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September 17, 2014

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

RECEIVED-FPSC
14 SEP 18 AM 9:32
COMMISSION
CLERK

REDACTED

Re: Docket No. 140001-EI

Dear Ms. Stauffer:

Enclosed is Gulf Power Company's Request for Confidential Classification pertaining to Gulf Power's response to Staff's Second Set of Interrogatories (Nos. 12-25) in the above-referenced docket.

Sincerely,

Robert L. McGee, Jr.
Regulatory and Pricing Manager

md

Enclosures

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

COM
AFD *Archived Ex B and CD*

APA _____

ECO _____

ENG _____

GCL _____

IDM _____

TEL _____

CLK _____

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: September 18, 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 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 Second Set of Interrogatories to Gulf Power Company (Nos. 12-25). As grounds for this request, the Company states:

1. A portion of the information submitted by Gulf Power in response to interrogatory numbers 12 and 14 of Commission Staff's Second 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. Disclosure of the pricing data 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 this pricing data 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.

3. Submitted as Exhibit "A" are copies of the subject documents, on which are 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 17th day of September, 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: September 18, 2014

REQUEST FOR CONFIDENTIAL CLASSIFICATION

EXHIBIT "A"

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

EXHIBIT "B"

12. For realized (actual) hedging gains and losses for the twelve months beginning August 1, 2013, and ending July 31, 2014, associated with swap contracts for natural gas, please provide the following information in a schedule format:

- (a) the transaction date (the date the swap was entered into) for the swap;
- (b) the fixed price for the swap;
- (c) the month or period in the future the swap is covering; and
- (d) the corresponding NYMEX futures price for the future month or period for natural gas on the transaction date of the swap.

ANSWER:

	(A)	(B)	(C)	(D)	(E)	(F)
	Transaction Date	Fixed Price	Period Begin Date	Period End Date	Average NYMEX Price at Market Close (\$/MMBTU)	% Difference
1	7/13/2009		1/1/2013	12/31/2013	6.935	
2	8/31/2009		1/1/2013	12/31/2013	6.896	
3	9/3/2009		1/1/2013	12/31/2013	6.747	
4	9/16/2010		1/1/2013	12/31/2013	5.496	
5	1/5/2011		1/1/2013	12/31/2013	5.236	
6	2/23/2011		1/1/2013	12/31/2013	5.126	
7	3/7/2011		1/1/2014	12/31/2014	5.478	
8	4/5/2011		1/1/2013	12/31/2013	5.369	
9	4/18/2011		1/1/2013	12/31/2013	5.281	
10	5/5/2011		1/1/2013	12/31/2013	5.287	
11	5/5/2011		1/1/2014	12/31/2014	5.605	
12	5/9/2011		1/1/2013	12/31/2013	5.217	
13	5/26/2011		1/1/2013	12/31/2013	5.266	
14	6/3/2011		1/1/2014	12/31/2014	5.572	
15	6/3/2011		1/1/2013	12/31/2013	5.333	
16	6/9/2011		1/1/2014	12/31/2014	5.490	
17	6/16/2011		1/1/2014	12/31/2014	5.476	
18	6/23/2011		1/1/2014	12/31/2014	5.341	
19	6/23/2011		1/1/2014	12/31/2014	5.341	
20	7/6/2011		1/1/2014	12/31/2014	5.349	
21	7/6/2011		1/1/2013	12/31/2013	5.087	

	(A)	(B)	(C)	(D)	(E)	(F)
	Transaction Date	Fixed Price	Period Begin Date	Period End Date	Average NYMEX Price at Market Close (\$/MMBTU)	% Difference
22	7/7/2011		1/1/2013	12/31/2013	5.064	
23	7/7/2011		1/1/2014	12/31/2014	5.356	
24	7/28/2011		1/1/2013	12/31/2013	5.102	
25	7/29/2011		1/1/2013	12/31/2013	5.047	
26	7/29/2011		1/1/2014	12/31/2014	5.344	
27	8/3/2011		1/1/2013	12/31/2013	5.053	
28	8/4/2011		1/1/2013	12/31/2013	4.959	
29	8/4/2011		1/1/2014	12/31/2014	5.269	
30	8/29/2011		1/1/2013	12/31/2013	4.901	
31	9/9/2011		1/1/2014	12/31/2014	5.235	
32	9/9/2011		1/1/2013	12/31/2013	4.930	
33	9/15/2011		1/1/2013	12/31/2013	4.927	
34	9/23/2011		1/1/2014	12/31/2014	5.102	
35	9/29/2011		1/1/2013	12/31/2013	4.821	
36	10/3/2011		1/1/2013	12/31/2013	4.785	
37	10/7/2011		1/1/2013	12/31/2013	4.682	
38	10/7/2011		1/1/2014	12/31/2014	4.981	
39	10/18/2011		1/1/2013	12/31/2013	4.615	
40	11/7/2011		1/1/2013	12/31/2013	4.507	
41	11/7/2011		1/1/2014	12/31/2014	4.878	
42	11/9/2011		1/1/2014	12/31/2014	4.812	
43	11/9/2011		1/1/2013	12/31/2013	4.446	
44	11/11/2011		1/1/2013	12/31/2013	4.382	
45	11/14/2011		1/1/2013	12/31/2013	4.345	
46	11/14/2011		1/1/2014	12/31/2014	4.703	
47	11/18/2011		5/1/2013	12/31/2013	4.316	
48	11/22/2011		5/1/2013	12/31/2013	4.364	
49	11/23/2011		5/1/2013	12/31/2013	4.387	
50	11/23/2011		1/1/2014	12/31/2014	4.675	
51	12/5/2011		1/1/2013	12/31/2013	4.351	
52	12/6/2011		1/1/2014	12/31/2014	4.706	
53	12/8/2011		1/1/2014	12/31/2014	4.633	
54	12/9/2011		1/1/2013	12/28/2013	4.150	
55	12/9/2011		1/1/2014	12/31/2014	4.520	
56	12/14/2011		1/1/2014	12/31/2014	4.399	

	(A)	(B)	(C)	(D)	(E)	(F)
	Transaction Date	Fixed Price	Period Begin Date	Period End Date	Average NYMEX Price at Market Close (\$/MMBTU)	% Difference
57	12/14/2011		5/1/2013	12/31/2013	4.061	
58	12/28/2011		1/1/2013	12/31/2013	4.023	
59	1/5/2012		5/1/2013	12/31/2013	3.960	
60	1/5/2012		1/1/2014	12/31/2014	4.338	
61	1/11/2012		6/1/2013	8/31/2013	3.747	
62	1/13/2012		1/1/2014	12/31/2014	4.170	
63	1/17/2012		5/1/2013	12/31/2013	3.606	
64	1/19/2012		1/1/2013	12/31/2013	3.400	
65	1/19/2012		1/1/2014	12/31/2014	3.865	
66	1/26/2012		1/1/2013	12/31/2013	3.652	
67	1/26/2012		1/1/2014	12/31/2014	4.005	
68	1/30/2012		1/1/2013	12/31/2013	3.675	
69	1/30/2012		1/1/2014	12/31/2014	4.033	
70	1/31/2012		1/1/2014	12/31/2014	3.946	
71	1/31/2012		1/1/2013	12/31/2013	3.560	
72	2/7/2012		1/1/2014	12/31/2014	4.065	
73	2/9/2012		1/1/2013	12/31/2013	3.688	
74	2/27/2012		1/1/2013	12/31/2013	3.685	
75	2/28/2012		1/1/2013	12/31/2013	3.590	
76	2/28/2012		1/1/2014	12/31/2014	4.006	
77	3/5/2012		6/1/2013	12/31/2013	3.579	
78	3/7/2012		1/1/2013	12/31/2013	3.411	
79	3/7/2012		1/1/2014	12/31/2014	3.834	
80	3/13/2012		1/1/2013	12/31/2013	3.507	
81	3/13/2012		1/1/2014	12/31/2014	3.932	
82	3/29/2012		1/1/2013	12/31/2013	3.428	
83	4/11/2012		1/1/2013	12/31/2013	3.393	
84	4/17/2012		1/1/2013	12/31/2013	3.305	
85	4/17/2012		1/1/2014	12/31/2014	3.765	
86	4/19/2012		1/1/2014	12/31/2014	3.719	
87	4/19/2012		1/1/2013	12/31/2013	3.240	
88	4/23/2012		1/1/2014	12/31/2014	3.702	
89	5/10/2012		1/1/2014	12/31/2014	4.000	
90	5/10/2012		6/1/2013	12/31/2013	3.717	
91	5/21/2012		1/1/2014	12/31/2014	3.922	

	(A)	(B)	(C)	(D)	(E)	(F)
	Transaction Date	Fixed Price	Period Begin Date	Period End Date	Average NYMEX Price at Market Close (\$/MMBTU)	% Difference
92	5/21/2012		6/1/2013	9/30/2013	3.557	
93	5/23/2012		6/1/2013	12/31/2013	3.664	
94	5/25/2012		6/1/2013	9/30/2013	3.504	
95	5/29/2012		1/1/2014	12/31/2014	3.858	
96	5/30/2012		5/1/2013	12/31/2013	3.436	
97	6/7/2012		1/1/2014	12/31/2014	3.788	
98	6/7/2012		1/1/2013	12/31/2013	3.371	
99	6/13/2012		1/1/2013	12/31/2013	3.296	
100	6/15/2012		1/1/2014	12/31/2014	3.815	
101	6/28/2012		1/1/2013	12/31/2013	3.525	
102	6/28/2012		1/1/2014	12/31/2014	3.903	
103	7/6/2012		1/1/2013	12/31/2013	3.531	
104	7/6/2012		1/1/2014	12/31/2014	3.906	
105	7/12/2012		6/1/2013	12/31/2013	3.700	
106	8/1/2012		6/1/2013	12/31/2013	3.790	
107	8/1/2012		1/1/2014	12/31/2014	4.086	
108	8/2/2012		6/1/2013	12/31/2013	3.614	
109	8/2/2012		1/1/2014	12/31/2014	3.931	
110	8/10/2012		1/1/2014	12/31/2014	3.976	
111	8/10/2012		5/1/2013	12/31/2013	3.628	
112	8/13/2012		5/1/2013	12/31/2013	3.586	
113	8/13/2012		1/1/2014	12/31/2014	3.933	
114	8/16/2012		5/1/2013	12/31/2013	3.548	
115	8/16/2012		1/1/2014	12/31/2014	3.898	
116	8/23/2012		6/1/2013	12/31/2013	3.613	
117	8/23/2012		1/1/2014	12/31/2014	3.927	
118	8/27/2012		6/1/2013	12/31/2013	3.495	
119	8/27/2012		1/1/2014	12/31/2014	3.819	
120	9/5/2012		1/1/2013	12/31/2013	3.461	
121	9/5/2012		1/1/2014	12/31/2014	3.868	
122	9/7/2012		1/1/2013	12/31/2013	3.376	
123	9/7/2012		1/1/2014	12/31/2014	3.805	
124	9/18/2012		1/1/2013	12/31/2013	3.545	
125	10/22/2012		1/1/2014	12/31/2014	4.222	
126	10/24/2012		1/1/2014	12/31/2014	4.229	

	(A)	(B)	(C)	(D)	(E)	(F)
	Transaction Date	Fixed Price	Period Begin Date	Period End Date	Average NYMEX Price at Market Close (\$/MMBTU)	% Difference
127	11/1/2012		1/1/2014	12/31/2014	4.226	
128	11/2/2012		4/1/2013	10/31/2013	3.745	
129	11/2/2012		1/1/2014	12/31/2014	4.123	
130	11/9/2012		4/1/2013	10/31/2013	3.713	
131	11/9/2012		1/1/2014	12/31/2014	4.094	
132	11/26/2012		5/1/2014	9/30/2014	4.153	
133	11/29/2012		1/1/2014	12/31/2014	4.117	
134	11/30/2012		4/1/2013	10/31/2013	3.672	
135	11/30/2012		1/1/2014	12/31/2014	4.070	
136	12/4/2012		7/1/2013	9/30/2013	3.697	
137	12/10/2012		5/1/2014	11/30/2014	3.993	
138	12/11/2012		6/1/2013	12/31/2013	3.684	
139	12/12/2012		5/1/2014	11/30/2014	3.937	
140	1/2/2013		6/1/2013	12/31/2013	3.564	
141	1/2/2013		5/1/2014	11/30/2014	3.949	
142	1/9/2013		6/1/2013	12/31/2013	3.467	
143	1/9/2013		5/1/2014	11/30/2014	3.888	
144	1/29/2013		1/1/2014	12/31/2014	3.989	
145	2/14/2013		10/1/2013	12/31/2013	3.642	
146	2/14/2013		1/1/2014	12/31/2014	3.954	
147	3/12/2013		6/1/2014	9/30/2014	4.080	
148	3/21/2013		4/1/2014	10/31/2014	4.107	
149	5/16/2013		2/1/2014	12/31/2014	4.181	
150	5/16/2013		6/1/2013	10/31/2013	3.988	
151	5/22/2013		6/1/2014	9/30/2014	4.274	
152	5/22/2013		6/1/2013	9/30/2013	4.230	
153	5/28/2013		6/1/2014	12/31/2014	4.330	
154	5/30/2013		6/1/2014	12/31/2014	4.230	
155	5/31/2013		11/1/2013	12/31/2013	4.161	
156	6/6/2013		7/1/2013	12/31/2013	3.898	
157	6/6/2013		1/1/2014	12/31/2014	4.099	
158	6/14/2013		1/1/2014	12/31/2014	4.028	
159	6/21/2013		1/1/2014	3/31/2014	4.096	
160	6/24/2013		8/1/2013	12/31/2013	3.830	
161	6/27/2013		11/1/2013	3/31/2014	3.850	

	(A)	(B)	(C)	(D)	(E)	(F)
	Transaction Date	Fixed Price	Period Begin Date	Period End Date	Average NYMEX Price at Market Close (\$/MMBTU)	% Difference
162	6/27/2013		1/1/2014	12/31/2014	3.931	
163	7/11/2013		1/1/2014	12/31/2014	3.958	
164	7/26/2013		11/1/2013	12/31/2013	3.747	
165	7/26/2013		2/1/2014	2/28/2014	3.916	
166	7/26/2013		7/1/2014	8/31/2014	3.917	
167	7/29/2013		1/1/2014	12/31/2014	3.873	
168	8/5/2013		4/1/2014	12/31/2014	3.783	
169	8/7/2013		11/1/2013	12/31/2013	3.485	
170	8/7/2013		1/1/2014	12/31/2014	3.699	
171	9/10/2013		1/1/2014	3/31/2014	3.897	
172	9/24/2013		1/1/2014	3/31/2014	3.824	
173	10/21/2013		1/1/2014	3/31/2014	3.881	
174	10/22/2013		1/1/2014	3/31/2014	3.797	
175	10/28/2013		1/1/2014	3/31/2014	3.740	
176	11/4/2013		1/1/2014	12/31/2014	3.606	

14. For realized (actual) hedging gains and losses for the twelve months beginning August 1, 2013, and ending July 31, 2014, associated with options for natural gas prices, please provide the following information:

- (a) the transaction date for the option;
- (b) the option price or premium;
- (c) the type of option;
- (d) the time to expiration; and
- (e) the corresponding futures price, forward price, or comparable market price for the period on the transaction date of the option.

ANSWER:

	(A)	(B)	(C)	(D)	(E)	(F)	(G)	(H)	(I)
	Date Deal Was Entered	Strike \$/MMBtu	Option Prem.	Portfolio	Put Call	Direction	Period Begin Date	Period End Date	Average NYMEX Price at Market Close (\$/MMBTU)
1	9/24/2013		\$0.00	Collar	Call	Buy	5/1/2014	10/31/2014	3.830
2	9/24/2013		\$0.00	Collar	Put	Sell	5/1/2014	10/31/2014	3.830
3	10/3/2013		\$0.00	Collar	Call	Buy	2/1/2014	4/30/2014	3.749
4	10/3/2013		\$0.00	Collar	Put	Sell	2/1/2014	4/30/2014	3.749
5	10/22/2013		\$0.00	Collar	Call	Buy	6/1/2014	6/30/2014	3.801
6	10/22/2013		\$0.00	Collar	Put	Sell	6/1/2014	6/30/2014	3.801
7	10/28/2013		\$0.00	Collar	Call	Buy	5/1/2014	11/30/2014	3.802
8	10/28/2013		\$0.00	Collar	Put	Sell	5/1/2014	11/30/2014	3.802
9	10/31/2013		\$0.00	Collar	Call	Buy	2/1/2014	1/31/2015	3.761
10	10/31/2013		\$0.00	Collar	Put	Sell	2/1/2014	1/31/2015	3.761
11	11/4/2013		\$0.00	Collar	Call	Buy	2/1/2014	1/31/2015	3.639
12	11/4/2013		\$0.00	Collar	Put	Sell	2/1/2014	1/31/2015	3.639
13	6/26/2014		\$0.00	Collar	Call	Buy	8/1/2014	10/31/2014	4.426
14	6/26/2014		\$0.00	Collar	Put	Sell	8/1/2014	10/31/2014	4.426
15	6/27/2014		\$0.00	Collar	Call	Buy	8/1/2014	10/31/2014	4.394
16	6/27/2014		\$0.00	Collar	Put	Sell	8/1/2014	10/31/2014	4.394
17	7/7/2014		\$0.00	Collar	Call	Buy	8/1/2014	10/31/2014	4.222
18	7/7/2014		\$0.00	Collar	Put	Sell	8/1/2014	10/31/2014	4.222

EXHIBIT "C"

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

Line(s)/Field(s)

Response to Interrogatory # 12

Page 1 of 6, Columns B and F, lines 1-21
Page 2 of 6, Columns B and F lines 22-56
Page 3 of 6, Columns B and F, lines 57-91
Page 4 of 6, Columns B and F, lines 92-126
Page 5 of 6, Columns B and F, lines 127-161
Page 6 of 6, Columns B and F, lines 162-176

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.

Response to Interrogatory #14

Page 1 of 1, Column B, lines 1-18

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 overnight mail this 17th day of September, 2014 to the following:

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c/o Brickfield Law Firm
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