

Robert L. McGee, Jr.  
Regulatory & Pricing Manager

One Energy Place  
Pensacola, Florida 32520-0780

Tel 850.444.6530  
Fax 850.444.6026  
RLMCGEE@southernco.com



March 1, 2016

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

RECEIVED-FPSC  
2016 MAR -2 AM 10:07  
COMMISSION  
CLERK

**REDACTED**

RE: Docket No. 160001-EI

Dear Ms. Stauffer:

Enclosed is Gulf Power Company's Request for Confidential Classification  
pertaining to Schedule 2 of Exhibit HRB-1 to the Direct Testimony of Herbert R.  
Ball dated March 2, 2016.

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.: 160001-EI  
Date: March 2, 2016

REQUEST FOR CONFIDENTIAL CLASSIFICATION

GULF POWER COMPANY ["Gulf Power", "Gulf", or the "Company"], by and through its undersigned attorney 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 information contained in Schedule 2 of Exhibit HRB-1 to the Direct Testimony of Herbert R. Ball dated March 2, 2016. As grounds for this request, the Company states:

1. A portion of the information contained in Schedule 2 of Exhibit HRB-1 to the Direct Testimony of Herbert R. Ball dated March 2, 2016 constitutes proprietary and commercially sensitive information regarding competitive interests and contractual matters of Gulf Power, which, if disclosed to the general public, would cause irreparable harm to Gulf Power. This information is entitled to confidential classification pursuant to section 366.093(3)(d) and (e), Florida Statutes. Schedule 2 contains price terms for Gulf Power's coal purchases in 2015. Gulf and other members of the market in which it competes consider such pricing information to be competitively sensitive. Disclosure of this information would adversely affect Gulf's ability to conduct its coal procurement activities to the benefit of its customers. Disclosure of such cost information would also impair Gulf's ability to enter into future contracts for the benefit of its customers.

2. The information filed pursuant to this Request is intended to be, and is treated as confidential by Gulf Power and, to the best of this attorney's knowledge, has not been otherwise publicly disclosed.

3. Submitted as Exhibit "A" is one (1) copy of Schedule 2, 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 2 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 1<sup>st</sup> day of March, 2016.



---

**JEFFREY A. STONE**

Florida Bar No. 325953

**RUSSELL A. BADDERS**

Florida Bar No. 007455

**STEVEN R. GRIFFIN**

Florida Bar No. 0627569

**Beggs & Lane**

P. O. Box 12950

Pensacola, FL 32591

(850) 432-2451

**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.: 160001-EI  
Date: March 2, 2016

\_\_\_\_\_)

**REQUEST FOR CONFIDENTIAL CLASSIFICATION**

**EXHIBIT "A"**

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

**EXHIBIT "B"**

**HRBall Testimony Exhibit - Schedule 2**

	A	B	C	D	E
<b>1</b>	<b>Gulf Contract Coal Supplies</b>				
<b>2</b>			<b>Received</b>	<b>Actual</b>	<b>Weighted Avg</b>
<b>3</b>	<b>Supplier</b>	<b>Plant</b>	<b>Quantity (tons)</b>	<b>Heating Value</b>	<b>Price \$/MMBTU</b>
<b>4</b>	American Coal Company	Crist	124,583	11858	
<b>5</b>	Foresight Coal Sales	Crist	723,620	11771	
<b>6</b>	Alpha Coal Sales	Crist	467,757	12369	
<b>7</b>	<b>Weighted Average</b>	<b>Crist</b>	<b>1,315,960</b>	<b>11992</b>	<b>\$3.764</b>
<b>8</b>					
<b>9</b>	Alpha Coal Sales	Smith	134,676	12348	
<b>10</b>	<b>Weighted Average</b>	<b>Smith</b>	<b>134,676</b>	<b>12348</b>	<b>\$4.894</b>
<b>11</b>					
<b>12</b>	Coal Sales Twentymile Coal Co.	Daniel (Gulf 50%)	7,400	11128	
<b>13</b>	Oxbow Carbon	Daniel (Gulf 50%)	60	12020	
<b>14</b>	<b>Weighted Average</b>	<b>Daniel (Gulf 50%)</b>	<b>7,460</b>	<b>11135</b>	<b>\$5.899</b>
<b>15</b>					
<b>16</b>	<b>Gulf Spot Coal Supplies</b>				
<b>17</b>			<b>Received</b>	<b>Actual</b>	<b>Weighted Avg</b>
<b>18</b>	<b>Supplier</b>	<b>Plant</b>	<b>Quantity (tons)</b>	<b>Heating Value</b>	<b>Price \$/MMBTU</b>
<b>19</b>	Arch Coal Sales	Crist	52,426	8863	
<b>20</b>	Argus Coal Sales	Crist	18,245	11897	
<b>21</b>	Glencore LTD	Crist	167,049	12145	
<b>22</b>	<b>Weighted Average</b>	<b>Crist</b>	<b>237,720</b>	<b>11402</b>	<b>\$3.782</b>
<b>23</b>					
<b>24</b>	Arch Coal Sales	Smith	101068	8906	
<b>25</b>	Argus Coal Sales	Smith	39100	11932	
<b>26</b>	Glencore LTD	Smith	70743	11802	
<b>27</b>	<b>Weighted Average</b>	<b>Smith</b>	<b>210911</b>	<b>10438</b>	<b>\$3.516</b>
<b>28</b>					
<b>29</b>	Coal Sales	Daniel (Gulf 50%)	122997	8787	
<b>30</b>	Arch Coal Sales	Daniel (Gulf 50%)	249848	11415	
<b>31</b>	Arch Coal Sales	Daniel (Gulf 50%)	299158	8866	
<b>32</b>	Arch Coal Sales	Daniel (Gulf 50%)	96519	11551	
<b>33</b>	Peabody Coal Sales	Daniel (Gulf 50%)	36643	11266	
<b>34</b>	Arch Coal Sales	Daniel (Gulf 50%)	40442	8863	
<b>35</b>	Arch Coal Sales	Daniel (Gulf 50%)	20048	8788	
<b>36</b>	<b>Weighted Average</b>	<b>Daniel (Gulf 50%)</b>	<b>865,656</b>	<b>9990</b>	<b>\$3.401</b>

EXHIBIT C

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

**Line(s)/Field(s)**

Schedule 2

Page 1 of 1

Lines 4-6, 9, 12-13, 19-21, 24-26, and 29-35

Column E

**Justification**

This information is entitled to confidential classification pursuant to section

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.: **160001-EI**

**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that a true copy of the foregoing was furnished by overnight mail this 1st day of March, 2016 to the following:

Florida Public Utilities Company  
Florida Division of Chesapeake  
Utilities Corp  
Mike Cassel, Director  
Regulatory and Governmental Affairs  
1750 SW 14<sup>th</sup> Street, Suite 200  
Fernandina Beach, FL 32034  
[mcassel@fpuc.com](mailto:mcassel@fpuc.com)

PCS Phosphate – White Springs  
c/o Stone Mattheis Xenopoulos  
& Brew, P.C.  
James W. Brew/Laura A. Wynn  
Eighth Floor, West Tower  
1025 Thomas Jefferson St, NW  
Washington, DC 20007  
[jbrew@smxblaw.com](mailto:jbrew@smxblaw.com)  
[law@smxblaw.com](mailto:law@smxblaw.com)

Duke Energy Florida  
John T. Burnett  
Dianne M. Triplett  
299 First Avenue North  
St. Petersburg, FL 33701  
[Dianne.triplett@duke-energy.com](mailto:Dianne.triplett@duke-energy.com)  
[John.burnett@duke-energy.com](mailto:John.burnett@duke-energy.com)

Florida Power & Light Company  
John T. Butler  
Maria J. Moncada  
700 Universe Boulevard (LAW/JB)  
Juno Beach, FL 33408-0420  
[John.Butler@fpl.com](mailto:John.Butler@fpl.com)  
[Maria.moncada@fpl.com](mailto:Maria.moncada@fpl.com)

Florida Power & Light Company  
Kenneth Hoffman  
215 South Monroe Street,  
Suite 810  
Tallahassee, FL 32301-1858  
[Ken.Hoffman@fpl.com](mailto:Ken.Hoffman@fpl.com)

Ausley Law Firm  
James D. Beasley  
J. Jeffrey Wahlen  
Ashley M. Daniels  
Post Office Box 391  
Tallahassee, FL 32302  
[jbeasley@ausley.com](mailto:jbeasley@ausley.com)  
[adaniels@ausley.com](mailto:adaniels@ausley.com)  
[jwahlen@ausley.com](mailto:jwahlen@ausley.com)

Gunster Law Firm  
Beth Keating  
215 South Monroe Street, Suite 601  
Tallahassee, FL 32301-1839  
[bkeating@gunster.com](mailto:bkeating@gunster.com)

Office of Public Counsel  
Patricia A. Christensen  
Associate Public Counsel  
c/o The Florida Legislature  
111 W. Madison Street, Room 812  
Tallahassee, FL 32399-1400  
[Christensen.patty@leg.state.fl.us](mailto:Christensen.patty@leg.state.fl.us)

Duke Energy Florida, Inc.  
Matthew R. Bernier  
Cameron Cooper  
106 East College Avenue,  
Suite 800  
Tallahassee, FL 32301-7740  
[Matthew.bernier@duke-energy.com](mailto:Matthew.bernier@duke-energy.com)  
[Cameron.Cooper@duke-energy.com](mailto:Cameron.Cooper@duke-energy.com)

Florida Industrial Power Users Group  
c/o Moyle Law Firm  
Jon C. Moyle, Jr.  
118 North Gadsden Street  
Tallahassee, FL 32301  
[jmoyle@moylelaw.com](mailto:jmoyle@moylelaw.com)

Tampa Electric Company  
Ms. Paula K. Brown, Manager  
Regulatory Coordination  
P. O. Box 111  
Tampa, FL 33601-0111  
[Regdept@tecoenergy.com](mailto:Regdept@tecoenergy.com)

Office of the General Counsel  
Suzanne Brownless  
2540 Shumard Oak Blvd  
Tallahassee, FL 32399-0850  
[sbrownle@psc.state.fl.us](mailto:sbrownle@psc.state.fl.us)  
[tefarley@psc.state.fl.us](mailto:tefarley@psc.state.fl.us)  
[ASoete@psc.state.fl.us](mailto:ASoete@psc.state.fl.us)

Florida Retail Federation  
Robert Scheffel Wright  
John T. LaVia  
c/o Gardner Law Firm  
1300 Thomaswood Drive  
Tallahassee, FL 32308  
[schef@gbwlegal.com](mailto:schef@gbwlegal.com)  
[jlavia@gbwlegal.com](mailto:jlavia@gbwlegal.com)



---

**JEFFREY A. STONE**  
Florida Bar No. 325953  
[jas@beggslane.com](mailto:jas@beggslane.com)  
**RUSSELL A. BADDERS**  
Florida Bar No. 007455  
[rab@beggslane.com](mailto:rab@beggslane.com)  
**STEVEN R. GRIFFIN**  
Florida Bar No. 0627569  
[srg@beggslane.com](mailto:srg@beggslane.com)  
**BEGGS & LANE**  
P. O. Box 12950  
Pensacola FL 32591-2950  
(850) 432-2451  
**Attorneys for Gulf Power**