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August 31, 2015

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



UN SEL -1 WM 8: 11

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-3 to the Direct Testimony of C. Shane Boyett dated September 1, 2015.

Sincerely,

Robert L. McGee, Jr.
Regulatory and Pricing Manager

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Enclosures

cc: Beggs & Lane Jeffrey A. Stone, Esq. AFD Recheted +CD

ECO ____

ENG ____

GCL ____

TEL ____

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

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

Date:

Docket No.:

150001-EI

September 1, 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-3 to the Direct Testimony of C. Shane Boyett dated September 1, 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.

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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 31st day of August, 2015.

JEFFREY A. STONE

Florida Bar No. 325953

RUSSELL A. BADDERS

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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

Date:

September 1, 2015

REQUEST FOR CONFIDENTIAL CLASSIFICATION

EXHIBIT "A"

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

EXHIBIT "B"



A B C D E F G H I J K L M

Schedule CCE-4

Page 1 of 1

Gulf Power Company 2016 Capacity Contracts

			Term		Contract									
1 Contract/Counterparty		Start	End [3]		Type									
Southern Intercompany Interchange PPAs		5/1/2007	5 Yr Notice		SES Opco									
Shell Energy N.A. (U.S.), LP (C)		11/2/2009	5/31/2023		Firm									
South Carolina PSA		9/1/2003	*		Other									
7 Capacity Costs (\$) 8 Southern Intercompany Interchange 9 PPMs 10 Shell Energy N.A. (U.S.), LP 11 Other		January	February 0	March 0	April 4,074	May	June 19,757	July 0	August 0	September 19,644	October 5,224	November (1,871)	December (252)	Total 46,576
		是是可收	SH 64	10.675	N TOTAL	THE PARTY	E T	是加		myled %		Constant.	45	
2 South Carolina PSA 3	Total	7,346,33	7,346,338	7,346,338	7,350,412	7,346,338	7,366,095	7,346,338	7,346,338	7,365,982	7,351,562	7,344,467	7,346,086	88,202,63
4 Capacity MW		January	February	March	April	May	June	July	August	September	October	November	December	
Southern Intercompany Interchange PPAs Shell Energy N.A. (U.S.), LP		0.0		0.0	24.9	0.0	11.0	0.0	0.0	8.6	32.0	(11.4)	(1.5)	
South Carolina PSA			1 5 5 F	718005	S 0548 W	100000	0.75		Since	The same of	-	Pr 30 I		

^{20 (1)} Unless otherwise noted, contract remains effective unless terminated upon 30 days prior written notice.

^{21 (2)} Contract megawatts became firm on June 1, 2014.

EXHIBIT "C"

<u>Line-by-Line/Field-by-Field Justification</u> <u>Line(s)/Field(s)</u>

Lines 10 and 12; Columns A-M Lines 17 and 19, 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-El

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true copy of the foregoing was furnished by overnight mail this 31st day of August, 2015 to the following:

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