0 0.0 0.0 0.0	(104) (52) (52) (52)	0.0 0.0 0.0 0.0	(104) (52) (52) (52)	0,0 0.0 0.0	(52) (52) (62)	0.0 0.0 0.0	(104) (52) (52) (52)	0.0 0.0 0.0	(52) (52) (52)	0.0 0.0 0.0	(52) (62) (52)	0.0	(52)	0.0	(62)	0.0 0.0	(104) (52)	0.0 6.0	(104) (52)	(1,248) (624)
43 Calpine Power Services ⁽¹⁾ 44 Effingham County Power, LLC ⁽¹⁾ 45 Exelon Power Team ⁽¹⁾ 46 FP&L Energy Power Marketing ⁽¹⁾ 47 KGEN, LLC ⁽¹⁾	0.0 0.0 0.0 0.0 0.0	(104) (52) (52) (52) (156)	0.0 0.0 0.0 0.0	(104) (52) (52) (52) (156)	0.0 0.0 0.0 0.0 0.0	(104) (52) (52) (52) (156)	0.0 0.0 0.0 0.0 0.0	(104) (52) (52) (52) (156)	0.0 0.0 0.0 0.0	(52) (52) (62) (156)	0.0 0.0 0.0 0.0	(104) (52) (52) (52) (156)	0.0 0.0 0.0 0.0	(52) (52) (52) (156)	0.0 0.0 0.0 0.0	(52) (62)	0.0 0,0	(52) (52)	0.0 0.0	(62) (52)	0.0 0.0 0.0	(104) (52) (52)	0.0 8.9 0.0	(104) (52) (52)	(1,248) (624) (624) (624)
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54 55 58 (1) Generator Balancing Service provides no capacity scheduling entitlements.

EXHIBIT "C"

Line-by-Line/Field-by-Field Justification Line(s)/Field(s)

Page 1 of 1 Lines 39-40; Columns O-BB Line 41, Columns E-BB

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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.

COMMISSIONERS: MATTHEW M. CARTER II, CHAIRMAN LISA POLAK EDGAR KATRINA J. MCMURRIAN NANCY ARGENZIANO NATHAN A. SKOP



OFFICE OF COMMISSION CLERK ANN COLE COMMISSION CLERK (850) 413-6770

Public Service Commission

ACKNOWLEDGEMENT

DATE: September 2, 2008

TO: Susan Ritenour/Gulf Power Company

FROM: Marguerite H. McLean, Office of Commission Clerk

RE: Acknowledgement of Receipt of Confidential Filing

This will acknowledge receipt of a CONFIDENTIAL DOCUMENT filed in Docket Number <u>080001-EI (DN 08006-08)</u> or, if filed in an undocketed matter, concerning certain information contained in Schedule CCE-4 of Exh RWD-3 to direct testimony of <u>Richard W. Dodd</u>, and filed on behalf of <u>GPC</u>. The document will be maintained in locked storage.

If you have any questions regarding this document, please contact Marguerite McLean, Deputy Clerk, at (850) 413-6770.