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**REDACTED**



claim of confidentiality  
notice of intent  
 request for confidentiality  
filed by OPC

February 29, 2012

For DN 01169-12, which  
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RECEIVED-FPSC  
12 MAR - 1 AM 11:06  
COMMISSION  
CLERK

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

RE: Docket No. 120001-EI

Dear Ms. Cole:

Enclosed is an original and seven copies of Gulf Power Company's Request for Confidential Classification pertaining to Schedule CCA-4 of Exhibit RWD-1 to the Direct Testimony of Richard W. Dodd dated March 1, 2012.

Regards,

*Susan D. Ritenour*

nm

Enclosures

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

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DOCUMENT NUMBER-DATE

01168 MAR-12

FPSC-COMMISSION CLERK

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

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

Docket No.: 120001-EI  
Date: March 1, 2012

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 its request that the Florida Public Service Commission enter an order protecting from public disclosure certain information contained in Schedule CCA-4 of Exhibit RWD-1 to the Direct Testimony of Richard W. Dodd dated March 1, 2012, (Schedule CCA-4) on behalf of Gulf Power. As grounds for this request, the Company states:

1. A portion of the information contained in Schedule CCA-4 is proprietary confidential business information regarding contractual matters which would cause irreparable harm to Gulf Power, the entities with whom it has contracted, and most importantly, to Gulf’s customers if such information was disclosed to the general public. In addition, the Schedule contains information relating to competitive interests in capacity markets which would cause irreparable harm to Gulf Power and the entities with whom it has contracted if such information was disclosed to the general public. The information is entitled to confidential classification pursuant to section 366.093(3) (d) and (e), Florida Statutes. Schedule CCA-4 provides the price terms for capacity contracts which were active in 2011. The price terms in these contracts are regarded by both Gulf and the counterparties as confidential. The pricing, which resulted from negotiations between 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 because potential counterparties may refuse to enter into contracts with Gulf, or may charge higher prices if the price terms were made public.

DOCUMENT NUMBER-DATE

01168 MAR-1 2012

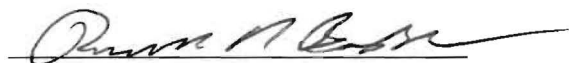
FPSC-COMMISSION CLERK

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" is a copy of Schedule CCA-4, 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 Schedule CCA-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 29<sup>th</sup> day of February, 2012.



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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.: 120001-EI  
Date: March 1, 2012

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**REQUEST FOR CONFIDENTIAL CLASSIFICATION**

**EXHIBIT "A"**

Provided to Commission Clerk under separate  
cover as confidential information.

EXHIBIT "B"

Gulf Power Company  
2011 Capacity Contracts

Contract/Counterparty	Term		Contract
	Start	End <sup>(1)</sup>	Type
Southern Intercompany Interchange	5/1/2007	5 Yr Notice	SES Opco
<u>PPAs</u>			
Coral Power, LLC	6/1/2009	5/31/2014	Firm
Southern Power Company	6/1/2009	5/31/2014	Firm
Shell Energy N.A. (U.S.), LP <sup>(2)</sup>	11/2/2009	5/31/2023	Non-Firm
<u>Other</u>			
Alabama Electric Cooperative	1/1/2011	1/14/2011	Other
South Carolina Electric & Gas	5/9/2011	12/31/2012	Other
South Carolina PSA	9/1/2003	-	Other

(1) Unless otherwise noted, contract remains effective unless terminated upon 30 days prior written notice.

(2) Contract megawatts become firm no later than June 1, 2014.

Capacity Costs  
2011

Contract	January		February		March		April		May		June	
	MW	\$	MW	\$	MW	\$	MW	\$	MW	\$	MW	\$
Southern Intercompany Interchange	321.0	738,310	289.2	295,176	(6.6)	10,576	111.7	41,326	244.5	5,381	0.0	0
<u>PPAs</u>												
Coral Power, LLC	[REDACTED]											
Southern Power Company	[REDACTED]											
Shell Energy N.A. (U.S.), LP	[REDACTED]											
<u>Other</u>												
Alabama Electric Cooperative	[REDACTED]	(1,522)	0.0	0	0.0	0	0.0	0	0.0	0	0.0	0
South Carolina Electric & Gas	0.0	0	0.0	0	0.0	0	0.0	0	[REDACTED]			
South Carolina PSA	[REDACTED]											
<b>Total</b>		<b>2,343,362</b>		<b>1,831,895</b>		<b>1,536,219</b>		<b>1,589,788</b>		<b>2,324,521</b>		<b>7,426,073</b>

Gulf Power Company  
2011 Capacity Contracts

Contract/Counterparty	Term		Contract Type
	Start	End <sup>(1)</sup>	
Southern Intercompany Interchange	5/1/2007	5 Yr Notice	SES Opco
<u>PPAs</u>			
Coral Power, LLC	6/1/2009	5/31/2014	Firm
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Shell Energy N.A. (U.S.), LP <sup>(2)</sup>	11/2/2009	5/31/2023	Non-Firm
<u>Other</u>			
Alabama Electric Cooperative	1/1/2011	1/14/2011	Other
South Carolina Electric & Gas	5/9/2011	12/31/2012	Other
South Carolina PSA	9/1/2003	-	Other

(1) Unless otherwise noted, contract remains effective unless terminated upon 30 days prior written notice.  
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Capacity Costs  
2011

Contract	July		August		September		October		November		December		Total \$
	MW	\$	MW	\$	MW	\$	MW	\$	MW	\$	MW	\$	
Southern Intercompany Interchange	0.0	0	0.0	0	26.2	170,262	183.7	100,860	5.8	90,572	(28.3)	(4,691)	1,447,772
<u>PPAs</u>													
Coral Power, LLC	[REDACTED]												
Southern Power Company	[REDACTED]												
Shell Energy N.A. (U.S.), LP	[REDACTED]												
<b>Total PPAs</b>													41,305,350
<u>Other</u>													
Alabama Electric Cooperative	0.0	0	0.0	0	0.0	0	0.0	0	0.0	0	0.0	0	(1,522)
South Carolina Electric & Gas	[REDACTED]		0.0	0	0.0	0	0.0	0	[REDACTED]				(11,861)
South Carolina PSA	[REDACTED]												(38,056)
<b>Total</b>	7,519,039		7,117,981		6,442,713		1,582,377		1,563,637		1,424,078		42,701,683

EXHIBIT "C"

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

**Line(s)/Field(s)**

Page 1 of 2  
Lines 29-31 and 36, Columns F-Q  
Line 34, Column F  
Line 35, Columns N-Q

Page 2 of 2  
Lines 29-31, Columns W-AI  
Line 35, Columns W-X and AE-AH  
Line 36, Lines W-AH

**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.

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	A	B	C	D	E	F	G	H	I	J	K	L	M	N	O	P	Q
1	Gulf Power Company																
2	2011 Capacity Contracts																
3																	
4																	
5						Term			Contract								
6	Contract/Counterparty				Start	End <sup>(1)</sup>		Type									
7	Southern Intercompany Interchange				5/1/2007	5 Yr Notice		SES Opco									
8	<u>PPAs</u>																
9	Coral Power, LLC				6/1/2009	5/31/2014		Firm									
10	Southern Power Company				6/1/2009	5/31/2014		Firm									
11	Shell Energy N.A. (U.S.), LP <sup>(2)</sup>				11/2/2009	5/31/2023		Non-Firm									
12	<u>Other</u>																
13	Alabama Electric Cooperative				1/1/2011	1/14/2011		Other									
14	South Carolina Electric & Gas				5/9/2011	12/31/2012		Other									
15	South Carolina PSA				9/1/2003	-		Other									

(1) Unless otherwise noted, contract remains effective unless terminated upon 30 days prior written notice.  
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Capacity Costs		January		February		March		April		May		June				
2011		MW	\$	MW	\$	MW	\$	MW	\$	MW	\$	MW	\$			
26	Contract															
27	Southern Intercompany Interchange	321.0	738,310	289.2	295,176	(6.6)	10,576	111.7	41,326	244.5	5,381	0.0	0			
28	<u>PPAs</u>															
29	Coral Power, LLC	[REDACTED]														
30	Southern Power Company	[REDACTED]														
31	Shell Energy N.A. (U.S.), LP	[REDACTED]														
32																
33	<u>Other</u>															
34	Alabama Electric Cooperative	[REDACTED]	(1,522)	0.0	0	0.0	0	0.0	0	0.0	0	0.0	0			
35	South Carolina Electric & Gas	0.0	0	0.0	0	0.0	0	0.0	0	[REDACTED]						
36	South Carolina PSA	[REDACTED]														
37	Total		2,343,362		1,831,895		1,536,219		1,589,788		2,324,521		7,426,073			

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<i>Total PPAs</i>													41,305,350
<i>Other</i>													
Alabama Electric Cooperative	0.0	0	0.0	0	0.0	0	0.0	0	0.0	0	0.0	0	(1,522)
South Carolina Electric & Gas	[REDACTED]		0.0	0	0.0	0	0.0	0	[REDACTED]		[REDACTED]		(11,861)
South Carolina PSA	[REDACTED]												(38,056)
<b>Total</b>	7,519,039		7,117,981		6,442,713		1,582,377		1,563,637		1,424,078		42,701,683

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

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

Docket No.: **120001-EI**

**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that a true copy of the foregoing was furnished by U. S. mail this 29th day of February, 2012 on the following:

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