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

Re: Docket No. 160001-EI

REDACTED

Dear Ms. Stauffer:

Enclosed is Gulf Power Company's Request for Confidential Classification pertaining to Gulf Power's response to Staff's First Set of Interrogatories (Nos. 1-10) in the above-referenced docket.

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: April 22, 2016

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 submitted by Gulf Power in response to Commission Staff’s First Set of Interrogatories to Gulf Power Company (Nos. 1-10). As grounds for this request, the Company states:

1. A portion of the information submitted by Gulf Power in response to interrogatories numbered 1, 2, 4, and 5 of Commission Staff’s First Set of Interrogatories constitutes proprietary confidential business information concerning bids or other contractual data the disclosure of which would impair the efforts of Gulf Power to contract for goods and/or services on favorable terms. The information is entitled to confidential classification pursuant to section 366.093(3)(d) and (e), Florida Statutes. Specifically, the confidential information consists of pricing terms for coal and natural gas offered to and/or purchased by Gulf Power in connection with Requests for Proposal issued by Gulf Power in 2015. Disclosure of this information would negatively impact Gulf’s ability to negotiate pricing favorable to its customers in the future. In addition, potential counterparties may refuse to enter into future contracts with Gulf, or may charge higher prices, if these terms were made public.

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. Submitted as Exhibit "A" are copies of the subject documents, on which are 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 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 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 21st day of April, 2016.



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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: April 22, 2016

REQUEST FOR CONFIDENTIAL CLASSIFICATION

EXHIBIT "A"

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

EXHIBIT "B"

1. For each Request for Proposal (RFP) for coal issued in 2015 by or on behalf of Gulf, list the bids received. For each bid, include the supplier, tonnage bid, coal quality, and delivered price information, as well as the method and route of delivery.

ANSWER:

Solicitations (RFPs) were issued during 2015 on behalf of Southern Company, soliciting bids from all suppliers contained in Southern Company's Internet Bid System (CIBS), which includes approved suppliers listed on the Gulf Power Company Bid List.

Regarding the April 30, 2015 solicitation, purchases of PRB coal were to be made for Plant Daniel. The solicitation requested bids for the purchase of coal for (Option 1) May - September; and (Option 2) October - December of 2015. All bids were due on May 12, 2015.

Option 1: In response to the solicitation, eleven (11) applicable bids were received from seven (7) different coal suppliers. All bids received were PRB offers. Below is a listing of the bids that were received:

Table 1:

A	B	C	D	E	F
BID	SUPPLIER	TONS	BTU/LB	Transport	Delv'd (\$/MMBtu)
2	Cloud Peak (Antelope)			Rail	
1	Mabanaft OTC (BT)			Rail	
3	Arch (BT)			Rail	
4	Enserco OTC (CR)			Rail	
5	Buckskin			Rail	
6	Enserco OTC (CR)			Rail	
7	Enserco OTC (CR)			Rail	
8	Cloud Peak (CR)			Rail	
9	Peabody (NARM)			Rail	
10	Peabody (NARM North)			Rail	
11	Ambre			Rail	

Option 2: In response to the solicitation, eleven (10) applicable bids were received from seven (7) different coal suppliers. All bids received were PRB offers. Below is a listing of the bids that were received:

Table2

A	B	C	D	E	F
BID	SUPPLIER	TONS	BTU/LB	Transport	Delv'd (\$/MMBtu)
2	Cloud Peak (Antelope)	[REDACTED]	[REDACTED]	Rail	[REDACTED]
3	Arch (BT)			Rail	
1	Mabanaft BT			Rail	
5	Enserco OTC (CR)			Rail	
4	Buckskin			Rail	
6	Cloud Peak (CR)			Rail	
8	Peabody (NARM)			Rail	
7	Enserco OTC (CR)			Rail	
9	Peabody (NARM North)			Rail	
10	Ambre			Rail	

**Delivered pricing to Plant Daniel*

Regarding the August 10, 2015 solicitation, purchases of PRB coal were to be made for Plant Daniel. The solicitation requested bids for the purchase of coal for October - December 2015. All bids were due on August 18, 2015. In response to the solicitation, seven (7) applicable bids were received from six (6) different coal suppliers. All bids received were PRB offers. Below is a listing of the bids that were received:

Table 3

A	B	C	D	E	F
BID	SUPPLIER	TONS	BTU/LB	Transport	Delv'd (\$/MMBtu)
5	Cloud Peak (Antelope)	[REDACTED]	[REDACTED]	Rail	[REDACTED]
4	Arch (BT)			Rail	
3	Buckskin			Rail	
1	Alpha			Rail	
6	Cloud Peak (CR)			Rail	
2	Peabody OTC			Rail	
7	Ambre			Rail	

**Delivered pricing to Plant Daniel*

Regarding the August 11, 2015 solicitation, purchases of bituminous coal were to be made for Plant Crist. The solicitation requested bids for 2 proposals: A) September - December 2015; and B) January - June 2016. All bids were due on August 19, 2015. In response to the solicitation, forty (40) bids were received from twenty-five (25) different coal suppliers. The bids received from the Central Appalachian, Southern Appalachian, Northern Appalachian, Illinois Basin, Western Bituminous and Colombian coal supply regions. Below is a listing of the bids that were received:

Table 4
 Proposal A:

A	B	C	D	E	F
BID	SUPPLIER	TONS	BTU/LB	Transport	Delv'd (\$/MMBtu)
6	PEABODY COALTRADE			Rail	
25	GLENCORE LTD			Import	
30	SMOKY MOUNTAIN COAL CORP.			Rail	
26	GLENCORE LTD			Rail	
18	ALLIANCE COAL LLC			Rail	
21	FOUNDATION ENERGY SALES, INC.			Rail	
8	MURRAY ENERGY CORPORATION			Rail	
20	SMOKY MOUNTAIN COAL CORP.			Rail	
2	ARCH COAL INC.			Rail	
11	BOWIE RESOURCE PARTNERS			Rail	
4	PEABODY COAL SALES, LLC			Rail	
14	DRUMMOND COAL SALES, INC.			Import	
3	ARCH COAL INC.			Rail	
7	MURRAY ENERGY CORPORATION			Rail	
36	DELTA COALS LLC			Rail	
39	CONSOL ENERGY INC			Rail	
1	PEABODY COAL SALES, LLC			Rail	
37	DELTA COALS LLC			Rail	
9	PEVLER COAL SALES COMPANY INC.			Rail	
10	SOUTHERN COAL SALES			Rail	
5	PEVLER COAL SALES COMPANY INC.			Rail	
35	DELTA COALS LLC			Rail	
32	GOLDMAN SACHS			Rail	
31	GOLDMAN SACHS			Rail	
28	BLACKHAWK MINING, LLC			Rail	

Table 4 continued

A	B	C	D	E	F
12	EMERALD INTERNATIONAL CORP			Barge	
22	RHINO ENERGY LLC			Rail	
38	RWE TRADING			Rail	
27	BLACKHAWK MINING, LLC			Rail	
15	ARMSTRONG COAL CO			Rail	
33	LAFAYETTE ENERGY COMPANY			Rail	
40	CRIMSON COAL			Rail	
23	CANARY ENERGY			Rail	
13	B & W RESOURCES, INC			Rail	
17	ALLIANCE COAL LLC			Rail	
34	DELTA COALS LLC			Rail	
19	ALLIANCE COAL LLC			Rail	
16	SOLAR SOURCES INC.			Rail	
24	SOUTHERN COAL AND LAND CO			Rail	
29	SOUTHLAND RESOURCES INC.			Rail	

*Delivered pricing to Plant Crist

Table 5
 Proposal B:

A	B	C	D	E	F
BID	SUPPLIER	TONS	BTU/LB	Transport	Delv'd (\$/MMBtu)
8	TRAFIGURA AG			Rail	
1	PEABODY COALTRADE			Rail	
37	ALLIANCE COAL LLC			Rail	
45	MURRAY ENERGY CORPORATION			Rail	
46	MURRAY ENERGY CORPORATION			Rail	
23	ARMSTRONG COAL CO			Rail	
30	MURRAY ENERGY CORPORATION			Rail	
27	PEABODY COAL SALES, LLC			Rail	
44	MURRAY ENERGY CORPORATION			Rail	
6	KNIGHT HAWK COAL, LLC			Rail	
15	COAL MARKETING COMPANY (U.S.A.), INC.			Import	
17	COAL MARKETING COMPANY (U.S.A.), INC.			Import	

Table 5 continued

A	B	C	D	E	F
28	CRIMSON COAL CORPORATION			Rail	
29	CRIMSON COAL CORPORATION			Rail	
33	PATRIOT COAL SALES LLC			Rail	
32	PATRIOT COAL SALES LLC			Rail	
26	GLENCORE LTD			Import	
9	TRAFIGURA AG			Rail	
25	GLENCORE LTD			Import	
3	SOUTHERN COAL SALES			Rail	
35	ALLIANCE COAL LLC			Rail	
39	SMOKY MOUNTAIN COAL CORP.			Rail	
36	ALLIANCE COAL LLC			Rail	
5	SOUTHERN COAL SALES			Rail	
24	SMOKY MOUNTAIN COAL CORP.			Rail	
20	FOUNDATION ENERGY SALES, INC.			Rail	
21	FOUNDATION ENERGY SALES, INC.			Rail	
7	B & W RESOURCES, INC			Rail	
2	BLACKHAWK MINING, LLC			Rail	
13	CONSOL ENERGY INC			Rail	
14	CANARY ENERGY			Rail	
19	ARCH COAL INC.			Rail	
4	SOUTHERN COAL SALES			Rail	
11	RHINO ENERGY LLC			Rail	
43	DRUMMOND COAL SALES, INC.			Import	
38	LAFAYETTE ENERGY COMPANY			Rail	
34	ALLIANCE COAL LLC			Rail	
42	DELTA COALS LLC			Rail	
41	DELTA COALS LLC			Rail	
18	ARCH COAL INC.			Rail	
16	SOLAR SOURCES INC.			Rail	
47	LAFAYETTE ENERGY COMPANY			Rail	
31	PATRIOT COAL SALES LLC			Rail	
22	PEABODY COAL SALES, LLC			Rail	
12	RHINO ENERGY LLC			Rail	
10	PEVLER COAL SALES COMPANY INC.			Rail	
40	SOUTHLAND RESOURCES INC.			Rail	

2. Please describe the action taken for each bid identified in response to Interrogatory No. 1. Include in your response an explanation of the evaluation process and how successful proposals were selected.

ANSWER:

1
2 Regarding the April 30, 2015 PRB solicitation, a review of Plant Daniel's inventory plan
3 and burn projections for the May - December 2015 period indicated a need to purchase
4 PRB coal. The goal of this RFP was to purchase volumes that conform to the
5 contracting philosophy contained in the Southern Company Coal and Transportation
6 Procurement Strategy. For Option 1, the eleven (11) applicable bids received were
7 evaluated on a fully delivered \$/MMBtu basis, including the value of sulfur. Likewise for
8 Option 2, the ten (10) applicable bids were evaluated in a similar manner. In support of
9 the evaluation process, transportation rates and SO2 allowance values were provided
10 and included as part of the analysis. Other inputs to the evaluation included railcar
11 lease and maintenance and dust suppression costs.

12
13 Option 1: The least cost PRB coal delivered into Plant Daniel was Bid No. 2
14 submitted by Cloud Peak [REDACTED] which delivered to Plant Daniel for a price
15 of [REDACTED]. MPC agreed to purchase 30,000 tons from Cloud Peak's
16 Antelope mine for the Q3 delivery period.

17
18 Option 2: The Cloud Peak bid No. 2 [REDACTED] was still the most competitive
19 offer followed by the Arch Bid No. 3 [REDACTED]. Both delivered to Daniel for
20 approximately of [REDACTED]. MPC agreed to purchase 70,000 tons from Cloud
21 Peak's Antelope mine and 56,000 tons from Arch for the Q4 delivery period.

22
23 Regarding the August 10, 2015 PRB solicitation, a review of Plant Daniel's inventory
24 plan and burn projections for the October - December 2015 period indicated a need to
25 purchase PRB coal. The goal of this RFP was to purchase volumes that conform to the
26 contracting philosophy contained in the Southern Company Coal and Transportation
27 Procurement Strategy. The seven (7) applicable bids received were evaluated on a
28 fully delivered \$/MMBtu basis, including the value of sulfur. In support of the evaluation
29 process, transportation rates and SO2 allowance values were provided and included as
30 part of the analysis. Other inputs to the evaluation included railcar lease and
31 maintenance and dust suppression costs. The least cost PRB coal delivered into Plant
32 Daniel was Bid No. 5 submitted by Cloud Peak [REDACTED] which delivered to Plant
33 Daniel for a price of [REDACTED]. The next most competitive offer was Bid No. 4
34 submitted by Arch [REDACTED] and delivered for [REDACTED]. During the purchasing
35 process, as a result of parties unable to come to terms and conditions for the new
36 purchase, Cloud Peak withdrew their offer. MPC therefore agreed to pursue the
37 purchase from Arch for 150,000 tons for the Q4 delivery period.

1 Regarding the August 11, 2015 bituminous solicitation, a review of Plant Crist's
2 inventory plan and burn projections for September - December 2015 (Proposal A) and
3 January - June 2016 (Proposal B) indicated a need to purchase low sulfur bituminous
4 coal for blending with higher sulfur coal supply currently under contract. The blend
5 objective is to produce a sulfur blend conforming to the current cap of 3.00/lbsSO₂ at
6 Plant Crist. The forty (40) applicable bids received were evaluated on a fully delivered
7 \$/MMBtu basis, including the value of sulfur. In support of the evaluation process,
8 transportation rates and SO₂ allowance values were provided and included as part of
9 the analysis. Other inputs to the evaluation included railcar lease and maintenance and
10 dust suppression costs.

11
12 Proposal A: The least cost bituminous coal delivered into Plant Crist that was
13 below the maximum allowable sulfur content was Bid No. 25 submitted by
14 Glencore [REDACTED] which delivered for [REDACTED]. GULF agreed to pursue
15 the purchase from Glencore for 160,000 tons for the Q4 delivery period.

16
17 Proposal B: The least cost bituminous coals delivered into Plant Crist that was
18 below the maximum allowable sulfur content and met the other minimum coal
19 quality specifications were Bids No. 15 & 17 submitted by Coal Marketing
20 Company [REDACTED] respectively), which delivered for [REDACTED]
21 [REDACTED] respectively. During negotiations, GULF requested Bid No. 17 be
22 lowered to [REDACTED] which brought this higher Btu/lb offer (Bid No. 17) equal to
23 the lower Btu/lb offer (Bid No. 15) on a delivered basis [REDACTED]. GULF
24 agreed to pursue the purchase from Coal Marketing Company for 7 vessels
25 (82,000 - 94,000 tons per vessel) for the 2016 delivery period.

4. For each RFP for natural gas issued in 2015 by Gulf, list the bids received. For each bid, include the supplier, volume bid, and delivered price information, as well as the primary pipeline used for delivery.

ANSWER:

Southern Company Services (SCS), as agent for Alabama Power Company, Georgia Power Company, Mississippi Power Company, Gulf Power Company and Southern Power Company, solicited bids in the Fall of 2015 for firm, base load natural gas supply to assist in serving the fuel requirements of its affiliates. The bids received from the Fall 2015 RFP are documented in Attachment A.

Bids Received – Fall 2015 RFP

<u>(A)</u>	<u>(B)</u>	<u>(C)</u>	<u>(D)</u>	<u>(E)</u>	<u>(F)</u>
DTE Energy Trading					
<u>Pipeline</u>	<u>Point</u>	<u>Volume</u>	<u>Price</u>	<u>Begin Date</u>	<u>End Date</u>
Gulf South	Bosco			June-16	May-17
Texla					
<u>Pipeline</u>	<u>Point</u>	<u>Volume</u>	<u>Price</u>	<u>Begin Date</u>	<u>End Date</u>
Gulf South	Perryville Exchange			June-16	September-16
Gulf South	Perryville Exchange			June-16	September-18
BP					
<u>Pipeline</u>	<u>Point</u>	<u>Volume</u>	<u>Price</u>	<u>Begin Date</u>	<u>End Date</u>
Destin	FGT			June-16	May-17
Destin	FGT			June-16	May-17
Chevron					
<u>Pipeline</u>	<u>Point</u>	<u>Volume</u>	<u>Price</u>	<u>Begin Date</u>	<u>End Date</u>
FGT	Mobile Bay			June-16	May-17
FGT	Mobile Bay			June-16	May-17
Cross Timbers					
<u>Pipeline</u>	<u>Point</u>	<u>Volume</u>	<u>Price</u>	<u>Begin Date</u>	<u>End Date</u>
FGT	Mobile Bay			June-16	May-17
FGT	Mobile Bay			June-16	May-17
Iberdrola					
<u>Pipeline</u>	<u>Point</u>	<u>Volume</u>	<u>Price</u>	<u>Begin Date</u>	<u>End Date</u>
FGT	FGT			June-16	May-17

5. Please describe the action taken for each bid identified in response to Interrogatory No. 4. Include in your response an explanation of the evaluation process and how successful proposals were selected.

ANSWER:

1 After reviewing the gas supply needs, each bid was evaluated based on price, location,
2 volume, term, transportation rights (firm or interruptible) and the flexibility of supply.
3

4 The following bid was accepted from the bids identified in response to Interrogatory
5 No. 4:
6

7	SUPPLIER:	Cross Timbers
8	VOLUME:	
9	PRICE:	
10	DELIVER POINT:	Mobile Bay
11	PIPELINE:	FGT
12	TERM:	June 2016 – May 2017

EXHIBIT "C"

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

Line(s)/Field(s)

Justification

Response to Interrogatory # 1

Pages 1 through 5

Tables 1 through 5, Columns C, D & F as marked

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.

Response to Interrogatory # 2

Page 1 of 2

Lines 14-15,18-20 and 32-34, as marked

Page 2 of 2

Lines 14 and 20-23, as marked

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.

Response to Interrogatory #4

Page 1 of 1

Columns C and D(Table), as marked

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.

Response to Interrogatory # 5

Page 1 of 1

Lines 8-9 as marked

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.: **160001-EI**

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true copy of the foregoing was furnished by overnight mail this 21st day of April, 2016 to the following:

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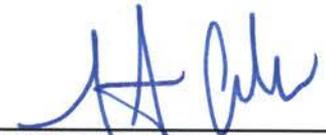
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