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April 16, 2015

REDACTED

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

RE: Docket No.: 110321-EI

Dear Ms. Stauffer:

Enclosed for official filing is Gulf Power Company's Request for Extended Confidential Classification pertaining to portions of the Commission's Review of Coal Combustion Residual Storage and Disposal Processes of the Florida Electric Industry (PA-10-10-004). Also included is a DVD of Gulf's Request for Extended Confidential Classification in Microsoft Word format.

Sincerely,

Robert L. McGee, Jr.
Regulatory and Pricing Manager

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Enclosures

cc: Beggs and Lane
Jeffrey A. Stone, Esq

- COM _____
- AFD _____
- APA _____
- ECO _____
- ENG _____
- GCL _____
- IDM _____
- FEL _____
- FX _____

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COMMISSION
CLERK

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

IN RE: Review of Coal Combustion
Residual Storage and Disposal Processes of
the Florida Electric Industry

Docket No.: 110321-EI
Date: April 17, 2015

REQUEST FOR EXTENDED 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 granting extended confidential classification for certain information produced by Gulf Power in connection with the Commission's Review of Coal Combustion Residual Storage and Disposal Processes of the Florida Electric Industry (PA-10-10-004) (the "Review"). As grounds for this request, the Company states:

1. On November 23, 2011, Gulf filed a Request for Confidential Classification of certain information produced by Commission Staff and Gulf Power in connection with the Review. (Document No. 08597-11). The materials that were subject to the initial request were contained in Document No. 08598-11 (collectively the "Confidential Materials").
2. On January 24, 2012, the Commission entered an order granting Gulf Power's request for a period of eighteen (18) months. See Order No. PSC-12-0035-CFO-EI.
3. On August 16, 2013, Gulf filed an Amended Request for Extended Confidential Classification of portions of the Confidential Materials that were subject to Order No. PSC-12-0035-CFO-EI. (Document No. 04807-13).
4. On October 17, 2013, the Commission entered an order granting Gulf Power's request for a period of eighteen (18) months. See Order No. PSC-13-0492-CFO-EI.
5. As provided in section 366.093(4), Florida Statutes, and by the Commission's Order, the confidential information will be made public after a period of 18 months unless Gulf

or another affected party shows, and the Commission finds, that the confidential information continues to comprise proprietary confidential business information. The 18-month extension period expires on April 17, 2015. Gulf hereby requests that the Commission enter an order extending the confidential classification of a portion¹ of the confidential materials identified in Attachment "A" to Order No. PSC-13-0492-CFO-EI for an additional 18-month period.

6. The confidential materials identified below remain sensitive and are entitled to continued confidential classification for the same reasons that they were initially classified. As stated in Gulf's previous requests and as described in detail below, this information constitutes "proprietary confidential business information" as defined by section 366.093(3), Florida Statutes.

7. Commission Staff issued two separate Data Requests to Gulf Power in connection with the Review. In response to question 6 of DR-2, Gulf provided copies of (1) bid proposals from three vendors for a Flue Gas Desulphurization ("FGD") wastewater treatment system; (2) a Functional Design Specification for the FGD wastewater treatment system developed by Infilco Degremont, Inc.; and (3) two reports from Chiyoda Corporation relating to research and development conducted by Chiyoda at the Plant Crist Mercury Research Center. The pricing components of the above-referenced bid proposals are confidential pursuant to section 366.093(3)(d), Florida Statutes. The above-referenced Functional Design Specification is the intellectual property of Infilco Degremont Inc. and is considered confidential by Infilco Degremont, Inc. Disclosure of this information could result in Infilco Degremont Inc's --and other contractors-- refusing to do business with Gulf Power in the future or charging higher prices for their services. This information is confidential pursuant to section 366.093(3)(d) and

¹ Due to the passage of time, a substantial portion of the information identified in Attachment "A" to Order No. PSC-13-0492-CFO-EI is no longer considered confidential and is therefore not a subject of this request.

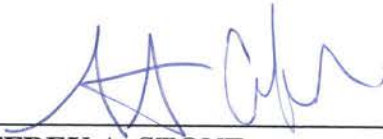
(e). The above-referenced reports developed by Chiyoda Corporation are the intellectual property of Chiyoda Corporation and are considered confidential by Chiyoda Corporation. Chiyoda Corporation devoted significant resources toward development of the conclusions reflected in these reports. The conclusions and the processes used to develop the conclusions are not publicly known, are of value to Chiyoda Corporation and would be valuable to other market participants. Disclosure of this information could result in Chiyoda Corporation --and other market participants-- refusing to do business with Gulf Power in the future. This information is confidential pursuant to section 366.093(3)(d) and (e).

8. 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.

9. Submitted as Exhibit "A" are copies of the documents which are the subject of this request. 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 contained in Exhibit "A" to this request for an additional 18-month period.

Respectfully submitted this 16th day of April, 2015.



JEFFREY A. STONE

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Attorneys for Gulf Power Company

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

IN RE: Review of Coal Combustion
Residual Storage and Disposal Processes of
the Florida Electric Industry

Docket No.: 110321-EI
Date: April 17, 2015

REQUEST FOR EXTENDED CONFIDENTIAL CLASSIFICATION

EXHIBIT "A"

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

EXHIBIT "B"

(Siemens)

1.0 SCOPE

In accordance with your inquiry No. Inviting proposals for Wastewater Treatment system for the referenced generating plant and subject to all conditions and requirements of your Specification, all related attachments and accompanying documents in connection therewith, we propose to design, fabricate, deliver, and commission the equipment for the prices quoted herein. Pricing does not include state sales/use tax. "Option" is understood to be Purchaser's option.

2.0 PRICING

Note: All pricing F.O.B. plant site; State sales/use tax is excluded

2.1 Proposal 1 - River water as makeup, discharge to river

For scope of supply as described in the Specifications and Vendor Proposal

- 2.1.1 Price for providing equipment \$ _____
- 2.1.2 Price for start up assistance \$ _____
- 2.1.3 Price per day for additional field technical support \$ _____
- 2.1.4 Maximum freight to plant site (All freight to be included here) \$ _____
- 2.1.5 Price for erection of clarifiers (Option) \$ _____
- 2.1.6 Price for low local shear agitators (Option) (where beneficial for process chemistry) \$ _____
- 2.1.7 Price for acid/caustic neutralization equipment (Option) \$ _____

2.2 Proposal 2 - Reclaim water as makeup, discharge to deep wells

For scope of supply as described in the Specifications and Vendor Proposal

- 1 2.2.1 Price for providing equipment [REDACTED]
 - 2 2.2.2 Price for start up assistance \$ [REDACTED]
 - 3 2.2.3 Price per day for additional field technical support \$ [REDACTED]
 - 4 2.2.4 Maximum freight to plant site (All freight to be included here) \$ [REDACTED]
 - 5 2.2.5 Price for erection of clarifiers (Option) \$ [REDACTED]
 - 6 2.2.6 Price for low local shear agitators (Option) (where beneficial for process chemistry) \$ [REDACTED]
 - 7 2.2.7 Price for acid/caustic neutralization equipment (Option) \$ [REDACTED]
 - 8 2.2.8 Price for items which increase filter press automation, minimize maintenance, or alert DCS operators there is trouble with the presses (Option) \$ [REDACTED]
 - 9 2.2.9 Price for filter press cloth wash system (Option) \$ [REDACTED]
- ITEMS BELOW INSERTED BY SIEMENS WATER TECHNOLOGIES
- 10 2.2.10 Price for containment during site sand blasting operation (Option) \$ [REDACTED]
 - 11 2.2.11 Price for filter press acid wash (Option) \$ [REDACTED]
 - 12 2.2.12 Price for coagulant storage tank (Option) \$ [REDACTED]
 - 13 2.2.13 Price for hydrochloric acid storage tank & fume scrubber (Option) \$ [REDACTED]

(Aquatech)

1.0 SCOPE

In accordance with your Inquiry No. Inviting proposals for Wastewater Treatment system for the referenced generating plant and subject to all conditions and requirements of your Specification, all related attachments and accompanying documents in connection therewith, we propose to design, fabricate, deliver, and commission the equipment for the prices quoted herein. Pricing does not include state sales/use tax. "Option" is understood to be Purchaser's option.

2.0 PRICING

Note: All pricing F.O.B. plant site; State sales/use tax is excluded

2.1 Proposal 1 - River water as makeup, discharge to river

For scope of supply as described in the Specifications and Vendor Proposal

- 2.1.1 Price for providing equipment \$ _____
- 2.1.2 Price for start up assistance \$ _____
- 2.1.3 Price per day for additional field technical support \$ _____
- 2.1.4 Maximum freight to plant site (All freight to be included here) \$ _____
- 2.1.5 Price for erection of clarifiers (Option) \$ _____
- 2.1.6 Price for low local shear agitators (Option) (where beneficial for process chemistry) \$ _____
- 2.1.7 Price for acid/caustic neutralization equipment (Option) \$ _____

2.2 Proposal 2 - Reclaim water as makeup, discharge to deep wells

For scope of supply as described in the Specifications and Vendor Proposal

1
2
3
4
5
6
7
8
9

- 2.2.1 Price for providing equipment \$ [REDACTED]
- 2.2.2 Price for start up assistance \$ [REDACTED]
- 2.2.3 Price per day for additional field technical support \$ [REDACTED]
- 2.2.4 Maximum freight to plant site (All freight to be included here) \$ [REDACTED]
- 2.2.5 Price for erection of clarifiers (Option) \$ [REDACTED]
- 2.2.6 Price for low local shear agitators (Option) (where beneficial for process chemistry) \$ [REDACTED]
- 2.2.7 Price for acid/caustic neutralization equipment (Option) \$ [REDACTED]
- 2.2.8 Price for items which increase filter press automation, minimize maintenance, or alert DCS operators there is trouble with the presses (Option) \$ [REDACTED]
- 2.2.9 Price for filter press cloth wash system (Option) \$ [REDACTED]

(Intilco Degreemont)

1.0 SCOPE

In accordance with your inquiry No. Inviting proposals for Wastewater Treatment system for the referenced generating plant and subject to all conditions and requirements of your Specification, all related attachments and accompanying documents in connection therewith, we propose to design, fabricate, deliver, and commission the equipment for the prices quoted herein. Pricing does not include state sales/use tax. 'Option' is understood to be Purchaser's option.

2.0 PRICING

Note: All pricing F.O.B. plant site; State sales/use tax is excluded

2.1 Proposal 1 - River water as makeup, discharge to river (Alternate Design)

For scope of supply as described in the Specifications and Vendor Proposal

- 1 2.1.1 Price for providing equipment
- 2 2.1.2 Price for start up assistance
- 3 2.1.3 Price per day for additional field technical support
- 4 2.1.4 Maximum freight to plant site (All freight to be included here)
- 5 2.1.5 Price for erection of clarifiers (Option)
- 6 2.1.6 Price for low local shear agitators (Option)
(where beneficial for process chemistry)
- 7 2.1.7 Price for acid/caustic neutralization equipment (Option)

2.2 Proposal 2 - Recycled water as makeup, discharge to deep wells (BASE Design)

For scope of supply as described in the Specifications and Vendor Proposal

- 8 2.2.1 Price for providing equipment
- 9 2.2.2 Price for start up assistance
- 10 2.2.3 Price per day for additional field technical support
- 11 2.2.4 Maximum freight to plant site (All freight to be included here)
- 12 2.2.5 Price for erection of clarifiers (Option)
- 13 2.2.6 Price for low local shear agitators (Option)
(where beneficial for process chemistry)
- 14 2.2.7 Price for acid/caustic neutralization equipment (Option)
- 15 2.2.8 Price for items which increase filter press automation, minimize maintenance, or alert DCS operators there is trouble with the presses (Option)
- 16 2.2.9 Price for filter press cloth wash system (Option)

6.0 DESCRIPTIVE DATA AND ENGINEERING INFORMATION

The following descriptive information and design data are furnished in connection with the equipment and materials offered with this Proposal.

6.1 Utility Consumption Data - Plant Crst

Proposal 1

| | | |
|---|------------------|---------------------|
| Instrument air (also use for service air) | peak scfm @ psi | average scfm @ psi |
| Potable water | 0 peak gpm @ psi | 0 average gpm @ psi |
| Service water | peak gpm @ psi | average gpm @ psi |
| Electricity | peak kW | average kW/day |

Proposal 2

| | | |
|---|-----------------|--------------------|
| Instrument air (also use for service air) | peak scfm @ psi | average scfm @ psi |
| Potable water | peak gpm @ psi | average gpm @ psi |
| Service water | peak gpm @ psi | average gpm @ psi |
| Electricity | peak kW | average kW/day |

6.2 Chemical Consumption Data - Plant Crst

6.2.1 Chemical Description and Estimated Cost

SYSTEM

Proposal 1

| | | | |
|------------------------------------|--|--|--|
| Coagulant (as 40% ferric chloride) | | | |
| Polymer | | | |
| Dewatering Polymer (if needed) | | | |
| Hydrochloric Acid (37%) | | | |
| TMT | | | |
| Lime (hydrated) | | | |
| | | | |
| | | | |
| | | | |

6.2.2 Chemical Dosing Rate (Estimated)

Proposal 1

| | | | | | | |
|-------------------------------------|-----|------|-------|-------|------|--------|
| Coagulant (as 40% ferric chloride) | 75 | mg/L | | lb/hr | 1.35 | gal/hr |
| Polymer (Neat Solution 30 % Active) | 10 | mg/L | | lb/hr | 0.25 | gal/hr |
| Dewatering Polymer (if needed) | N/A | mg/L | N/A | lb/hr | N/A | gal/hr |
| Hydrochloric Acid (37%) | 20 | mg/L | | lb/hr | 0.5 | gal/hr |
| TMT | 4 | mg/L | | lb/hr | 0.26 | gal/hr |
| Lime (hydrated) | 480 | mg/L | 47.95 | lb/hr | | gal/hr |
| | | mg/L | | lb/hr | | gal/hr |
| | | mg/L | | lb/hr | | gal/hr |
| | | mg/L | | lb/hr | | gal/hr |

Document Request 2 (Documents Produced)

Question 6

Document titled **Functional Design Specification (Infilco Degremont, Inc.)** is confidential in its entirety.

Document Request 2 (Documents Produced)

Question 6

Documents titled 2008 & 2009 Pilot Test Plant Reports from Chiyoda Corporation are confidential in their entirety.