Robert L. McGee, Jr. Robert C. Mathania (Womener)

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Circumbergy Flace Pensicola, Florida 22520, 07571

Tel 850-444-6530 Fax 359-444-6026 REMCCELexisonthem colorit



REDACTED

August 1, 2013

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

RE: Docket No. 130001-EI

Dear Ms. Cole:

Enclosed is Gulf Power Company's Request for Confidential Classification regarding information submitted by Gulf Power pertaining to Schedule CCE-4 of Exhibit RWD-2 to the Direct Testimony of Richard W. Dodd dated August 2, 2013.

Sincerely,

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Robert L. McGee, Jr. Regulatory and Pricing Manager

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Enclosures

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





BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

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

Docket No.: 130001-EI Date: August 2, 2013

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-2 to the Direct Testimony of Richard W. Dodd dated August 1, 2013 (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 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. In addition, potential counterparties may refuse to enter into contracts with Gulf, or may charge higher prices, if the price terms are 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 Gulf Power and, to this attorney's knowledge, has not otherwise been publicly disclosed.

3. Submitted as Exhibit "A" is a copy of Schedule CCE-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 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 1st day of August, 2013.

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

Docket No.: 130001-EI Date: August 2, 2013

REQUEST FOR CONFIDENTIAL CLASSIFICATION

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EXHIBIT "A"

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

EXHIBIT "B"

A	в	С	D	E	F	G	н	1	J	ĸ	L	M	N	0	P
		-	-					1.5	-					-	

1 Gulf Power Company

2 2013 Capacity Contracts

Schedule CCE-4 Page 1 of 2

		Ter	m	Contract
3	Contract/Counterparty	Start	End (1)	Туре
4	Southern Intercompany Interchange	5/1/2007	5 Yr Notice	SES Opco
5	PPAs			
6	Coral Power,LLC	6/1/2009	5/31/2014	Firm
7	Southern Power Company	6/1/2009	5/31/2014	Firm
в	Shell Energy N.A. (U.S.), LP (2)	11/2/2009	5/31/2023	Non-Firm
9	Other			
0	South Carolina PSA	9/1/2003		Other
1	South Carolina Electric & Gas	1/1/2013	6/30/2013	Other

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

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

14 Capacity Costs

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2013		January	1	Febru	uary	Mar	ch	Apr	il	May	y	June	
Contract		MW	\$	MW	\$ (1)	MW	\$	MW	\$	MW	\$ (1)	MW	\$ (1)
Southern Intercompany Interchange		177.8	422,287	0.0	(102,074)	370.1	344,833	18.0	45,196	0.0	(1,079)	0.0	8,403
PPAs													
Coral Power,LLC	1.000	and the second	and the second second	and the second	an interior	The second			ALL STAT	and the second	The second second		
Southern Power Company													
Shell Energy N.A. (U.S.), LP					100 C	1.17				den kiel	ALC: NOT THE OWNER		
Other													
South Carolina PSA	IO	2	and the state of the		1000		and the second		1	all and a first state		These .	
South Carolina Electric & Gas		0.0	0			0.0	0	0.0	0				
	Total		2,380,170		1,898,537		2,389,783		2,045,794		2,596,589		6,777,892
	Contract Southern Intercompany Interchange <u>PPAs</u> Coral Power,LLC Southern Power Company Shell Energy N.A. (U.S.), LP <u>Other</u>	Contract Southern Intercompany Interchange PPAs Coral Power,LLC Southern Power Company Shell Energy N.A. (U.S.), LP Other South Carolina PSA South Carolina Electric & Gas	Contract MW Southern Intercompany Interchange 177.8 PPAs 177.8 Coral Power,LLC Southern Power Company Southern Power Company Shell Energy N.A. (U.S.), LP Other South Carolina PSA South Carolina Electric & Gas 0.0	Contract MW \$ Southern Intercompany Interchange 177.8 422,287 PPAs 177.8 422,287 Coral Power,LLC Southern Power Company 177.8 Shell Energy N.A. (U.S.), LP Image: Content of the second	Contract MW \$ MW Southern Intercompany Interchange 177.8 422,287 0.0 PPAs 177.8 422,287 0.0 Coral Power,LLC Southern Power Company 5 1 Southern Power Company 5 1 1 Southern Power Company 5 1 1 Southern Power Company 5 1 1 South Carolina PSA 0.0 0 1	Contract MW \$ MW \$ ⁽¹⁾ Southern Intercompany Interchange 177.8 422,287 0.0 (102,074) PPAs Coral Power,LLC Southern Power Company Shell Energy N.A. (U.S.), LP Image: Construct of the state of	Contract MW \$ MW \$ ⁽¹⁾ MW Southern Intercompany Interchange 177.8 422,287 0.0 (102,074) 370.1 PPAs Coral Power,LLC Southern Power Company Shell Energy N.A. (U.S.), LP Image: Control of the state of the st	Contract MW \$ MW \$ ⁽¹⁾ MW \$ Southern Intercompany Interchange 177.8 422,287 0.0 (102,074) 370.1 344,833 PPAs Coral Power,LLC Southern Power Company Shell Energy N.A. (U.S.), LP Image: Construct of the second se	ContractMW\$MW\$MWSouthern Intercompany Interchange PPAs177.8422,2870.0(102,074)370.1344,83318.0Coral Power,LLC Southern Power Company Shell Energy N.A. (U.S.), LP	ContractMW\$MW\$MW\$Southern Intercompany Interchange PPAs177.8422,2870.0(102,074)370.1344,83318.045,196Coral Power,LLC Southern Power Company Shell Energy N.A. (U.S.), LPImage: Coral Power Company Shell Energy N.A. (U.S.), LPImage: Coral Power Company South Carolina PSA South Carolina Electric & Gas0.000000	ContractMW\$MW\$MW\$MWSouthern Intercompany Interchange PPAs177.8422,2870.0(102,074)370.1344,83318.045,1960.0Coral Power,LLC Southern Power Company Shell Energy N.A. (U.S.), LP	Contract MW \$ MU	Contract MW \$ MU \$ \$

26 (1) Southern Intercompany Interchange reserve sharing charge consists of prior month true up only

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									-						

1 Gulf Power Company

2 2013 Capacity Contracts

		Ter	m	Contract		
3	Contract/Counterparty	Start	End (1)	Туре		
4	Southern Intercompany Interchange	5/1/2007	5 Yr Notice	SES Opco		
5	<u>PPAs</u>					
6	Coral Power,LLC	6/1/2009	5/31/2014	Firm		
7	Southern Power Company	6/1/2009	5/31/2014	Firm		
8	Shell Energy N.A. (U.S.), LP (2)	11/2/2009	5/31/2023	Non-Firm		
9	Other					
10	South Carolina PSA	9/1/2003		Other		
11	South Carolina Electric & Gas	1/1/2013	6/30/2013	Other		

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

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14 Capacity Costs

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2013		January	1	Febr	Jary	Mar	rch	Apr	il	Ma	У	June	
Contract		MW	\$	MW	\$ (1)	MW	\$	MW	\$	MW	\$ (1)	MW	\$ (1)
Southern Intercompany Interchange		177.8	422,287	0.0	(102,074)	370.1	344,833	18.0	45,196	0.0	(1,079)	0.0	8,403
PPAs													
Coral Power,LLC													
Southern Power Company													
Shell Energy N.A. (U.S.), LP													
Other													
South Carolina PSA		1 - A Destroyed in the	and the state	an and a set	21000		1.000	and the second second		S. 16-2	a state of the second sec	10000	
South Carolina Electric & Gas		0.0	0			0.0	0	0.0	0				
	Total		2,380,170		1,898,537		2,389,783		2,045,794		2,596,589		6,777,892
	2013 Southern Intercompany Interchange <u>PPAs</u> Coral Power,LLC Southern Power Company Shell Energy N.A. (U.S.), LP <u>Other</u>	2013 Contract Southern Intercompany Interchange <u>PPAs</u> Coral Power,LLC Southern Power Company Shell Energy N.A. (U.S.), LP <u>Other</u> South Carolina PSA South Carolina Electric & Gas	2013 January Contract MW Southern Intercompany Interchange 177.8 <i>PPAs</i> 177.8 Coral Power,LLC Southern Power Company Southern Power Company Shell Energy N.A. (U.S.), LP Other South Carolina PSA South Carolina Electric & Gas 0.0	2013 January Contract MW \$ Southern Intercompany Interchange 177.8 422,287 <i>PPAs</i> 177.8 422,287 Coral Power,LLC Southern Power Company 177.8 Shell Energy N.A. (U.S.), LP Image: Content of the second	2013 January Febru Contract MW \$ MW Southern Intercompany Interchange 177.8 422,287 0.0 <i>PPAs</i> Coral Power,LLC Southern Power Company 5hell Energy N.A. (U.S.), LP 1 Other South Carolina PSA 0.0 0	2013 January February Contract MW \$ MW \$ ⁽¹⁾ Southern Intercompany Interchange 177.8 422,287 0.0 (102,074) <i>PPAs</i> Coral Power,LLC Southern Power Company Shell Energy N.A. (U.S.), LP Image: Contract of the state of	2013 January February Mar Contract MW \$ MW \$ ⁽¹⁾ MW Southern Intercompany Interchange 177.8 422,287 0.0 (102,074) 370.1 <i>PPAs</i> Coral Power,LLC Southern Power Company Shell Energy N.A. (U.S.), LP <i>Other</i> South Carolina PSA O.0 0 0.0	2013 January February March Contract MW \$ MW \$ ⁽¹⁾ MW \$ Southern Intercompany Interchange 177.8 422,287 0.0 (102,074) 370.1 344,833 <i>PPAs</i> Coral Power,LLC Southern Power Company Shell Energy N.A. (U.S.), LP <i>Other</i> 0.0 0 Other South Carolina PSA 0.0 0 0.0 0	2013 January February March April Contract MW \$ MW \$ MW Southern Intercompany Interchange 177.8 422,287 0.0 (102,074) 370.1 344,833 18.0 PPAs Coral Power,LLC Southern Power Company Shell Energy N.A. (U.S.), LP Description Description Description Other South Carolina PSA O.0 0 0.0 0 0.0	2013 January February March April Contract MW \$	2013 January February March April March April< March March April< March April March A	2013 January February March April May Contract MW \$ MW \$ (1) MW \$ MW \$ (1) Southern Intercompany Interchange 177.8 422,287 0.0 (102,074) 370.1 344,833 18.0 45,196 0.0 (1,079) PPAs Coral Power,LLC Southern Power Company 5	2013 January February March April May June Contract MW \$ MU </td

26 (1) Southern Intercompany Interchange reserve sharing charge consists of prior month true up only

Schedule CCE-4 Page 1 of 2

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1 Gulf Power Company

2 2013 Capacity Contracts

Schedule CCE-4 Page 2 of 2

		Te	Contract		
3	Contract/Counterparty	Start	End ⁽¹⁾	Туре	
4	Southern Intercompany Interchange	5/1/2007	5 Yr Notice	SES Opco	
5	PPAs				
6	Coral Power,LLC	6/1/2009	5/31/2014	Firm	
7	Southern Power Company	6/1/2009	5/31/2014	Firm	
8	Shell Energy N.A. (U.S.), LP (2)	11/2/2009	5/31/2023	Non-Firm	
9	Other				
10	South Carolina PSA	9/1/2003	3 - 7	Other	
11	South Carolina Electric & Gas	1/1/2013	6/30/2013	Other	

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14	Capacity Costs	

2013		July		Augu	ust	Septen	nber	Octob	er	Novem	ber	Dece	ember	
Contract		MW	\$	MW	\$	MW	\$	MW	\$	MW	\$	MW	s	Total \$
Southern Intercompany Interchar	ige	0.0	0	0.0	0	0.0	0	0.0	0	0.0	0	0.0	0	717,566
PPAs														
Coral Power,LLC		instantion in	COLUMN ST			and the second	2-12 200	the second second	Silen a	The I wanted	STATISTICS.	1. A.	THE OWNER WHEN I	A CONTRACTOR
Southern Power Company														ALC: NO.
Shell Energy N.A. (U.S.), LP														1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1
	Total PPAs													45,441,114
Other														
South Carolina PSA		Constant of the last		1.1.1.	ALL CARENTS	and the state of the	AT SAUGH			and the second			State State State	(38,374)
South Carolina Electric & Gas	-	0.0	0	0.0	0	0.0	0	0.0	0	0.0	0	0.0	0	(7,902)
	Total		7,267,649	1	7,018,398		7,017,398	:	2,239,398	2	2,240,398		2,240,398	46,112,404
	2013 Contract Southern Intercompany Interchar <u>PPAs</u> Coral Power,LLC Southern Power Company Shell Energy N.A. (U.S.), LP <u>Other</u> South Carolina PSA	2013 Contract Southern Intercompany Interchange <u>PPAs</u> Coral Power,LLC Southern Power Company Shell Energy N.A. (U.S.), LP Total PPAs <u>Other</u> South Carolina PSA South Carolina Electric & Gas	2013 July Contract MW Southern Intercompany Interchange 0.0 PPAs 0.0 Coral Power,LLC Southern Power Company Southern Power Company Shell Energy N.A. (U.S.), LP Total PPAs Other South Carolina PSA South Carolina Electric & Gas 0.0	2013 July Contract MW \$ Southern Intercompany Interchange 0.0 0 PPAs 0.0 0 Coral Power,LLC Southern Power Company 5 Southern Power Company 5 5 Southern Power Company 5 5 Total PPAs Other 5 South Carolina PSA 0.0 0	2013 July Augume Contract MW \$ MW Southern Intercompany Interchange 0.0 0 0.0 PPAs 0.0 0 0.0 Coral Power,LLC Southern Power Company	2013 July August Contract MW \$ MW \$ Southern Intercompany Interchange 0.0 0 0.0 0 <i>PPAs</i> Coral Power,LLC Southern Power Company Shell Energy N.A. (U.S.), LP Total PPAs Image: Contract Power Company South Carolina PSA 0.0 0 0.0 0 South Carolina Electric & Gas 0.0 0 0.0	2013 July August Septem Contract MW MW MW MW Southern Intercompany Interchange 0.0 0 0.0 0 0.0 PPAs Coral Power,LLC Southern Power Company Shell Energy N.A. (U.S.), LP Total PPAs Total PPAs South Carolina PSA 0.0 0 0.0 0 0.0 South Carolina Electric & Gas 0.0 0 0.0 0 0.0	2013 July August September Contract MW \$ MW \$ Southern Intercompany Interchange 0.0 0 0.0 0 0 <i>PPAs</i> Coral Power,LLC Southern Power Company - - - Shell Energy N.A. (U.S.), LP - - - - Total PPAs Other - - - South Carolina PSA - - - South Carolina Electric & Gas 0.0 0 0.0 0	2013 July August September Octobe Contract MW \$ MW \$ MW Southern Intercompany Interchange 0.0 0 0.0 0 0.0 PPAs Coral Power,LLC Southern Power Company Image: Coral Power, Curve Company Image: Coral Power, Curve Company Image: Coral Power Company	2013JulyAugustSeptemberOctoberContractMWMWMWMWMW\$Southern Intercompany Interchange0.000.000.000.00PPAsCoral Power,LLCContern Power CompanyShell Energy N.A. (U.S.), LPImage: Coral PPAsImage: Coral PPAs	2013JulyAugustSeptemberOctoberNovemContractMWMWMWMWMWMWMWMWSouthern Intercompany Interchange0.000.000.000.00PPAsCoral Power,LLCSouthern Power CompanyShell Energy N.A. (U.S.), LPTotal PPAsOtherSouth Carolina PSASouth Carolina Electric & Gas0.000.000.000.000.000.000.000.000.000.000.000.000.0000.000 </td <td>2013 July August September October November Contract MW \$ MU \$ MU \$ <th< td=""><td>2013 July August September October November Decc Contract MW \$</td><td>2013 July August September October November December Contract MW \$</td></th<></td>	2013 July August September October November Contract MW \$ MU \$ MU \$ <th< td=""><td>2013 July August September October November Decc Contract MW \$</td><td>2013 July August September October November December Contract MW \$</td></th<>	2013 July August September October November Decc Contract MW \$	2013 July August September October November December Contract MW \$

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EXHIBIT "C"

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

Page 1 of 2

Lines 19-21 and line 23; Columns E-P Line 24, Columns G - H, and M-P

Page 2 of 2

Lines 19-21, Columns E-Q Line 23, Columns E-P

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.: 130001-EI

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true copy of the foregoing was furnished by overnight mail this 1st day of August, 2013 to the following:

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Florida Public Utilities Company Cheryl M. Martin 1641 Worthington Road Suite 220 West Palm Beach, FL 33409-6703 cyoung@fpuc.com

Florida Power & Light Company John T. Butler 700 Universe Boulevard (LAW/JB) Juno Beach, FL 33408-0420 John.Butler@fpl.com

Gunster Law Firm Beth Keating 215 South Monroe Street, Suite 601 Tallahassee, FL 32301-1839 <u>bkeating@gunster.com</u>

Florida Industrial Power Users Group c/o Moyle Law Firm Jon C. Moyle, Jr. 118 North Gadsden Street Tallahassee, FL 32301 jmoyle@moylelaw.com

Florida Retail Federation Robert Scheffel Wright John T. LaVia c/o Gardner Bist Wiener Wadsworth Bowden Bush Dee LaVia & Wright P.A. 1300 Thomaswood Drive Tallahassee, FL 32308 <u>schef@gbwlegal.com</u> jlavia@gbwlegal.com Brickfield Law Firm James W. Brew F. Alvin Taylor Eighth Floor, West Tower 1025 Thomas Jefferson St, NW Washington, DC 20007 jbrew@bbrslaw.com

Florida Power & Light Company Kenneth Hoffman 215 South Monroe Street, Suite 810 Tallahassee, FL 32301-1858 Ken.Hoffman@fpl.com

Office of Public Counsel J. Kelly P. Christensen C. Rehwinkel c/o The Florida Legislature 111 W. Madison Street, Room 812 Tallahassee, FL 32393-1400 Christensen.patty@leg.state.fl.us

Tampa Electric Company Ms. Paula K. Brown Regulatory Affairs P. O. Box 111 Tampa, FL 33601-0111 <u>Regdept@teccenergy.com</u> Duke Energy Florida John T. Burnett Dianne M. Triplett Post Office Box 14042 St. Petersburg, FL 33733 John.burnett@pgnmail.com

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Office of the General Counsel Martha Barrera 2540 Shumard Oak Blvd Tallahassee, FL 32399-0850 mbarrera@psc.state.fl.us

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