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COMMISSION
CLERK



February 28, 2014

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

REDACTED

RE: Docket No. 140001-EI

Dear Ms. Stauffer:

Enclosed is 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 3, 2014.

Sincerely,

Robert L. McGee, Jr.
Regulatory and Pricing Manager

md

Enclosures

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

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TEL _____
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BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

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

Docket No.: 140001-EI
Date: March 3, 2014

_____)

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 3, 2014, (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 2013. 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.

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 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 28th day of February, 2014.



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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.: 140001-EI
Date: March 3, 2014

REQUEST FOR CONFIDENTIAL CLASSIFICATION

EXHIBIT "A"

Provided to Commission Clerk under separate
cover as confidential information.

EXHIBIT "B"

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Contract/Counterparty	Term		Contract Type
	Start	End ⁽¹⁾	
Southern Intercompany Interchange	5/1/2007	5 Yr Notice	SES Opco
<i>PPAs (Confidential)</i>			
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 ⁽²⁾	11/2/2009	5/31/2023	Non-Firm
<i>Other (Confidential)</i>			
Alabama Electric Cooperative	11/27/2013	11/29/2013	Other
South Carolina PSA	9/1/2003	-	Other
South Carolina Electric & Gas	1/1/2013	6/30/2013	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.

Contract	January		February		March		April		May		June	
	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
<i>PPAs</i>												
Coral Power, LLC	[REDACTED]											
Southern Power Company	[REDACTED]											
Shell Energy N.A. (U.S.), LP	[REDACTED]											
<i>Other</i>												
Alabama Electric Cooperative	0.0	0	0.0	0	0.0	0	0.0	0	0.0	0	0.0	0
South Carolina Electric & Gas	0.0	0	[REDACTED]		0.0	0	0.0	0	[REDACTED]			
South Carolina PSA	[REDACTED]											
Total		2,380,170		1,898,537		2,389,783		2,045,795		2,596,589		6,777,892

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

Docket No. 140001-EI
2013 Final True-Up Filing
Exhibit RWD-1, Page 6 of 212

Gulf Power Company
2013 Capacity Contracts

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Contract/Counterparty	Term		Contract Type
	Start	End ⁽¹⁾	
Southern Intercompany Interchange <i>PPAs (Confidential)</i>	5/1/2007	5 Yr Notice	SES Opco
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 ⁽²⁾ <i>Other (Confidential)</i>	11/2/2009	5/31/2023	Non-Firm
Alabama Electric Cooperative	11/27/2013	11/29/2013	Other
South Carolina PSA	9/1/2003	-	Other
South Carolina Electric & Gas	1/1/2013	6/30/2013	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 2013 Contract	July		August		September		October		November		December		Total \$
	MW	\$	MW	\$	MW	\$	MW	\$	MW	\$	MW	\$ ⁽¹⁾	
Southern Intercompany Interchange <i>PPAs</i>	0.0	0	0.0	0	120.0	413,300	58.9	20,971	(83.4)	(36,525)	0.0	1,366	1,116,678
Coral Power, LLC	[REDACTED]												
Southern Power Company	[REDACTED]												
Shell Energy N.A. (U.S.), LP	[REDACTED]												
<i>Total PPA's</i>	[REDACTED]												45,273,839
<i>Other</i>	[REDACTED]												
Alabama Electric Cooperative	0.0	0	0.0	0	0.0	0	0.0	0	[REDACTED]	0.0	0	0	(906)
South Carolina Electric & Gas	0.0	0	0.0	0	0.0	0	0.0	0	0.0	0	0.0	0	(7,902)
South Carolina PSA	[REDACTED]												(37,750)
Total	7,263,297		7,004,080		7,207,858		2,490,995		2,203,139		2,085,824		46,343,959

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

EXHIBIT "C"

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

Line(s)/Field(s)

Page 1 of 2
Lines 30-32, 37 Columns E-P
Line 36, Columns G-H and M-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.

Page 2 of 2
Lines 30-32, Columns E-Q
Line 35, Columns M-N
Line 37, Columns E-P

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.: **140001-EI**

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true copy of the foregoing was furnished by U.S. mail this 28th day of February, 2014 to the following:

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