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August 3, 2015

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

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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 information submitted by Gulf Power pertaining to Schedule CCE-4 of Exhibit CSB-2 to the Direct Testimony of C. Shane Boyett 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
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.: 150001-EI
Date: 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 a request that the Florida Public Service Commission enter an order protecting from public disclosure certain information contained in Schedule CCE-4 of Exhibit CSB-2 to the Direct Testimony of C. Shane Boyett dated August 4, 2015 (Schedule CCE-4) on behalf of Gulf Power. As grounds for this request, the Company states:

1. A portion of the information contained in Schedule CCE-4 is proprietary confidential business information regarding contractual matters which would cause irreparable harm to Gulf Power, the entities with whom it has entered into contracts and most importantly to Gulf's customers, if such information was disclosed to the general public. Schedule CCE-4 contains pricing information for capacity purchases between Gulf Power and various counterparties. The pricing information is 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. In addition, potential counterparties may refuse to enter into contracts with Gulf, or may charge higher prices, if the price terms are made public. The information is entitled to confidential classification pursuant to section 366.093(3)(d) and (e), Florida Statutes.

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 CCE-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 CCE-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 3rd day of August, 2015.



JEFFREY A. STONE

Florida Bar No. 325953

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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.: 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"

**Gulf Power Company
2015 Capacity Contracts**

	Term		Contract Type
	Start	End ⁽¹⁾	
1 Contract/Counterparty			
2 Southern Intercompany Interchange	5/1/2007	5 Yr Notice	SES Opoo
3 <u>PPAs</u>			
4 Shell Energy N.A. (U.S.), LP ⁽²⁾	11/2/2009	5/31/2023	Firm
5 <u>Other</u>			
6 Alabama Electric Cooperative	1/4/2015	3/31/2015	Other
7 Cargill Power, LLC	1/7/2015	6/26/2015	Other
8 South Carolina PSA	9/1/2003	-	Other
9 South Carolina Electric & Gas	1/2/2015	6/26/2015	Other

	Actual January	Actual February	Actual March	Actual April	Actual May	Actual June	Projected July	Projected August	Projected September	Projected October	Projected November	Projected December	Total
10 Capacity Costs (\$)													
11 Southern Intercompany Interchange	0	0	0	0	0	0	0	0	0	0	0	0	0
12 <u>PPAs</u>													
13 Shell Energy N.A. (U.S.), LP													
14 <u>Other</u>													
15 Alabama Electric Cooperative				0	0	0							
16 Cargill Power, LLC					0		0	0	0	0	0	0	
17 South Carolina PSA													
18 South Carolina Electric & Gas													
19 Total	7,387,528	7,392,119	7,387,234	7,395,118	7,397,373	7,423,168	7,382,585	7,382,585	7,382,585	7,382,585	7,382,585	7,382,585	88,678,050

	Actual January	Actual February	Actual March	Actual April	Actual May	Actual June	Projected July	Projected August	Projected September	Projected October	Projected November	Projected December
22 Capacity MW												
23 Southern Intercompany Interchange	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
24 <u>PPAs</u>												
25 Shell Energy N.A. (U.S.), LP												
26 <u>Other</u>												
27 Alabama Electric Cooperative				0.0	0.0	0.0						
28 Cargill Power, LLC					0.0		0.0	0.0	0.0	0.0	0.0	0.0
29 South Carolina PSA												
30 South Carolina Electric & Gas												

32 (1) Unless otherwise noted, contract remains effective unless terminated upon 30 days prior written notice.
33 (2) Contract megawatts became firm on June 1, 2014.

EXHIBIT "C"

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

Line(s)/Field(s)

Line 14, Columns A – M
Line 17, Columns A – C and G – M
Line 18, Columns A –D, F and M
Lines 19 through 20, Columns A – M

Line 25, Columns A – L
Line 28, Columns A – C and G – L
Line 29, Columns A –D, and F
Lines 30 through 31, Columns A – L

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.

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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