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November 1, 2013

GULF POWER
A SOUTHERN COMPANY

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

RE: Docket No. 130140-EI

Dear Ms. Cole:

Enclosed is Gulf Power Company's Restated Request for Confidential Classification for certain portions of its Revised Environmental Compliance Program, exhibit JOV-1 to James O. Vick's testimony, resubmitted concurrently in the above referenced docket. The only changes to the resubmitted exhibit JOV-1 are to the docket number referenced in the header of the document.

Also enclosed is a CD containing the Request for Confidential Classification as well as exhibit C in Microsoft Word as prepared on a Windows based computer.

Sincerely,

Robert L. McGee, Jr.
Regulatory and Pricing Manager

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Enclosures

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

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AFD 1 Exh B, 1 CD
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BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

IN RE: Petition for Increase in Rates by Gulf Power Company	Docket No.: 130140-EI Date: November 4, 2013

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RESTATED 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 this restated request that the Florida Public Service Commission enter an order protecting from public disclosure certain portions of its Revised Environmental Compliance Program Update for the Clean Air Interstate Rule, National Ambient Air Quality Standards, Mercury and Air Toxics Standards and Clean Air Visibility Rule (the "Compliance Program") which is being filed in the above-referenced docket as Exhibit JOV-1 to the direct testimony of Gulf witness James O. Vick. This request supersedes and replaces the request filed September 24, 2013 in Docket No. 130092-EI (DN 05658-13). As grounds for this request, the Company states:

1. Gulf Power seeks confidential classification for portions of its Compliance Program which is being filed concurrently with this request.[1] Portions of the subject information relate to competitive interests, the disclosure of which would impair the competitive business of Gulf Power and Gulf Power's ability to procure goods and services on a fair and reasonable basis. This information is entitled to confidential classification pursuant to section 366.093(3)(d)-(e), Florida Statutes. Additionally, portions of the subject information relate to system reliability and security. This information is entitled to confidential classification pursuant to section 366.093(3)(c), Florida Statutes.

[1] Gulf Power's revised Compliance Program was originally filed in Docket No. 130092-EI on September 24, 2013. It was accompanied by a Request for Confidential Classification (DN 05658-13). That Request for Confidential Classification is still pending. On October 10, 2013, the Commission entered Order No. PSC-13-0454-PCO-EI consolidating Docket No. 130092 with Docket No. 130140-EI. Therefore, for clarity of the record, Gulf Power is re-filing its revised Compliance Program in Docket No. 130140-EI.

2. Table 3.1-1 identifies in detail Gulf Power's projected capital expenditures, by plant and by project, associated with the Compliance Program. For projects that have not yet been sent out for bid, disclosure of this information could negatively impact Gulf's ability to negotiate pricing favorable to its customers when contracting with vendors of materials needed by Gulf in order to implement its Compliance Program. Similarly, Table 3.1-2 identifies in detail Gulf Power's projected operation and maintenance expenses, by plant and by project, associated with the Compliance Program. Disclosure of this information could negatively impact Gulf's ability to negotiate pricing favorable to its customers when contracting with vendors of services needed by Gulf in order to implement is Compliance Program.

3. Table 3.3-1 provides the results of an economic viability analysis performed by Southern Company Services for Gulf Power of various options for achieving compliance with the EPA's Mercury and Air Toxics Standards (MATS) rule at Gulf Power's Plant Crist. This table provides cost projections for four compliance alternatives including projected fuel, transmission, production and emission controls costs. This same cost data is also set forth in the discussion that immediately precedes the table. Wholesale competitors as well as suppliers of commodities and services could utilize this information to undermine Gulf's bargaining position in the markets where Gulf must compete to obtain commodities and services or make purchases or sales of wholesale power.

4. Table 3.3-2 provides the results of an economic viability analysis performed by Sothern Company Services for Gulf Power of various options for achieving compliance with the EPA's MATS rule at Gulf Power's Plant Smith. This table provides cost projections for two compliance alternatives including projected transmission and production costs. This same cost data is also set forth in the discussion that immediately precedes the table. Wholesale competitors as well as suppliers of commodities and services could utilize this information to undermine Gulf's bargaining position in the markets where Gulf must compete to obtain commodities and services or make purchases or sales of wholesale power.

5. Section 3.3.2 of the Compliance Program addresses MATS compliance costs associated with Gulf Power's ownership interest in Plant Daniel which is operated by Gulf Power's sister company, Mississippi Power. Specifically, section 3.3.2 identifies projected costs and benefits associated with installing activated carbon and bromine injection systems at Plant Daniel. Disclosure of this cost information could negatively impact Gulf's ability to negotiate pricing favorable to its customers when contracting with vendors of materials needed by Gulf in order to implement these compliance options.

6. Finally, sections 3.3.1 and 3.3.3 of the Compliance Program contain detailed discussion of system reliability risks and requirements at Plants Crist and Smith. This information is considered Critical Energy Infrastructure Information by Gulf. Disclosure of this non-public information could pose a security risk to Gulf's system and to the bulk electric system as a whole whether through cyber-attack, physical attack or some combination thereof.

7. 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.

8. Submitted as Exhibit "A" are highlighted pages from the Compliance Program which contain confidential information. Exhibit "A" should be treated as confidential pending a ruling on this request. Attached as Exhibit "B" are two edited copies of Exhibit "A," 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 November, 2013.

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BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

IN RE: Petition for Increase in Rates
by Gulf Power Company
_____)

Docket No.: 130140-EI
Date: November 4, 2013

REQUEST FOR CONFIDENTIAL CLASSIFICATION

EXHIBIT "A"

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

REDACTED

EXHIBIT "B"

Table 3.1-1
Compliance Program Capital Expenditures
$ in Thousands

	Prior Years**	2013	2014	2015	2016	2017	2018	2019	2020	2021	2022	Total
By Plant												
Plant Crist												
Mercury Monitoring												
Unit 6 SCR	191,424											
Units 4-7 Scrubber	587,048											587,048
MATS Transmission Upgrades*	23	1,028	37,382	16,703	2,565	13,253	5,403					76,357
Plant Scholz												
Mercury Monitoring	644											644
Plant Smith												
Unit 1 SNCR	8,363											8,363
Unit 2 SNCR	2,905											2,905
Mercury Monitoring	1,433											1,433
CAIR Parametric Monitor	230											
MATS Transmission Upgrades*	1,765	26,945	41,900	6,370								76,980
Plant Daniel												
Mercury Monitoring												
Unit 1 SCR												
Unit 2 SCR												
Units 1 & 2 Scrubber	69,087											
Unit 1 Low NOx Burners	3,187											3,187
Unit 2 Low NOx Burners	3,586											3,586
Unit 1 & 2 Bromine & Activated Carbon Injection*												
By Project												
Mercury Monitoring	2,077											
SCRs	191,424											
Scrubbers	656,135											
SNCRs	11,268											11,268
CAIR Parametric Monitor	230											
Low Nox Burners	6,773											6,773
Unit 1 & 2 Activated Carbon & Bromine Injection												
MATS Transmission Upgrades	1,788	27,973	79,282	23,073	2,565	13,253	5,403					153,337
Annual Total	**869,695**	**142,631**	**188,670**	**99,296**	**95,994**	**145,036**	**60,975**	**4,067**	**667**	**333**	**667**	**1,608,031**

***Items Gulf seeks to include in the Compliance Program. All other items previously approved.**

****2006-2012 expenditures**

Expenditures presented for Plant Daniel represent Gulf's ownership portion.

Allowance cost projections are not included in Table 3.1-1

Table 3.1-2
Compliance Program Plant O&M Expenses
$ in Thousands

	2013	2014	2015	2016	2017	2018	2019	2020	2021	2022	Total
By Plant											
Plant Crist											
Mercury Monitoring											
Unit 6 SCR											
Units 4-7 Scrubber											
Plant Scholz											
Mercury Monitoring											
Plant Smith											
Unit 1 & 2 SNCR											
Mercury Monitoring											
Plant Daniel											
Mercury Monitoring											
Unit 1 SCR											
Unit 2 SCR											
Units 1&2 Scrubber											
Unit 1 & 2 Bromine & Activated Carbon Injection*											
By Project											
Mercury Monitoring											
SCRs											
Scrubbers											
SNCRs											
Activated Carbon & Bromine Injection*											
Annual Total	15,578	16,783	23,494	33,892	34,298	35,620	38,569	39,557	40,870	41,918	320,579

***Items Gulf seeks to include in the Compliance Program. All other items previously approved.**
Expenses presented for Plant Daniel represent Gulf's ownership portion.
Allowance cost projections are not included in Table 3.1-2

their respective MATS limits, and Plant Crist would be unable to operate until the scrubber is back in service. This MATS limitation is an important consideration in evaluating MATS compliance for Plant Crist because generation from this plant meets reliability requirements for Gulf's transmission system.

[redacted]

Studies were performed to identify the key transmission projects that would be necessary to alleviate this transmission risk in the event of a scrubber malfunction or outage. As explained in the following section, the best option for MATS compliance at Plant Crist for Gulf's customers is to proceed with the identified transmission projects in order to allow Plant Crist to commit and dispatch in the most economic manner, while avoiding the installation of additional environmental controls.

Plant Crist MATS Options

Gulf evaluated four options to address the impact of the MATS requirements on Plant Crist, as illustrated in Figure 3.3-1:

Option 1-[redacted] MW Natural Gas:
Supply Plant Crist with enough natural gas to generate at least [redacted] MW to meet the current transmission reliability requirements. This would require a new natural gas pipeline lateral.

Option 2-[redacted] MW Natural Gas/[redacted] MW Coal with ACI and DSI Controls:
Use the existing natural gas pipeline to provide [redacted] MW of generation with the remaining [redacted] MW of generation needed for current transmission reliability requirements provided by coal. This would not require a new gas lateral, but would require ACI and dry sorbent injection (DSI) controls for the scrubber bypass and would require the use of low sulfur and low chloride coal for long bypasses. This option would require an inventory of the low sulfur/low chloride coal.

Option 3-[redacted] MW Natural Gas and Transmission Upgrades:
Use the existing natural gas pipeline capacity to provide [redacted] MW of generation and implement certain transmission improvements to reduce the Plant Crist transmission reliability requirement from [redacted] MW to [redacted] MW.

Option 4- Transmission Upgrades Only:
Construct the transmission improvements necessary to remove all significant

Plant Crist MATS Analysis

For each Plant Crist MATS option, the NPV (Net Present Value) of estimated revenue requirements was calculated for transmission upgrades, fuel, must-run production costs, and emission control retrofits. The transmission NPV for Options 1 and 2 were the NPV of transmission projects that were projected to be needed primarily in the 2020 to 2025 timeframe even without the MATS rule. These NPVs were considered to be a base transmission cost. Transmission NPVs for Options 3 and 4 reflect higher costs of $[redacted]M and $[redacted]M, respectively, due to acceleration of many of these base transmission projects that Gulf must now move forward with due to MATS under these compliance options.

The fuel NPV included a gas pipeline cost for Option 1 and gas firm transportation cost for Options 1, 2, and 3. The must-run production cost NPV is the increased production cost of requiring the Plant Crist units to commit and operate to meet the transmission requirements. The fuel and must-run production cost NPVs for Option 1 range from $[redacted] to $[redacted]M across the range of integrated system scenarios; Option 2 ranges from $[redacted] to $[redacted]M; and Option 3 ranges from $[redacted] to $[redacted] M. Option 4, transmission upgrades only, had zero fuel or must run cost.

The emission control retrofits NPV was only a factor in Option 2, the gas and coal combination. It had an estimated NPV cost of $[redacted]M for the ACI and DSI controls needed to lower acid gas and mercury emissions.

A B C D

Table 3.3-1
Plant Crist MATS Analysis
NPV 2013 in millions

Option	Transmission NPV	Fuel and Must Run Production Costs NPV	Emission Controls NPV	Total all NPV Costs
Option 1: Natural Gas	[redacted]	[redacted]	$0	[redacted]
Option 2: Natural Gas and Coal	[redacted]	[redacted]	[redacted]	[redacted]
Option 3: Natural Gas and Transmission Upgrades	[redacted]	[redacted]	$0	[redacted]
Option 4: Transmission Upgrades Only	[redacted]	$0	$0	[redacted]

Plant Crist MATS Conclusion

Option 1 had the highest total NPV cost by a large margin. Therefore, it was eliminated from further consideration.

The cost of Option 2 was the next highest of the four options. Option 2 has plant operational risks associated with operating an emission control system intermittently and handling a secondary coal supply. In addition, uncertainty surrounding the potential effects the injection additives may have on compliance with current land- and water-based environmental rules increased the risk associated with Option 2. Furthermore, the coal pile at Plant Crist has already been reduced in size to accommodate existing environmental controls. The coal pile area today could not support two separate coal inventories, which would be required under this option. For these cost and operational reasons, Option 2 was eliminated from consideration.

The low end of the cost range for Option 3 was comparable to, but still higher than, the lowest cost option, Option 4. The high end of the cost range for Option 3 was well above the cost of Option 4. The cost of Option 3 is also subject to future natural gas price volatility and other variable market conditions which leave Gulf's customers exposed to the risk of costly must-run operations rather than the benefit of operating the Plant Crist units in economic system dispatch. Additionally, this option required a commitment to generate [redacted] MW with only natural gas firing during scrubber bypass. This operational constraint at Plant Crist would require an engineering study to more fully understand the operational challenges of this option.

Option 4, transmission upgrades only, had the lowest total NPV cost and has the lowest risk of the four options. The costs associated with Option 4 have a higher level of certainty, and the transmission upgrades do not cause any plant operational risks or costly must-run constraints. Option 4 has the benefit of removing the must-run requirement from Plant Crist, which will allow Gulf to operate the plant the most economically, generating a production cost savings for Gulf's customers as shown in Table 3.3-1. Therefore, it was determined that Option 4, transmission upgrades only, would be the lowest compliance cost and risk and therefore the best option for Gulf's customers.

Conclusions for Plant Crist

Based on previous economic assessments of Crist Units 4 through 7 and the Crist Unit 6 SCR economic evaluation, the retrofit of Crist Units 4 through 7 with a single scrubber, SNCRs on Units 4 and 5, and SCRs on Units 6 and 7 are the best options for compliance with the current requirements of CAIR, CAVR, and the anticipated NAAQS. These are the only technologies that offer the necessary emission reductions for SO_2 and NOx, and when used together, the scrubber and the SCRs on Units 6 and 7 provide additional benefit by reducing mercury emissions. Decisions regarding Gulf's CAIR compliance strategy were made jointly

the lead-time of the scrubber projects, which allowed the Company to wait for the final MATS rule to be published prior to committing to the ultimate MATS compliance strategy for Plant Daniel.

The bromine injection system would add bromine to the coal supply, which would cause mercury to be oxidized after combustion. Oxidized mercury can then be collected in the scrubbers. The ACI system is based on injecting powdered activated carbon into the duct work where it mixes with flue gas to absorb elemental mercury which is then captured in the precipitator.

Plant Daniel MATS Analysis and Conclusion

Testing completed for Plant Daniel has confirmed that bromine and ACI rather than more capital intensive controls such as baghouses with ACI will be sufficient to meet the final MATS standards. Gulf's 50% ownership costs for installing the injection systems is projected to be approximately $[redacted] million. This selection represents approximately $135 million in capital cost reductions when compared to the baghouse installation cost.

Engineering, procurement, and construction of the Plant Daniel bromine and ACI systems are scheduled to begin in January 2014 and last for approximately two years. Both injection systems will be placed in service with the scrubbers during fourth quarter of 2015.

Conclusions for Plant Daniel

The retrofit of Daniel Units 1 and 2 with scrubbers, bromine injection and ACI, the installation of Low-NOx burners, and the addition of SCRs on both units are the best options for compliance with the CAIR, MATS, CAVR, and the anticipated NAAQS. Fuel switching alone will not reduce emissions to the required level. Allowance purchases are too uncertain and risky as a sole compliance option and are not applicable for MATS compliance.

The scrubbers, low NOx burners, mercury monitors, and SCRs have been approved for recovery through the ECRC in past proceedings, subject to ongoing review of costs within the ECRC annual review process. This filing will update Gulf's Compliance Program to include the Plant Daniel bromine and ACI projects that have not been approved for ECRC recovery at this time. Gulf Power is requesting approval of inclusion of these projects in the Company's Compliance Program.

3.3.3 PLANT SMITH

Plant Smith includes two coal-fired electric generating units, Unit 1 and Unit 2, along with an oil-fired combustion turbine (CT) and a natural gas-fired combined cycle unit. The facility is located just north of Panama City, Florida. Plant Smith Unit 1 has a nameplate rating of 149.6 MW, and Unit 2 has a nameplate rating of 190.4 MW. Both coal-fired units were affected under the Acid Rain Program, and the plant has operated on low-sulfur coals since the 1990s to lower SO_2 emissions. Both units are also equipped with low-NOx combustion systems. Unit 1 has special low-NOx burner tips, and Unit 2 has low-NOx burners and separated overfired air.

The CAIR required the installation of a parametric emission monitoring system on the Plant Smith CT during 2007. Installation of SNCRs for Plant Smith Units 1 and 2 was needed for Phase I CAIR compliance in 2009. In addition to CAIR compliance, the SNCRs were needed to assist in maintaining local compliance with the anticipated 8-hour ozone non-attainment designation. The Smith Unit 2 SNCR was placed in-service in the fall of 2008, and the Smith Unit 1 SNCR was placed in-service during May of 2009.

Plant Smith MATS Requirements

Plant Smith Units 1 and 2 are subject to the MATS rule. Plant Smith emissions data, as well as data from similar units, indicate that while the MATS PM limit would be met, neither the acid gases nor the mercury limits will be met without additional emissions controls. Therefore, in order to continue operation of these Plant Smith units, additional environmental controls will be required to meet MATS limits. The analysis and the decision to install additional environmental controls on Plant Smith Units 1 and 2 for MATS compliance or to retire and replace is ongoing. However, due to the short MATS compliance window, this Compliance Plan update must address time sensitive transmission improvements that are caused by the requirements of the MATS rule.

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The proposed transmission upgrades allow Gulf to defer the retirement versus controls decision until there is more certainty surrounding future environmental regulations such as 316(b), CCB and effluent guidelines. The final MATS strategy could potentially include air pollution equipment as well as land and water controls needed due to anticipated effects the injection additives may have on compliance with current land- and water-based environmental rules.

Plant Smith MATS Analysis

For each Plant Smith MATS option, the NPV of estimated revenue requirements was calculated for the transmission upgrades and must-run production costs. A summary of the NPV costs are provided in Table 3.3-2. The transmission NPV for Option 1 is the NPV cost of transmission projects that were projected to be needed in 2023 and beyond under the current must-run arrangement. This NPV is considered to be a base transmission cost. The Option 2 transmission NPV reflects a $[redacted]M higher cost due to acceleration of those transmission improvements which Gulf must now move forward with due to MATS under this compliance option.

The must-run production cost NPV is the increased production cost of requiring Plant Smith Units 1 through 3 to commit and operate to meet the transmission requirements. This must-run production cost NPV for Option 1 ranges from $[redacted] to $[redacted]M across the range of integrated system scenarios while Option 2, controls and transmission upgrades, had zero must-run cost.

Table 3.3-2
Plant Smith MATS Analysis
NPV 2013 in millions

Option	Transmission NPV	Must-Run Production Costs NPV	Total all NPV Costs
1 – Controls and continue Must-Run	[redacted]	[redacted]	[redacted]
2 – Controls and Transmission Upgrades	[redacted]	$0	[redacted]

Plant Smith MATS Conclusion

With Option 1 there is risk and uncertainty due to future fuel prices and CO_2 regulatory impacts. Option 2, MATS controls and transmission upgrades, had the lowest total NPV as well as lower risk and less uncertainty. This indicated that installation of the transmission upgrades, as a part of the MATS compliance strategy, is the most cost-effective option for continued operation. Proceeding with the transmission upgrades evaluated in Option 2, which were also identified as being necessary under a retirement option, preserves the decision to install MATS controls or to retire the two units for a future time when more is known with regard to costs of compliance requirements associated with additional environmental regulations. Therefore, Gulf determined that the first part of the MATS compliance strategy for Plant Smith is the installation of the transmission upgrades required in Option 2. Gulf will submit revisions to its environmental Compliance Program for the Commission's review after a decision is made either to install additional MATS controls or to retire the units.

EXHIBIT "C"

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

Line(s)/Field(s)	**Justification**
Table 3.1-1 Page 10 Lines 1-12 as highlighted	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 2.
Table 3.1-2 Page 11 Lines 1-13 as highlighted	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 2.
Page 14 Lines 1-14 as highlighted	This information is entitled to confidential classification pursuant to §366.093(3)(c), Florida Statutes. The basis for this information being designated as confidential is more fully set forth in paragraph 6.
Page 17 Lines 1-6 as highlighted	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 3.
Table 3.3-1 Column A, Lines 7-10 Column B, Lines 7-9 Column C, Line 8 Column D, Lines 7-10	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 3.
Page 18 Line 1 as highlighted	This information is entitled to confidential classification pursuant to §366.093(3)(c), Florida Statutes. The basis for this information being designated as confidential is more fully set forth in paragraph 6.

Page 21 Line 1 as highlighted	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 5.
Page 22 Lines 1-8 as highlighted	This information is entitled to confidential classification pursuant to §366.093(3)(c), Florida Statutes. The basis for this information being designated as confidential is more fully set forth in paragraph 6.
Page 26 Lines 1-2 as highlighted	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 4.
Page 26 Column A, Lines 3-4 Column B, Line 3 Column C, Lines 3-4	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 4.

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

IN RE: Petition for Increase in Rates)
By Gulf Power Company)
) Docket No.: 130140-EI

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true copy of the foregoing has been furnished by overnight mail this 1st day of November, 2013:

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