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REDACTED

October 11, 2012

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

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

RECEIVED-FPSC  
12 OCT 15 AM 9:34  
COMMISSION  
CLERK

Re: Docket No. 120001-EI

For DN 06972-12, which  
is in locked storage. You must be  
authorized to view this DN.-CLK

Dear Ms. Cole:

Enclosed is Gulf Power Company's Request for Confidential Classification  
pertaining to Gulf Power's response to Staff's Sixth Set of Interrogatories  
(Nos. 42-56) in the above referenced docket.

Sincerely,

Robert L. McGee, Jr.  
Regulatory and Pricing Manager

COM  
 AFD  
APA  
ECO  
ENG  
GCL  
IDM  
TEL  
CLK

wb

Enclosures

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

DOCUMENT NUMBER-DATE

06971 OCT 15 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: October 12, 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 a request that the Florida Public Service Commission enter an order protecting from public disclosure certain information submitted by Gulf Power in response to Commission Staff’s Sixth Set of Interrogatories to Gulf Power Company (Nos. 42-56). As grounds for this request, the Company states:

1. A portion of the information submitted by Gulf Power in response to interrogatory number 42 of Commission Staff’s Sixth Set of Interrogatories constitutes proprietary confidential business information concerning bids or other contractual data the disclosure of which would impair the efforts of Gulf Power to contract for goods and/or services on favorable terms. The information is entitled to confidential classification pursuant to section 366.093(3)(d) and (e), Florida Statutes. Specifically, the information consists of pricing data for natural gas hedging transactions between Gulf Power and various counterparties. Gulf and other members of the market in which it competes consider this type of information to be competitively sensitive. Disclosure of this information would 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 these terms were made public.

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.

DOCUMENT NUMBER-DATE

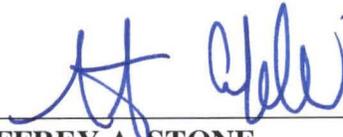
06971 OCT 15 2012

FPSC-COMMISSION CLERK

3. Submitted as Exhibit "A" are copies of the subject documents, 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 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 11<sup>th</sup> day of October, 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: October 12, 2012

**REQUEST FOR CONFIDENTIAL CLASSIFICATION**

**EXHIBIT "A"**

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

EXHIBIT "B"

REDACTED

COM	_____
AFD	_____
APA	_____
ECO	_____
ENG	_____
GCL	_____
IDM	_____
TEL	_____
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REDACTED

Staff's Sixth Set of Interrogatories  
Docket No. 120001-EI  
GULF POWER COMPANY  
October 11, 2012  
Item No. 42  
Page 2 of 6

ANSWER:

a.

	(A) Date Deal Was Entered Into	(B) Date Deal Started	(C) Date Deal Ended	(D) Deal Negotiated Fixed Price (\$/MMBTU)	(E) Average NYMEX Price at Market Close (\$/MMBTU)	(F) % Difference between Deal Price and Market Closing Price
1	7/17/2008	4/1/2011	10/31/2011		9.104	
2	7/23/2008	4/1/2011	10/31/2011		8.433	
3	8/18/2008	4/1/2011	10/31/2011		8.346	
4	9/2/2008	4/1/2011	10/31/2011		8.288	
5	9/2/2008	4/1/2011	10/31/2011		8.288	
6	1/8/2009	2/1/2012	12/31/2012		7.222	
7	1/8/2009	5/1/2011	12/31/2011		7.175	
8	1/14/2009	5/1/2011	12/31/2011		7.012	
9	1/14/2009	2/1/2012	12/31/2012		7.162	
10	1/23/2009	5/1/2011	11/28/2011		6.831	
11	1/23/2009	3/1/2012	12/31/2012		7.002	
12	3/4/2009	4/1/2012	10/31/2012		6.501	
13	3/4/2009	4/1/2011	10/31/2011		6.373	
14	4/1/2009	4/1/2011	10/31/2011		6.409	
15	4/20/2009	4/1/2011	10/31/2011		6.593	
16	4/27/2009	4/1/2011	10/31/2011		6.566	
17	6/22/2009	4/1/2012	10/31/2012		6.881	
18	7/15/2009	4/1/2012	10/31/2012		6.493	
19	1/5/2010	4/1/2011	10/31/2011		6.127	
20	2/18/2010	4/1/2011	10/31/2011		5.748	
21	2/22/2010	12/1/2011	3/31/2012		6.488	
22	3/18/2010	4/1/2011	10/31/2011		5.294	
23	3/23/2010	4/1/2012	10/31/2012		5.620	
24	4/15/2010	12/1/2011	3/31/2012		6.000	
25	4/29/2010	4/1/2011	10/31/2011		5.260	
26	4/29/2010	12/1/2011	3/31/2012		6.109	
27	5/19/2010	4/1/2011	10/31/2011		5.253	
28	6/21/2010	4/1/2011	10/31/2011		5.311	
29	8/10/2010	11/1/2011	3/31/2012		5.484	
30	8/10/2010	4/1/2011	10/31/2011		4.842	

DOCUMENT NUMBER-DATE

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FPSC-COMMISSION CLERK

	(A) Date Deal Was Entered Into	(B) Date Deal Started	(C) Date Deal Ended	(D) Deal Negotiated Fixed Price (\$/MMBTU)	(E) Average NYMEX Price at Market Close (\$/MMBTU)	(F) % Difference between Deal Price and Market Closing Price
31	8/11/2010	4/1/2011	10/31/2011		4.810	
32	8/16/2010	4/1/2012	10/31/2012		5.157	
33	8/25/2010	4/1/2011	10/31/2011		4.551	
34	8/26/2010	1/1/2011	12/31/2012		4.969	
35	9/8/2010	11/1/2010	12/31/2011		4.582	
36	9/8/2010	11/1/2010	12/31/2011		4.582	
37	9/17/2010	1/1/2012	12/31/2012		5.188	
38	9/21/2010	1/1/2012	12/31/2012		5.086	
39	9/21/2010	1/1/2011	12/31/2012		4.624	
40	11/2/2010	1/1/2011	12/31/2011		4.299	
41	11/2/2010	1/1/2011	12/31/2011		4.299	
42	11/5/2010	1/1/2012	12/31/2012		4.991	
43	11/12/2010	1/1/2011	12/31/2011		4.201	
44	12/16/2010	1/1/2012	12/31/2012		4.879	
45	1/27/2011	1/1/2012	12/31/2012		4.940	
46	2/7/2011	4/1/2011	12/31/2011		4.386	
47	2/7/2011	1/1/2012	12/31/2012		4.878	
48	2/9/2011	1/1/2012	12/31/2012		4.827	
49	2/9/2011	4/1/2011	12/31/2011		4.335	
50	2/11/2011	4/1/2011	12/31/2011		4.234	
51	2/16/2011	4/1/2011	12/31/2011		4.211	
52	2/16/2011	1/1/2012	12/31/2012		4.709	
53	2/17/2011	1/1/2012	12/31/2012		4.707	
54	2/17/2011	4/1/2011	12/31/2011		4.145	
55	3/2/2011	1/1/2012	12/31/2012		4.713	
56	3/10/2011	1/1/2012	12/31/2012		4.725	
57	4/6/2011	1/1/2012	12/31/2012		4.932	
58	4/18/2011	1/1/2012	12/31/2012		4.868	
59	5/5/2011	1/1/2012	12/31/2012		4.899	
60	5/17/2011	1/1/2012	12/31/2012		4.868	
61	6/23/2011	1/1/2012	12/31/2012		4.698	

	(A) Date Deal Was Entered Into	(B) Date Deal Started	(C) Date Deal Ended	(D) Deal Negotiated Fixed Price (\$/MMBTU)	(E) Average NYMEX Price at Market Close (\$/MMBTU)	(F) % Difference between Deal Price and Market Closing Price
62	6/27/2011	1/1/2012	12/31/2012		4.721	
63	7/6/2011	1/1/2012	12/31/2012		4.738	
64	7/29/2011	1/1/2012	12/31/2012		4.641	
65	8/3/2011	1/1/2012	12/31/2012		4.614	
66	11/4/2011	1/1/2012	12/31/2012		4.010	
67	11/7/2011	1/1/2012	12/31/2012		3.917	
68	11/8/2011	1/1/2012	12/31/2012		3.956	
69	11/9/2011	1/1/2012	12/31/2012		3.865	
70	11/11/2011	1/1/2012	12/31/2012		3.827	
71	11/14/2011	1/1/2012	12/31/2012		3.758	
72	11/15/2011	1/1/2012	12/31/2012		3.703	
73	11/16/2011	1/1/2012	12/31/2012		3.633	
74	11/22/2011	1/1/2012	12/31/2012		3.741	
75	11/23/2011	1/1/2012	12/31/2012		3.789	
76	11/28/2011	1/1/2012	12/31/2012		3.746	
77	11/30/2011	1/1/2012	12/31/2012		3.733	
78	1/26/2012	5/1/2012	12/31/2012		3.030	
79	1/30/2012	5/1/2012	12/31/2012		3.060	
80	1/31/2012	5/1/2012	12/31/2012		2.889	
81	2/27/2012	5/1/2012	12/31/2012		2.902	
82	5/10/2012	6/1/2012	6/30/2012		2.487	
83	5/10/2012	8/1/2012	8/31/2012		2.628	
84	5/14/2012	7/1/2012	7/31/2012		2.505	
85	5/15/2012	6/1/2012	6/30/2012		2.500	
86	5/29/2012	6/1/2012	6/30/2012		2.568	
87	5/30/2012	7/1/2012	8/31/2012		2.439	
88	6/1/2012	7/1/2012	7/31/2012		2.326	
89	6/1/2012	8/1/2012	8/31/2012		2.387	
90	6/7/2012	7/1/2012	7/31/2012		2.274	
91	6/7/2012	8/1/2012	8/31/2012		2.327	

b. There are no swap deals with a difference between the fixed price and the forward price that is greater than 5%.

c.

	(A) Date Deal Was Entered	(B) Period Covered	(C) Put Call	(D) Direction	(E) Portfolio	(F) Strike Price \$/MMBTU	(G) Option Premium	(H) Average NYMEX Price at Market Close (\$/MMBTU)
1	11/12/2010	Jan-Dec, 2011	Call	Buy	Collar	██████	\$0.00	\$4.17
2	11/12/2010	Jan-Dec, 2011	Put	Sell	Collar	██████	\$0.00	\$4.17
3	11/15/2010	Jan-Dec, 2011	Call	Buy	Collar	██████	\$0.00	\$4.21
4	11/15/2010	Jan-Dec, 2011	Put	Sell	Collar	██████	\$0.00	\$4.21
5	12/1/2010	Jan-Dec, 2011	Call	Buy	Collar	██████	\$0.00	\$4.41
6	12/1/2010	Jan-Dec, 2011	Put	Sell	Collar	██████	\$0.00	\$4.41
7	12/2/2010	Jan-Dec, 2011	Call	Buy	Collar	██████	\$0.00	\$4.47
8	12/2/2010	Jan-Dec, 2011	Put	Sell	Collar	██████	\$0.00	\$4.47
9	12/16/2010	Jan-Dec, 2011	Call	Buy	Collar	██████	\$0.00	\$4.16
10	12/16/2010	Jan-Dec, 2011	Put	Sell	Collar	██████	\$0.00	\$4.16
11	12/16/2010	Jan-Dec, 2011	Call	Buy	Collar	██████	\$0.00	\$4.11
12	12/16/2010	Jan-Dec, 2011	Put	Sell	Collar	██████	\$0.00	\$4.11
13	12/16/2010	Jan-Dec, 2011	Call	Buy	Collar	██████	\$0.00	\$4.36
14	12/16/2010	Jan-Dec, 2011	Put	Sell	Collar	██████	\$0.00	\$4.36
15	12/16/2010	Jan-Dec, 2011	Call	Buy	Collar	██████	\$0.00	\$4.71
16	12/16/2010	Jan-Dec, 2011	Put	Sell	Collar	██████	\$0.00	\$4.71
17	9/21/2011	Jan-Dec, 2012	Call	Buy	Collar	██████	\$0.09	\$4.37
18	9/21/2011	Jan-Dec, 2012	Put	Sell	Collar	██████	\$0.00	\$4.37
19	9/29/2011	Jan-Dec, 2012	Call	Buy	Collar	██████	\$0.00	\$4.28
20	9/29/2011	Jan-Dec, 2012	Put	Sell	Collar	██████	\$0.00	\$4.28
21	10/3/2011	Jan-Dec, 2012	Call	Buy	Collar	██████	\$0.00	\$4.21
22	10/3/2011	Jan-Dec, 2012	Put	Sell	Collar	██████	\$0.00	\$4.21
23	10/18/2011	Jan-Dec, 2012	Call	Buy	Collar	██████	\$0.00	\$4.09
24	10/18/2011	Jan-Dec, 2012	Put	Sell	Collar	██████	\$0.00	\$4.09
25	10/18/2011	Jan-Dec, 2012	Call	Buy	Collar	██████	\$0.00	\$3.96
26	10/18/2011	Jan-Dec, 2012	Put	Sell	Collar	██████	\$0.00	\$3.96
27	11/1/2011	Jan-Dec, 2012	Call	Buy	Collar	██████	\$0.00	\$4.06

	(A) Date Deal Was Entered	(B) Period Covered	(C) Put Call	(D) Direction	(E) Portfolio	(F) Strike Price \$/MMB TU	(G) Option Premium	(H) Average NYMEX Price at Market Close (\$/MMBTU)
28	11/1/2011	Jan-Dec, 2012	Put	Sell	Collar	████	\$0.00	\$4.06
29	12/5/2011	Feb 2012 - Jan 2013	Call	Buy	Collar	████	\$0.00	\$3.76
30	12/5/2011	Feb 2012 - Jan 2013	Put	Sell	Collar	████	\$0.00	\$3.76
31	12/7/2011	Feb 2012 - Jan 2013	Call	Buy	Collar	████	\$0.00	\$3.72
32	12/7/2011	Feb 2012 - Jan 2013	Put	Sell	Collar	████	\$0.00	\$3.72
33	12/9/2011	Feb 2012 - Jan 2013	Call	Buy	Collar	████	\$0.00	\$3.61
34	12/9/2011	Feb 2012 - Jan 2013	Put	Sell	Collar	████	\$0.00	\$3.61
35	12/22/2011	Feb 2012 - Jan 2013	Call	Buy	Collar	████	\$0.00	\$3.51
36	12/22/2011	Feb 2012 - Jan 2013	Put	Sell	Collar	████	\$0.00	\$3.51

d. In all of the collar transactions, the future price is within the bounds of the collar strike price.

**EXHIBIT "C"**

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

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

**Response to Interrogatory # 42(a)**

Page 2 of 6, Columns D and F, lines 1-30

Page 3 of 6, Columns D and F lines 31-61

Page 4 of 6, Columns D and F, lines 62-91

**Response to Interrogatory #42(c)**

Page 5 of 6, Column F, lines 1-27

Page 6 of 6, Column F, lines 28-36

**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.

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 10<sup>th</sup> day of October, 2012 on the following:

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