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August 3, 2015

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

RECEIVED-FPSC  
15 AUG -4 AM 9:57  
COMMISSION  
CLERK

**REDACTED**

RE: Docket No. 150001-EI

Dear Ms. Stauffer:

Enclosed is Gulf Power Company's Request for Confidential Classification regarding Gulf's Risk Management Plan dated August 4, 2015.

Sincerely,

Robert L. McGee, Jr.  
Regulatory and Pricing Manager

md

Enclosures

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

COM  
AFD Redacted + CD  
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ECO \_\_\_\_\_  
ENG \_\_\_\_\_  
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BEFORE THE PUBLIC SERVICE COMMISSION

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

Docket No.: 150001-EI  
Date filed: August 4, 2015

\_\_\_\_\_)

**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 portions of Gulf Power's Risk Management Plan for Fuel Procurement. As grounds for this request, the Company states:

1. Portions of Gulf Power's Risk Management Plan for Fuel Procurement are entitled to confidential classification pursuant to section 366.093(3)(d) and (e), Florida Statutes, as information, the public disclosure of which could cause irreparable harm to the competitive interests of Gulf Power and the ability of Gulf to enter into contracts on terms favorable to it and its customers. The Risk Management Plan for Fuel Procurement contains, in a single resource, detailed information about Gulf's fuel procurement strategy, including technology selection criteria, for the near term and into the future. Gulf Power and the other market participants for fuel, fuel transportation and fuel storage consider this detailed information to be competitively sensitive. The document discusses how Gulf manages its fuel procurement with specific details regarding Gulf's fuel needs, market position, and trends it sees in those markets in which it addresses its fuel needs. In addition, the fuel procurement strategy utilized by Gulf is discussed in detail. Pricing information is also included in this document. Similar information is not made public by other fuel market participants. Making this information public would give these other

market participants a competitive advantage over Gulf which would prevent Gulf from procuring its fuel needs in a manner that secures the best price and terms for its customers.

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. The Commission granted confidential classification for previous versions of Gulf Power Company's Risk Management Plan for Fuel Procurement in Florida Public Service Commission Order Nos. PSC-03-0032-CFO-EI, PSC-04-1056-CFO-EI, PSC 05-0700-CFO-EI, PSC-06-0636-CFO-EI, PSC-09-0284-CFO-EI, PSC-10-0189-CFO-EI, PSC-12-0452-CFO-EI, PSC-13-0541-CFO-EI and PSC-14-0507-CFO-EI.

4. Submitted as Exhibit "A" is a highlighted copy of Gulf Power's Risk Management Plan for Fuel Procurement. Exhibit "A" should be treated as confidential pending a ruling on this request. Attached as Exhibit "B" are two (2) edited copies of Gulf Power's Risk Management Plan for Fuel Procurement, 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 3<sup>rd</sup> day of August, 2015.



---

**JEFFREY A. STONE**

Florida Bar No. 325953

**RUSSELL A. BADDERS**

Florida Bar No. 007455

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Florida Bar No. 627569

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Pensacola, FL 32591

(850) 432-2451

**Attorneys for Gulf Power**

BEFORE THE PUBLIC SERVICE COMMISSION

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

Docket No.: 150001-EI  
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**REQUEST FOR CONFIDENTIAL CLASSIFICATION**

**Exhibit "A"**

Provided to the Commission Clerk

under separate cover as confidential information.

**Exhibit "B"**

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1 **GULF POWER**  
2 **COAL PROCUREMENT STRATEGY FOR 2016**  
3

4 **Coal Procurement Plan**

5 Based on burn forecast from the June update to the 2015 Energy Budget, the  
6 Gulf Power Company program has an estimated uncommitted coal supply  
7 need of [REDACTED] tons in 2016. Coal burn remains depressed as a result of low  
8 natural gas pricing and decreased loads. Our procurement plan below is  
9 based on the following assumptions:  
10

11 **Plant Crist**

- 12 • Short Term: Its current marginal fuel selection consists of a [REDACTED]  
13 [REDACTED]
- 14 • Long term: Current plan is to continue to utilize the [REDACTED]  
15 [REDACTED]
- 16 • Plant Crist is forecasted to have a capacity factor of less than [REDACTED]  
17 through 2019. An evaluation of the timing of when Crist units will be  
18 generating electricity provides insight into how coal deliveries should be  
19 procured. We forecast Crist to have at least one unit on line a majority  
20 of the time.

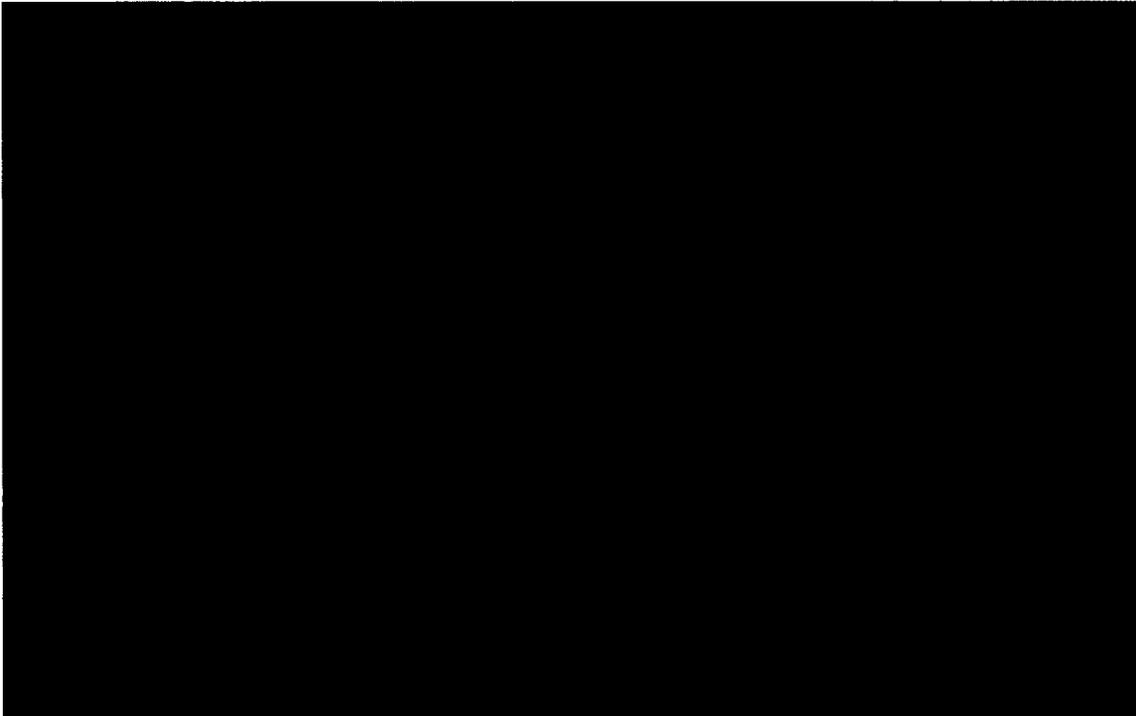
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22 **Plant Smith**

23 The coal fired units at Plant Smith will be retired in April 2016. It is anticipated  
24 that there will be no additional new coal supply needs at Plant Smith for 2016  
25 and the existing coal inventory will be consumed by the retirement date.

1 **State of the Program:**

2 The relationship between burn projections, current commitment levels,  
3 commitment targets per the coal procurement strategy, and corresponding  
4 future needs are detailed in the following chart:

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8 **Spot Coal Plan:**

9 Quarterly system-wide bituminous and sub-bituminous solicitations will be  
10 issued to address short term coal supply needs that may develop. With the  
11 uncertainty of burn that still exists today and with many coal units being  
12 displaced by natural gas generation, this quarterly process provides flexibility  
13 to better manage burn volatility. Gulf will purchase spot coal under these  
14 quarterly solicitations as the need arises.

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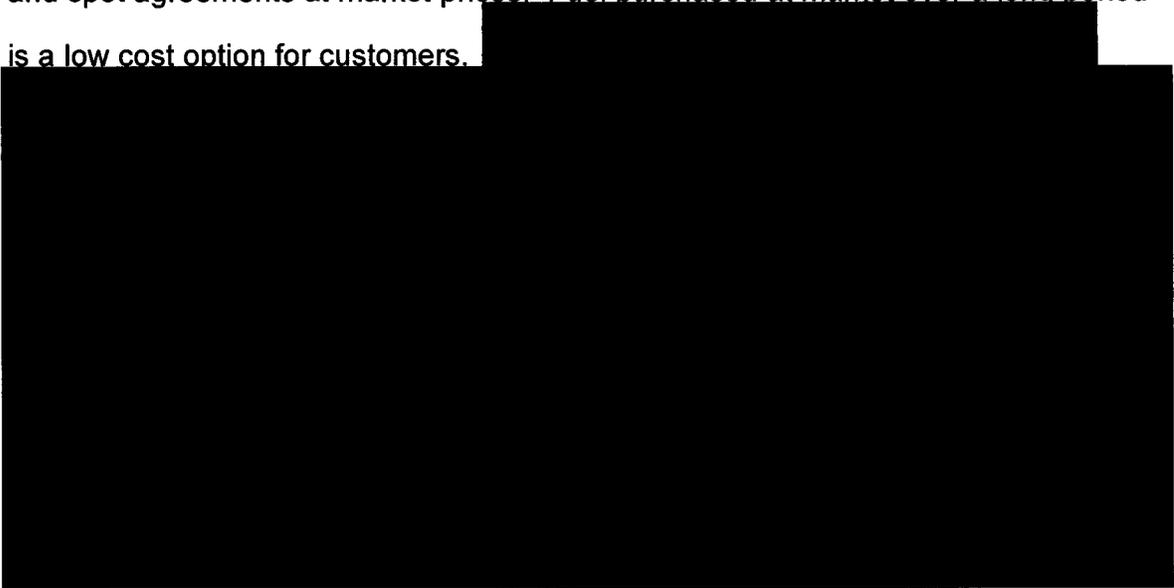
1 **Long-term Coal Plan:**

2 The Gulf program has [REDACTED] of its coal supply needs committed in 2016, and  
3 has no coal supply commitments in 2017-2019. A system-wide long-term  
4 bituminous solicitation will be issued late 2015 and/or early 2016 and Gulf will  
5 evaluate the need for long-term purchases for delivery in 2016. The  
6 purchases made will adhere to the percentage commitment guidelines set  
7 forth in the Coal Procurement Strategy.

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1 **Procurement Strategy**

2 Gulf's strategy for gas procurement is to purchase the commodity using long term  
3 and spot agreements at market prices. Fuel purchased at market over a long period  
4 is a low cost option for customers.



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13 For Gulf, spot-market contracts have a term of less than one year and long-term  
14 contracts have a term of 1 year or longer. All natural gas, regardless of whether it is  
15 bought under long-term contracts or spot-market contracts, is purchased at market  
16 based prices. While fuel purchased at market over long periods is a low cost option  
17 for customers, it does expose the customers to short-term price volatility. Since  
18 these price fluctuations can be severe, Gulf Power, at the direction of the Florida  
19 Public Service Commission, will attempt to protect its customers against short-term  
20 price volatility by utilizing hedging tools. It is understood that the cost of hedging will  
21 sometimes lead to fuel costs that are higher than market prices but that this is a  
22 reasonable trade-off for reducing the customers' exposure to fuel cost increases that  
23 would result if fuel prices actually settle at higher prices than when the hedges were  
24 placed.

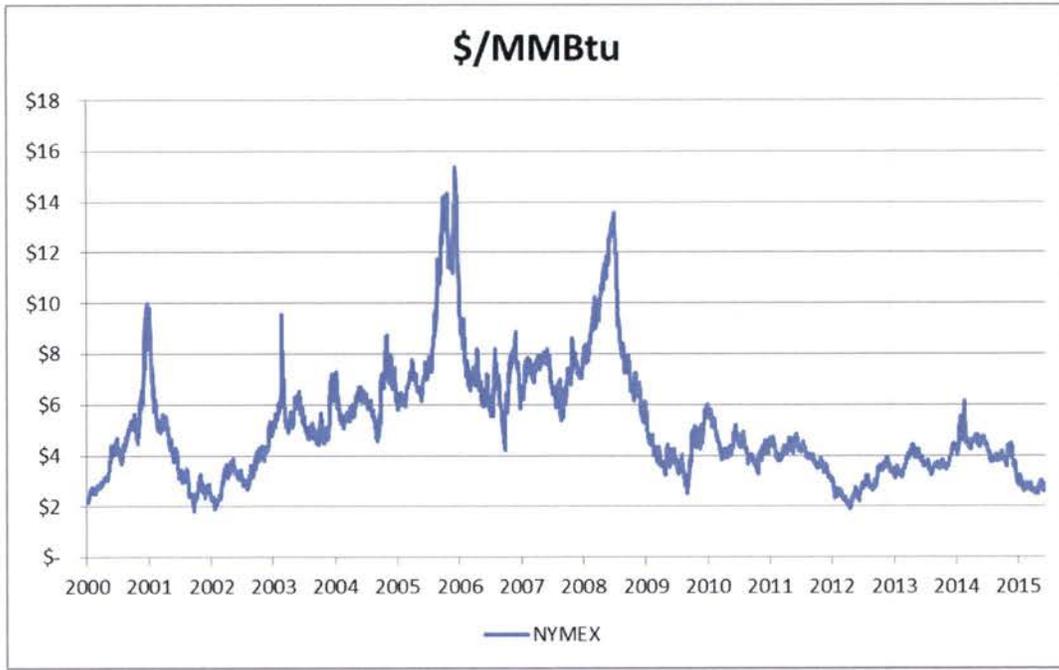
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1 The following graph of actual natural gas prices is an indication of price volatility in  
2 the gas commodity market:

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4 **Historical Natural Gas Prices - NYMEX**

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8 **Pricing Strategy**

9 Gulf Power will continue to purchase gas, both under long-term and spot contracts at  
10 market based prices. However, pursuant to Commission order, Gulf Power will  
11 financially hedge gas prices for some portion, generally between [REDACTED] percent of  
12 Gulf Power's projected annual gas burn for the current year, in order to protect  
13 against short-term price swings and to provide some level of price certainty. This [REDACTED]  
14 [REDACTED] percent hedge range allows Gulf Power to provide a degree of price certainty  
15 and protection against short-term price swings while still allowing the customers to  
16 participate in markets where natural gas prices are low. Gulf Power will secure

1 natural gas hedges over a time period not to exceed [REDACTED] months, per the following  
2 schedule:

3 Period	Lower Target Hedge %	Upper Target Hedge %
4 Prompt Year (2016)	[REDACTED]	[REDACTED]
5 Year 2 (2017)	[REDACTED]	[REDACTED]
6 Year 3 (2018)	[REDACTED]	[REDACTED]
7 Year 4 (2019)	[REDACTED]	[REDACTED]
8 Year 5 (2020)	[REDACTED]	[REDACTED]

9 Note: The annual hedge percentage is based on the budgeted annual gas burn

10  
11 Although SCS will target the levels shown in the table above, SCS may accelerate or  
12 decelerate the plan accordingly based on market conditions. Gulf's hedging targets  
13 are expressed on an annual basis due to the potential for large variances in month  
14 to month gas consumption. The monthly variance in gas burn is due to Gulf's units  
15 being dispatched on an economic basis with the other generating units in the  
16 Southern electric system and the impact of unit outages on Gulf's total gas burn.

17  
18 SCS, working in partnership with Gulf Power, develops short-term hedge strategies  
19 based on current and projected market conditions. [REDACTED]

20 [REDACTED]  
21 [REDACTED]  
22 [REDACTED] SCS will employ both technical and  
23 fundamental analysis to determine appropriate times to hedge. However, the  
24 objective is not to speculate on market price or attempt to outguess or "beat the  
25 market". Gulf will utilize fixed priced swaps as its primary financial gas price hedging  
26 instrument but may also utilize options when appropriate.

1 While the hedging program will protect the customer from short-term price spikes,  
2 hedges can also lead to higher costs when natural gas prices fall subsequent to  
3 entering hedges. Gulf Power will limit the amount of fixed-price hedges to a  
4 maximum of [REDACTED] percent of the projected fuel burn for the upcoming year. In  
5 addition, Gulf Power will limit option priced hedges to [REDACTED] percent of its projected  
6 burn. Finally, in order to protect its customers from market exposure in subsequent  
7 years, Gulf Power will take forward hedge positions for up to [REDACTED] months into the  
8 future.

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1 III. Business Objectives

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3 The Approved Business Objectives for the trading activities performed by  
4 Authorized Individuals are defined in Appendix A.

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7 IV. Business Strategies

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9 The business objectives are achieved by entering into transactions involving the  
10 approved commodities shown in Appendix B.

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23 Various contract types or financial instruments will be used to achieve the  
24 Approved Business Objectives. The Approved Risk Management Instruments  
25 are listed in Appendix C. SCS Risk Control must be consulted before the  
26 execution of any Approved Risk Management Instruments that have not been  
27 previously used, including combinations of instruments not previously used.  
28 SCS Risk Control must ensure that the requirements set forth in this RMP can  
29 be followed with respect to those instruments.

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32 V. Authorizations

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34 Appendix D contains the individuals, boards, and committees authorized to  
35 carry out various activities, reviews, and approvals.

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38 VI. Segregation of Duties

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40 The following functions are separated to ensure that the risk management  
41 activities are properly carried out:

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Appendix E shows the organizational separation of function required by this RMP. The following is a summary of the responsibilities of the different functions:

Origination, Structuring, and Execution: The functions of origination, structuring, and execution include the following responsibilities:

[Redacted]

Confirmation, Monitoring, Reporting and Disclosure: The functions of trade confirmation, risk monitoring, risk reporting, and disclosure include the following responsibilities:

[Redacted]

Settlement: The function of settlement includes the following responsibilities:

[Redacted]

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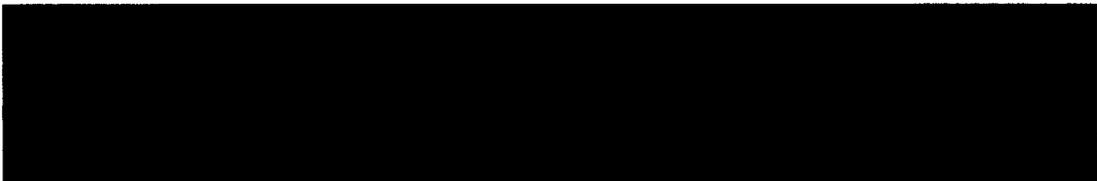
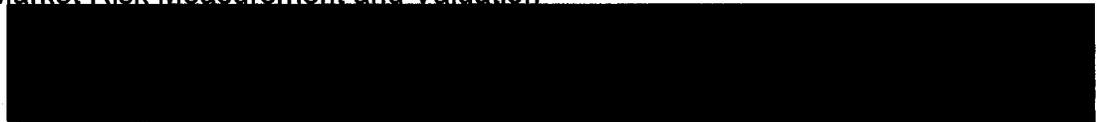
Cash Management: SCS Treasury is responsible for receiving and disbursing all funds from or to counterparties and for the delivery of margin / collateral requirements. SCS Treasury will also be responsible for investment of collateral provided by counterparties.

Accounting: SCS Accounting is responsible for posting transactions to the general ledger and reconciling the sub-ledgers to the general ledger.

VII. Market Risk Identification



VIII. Market Risk Measurement and Valuation



1 IX. Market Risk Limits

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3 Exposure Limits                      The maximum exposure limit for each business  
4    objective should not exceed the limits specified in  
5    Appendix H.

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7 Notifications                         Certain notifications to management are required  
8    as defined in Appendix G.

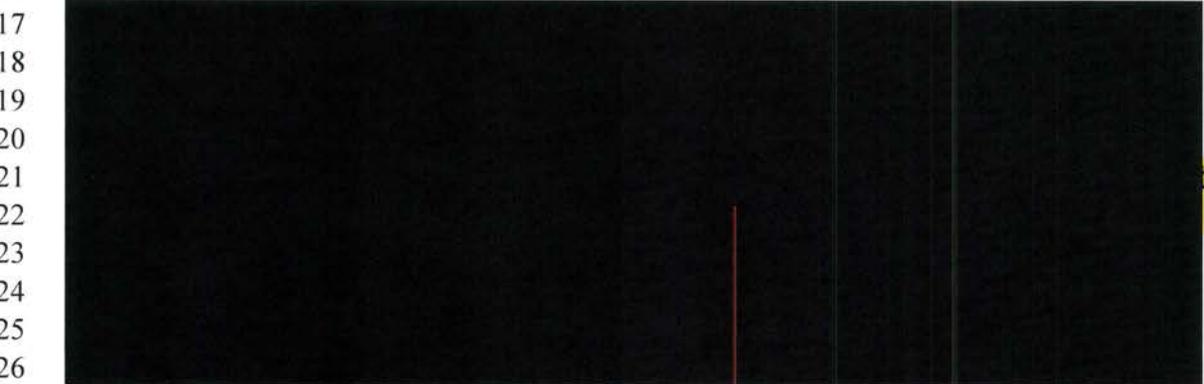
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10 Volumetric Position Limits         Volumetric Position limits as defined by the  
11    Commodity Futures Trading Commission (CFTC),  
12    will be monitored and reported as necessary,  
13    according to CFTC rules.

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15 X. Credit Risk

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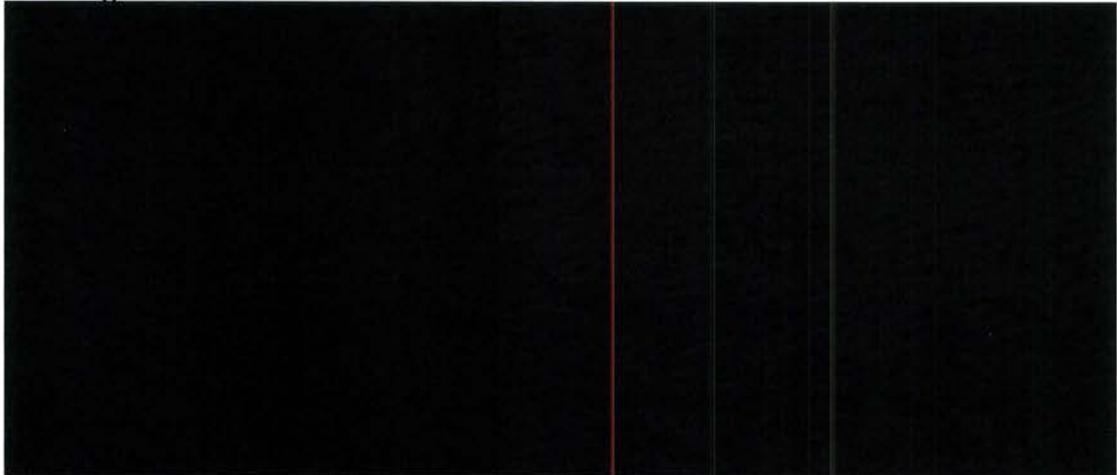
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XI. New Products

Structured transactions and new products may be developed from time to time that contain new risks or require new infrastructure support. The responsibilities associated with the approval of each structured transaction and new product include the following:



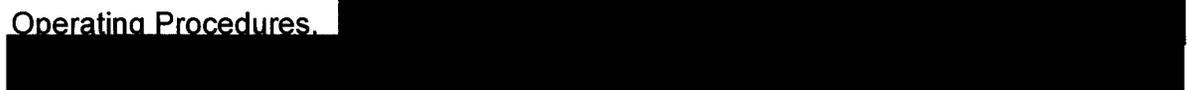
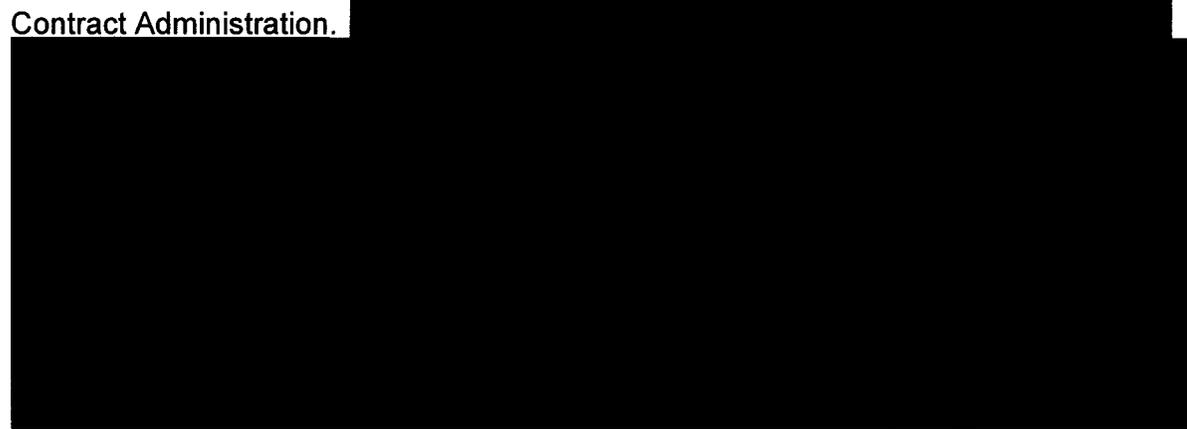
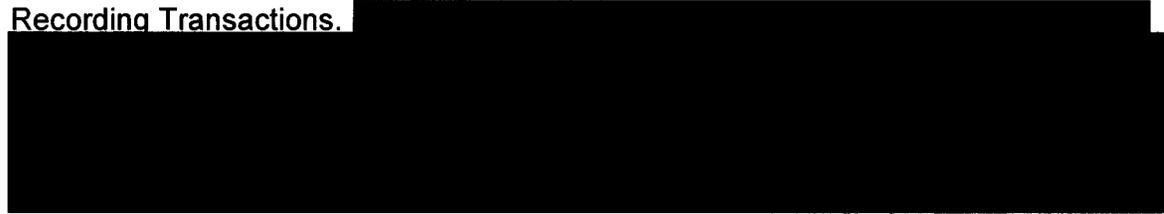
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**XII. Funding Liquidity**



**XIII. Operating Procedures and Systems**



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[Redacted]

XIV. Accounting, Tax, and Regulatory Reporting

[Redacted]

[Redacted]

XV. Legal

[Redacted]

XVI. Monitoring and Reporting

SCS Risk Control personnel will calculate and report the following items on a daily basis:

[Redacted]

The Portfolio Management group will prepare regular position reports. The Energy Analysis group will report preliminary gross margins or P&L on a daily basis.

1 XVII. Personal Trading  
2 All employees whose activities are governed by this RMP as defined in Section XIX  
3 are prohibited from trading any approved commodity for their own account or for the  
4 benefit of any party except as specifically authorized as part of the individual's duties  
5 with the Company.

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7 XVIII. Business Recovery

8 [Redacted]  
9 [Redacted]  
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13 XIX. Compliance

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30 XX. Independent Review

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40 XXII. Policy Amendments

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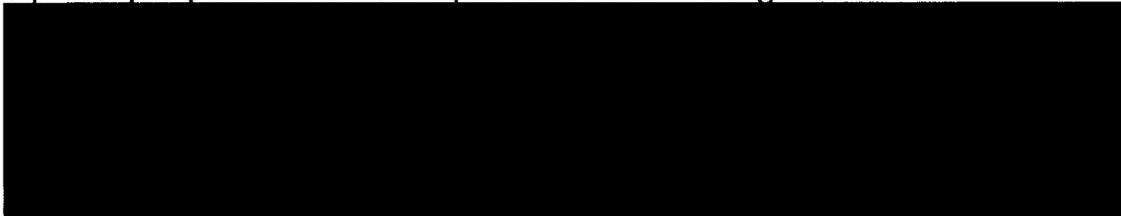


1  
2 APPENDIX A  
3 APPROVED BUSINESS OBJECTIVES  
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5 Fleet Operations and Trading

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7 The primary objectives of Fleet Operations and Trading are to:

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15 In addition to the primary objectives, Fleet Operations and Trading may execute  
16 secondary activities as limited by Appendix H to achieve the following secondary  
17 objectives to the extent permitted by all applicable policies and regulations:

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23 Any Primary or Secondary Strategies that would require clearing and / or posting of  
24 margin must be approved by the Risk Advisory and Controls Committee prior to  
25 execution.

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28 Southern Power Company Trading & Asset Management

29 The primary objectives of the SPC Trading and Asset Management activities are the  
30 following:

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36 In addition to the primary objectives, SPC Trading & Asset Management may  
37 execute secondary activities as limited by Appendix H to achieve the following  
38 secondary objectives to the extent permitted by all applicable policies and  
39 regulations (including, but not limited to the IIC and Separation Protocol):

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1 All SPC Secondary Strategies must be approved by the SPC Chief Financial Officer  
2 and the SPC Chief Commercial Officer.  
3 Any SPC Primary or Secondary Strategies that would require clearing and / or  
4 posting of margin must be approved by the SPC Chief Financial Officer and the SPC  
5 Chief Commercial Officer.

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8 Natural Gas Fulfillment Function

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10 The primary objectives of the Natural Gas Fulfillment Function are to:

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20 Secondary activities of the natural gas fulfillment function are restricted to positions  
21 intended to hedge secondary power positions, and which have been requested by  
22 Fleet Operations and Trading or SPC Trading & Asset Management.

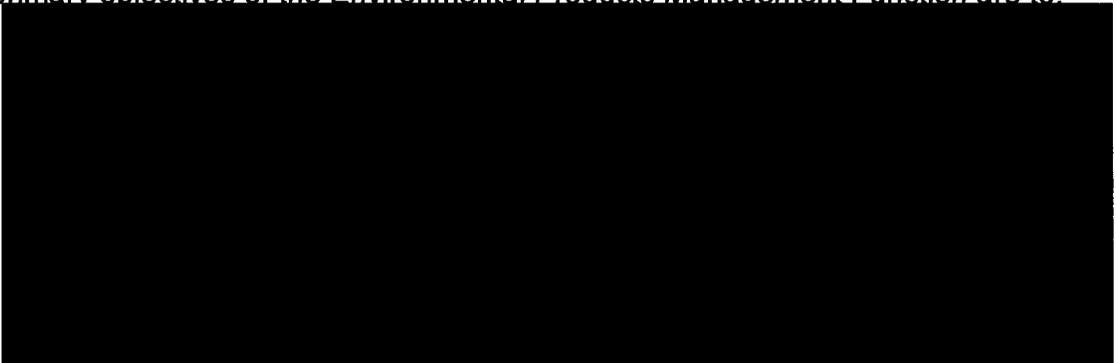
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25 Environmental Products Management Function

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27 The primary objectives of the Environmental Products Management Function are to:

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39 Secondary activities of the Environmental Products Management Function are  
40 restricted to positions intended to hedge secondary power positions, and which have  
41 been requested by Fleet Operations and Trading or SPC Trading & Asset  
42 Management.

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1 Coal Fulfillment Function

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3 The primary objectives of the Coal Fulfillment Function are to:

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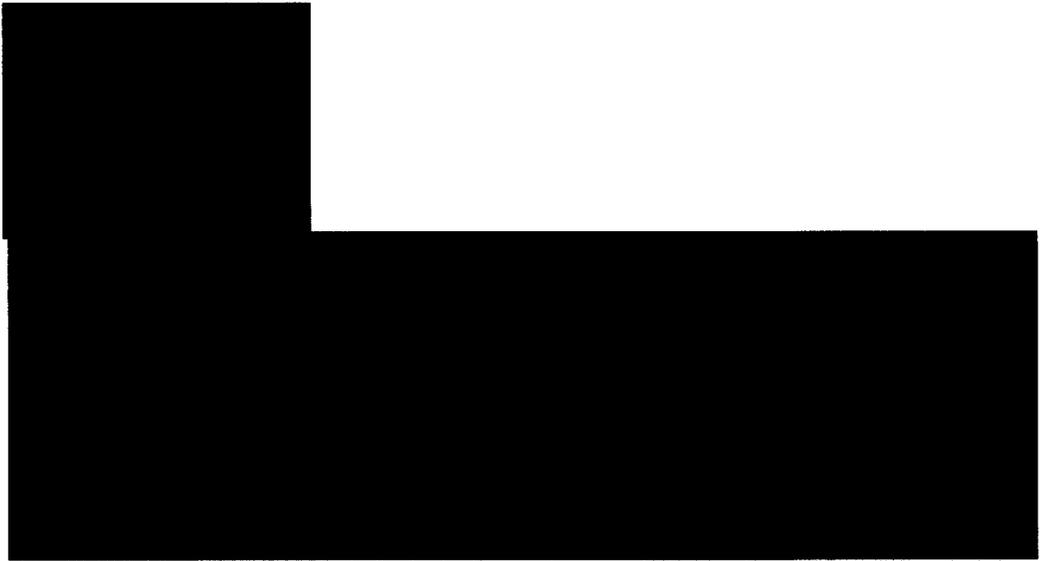
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13 Secondary activities of the Coal Fulfillment Function are restricted to positions  
14 intended to hedge secondary power positions, and which have been requested by  
15 Fleet Operations and Trading or SPC Trading & Asset Management.

APPENDIX B  
APPROVED COMMODITIES

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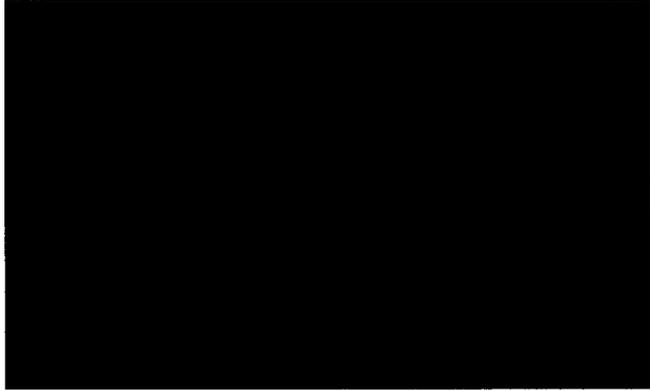
The approved commodities for this RMP are:



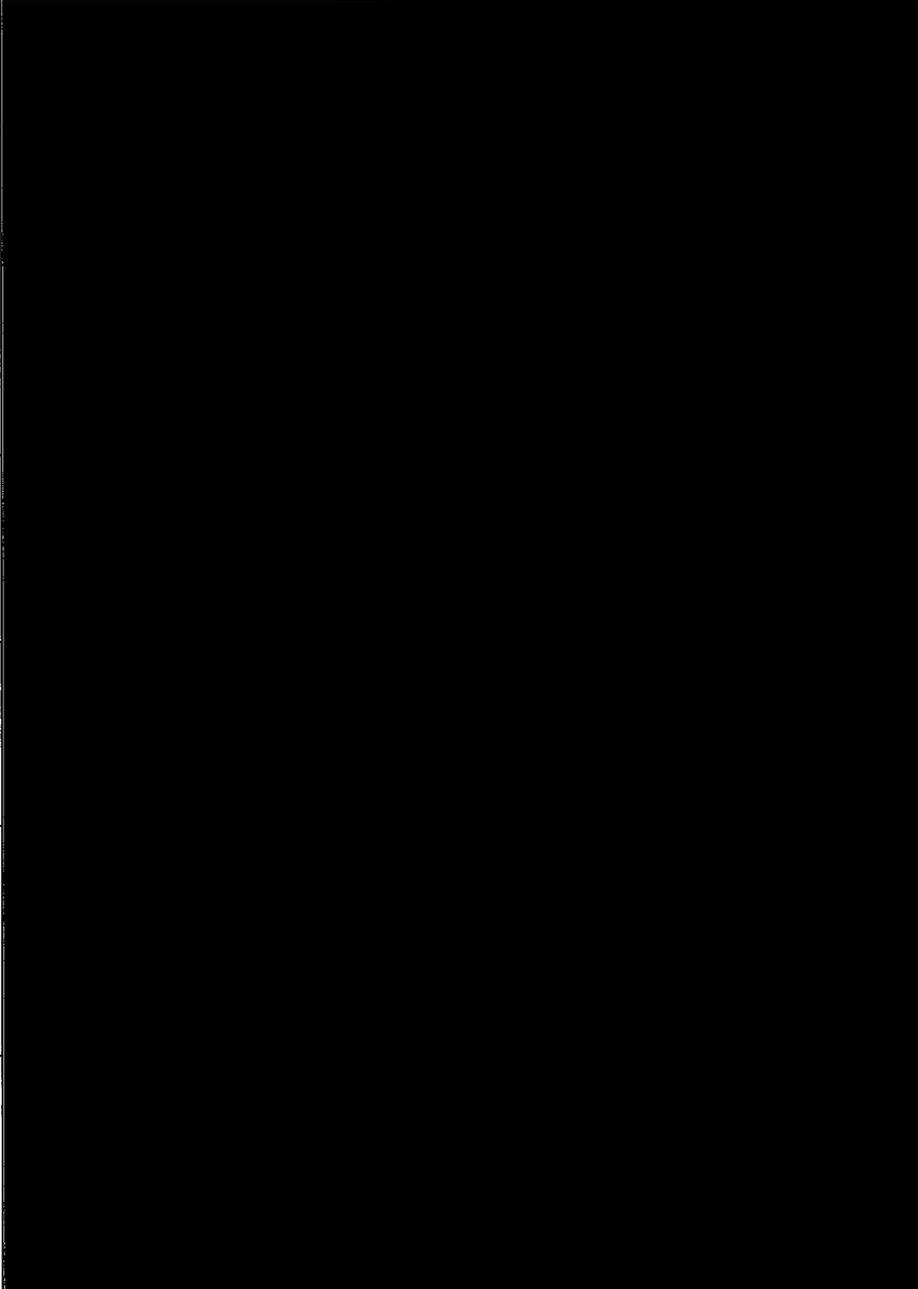
APPENDIX C  
APPROVED INSTRUMENTS

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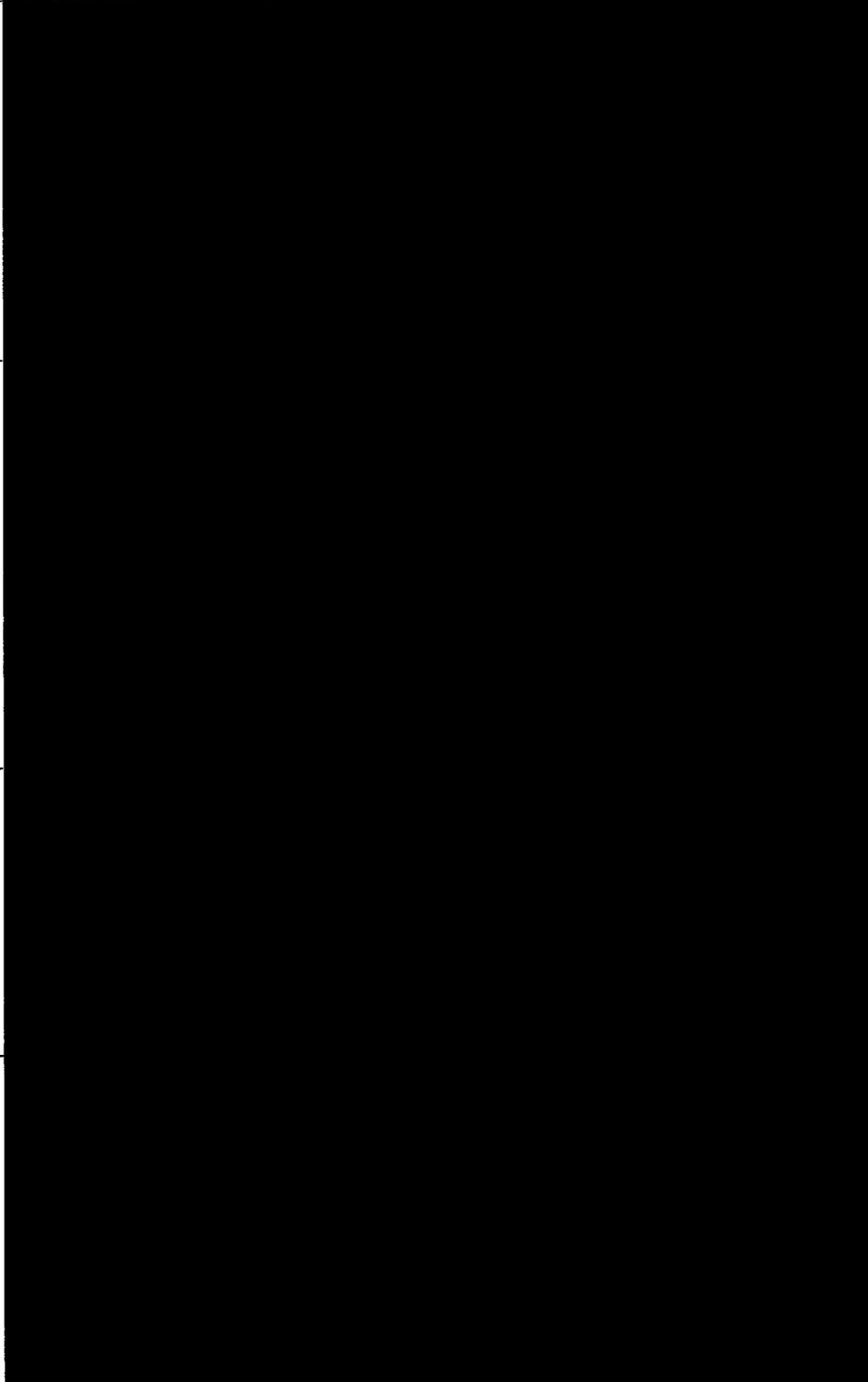
The approved instruments are:



APPENDIX D  
AUTHORIZATIONS

Name	Authority
Southern Company Risk Oversight Committee (SROC)	
Generation Risk Oversight Committee (GROC)	
Southern Power Risk Oversight Committee (SPROC)	
Risk Advisory and Controls Committee (RACC)	
Southern Company Generation Energy Credit Committee (ECC)	
Manager, Risk Control	

APPENDIX D  
AUTHORIZATIONS (continued)  
Energy Marketing

Name	Authority
Vice President, Commercial Operations & Services	
Vice President, Chief Commercial Officer, SPC	
Sr. Vice President, Chief Financial Officer, SPC	
Vice President, Fleet Operations and Trading	

Energy Trading  
Manager

Manager, SPC  
Trading and Asset  
Management

Term Traders

Energy Coordinators

Transmission Project  
Coordinators and  
Energy Schedulers

APPENDIX D  
AUTHORIZATIONS (continued)  
SCS Fuel Services

Name	Authority
Vice President, Fuel Services	
Gas Services Director	
Gas Operations Manager	
Gas Trading Manager	
Natural Gas Trader - Physical	
Natural Gas Trader - Financial	
Natural Gas Schedulers	
Coal Services Director	

APPENDIX F  
MARKET RISK MEASUREMENT

Approved Commodities	
Electrical Power	
Natural Gas	
Coal	
Environmental Products	
Oil Products	
RECs	

Parametric VaR Methodology

Formula Components

Component	Symbol	Comments
Value at Risk	VaR	See Equation Below
Position	PSN	Given in Applicable Measurement Units
Daily Standard Deviation of Price Change	$\Delta P$	Given in \$/Applicable Measurement Units
Holding Period – Business Days	HP	Taken From Parameters Table Shown Below
Confidence Interval Multiplier	CI	For Example: CI = 1.65 for 95-% Confidence Interval

Equation

$$\text{VaR} = \text{PSN} * \Delta P * \text{Square Root of HP} * \text{CI}$$

Parameters/Commodity	Holding Period (HP)	Multiplier (CI)
Electric Power Term <= 1 Year Term > 1 Year		
Natural Gas Term <= 1 Year Term > 1 Year		

APPENDIX F  
STRESS TESTING METHODOLOGY

The purpose of stress testing is to generate percentage price changes for the forward curve that answer this question:

If an extreme event occurs, what can we expect to happen to prices and the portfolio value?

The stress test is designed to capture the expected value of an extreme event as defined by an extreme value distribution. To differentiate, there is a downward and an upward stress test.

Specifically, the expected downward stress is calculated as:

$E[\Delta p/p \mid \Delta p/p < \Theta] = \text{the Integral of } f(x)dx \text{ from negative infinity to } \Theta$   
and the expected upward stress is calculated as:

$E[\Delta p/p \mid \Delta p/p > \Theta] = \text{the Integral of } f(x)dx \text{ from } \Theta \text{ to infinity}$

where  $\Theta$  is the threshold that defines classification as an extreme event,  $f(x)$  is an extreme value distribution fitted to a specific contract, and  $x$  is a percentage price change.

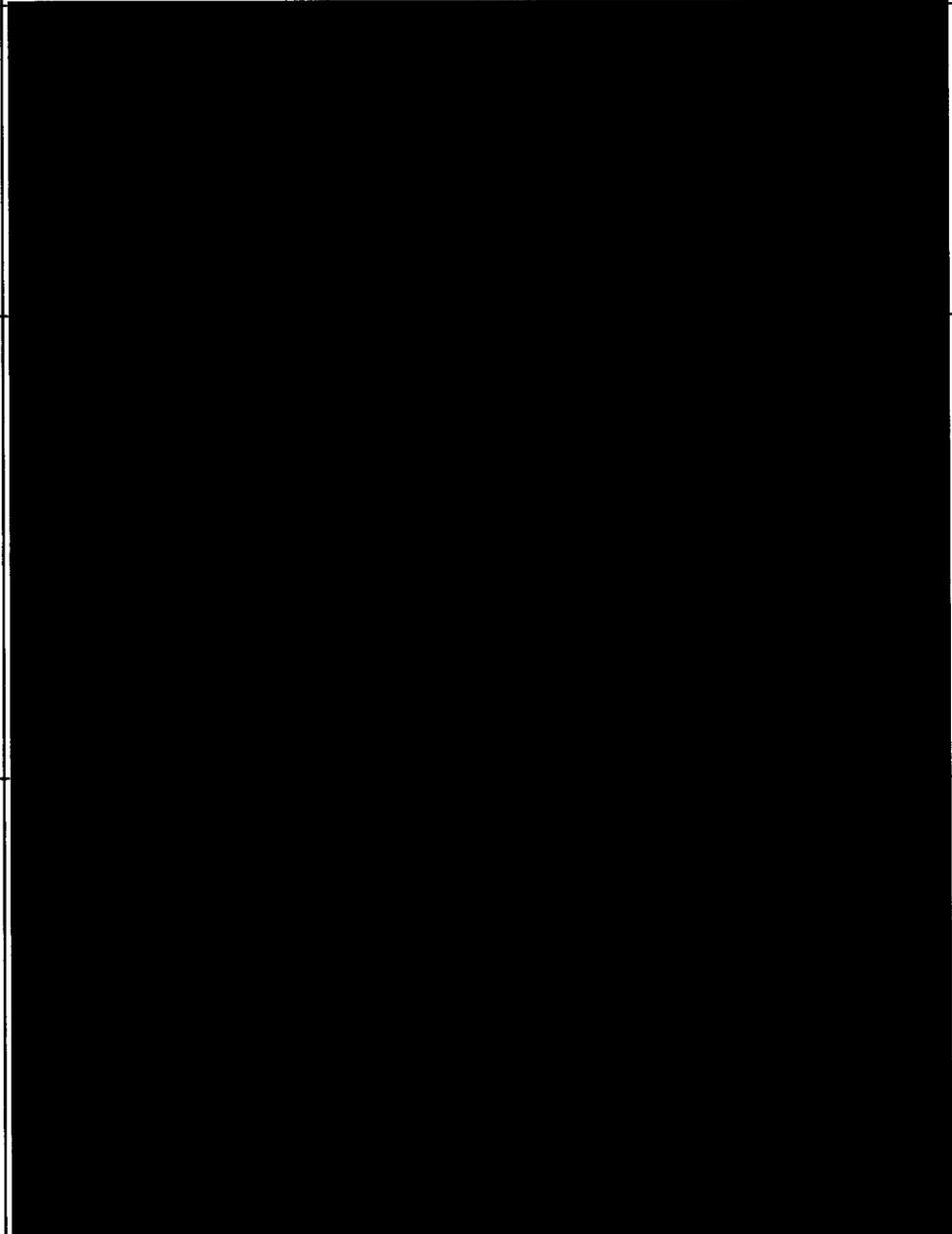
Price Return Distribution	
Holding Period	
Extreme Event Threshold	

**Ad Hoc Stress Testing**

Ad hoc stress testing will be performed as appropriate based on price scenarios determined using alternative methods including, but not limited to, the following:

- specific historical scenarios;
- rating agency defined price changes;
- analysis of out-of-the money option trading; and
- subjectively determined price changes.

APPENDIX G  
NOTIFICATION LEVELS

Position Classification	Income Change	Notify
Secondary Objectives		
Secondary Objectives		
Secondary Objectives		

APPENDIX G  
NOTIFICATION LEVELS

Position Classification	Income Change	Notify
All positions with mark-to-market changes immediately reflected in income (both primary and secondary activities)		
All positions with mark-to-market changes immediately reflected in income (both primary and secondary activities)		

APPENDIX G  
NOTIFICATION LEVELS

Position Classification	Value-at-Risk	Notify
All positions, except hedges associated with a commission approved program which provides for its own limits and/or cost recovery		

**NOTE: Recipients of notification events will only receive detailed information pertinent to their business needs, and any correspondence will be in compliance with the Separation Protocol.**

APPENDIX G  
NOTIFICATION LEVELS

Position Classification	Income Change	Notify
SPC Secondary Objectives		
SPC Secondary Objectives		
SPC Secondary Objectives		

Position Classification	Income Change	Notify
All SPC positions with mark-to-market changes immediately reflected in income		
All SPC positions with mark-to-market changes immediately reflected in income		

Position Classification	Value-at-Risk	Notify
All SPC positions		

APPENDIX H  
MARKET RISK LIMITS

Net Open Position Limits

		Value –at- Risk Limit
Secondary Activities		
All positions with marked-to-market changes immediately reflected in income		

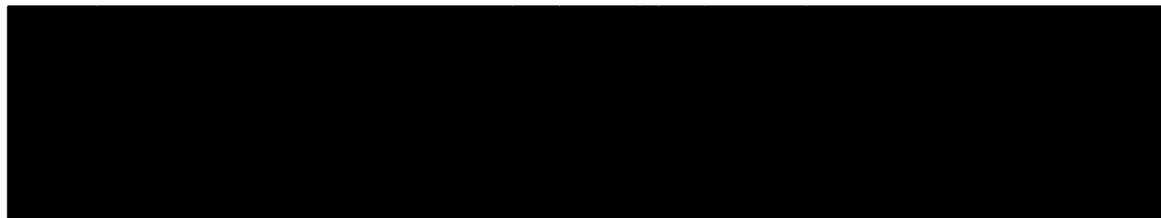
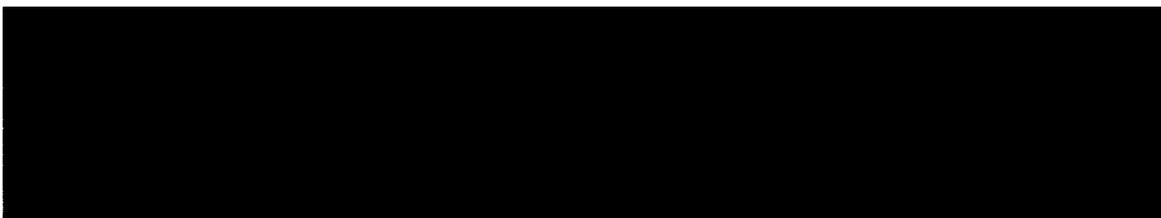
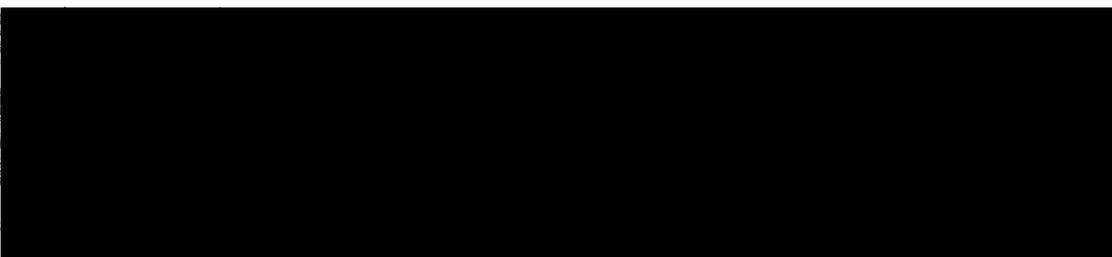
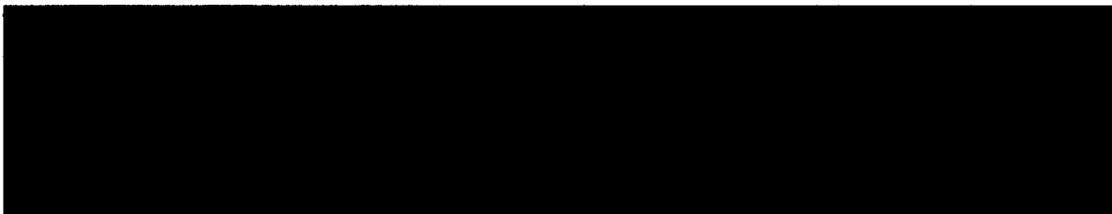
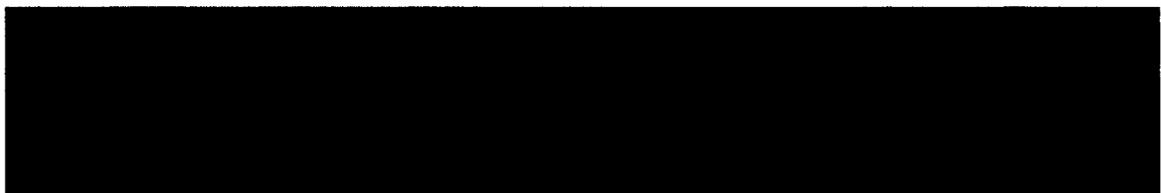
NOTE: Although the value-at-risk limit applies to positions marked to market through income, VaR is calculated and monitored for all positions, and there are notification requirements as defined in Appendix G.

**If such open position limits are exceeded, SCS Risk Control will calculate and equitably allocate the responsibilities to bring the positions back into compliance.**

APPENDIX J  
ACCOUNTING AND TAX

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FASB Accounting Standards Codification (“ASC”) 815 Derivatives and Hedging, ASC 820 Fair Value Measurements and related GAAP standards are the primary pronouncements addressing hedge accounting and provides guidance for exchange-traded contracts.



**Exhibit "C": Line-by-Line/Field-by-Field Justification**

<u>Line(s)/Field(s)<sup>1</sup></u>	<u>Justification</u>
Page 3 of 58 Line 7 Lines 12-16	The information delineated in Exhibit "C" 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 4 of 58 (Table)	
Page 5 of 58 Line 2	
Page 11 of 58 Lines 4 through 12	
Page 12 of 58 Line 11 Lines 13 through 14	
Page 13 of 58 Line 1 (Table) Lines 4 through 8 Lines 19-22	
Page 14 of 58 Lines 4, 5 and 7	
Page 23 of 58 Lines 12 through 16 Lines 18 through 21 Lines 42 through 45	
Page 24 of 58 Line 1 Lines 3 through 5 Lines 13 through 21 Lines 26 through 42 Lines 45 through 47	

<sup>1</sup> Page number references correspond with the page numbers printed in the bottom center of each page.

Page 25 of 58 Lines 1 through 3 Lines 16 through 20 Lines 24 through 26 Lines 28 through 29 Lines 31 through 33 Lines 35 through 39	The information delineated in Exhibit "C" 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 26 of 58 Lines 17 through 26 Lines 35 through 47	
Page 27 of 58 Lines 1 through 7 Lines 12 through 17 Lines 22 through 25 Lines 27 through 32 Lines 34 through 45 Lines 47 through 48	
Page 28 of 58 Lines 1 through 2 Lines 7 through 16 Lines 18 through 21 Lines 25 through 32 Lines 39 through 42	
Page 29 of 58 Lines 8 through 10 Lines 14 through 21 Lines 23 through 27 Lines 32 through 37 Lines 42 through 48	
Page 30 of 58 Lines 1 through 8	
Page 31 of 58 Lines 8 through 13 Lines 18 through 21 Lines 31 through 34 Lines 40 through 48	

Page 32 of 58 Lines 11 through 18 Lines 28 through 37	The information delineated in Exhibit "C" 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 33 of 58 Lines 4 through 11	
Page 34 of 58 Lines 6 through 15	
Page 35 of 58 Lines 6 through 11	
Page 36 of 58 (Table)	
Page 37 of 58 (Table)	
Page 38 of 58 (Table)	
Page 39 of 58 (Table)	
Page 41 of 58 (Tables)	
Page 42 of 58 (Table)	
Page 43 of 58 (Table)	
Page 44 of 58 (Table)	

Page 45 of 58 (Table)	The information delineated in Exhibit "C" 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 46 of 58 (Tables)	
Page 47 of 58 (Table)	
Page 53 of 58 Lines 9 through 13 Lines 15 through 20 Lines 22 through 28 Lines 30 through 35 Lines 37 through 42	

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

IN RE: **Fuel and Purchased Power Cost** )  
**Recovery Clause with Generating** )  
**Performance Incentive Factor** )

Docket No.: **150001-EI**

**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that a true copy of the foregoing was furnished by overnight mail this 3rd day of August, 2015 to the following:

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