Terry A. DavisAssistant Secretary and Assistant Treasurer

One Energy Place Pensacola, Florida 32520-0786

Tel 850.444.6664 Fax 850.444.6026 TADAVIS@southernco.com

REDACTED

April 12, 2012



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

RE: Docket No. 120007-El

Dear Ms. Cole:

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

For DN 02263-12, which is in locked storage. You must be authorized to view this DN-CLK

Enclosed is Gulf Power Company's Request for Confidential Classification pertaining to Gulf Power's response to Staff's First Set of Interrogatories (Nos. 1-2) in the above referenced docket.

Also enclosed is a compact disc containing the Request for Confidential Classification and Exhibit C in Microsoft Word as prepared on a Windows XP operating system.

Sincerely,

wb

Enclosures

APA ____ cc:

APA ECRO 1+cd

RAD SRC ADM OPC CLK Beggs & Lane

Jeffrey A. Stone, Esq.

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BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

IN RE: Environmental Cost Docket No.: 120007-EI
Recovery Clause Date: April 13, 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 produced by the Company in response to Commission Staff's First Set of Interrogatories (Nos. 1-2). As grounds for this request, the Company states as follows:

- 1. Portions of the information submitted by Gulf Power in response to interrogatory number 1(c) and (d) of Staff's First Interrogatories constitutes "proprietary confidential business information" as defined by section 366.093(3), Florida Statutes (the "Confidential Information").
- 2. Specifically, the Confidential Information consists of projected capital costs and annual operations and maintenance costs for flue gas desulfurization and selective catalytic reduction systems to be installed on Units 1 and 2 at Plant Daniel. Disclosure of this information could negatively impact Gulf Power's ability to negotiate pricing favorable to its customers when contracting with vendors of materials and services needed in order to implement the projects. Consequently, the Confidential Information is entitled to confidential classification pursuant to section 366.093(3)(d)-(e), Florida Statutes.
- 3. The information filed pursuant to this Request is intended to be, and is treated as confidential by Gulf Power and, to the best of this attorney's knowledge, has not otherwise been publicly disclosed.

OUT WENT REMOVE OF THE

4. Submitted as Exhibit "A" is one copy of Gulf's response to Staff's First Interrogatory. The Confidential Information is highlighted on Exhibit "A" and should be treated as confidential pending a ruling on this request. Attached as Exhibit "B" are two (2) edited copies of Gulf's response 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 in Exhibit "A" from public disclosure as proprietary confidential business information.

Respectfully submitted this 12th day of April, 2012.

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: Environmental Cost		
Recovery Clause	Docket No.:	120007-EI
)	Date:	April 13, 2012

REQUEST FOR CONFIDENTIAL CLASSIFICATION

EXHIBIT "A"

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

EXHIBIT "B"

A Jak

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Staff's First Set of Interrogatories GULF POWER COMPANY Docket No. 120007-EI April 12, 2012 Item No. 1 Page 1 of 2

- 1. Please provide updated information on Plant Daniel Units 1 and 2 Scrubber projects and SCRs projects. For each project please include the following information in your responses:
 - a. Project starting date

costs for the SCRs are

- b. Planned in-service date
- c. Estimated total capital costs (Gulf's share)
- d. Estimated annual O&M costs (Gulf's share)
- e. Project number as shown in the ECRC filing and its associated Excel files of Schedules 42-8A, 42-8E, and 42-4P
- f. FPSC Commission order number in which ECRC cost recovery of the project was granted.

ANSWER:

5

- a. Detailed engineering design for the Plant Daniel scrubber projects began during January of 2011. Foundation work is scheduled to begin during April of 2012.
 - Detailed engineering work for the Daniel SCRs is scheduled to begin during January of 2014 and construction is expected to start during October of 2014.
- b. The Daniel scrubber projects are scheduled to be placed in-service during December of 2015. The Daniel Unit 1 and Unit 2 SCRs are currently projected to be placed in-service during the fall of 2018 and the fall of 2017, respectively.

1 2	c.	Projected capital expenditures for the Daniel scrubber projects are approximately (Gulf's ownership portion). Capital expenditures for the Daniel Unit 1 and Unit 2 SCRs are projected to be approximately and and and approximately
3 4	d.	Annual O&M expenses for the Daniel scrubbers are projected to total approximately (Gulf's ownership portion). The projected annual O&M

e. The Daniel Unit 1 and Unit 2 Scrubbers are assigned project number (PE) 1551. The Daniel Unit 1 SCR project is assigned project number (PE) 1548 and the Daniel Unit 2 SCR project is assigned project number (PE) 1550. Each of these projects will be included in the ECRC project titled "CAIR/CAMR/CAVR Compliance" which is page 26 of Schedules 8A, 8E, and 4P and included in the excel files as the tab labeled "c26" respectively.

for each unit (Gulf's ownership portion).

Staff's First Set of Interrogatories GULF POWER COMPANY Docket No. 120007-EI April 12, 2012 Item No. 1 Page 1 of 2

- 1. Please provide updated information on Plant Daniel Units 1 and 2 Scrubber projects and SCRs projects. For each project please include the following information in your responses:
 - a. Project starting date
 - b. Planned in-service date
 - c. Estimated total capital costs (Gulf's share)
 - d. Estimated annual O&M costs (Gulf's share)
 - e. Project number as shown in the ECRC filing and its associated Excel files of Schedules 42-8A, 42-8E, and 42-4P
 - f. FPSC Commission order number in which ECRC cost recovery of the project was granted.

ANSWER:

a. Detailed engineering design for the Plant Daniel scrubber projects began during January of 2011. Foundation work is scheduled to begin during April of 2012.

Detailed engineering work for the Daniel SCRs is scheduled to begin during January of 2014 and construction is expected to start during October of 2014.

b. The Daniel scrubber projects are scheduled to be placed in-service during December of 2015. The Daniel Unit 1 and Unit 2 SCRs are currently projected to be placed in-service during the fall of 2018 and the fall of 2017, respectively.

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1 2 3	(Gulf's ownership portion). Capital expenditures for the Daniel Unit 1 and Unit 2 SCRs are projected to be approximately and and respectively (Gulf's ownership portion).
d. 4	Annual O&M expenses for the Daniel scrubbers are projected to total approximately (Gulf's ownership portion). The projected annual O&M costs for the SCRs are for each unit (Gulf's ownership portion).

e. The Daniel Unit 1 and Unit 2 Scrubbers are assigned project number (PE) 1551. The Daniel Unit 1 SCR project is assigned project number (PE) 1548 and the Daniel Unit 2 SCR project is assigned project number (PE) 1550. Each of these projects will be included in the ECRC project titled "CAIR/CAMR/CAVR Compliance" which is page 26 of Schedules 8A, 8E, and 4P and included in the excel files as the tab labeled "c26" respectively.

EXHIBIT "C"

<u>Line-by-Line/Field-by-Field Justification</u> <u>Line(s)/Field(s)</u>

Justification

Response to Interrogatory Number 1(c)

Page 1 of 2, lines 1-3

This information is entitled to confidential classification pursuant to §366.093(3)(d)-(e), Florida Statutes. The basis for this information being designated as confidential is more fully set forth in paragraph 2.

Response to Interrogatory Number 1(d)

Page 1 of 2, lines 4-5

This information is entitled to confidential classification pursuant to §366.093(3)(d)-(e), Florida Statutes. The basis for this information being designated as confidential is more fully set forth in paragraph 2.

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

IN RE: Environmental Cost)
Recovery Clause)

CERTIFICATE OF SERVICE

Docket No.: 120007-EI

I HEREBY CERTIFY that a true copy of the foregoing was furnished by U. S. mail this 12th day of April, 2012 on the following:

Ausley Law Firm James D. Beasley J. Jeffry Wahlen Post Office Box 391 Tallahassee, FL 32302 jbeasley@ausley.com Brickfield Law Firm James W. Brew F. Alvin Taylor Eighth Floor, West Tower 1025 Thomas Jefferson St, NW Washington, DC 20007-5201 ibrew@bbrslaw.com Federal Executive Agencies Captain Samuel Miller USAF/AFLOA/JACL/ULFSC 139 Barnes Drive, Suite 1 Tyndall AFB, FL 32403-5319 Samuel.Miller@Tyndall.af.mil

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