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



July 28, 2016

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 for Gulf Power Company's Form 423 Fuel Report for April through June 2016.

Sincerely,

J. M. Suf.

COM 4CD AFD) APA ECO ENG GCL IDM TEL

CLK

Robert L. McGee, Jr.

**Regulatory and Pricing Manager** 

md \_\_\_\_\_ Enclosures

Beggs & Lane CC: Jeffrey A. Stone, Esq. 6 9

### 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:
 July 29, 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 on its FPSC Form 423 Fuel Reports for the months of April 2016, May 2016 and June 2016 (the "423 Reports"). As grounds for this request, the Company states:

1. A portion of the information contained in Gulf Power's 423 Reports constitutes proprietary confidential business information concerning bids and other contractual data, the disclosure of which would impair the efforts of Gulf Power to contract for goods and 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 for coal and related transportation services purchased by Gulf Power. Gulf Power and the counterparties involved in these transactions consider the foregoing information to be confidential and competitively sensitive. Disclosure of this information could 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 the confidential information is publicly disclosed.

2. To this attorney's knowledge, the pricing information regarding shipments in this month's report has not been otherwise publicly disclosed. This information is intended to be, and is treated as, confidential by Gulf Power.

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/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 28th day of July, 2016.

in Bayer

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:
 July 29, 2016

## **REQUEST FOR CONFIDENTIAL CLASSIFICATION**

)

### EXHIBIT "A"

This information has been provided to the Commission Clerk

under separate cover as confidential information.

EXHIBIT "B"

### MONTHLY REPORT OF COST AND QUALITY OF COAL FOR ELECTRIC PLANTS ORIGIN, TONNAGE, DELIVERED PRICE, AND AS RECEIVED QUALITY

1.	Reporting Month:	APRIL	Year: 2016	4	Name, Title, & Telephone Number of Contact	t Person Concerning
					Data Submitted on this Form:	Mrs. Christa Rivera, Regulatory Analyst
2.	Reporting Company:	Gulf Power Co	ompany		<u>(850)- 444-6571</u>	
3.	Plant Name:	Crist Electric	Generating Plant	5	Signature of Official Submitting Report: Chris	ta L Rivera
				6	Date Completed: July 20, 2016	<u>6</u>

Line <u>No.</u> (a)	<u>Supplier Name</u> (b)	Mine	Location (c)		Purchase Type (d)	Transport Mode (e)	Tons(f)	Effective Purchase Price (\$/Ton) (g)	Total FOB Plant Price (\$/Ton) (i)	Sulfur Content (%) (j)	Btu Content (Btu/lb) (k)	Ash Content (%) (I)	Moisture Content (%) (m)
- 1	FORESIGHT	10	IL	199	с	RB	23,863.10		80.249	2.70	11,825	8.53	10.56
2	GLENCORE	45	IM	999	S	RB	23,863.10		79.868	0.63	12,438	5.94	8.34
3							-		-				
4													
5													
6													
7	<b>x</b>												
8													
9													
10													
11													
12													
13													
14													
15													

### MONTHLY REPORT OF COST AND QUALITY OF COAL FOR ELECTRIC PLANTS DETAILED PURCHASED COAL INVOICE INFORMATION

1.	Reporting Month:	APRIL	Year: 2016	4.	Name, Title, & Telephone Number of Contact Person Concerning
2.	Reporting Company:	Gulf Power Co	ompany		Data Submitted on this Form:     Ms. J.P. Peters, Fuels Analyst       (850)- 444-6571     1
3.	Plant Name:	Crist Electric (	Generating Plant	5.	Signature of Official Submitting Report: . Mrs. Christa Rivera, Regulatory Analyst
				6.	Date Completed: July 20, 2016

Line <u>No.</u> (a)	Supplier Name (b)		Location (c)		Purchase Type (d)	Tons (e)	FOB Mine Price (\$/Ton) (f)	Shorthaul & Loading Charges (\$/Ton) (g)	Original Invoice Price (\$/Ton) (h)	Retroactive Price increases (\$/Ton) (i)		Quality Adjustments (\$/Ton) (k)	Effective Purchase Price (\$/Ton) (I)
							.,				<u>,</u>		
1	FORESIGHT	10	IL	199	С	23,863.10		-		-		0.099	
2	GLENCORE	45	IM	999	S	23,863.10		-		-		3.198	
3												-	
4													
5													
6													
7													
8													
9													
10													
11													
12													
13													
14													
15													

#### MONTHLY REPORT OF COST AND QUALITY OF COAL FOR ELECTRIC PLANTS DETAIL OF TRANSPORTATION CHARGES

1.	Reporting Month:	APRIL	Year:	2016	4.	Name, Title, & Telephone Number of Co	ntact Person Concerning
						Data Submitted on this Form:	Mrs. Christa Rivera, Regulatory Analyst
<b>2</b> .	Reporting Company:	Gulf Power Co	ompany			<u>(850)- 444-6571</u>	
3.	Plant Name:	Crist Electric	Generati	ng Plant	5.	Signature of Official Submitting Report: (	Christa L Rivera

6. Date Completed: July 20, 2016

										Rail C	harges	V	Vaterborne	Charges		-		
Line No.	Supplier Na	me	<u>Mine I</u>	Location	Shipping Point	Transport Mode	Tons		Additional Shorthaul & Loading Charges (\$/Ton)	Rail Rate (\$/Ton)	Other Rail Charges (\$/Ton)	River Barge Rate (\$/Ton)	Trans- loading Rate (\$/Ton)	Ocean Barge Rate (\$/Ton)	Other Water Charges (\$/Ton)	Other Related Charges (\$/Ton)	Total Transpor- tation charges (\$/Ton)	FOB Plant Price (\$/Ton)
(a)	(b)			(c)	(d)	(e)	(f)	(g)	(h)	(i)	(i)	(k)	(I)	(m)	(n)	(o)	(p)	(q)
1 2 3	FORESIGHT GLENCORE	1 4		IL IM	199 ASDD 999 ASDD	RB RB	23,863.10 23,863.10		-	-	-		-	- -	-	-		80.249 79.868
4										-			-					
5										-			-					
6																		
7																		
8																		
9																		
10																		
11																		
12																		

13

14 15

### MONTHLY REPORT OF COST AND QUALITY OF COAL FOR ELECTRIC PLANTS ORIGIN, TONNAGE, DELIVERED PRICE, AND AS RECEIVED QUALITY

Effective Effective

1.	Reporting Month:	MAY	Year: 2016	4.	Name, Title, & Telephone Number of Contact F	Person Concerning
					Data Submitted on this Form:	<u>Mrs. Christa Rivera, Regulatory Analyst</u>
2.	Reporting Company:	Gulf Power Co	ompany		<u>(850)- 444-6571</u>	
3.	Plant Name:	Crist Electric (	Generating Plant	5.	Signature of Official Submitting Report: Christa	a L Rivera
				6.	Date Completed: July 20, 2016	

								Enective	Ellecuve					
								Purchase	Transport	Total FOB	Sulfur		Ash	Moisture
Line						Transport		Price	Charges	Plant Price	Content	Btu Content	Content	Content
No.		Mine	Location		Purchase Type	Mode	Tons	(\$/Ton)	(\$/Ton)	(\$/Ton)	(%)	(Btu/lb)	(%)	(%)
(a)			(c)		(d)	(e)	(f)	(g)	(h)	(i)	(i)	(k)	(I)	(m)
1	FORESIGHT	10	IL	199	с	RB	44,591.00			80.919	2.70	11,825	8.53	10.56
2	GLENCORE	45	IM	999	S	RB	44,591.00			80.468	0.63	12,438	5.94	8.34
3														
4														
5														
6														
7														
8														
9														
10														
11														
12														
13														
14														
15														

### MONTHLY REPORT OF COST AND QUALITY OF COAL FOR ELECTRIC PLANTS DETAILED PURCHASED COAL INVOICE INFORMATION

1.	Reporting Month:	MAY	Year:	2016	4.	Name, Title, & Telephone Number of Contact Person Concerning
						Data Submitted on this Form: Mrs. Christa Rivera, Regulatory Analyst
2.	Reporting Company:	Gulf Power Co	ompany			<u>(850)- 444-6571</u>
•			Canarati	na Diant	E	Signature of Official Submitting Report: Christa L Rivera
3.	Plant Name:	Crist Electric (	General	ng Plant	5.	Signature of Official Submitting Report. Christa L Rivera
					6.	Date Completed: July 20, 2016

Line No.	Supplier Name (b)		<u>_ocation</u> (c)		Purchase Type (d)	Tons (e)	FOB Mine Price (\$/Ton) (f)	Shorthaul & Loading Charges (\$/Ton) (g)	Original Invoice Price (\$/Ton) (h)	Retroactive Price increases (\$/Ton) (i)	Base Price (\$/Ton) (j)	Quality Adjustments (\$/Ton) (k)	Effective Purchase Price (\$/Ton) (I)
(a)	(b)		(0)		(0)	(e)	(1)	(9)	(1)		0	-	(1)
1	FORESIGHT	10	IL	199	С	44,591.00		-		-		0.099	
2	GLENCORE	45	IM	999	S	44,591.00		-		-		3.198	
3								-					
4													
5													
6													
7													
8													
9													
10													
11													
12													
13													
14													
15													

#### MONTHLY REPORT OF COST AND QUALITY OF COAL FOR ELECTRIC PLANTS DETAIL OF TRANSPORTATION CHARGES

1.	Reporting Month:	MAY	Year:	2016	4.	Name, Title, & Telephone Number of Co	ntact Person Concerning			
						Data Submitted on this Form:	Mrs. Christa Rivera, Regulatory Analyst			
2.	Reporting Company:	Gulf Power Co	mpany			<u>(850)- 444-6571</u>				
3.	Plant Name:	Crist Electric C	Generat	ing Plant	5. Signature of Official Submitting Report: Christa L Rivera					

6. Date Completed: July 20, 2016

									Rail C	harges	1	Vaterborne	Charges				
Line No.	Supplier Name	Mine	Location	_ Shipping Point	Transport Mode	Tons	Effective Purchase Price (\$/Ton)	Additional Shorthaul & Loading Charges (\$/Ton)	Rail Rate (\$/Ton)	Other Rail Charges (\$/Ton)	River Barge Rate (\$/Ton)	Trans- loading Rate (\$/Ton)	Ocean Barge Rate (\$/Ton)	Other Water Charges (\$/Ton)	Other Related Charges (\$/Ton)	Total Transpor- tation charges (\$/Ton)	FOB Plant Price (\$/Ton)
(a)	- (b)		(C)	(d)	(e)	(f)	(g)	(h)	(i)	(j)	(k)	(1)	(m)	(n)	(0)	(p)	(q)
1	FORESIGHT	10	IL	199 ASDD	RB	44,591.00		-	-	-			-	-	-		80.919
2	GLENCORE	45	IM	999 ASDD	RB	44,591.00		-	-	-			-	-	-		80.468
3									-			-					
4									-			-					
5									-			-					
6																	
7																	
8																	
9																	
10																	

(use continuation sheet if necessary)

### MONTHLY REPORT OF COST AND QUALITY OF COAL FOR ELECTRIC PLANTS ORIGIN, TONNAGE, DELIVERED PRICE, AND AS RECEIVED QUALITY

1.	Reporting Month:	MAY Year: 2016	4. Nan	ne, Title, & Telephone Number of Contact Person Concerning
-				a Submitted on this Form: <u>Mrs. Christa Rivera, Regulatory Analyst</u>
2.	Reporting Company:	Gulf Power Company	(65)	<u>0)- 444-6571</u>
3.	Plant Name:	Daniel Electric Generating Plant	5. Sigr	nature of Official Submitting Report: Christa L Rivera
			6. Date	e Completed: July 20, 2016

Line <u>No.</u> (a)	Supplier Name (b)		Location (c)		Purchase Type (d)	Transport Mode (e)	Tons (f)		Total FOB Plant Price (\$/Ton) (i)	Sulfur Content (%) (j)	Btu Content (Btu/lb) (k)	Ash Content (%) (I)	Moisture Content (%) (m)
				_	-				54 005	0.00	0.054	E 40	27.40
1	ARCH COAL SALES	169	WY	5	S	RR	58.66		51.225	0.23	8,854	5.40	27.10
2													
3													
4													
5													
6													
7													
8													
9													
10													

### MONTHLY REPORT OF COST AND QUALITY OF COAL FOR ELECTRIC PLANTS DETAILED PURCHASED COAL INVOICE INFORMATION

1.	Reporting Month:	MAY	Year: 2016	4.	Name, Title, & Telephone Nu	mber of Contact Person Concerning					
					Data Submitted on this Form	Mrs. Christa Rivera, Regulatory Analyst					
<b>2</b> .	Reporting Company:	Gulf Power Co	ompany		<u>(850)- 444-6571</u>						
3.	Plant Name:	Daniel Electric	Generating Plant	5.	5. Signature of Official Submitting Report: Christa L Rivera						
				6.	Date Completed:	<u>July 20, 2016</u>					

Line No.	Supplier Name	Mine	Location		Purchase Type	Tons	FOB Mine Price (\$/Ton)	Shorthaul & Loading Charges (\$/Ton)	Original Invoice Price (\$/Ton)	Retroactive Price increases (\$/Ton)	Base Price (\$/Ton)	Quality Adjustments (\$/Ton)	(\$/Ton)
(a)	(b)		(c)		(d)	(e)	( <b>f</b> )	(g)	(h)	(i)	(j)	(k)	(1)
1 2	ARCH COAL SALES	169	WY	5	S	58.66		-		-		0.005	
3													
4													
5													
6													
7													
8													
9													
10													

#### MONTHLY REPORT OF COST AND QUALITY OF COAL FOR ELECTRIC PLANTS DETAIL OF TRANSPORTATION CHARGES

1.	Reporting Month:	MAY	Year:	2016	4.	Name, Title, & Telephone Number of (	Contact Person Concerning				
						Data Submitted on this Form:	Mrs. Christa Rivera, Regulatory Analyst				
2.	Reporting Company:	Gulf Power Co	mpany			<u>(850)- 444-6571</u>					
3.	Plant Name:	Daniel Electric	Genera	ating Plant	5.	5. Signature of Official Submitting Report: Christa L Rivera					

6. Date Completed: July 20, 2016

										Rail Charges		Waterborne Charges						
Line No.	Supplier Name	Mine	Location		Shipping Point	Transport Mode	Tons		Additional Shorthaul & Loading Charges (\$/Ton)	Rail Rate (\$/Ton)	Other Rail Charges (\$/Ton)	River Barge Rate (\$/Ton)	Trans- loading Rate (\$/Ton)	Ocean Barge Rate (\$/Ton)	Other Water Charges (\$/Ton)	Other Related Charges (\$/Ton)	Total Transpor- tation charges (\$/Ton)	FOB Plant Price (\$/Ton)
(a)	(b)		(c)		(d)	(e)	(f)	(g)	(h)	(i)	(j)	(k)	(1)	(m)	(n)	(0)	<b>(</b> p)	(q)
1	ARCH COAL SALES	169	WY	5	BLACK THUNDEF	RR	58.66		-		5.50	-	-	-	-	-		51.225
2																		
3																		
4																		
5																		
6																		
7																		
8																		
•																		

9

10

(use continuation sheet if necessary)

FPSC Form No. 423-2(b) (2/87) Page 14 of 15

### MONTHLY REPORT OF COST AND QUALITY OF COAL FOR ELECTRIC PLANTS ORIGIN, TONNAGE, DELIVERED PRICE, AND AS RECEIVED QUALITY

1.	Reporting Month:	JUNE	Year: 2016	4.	Name, Title, & Telephone Number of Conta	act Person Concerning
					Data Submitted on this Form:	Mrs. Christa Rivera, Regulatory Analyst
2.	Reporting Company:	Gulf Power Co	ompany		<u>(850)-444-6571</u>	
3.	Plant Name:	Crist Electric	Generating Plant	5.	Signature of Official Submitting Report: Ch	rista L Rivera
				6.	Date Completed: July 20, 20	<u>16</u>

Line <u>No.</u> (a)	<u>Supplier Name</u> (b)	Mine	e Location (c)		Purchase Type (d)	Transport Mode (e)	Tons (f)	Effective Purchase Price (\$/Ton) (g)	Total FOB Plant Price (\$/Ton) (i)	Sulfur Content (%) (j)	Btu Content (Btu/lb) (k)	Ash Content (%) (I)	Moisture Content (%) (m)
1	FORESIGHT	10	۱L	199	с	RB	64,404.05		79.929	2.70	11,825	8.53	10.56
2	GLENCORE	45	IM	999	s	RB	64,404.05		79.398	0.63	12,438	5.94	8.34
3							-		-				
4													
5													
6													
7													
8													
9													
10													
11													
12													
13													
14													
15													

### MONTHLY REPORT OF COST AND QUALITY OF COAL FOR ELECTRIC PLANTS DETAILED PURCHASED COAL INVOICE INFORMATION

1.	Reporting Month:	JUNE	Year: 2016	4.	I. I	Name, Title, & Telephone Number of Contact Person Concerning						
					I	Data Submitted on this Form: <u>Mrs. Christa Rivera, Regulatory Analyst</u>						
2.	Reporting Company:	Gulf Power C	ompany		<u>(850)-444-6571</u>							
3.	Plant Name:	Crist Electric	Generating Pla	<u>nt</u> 5.	5. Signature of Official Submitting Report: Christa L Rivera							
				6.	i. I	Date Completed: July 20, 2016						

Line No.	Supplier Name		Location		Purchase Type	Tons	Price (\$/Ton)	Shorthaul & Loading Charges (\$/Ton)	Original Invoice Price (\$/Ton)	Retroactive Price increases (\$/Ton)	Base Price (\$/Ton)	Quality Adjustments (\$/Ton)	(\$/Ton)
(a)	(b)	4	(C)		(d)	(e)	(f)	(g)	(h)	(i)	(j)	(k)	(I)
1	FORESIGHT	10	۱L	199	С	64,404.05		-		-		0.099	
2	GLENCORE	45	IM	999	S	64,404.05		-		-		3.198	
3								-		-		-	
4													
5													
6													
7													
8													
9													
10													
11													
12													
13													
14													
15													

#### FPSC Form No. 423-2(b)

#### MONTHLY REPORT OF COST AND QUALITY OF COAL FOR ELECTRIC PLANTS DETAIL OF TRANSPORTATION CHARGES

1.	Reporting Month:	JUNE	Year: 2016	4.	ł.	Name, Title, & Telephone Number of Cor	ntact Person Concerning
						Data Submitted on this Form:	Mrs. Christa Rivera, Regulatory Analyst
2.	Reporting Company:	Gulf Power Co	ompany			<u>(850)-444-6571</u>	
3.	Plant Name:	Crist Electric (	Generating Plant	5.	5.	Signature of Official Submitting Report: C	christa L Rivera

6. Date Completed: July 20, 2016

									Rail C	harges		Vaterborne	Charges			_	
Line No.	Supplier Name	Mine L	_ocation	Shipping Point	Transport Mode	Tons		Additional Shorthaul & Loading Charges (\$/Ton)	Rail Rate (\$/Ton)	Other Rail Charges (\$/Ton)	River Barge Rate (\$/Ton)	Trans- loading Rate (\$/Ton)	Ocean Barge Rate (\$/Ton)	Other Water Charges (\$/Ton)	Other Related Charges (\$/Ton)	Total Transpor- tation charges (\$/Ton)	FOB Plant Price (\$/Ton)
(a)	(b)	(	(C)	(d)	(e)	(f)	(g)	(h)	(i)	(j)	(k)	(I)	(m)	(n)	(0)	(p)	(q)
	FORESIGHT GLENCORE	10 45	IL IM	ASDD ASDD	RB RB	64,404.05 64,404.05		-	-	-			-	-	-		79.929 79.398
3									-			-			_		-
4									-			-					
5									-			-					
6																	
7																	
8																	
9																	
10																	
11																	
12																	
13																	
14																	
15																	

(use continuation sheet if necessary)

FPSC Form No. 423-2(b) (2/87) Page 6 of 15

# EXHIBIT "C"

# Reporting Month: April 2016

## Form 423-2

Plant Names	Columns	Justification
Plant Crist, lines 1-2	(g)	The Effective Purchase Price represents the contract coal commodity price net of Quality Adjustments found in column (k) on form 423-2(a). This information is considered confidential and competitively sensitive by Gulf Power's coal suppliers. Additionally, disclosure of this information, in conjunction with the information disclosed under other columns in this filing, would enable coal suppliers to determine the prices being charged by their competitors. This, in turn, could lead to less competitive pricing and impact Gulf's ability to bargain for price concessions with its coal suppliers. This information is confidential pursuant to section 366.093(3)(d)-(e), Florida Statutes.
Plant Crist, lines 1-2	(h)	The Effective Transport Charges represent per ton transport charges incurred by Gulf to transport coal to its plants. This information is considered confidential and competitively sensitive by Gulf's transportation providers. Additionally, disclosure of Gulf's Effective Transport Charges in conjunction with the Total FOB Plant Price in column (i) would enable disclosure of the Effective Purchase Price in column (g) by subtracting the Effective Transport Charges in column (h) from the Total FOB Plant Price in column (i). This information is confidential pursuant to section 366.093(3)(d)-(e), Florida Statutes.

## Form 423-2(a)

Plant Crist, lines 1-2	(f)	The FOB Mine Price is the current contract price of coal purchased by Gulf from each supplier. Disclosure of this information would enable suppliers to compare prices with their competitors which could lead to less competitive coal pricing in future bidding. Disclosure could also result in reduced ability for Gulf Power to bargain for price concessions from individual suppliers. This information is confidential pursuant to section 366.093(3)(d)-(e), Florida Statutes.
Plant Crist, lines 1-2	(h)	The Original Invoice Price is the same as the FOB Price in column (f) except in cases when the supplier discloses its short haul and loading costs (column (g)), if any, included in the contract price of coal. Disclosure of this information would therefore be detrimental for the same reasons as are articulated above in connection with the FOB Mine Price.
Plant Crist, lines 1-2	(j)	The Base Price is the same as the Original Invoice Price in column (h), since retroactive pricing adjustments (column (i)) are normally received, if at all, after the reporting month and are included on Form 423-C, if necessary. Disclosure of this information would therefore be detrimental for the same reasons as are articulated above in connection with the FOB Mine Price.
Plant Crist, lines 1-2	(1)	The Effective Purchase Price represents the Base Price in column (j) adjusted by the Quality Adjustments in column (k). Disclosure of this information would therefore be detrimental for the same reasons as are articulated above in connection with FOB Mine Price.

## Form 423-2(b)

Plant Crist, lines 1-2	(g)	The Effective Purchase Price, as described above, is contract coal commodity price net of Quality Adjustments found in column (k) on form 423-2(a) and is confidential for the reasons previously stated.
Plant Crist, lines 1-2	(k)	The River Barge Rate is the current rate that Gulf Power pays to transport coal to its plants via barge. This information is considered confidential by Gulf's barge transportation providers. Additionally, disclosure of this information would enable barge transport providers to compare rates with their competitors which, in turn, could lead to less competitive barge rates in future negotiations. Disclosure could also result in reduced ability for Gulf Power to bargain for price concessions from individual providers. This information is confidential pursuant to section 366.093(3)(d), Florida Statutes.
Plant Crist, lines 1-2	(1)	The Transloading Rate is the contract price to unload coal from vessels and trains and reload coal into Gulf's barges at the associated port facilities. The terms of the transloading agreement state that these rates shall remain confidential between the parties of the contract. Revealing this information would harm Gulf's and its suppliers' competitive interests. This information is confidential pursuant to section 366.093(3)(d), Florida Statutes.
Plant Crist, lines 1-2	(p)	The Total Transportation Charges represent the total cost reported as transportation charges. Disclosure of this information in conjunction with information disclosed in other columns of Form 423-2(b) could enable third parties to determine individual components of the Total Transportation Charge, such as Rail or River Barge Rates which are confidential for the reasons stated above.

# EXHIBIT "C"

# Reporting Month: May 2016

## Form 423-2

Plant Names	Columns	Justification
Plant Crist, lines 1-2	(g)	The Effective Purchase Price represents the contract coal
Plant Daniel, line 1		commodity price net of Quality Adjustments found in column (k) on form 423-2(a). This information is considered confidential and competitively sensitive by Gulf Power's coal suppliers. Additionally, disclosure of this information, in conjunction with the information disclosed under other columns in this filing, would enable coal suppliers to determine the prices being charged by their competitors. This, in turn, could lead to less competitive pricing and impact Gulf's ability to bargain for price concessions with its coal suppliers. This information is confidential pursuant to section 366.093(3)(d)-(e), Florida Statutes.
Plant Crist, lines 1-2 Plant Daniel, line 1	(h)	The Effective Transport Charges represent per ton transport charges incurred by Gulf to transport coal to its plants. This information is considered confidential and competitively sensitive by Gulf's transportation providers. Additionally, disclosure of Gulf's Effective Transport Charges in conjunction with the Total FOB Plant Price in column (i) would enable disclosure of the Effective Purchase Price in column (g) by subtracting the Effective Transport Charges in column (h) from the Total FOB Plant Price in column (i). This information is confidential pursuant to section 366.093(3)(d)-(e), Florida Statutes.

## Form 423-2(a)

Plant Crist, lines 1-2 Plant Daniel, line 1	(f)	The FOB Mine Price is the current contract price of coal purchased by Gulf from each supplier. Disclosure of this information would enable suppliers to compare prices with their competitors which could lead to less competitive coal pricing in future bidding. Disclosure could also result in reduced ability for Gulf Power to bargain for price concessions from individual suppliers. This information is confidential pursuant to section 366.093(3)(d)-(e), Florida Statutes.
Plant Crist, lines 1-2 Plant Daniel, line 1	(h)	The Original Invoice Price is the same as the FOB Price in column (f) except in cases when the supplier discloses its short haul and loading costs (column (g)), if any, included in the contract price of coal. Disclosure of this information would therefore be detrimental for the same reasons as are articulated above in connection with the FOB Mine Price.
Plant Crist, lines 1-2 Plant Daniel, line 1	(j)	The Base Price is the same as the Original Invoice Price in column (h), since retroactive pricing adjustments (column (i)) are normally received, if at all, after the reporting month and are included on Form 423-C, if necessary. Disclosure of this information would therefore be detrimental for the same reasons as are articulated above in connection with the FOB Mine Price.
Plant Crist, lines 1-2 Plant Daniel, line 1	(1)	The Effective Purchase Price represents the Base Price in column (j) adjusted by the Quality Adjustments in column (k). Disclosure of this information would therefore be detrimental for the same reasons as are articulated above in connection with FOB Mine Price.

## Form 423-2(b)

Plant Crist, lines 1-2	(g)	The Effective Purchase Price, as described above, is contract
Plant Daniel, line 1		coal commodity price net of Quality Adjustments found in column (k) on form 423-2(a) and is confidential for the reasons previously stated.
Plant Daniel, line 1	(i)	The Rail Rate is the current rate that Gulf Power pays to transport coal to its plants via rail. This information is considered confidential by Gulf's rail transportation providers. Additionally, disclosure of this information would enable rail transport providers to compare rates with their competitors which, in turn, could lead to less competitive rail rates in future negotiations. Disclosure would also result in reduced ability for Gulf Power to bargain for price concessions from individual providers. This information is confidential pursuant to section 366.093(3)(d), Florida Statutes.
Plant Crist, lines 1-2	(k)	The River Barge Rate is the current rate that Gulf Power pays to transport coal to its plants via barge. This information is considered confidential by Gulf's barge transportation providers. Additionally, disclosure of this information would enable barge transport providers to compare rates with their competitors which, in turn, could lead to less competitive barge rates in future negotiations. Disclosure could also result in reduced ability for Gulf Power to bargain for price concessions from individual providers. This information is confidential pursuant to section 366.093(3)(d), Florida Statutes.
Plant Crist, lines 1-2	(1)	The Transloading Rate is the contract price to unload coal from vessels and trains and reload coal into Gulf's barges at the associated port facilities. The terms of the transloading agreement state that these rates shall remain confidential between the parties of the contract. Revealing this information would harm Gulf's and its suppliers' competitive interests. This information is confidential pursuant to section 366.093(3)(d), Florida Statutes.
Plant Crist, lines 1-2 Plant Daniel, line 1	(p)	The Total Transportation Charges represent the total cost reported as transportation charges. Disclosure of this information in conjunction with information disclosed in other columns of Form 423-2(b) could enable third parties to determine individual components of the Total Transportation Charge, such as Rail or River Barge Rates which are confidential for the reasons stated above.

# EXHIBIT "C"

# Reporting Month: June 2016

# <u>Form 423-2</u>

Plant Names	Columns	Justification
Plant Crist, lines 1-2	(g)	The Effective Purchase Price represents the contract coal commodity price net of Quality Adjustments found in column (k) on form 423-2(a). This information is considered confidential and competitively sensitive by Gulf Power's coal suppliers. Additionally, disclosure of this information, in conjunction with the information disclosed under other columns in this filing, would enable coal suppliers to determine the prices being charged by their competitors. This, in turn, could lead to less competitive pricing and impact Gulf's ability to bargain for price concessions with its coal suppliers. This information is confidential pursuant to section 366.093(3)(d)-(e), Florida Statutes.
Plant Crist, lines 1-2	(h)	The Effective Transport Charges represent per ton transport charges incurred by Gulf to transport coal to its plants. This information is considered confidential and competitively sensitive by Gulf's transportation providers. Additionally, disclosure of Gulf's Effective Transport Charges in conjunction with the Total FOB Plant Price in column (i) would enable disclosure of the Effective Purchase Price in column (g) by subtracting the Effective Transport Charges in column (h) from the Total FOB Plant Price in column (i). This information is confidential pursuant to section 366.093(3)(d)-(e), Florida Statutes.

# Form 423-2(a)

Plant Crist, lines 1-2	(f)	The FOB Mine Price is the current contract price of coal purchased by Gulf from each supplier. Disclosure of this information would enable suppliers to compare prices with their competitors which could lead to less competitive coal pricing in future bidding. Disclosure could also result in reduced ability for Gulf Power to bargain for price concessions from individual suppliers. This information is confidential pursuant to section 366.093(3)(d)-(e), Florida Statutes.
Plant Crist, lines 1-2	(h)	The Original Invoice Price is the same as the FOB Price in column (f) except in cases when the supplier discloses its short haul and loading costs (column (g)), if any, included in the contract price of coal. Disclosure of this information would therefore be detrimental for the same reasons as are articulated above in connection with the FOB Mine Price.
Plant Crist, lines 1-2	(j)	The Base Price is the same as the Original Invoice Price in column (h), since retroactive pricing adjustments (column (i)) are normally received, if at all, after the reporting month and are included on Form 423-C, if necessary. Disclosure of this information would therefore be detrimental for the same reasons as are articulated above in connection with the FOB Mine Price.
Plant Crist, lines 1-2	(1)	The Effective Purchase Price represents the Base Price in column (j) adjusted by the Quality Adjustments in column (k). Disclosure of this information would therefore be detrimental for the same reasons as are articulated above in connection with FOB Mine Price.

## Form 423-2(b)

Plant Crist, lines 1-2	(g)	The Effective Purchase Price, as described above, is contract coal commodity price net of Quality Adjustments found in column (k) on form 423-2(a) and is confidential for the reasons previously stated.
Plant Crist, lines 1-2	(k)	The River Barge Rate is the current rate that Gulf Power pays to transport coal to its plants via barge. This information is considered confidential by Gulf's barge transportation providers. Additionally, disclosure of this information would enable barge transport providers to compare rates with their competitors which, in turn, could lead to less competitive barge rates in future negotiations. Disclosure could also result in reduced ability for Gulf Power to bargain for price concessions from individual providers. This information is confidential pursuant to section 366.093(3)(d), Florida Statutes.
Plant Crist, lines 1-2	(1)	The Transloading Rate is the contract price to unload coal from vessels and trains and reload coal into Gulf's barges at the associated port facilities. The terms of the transloading agreement state that these rates shall remain confidential between the parties of the contract. Revealing this information would harm Gulf's and its suppliers' competitive interests. This information is confidential pursuant to section 366.093(3)(d), Florida Statutes.
Plant Crist, lines 1-2	(p)	The Total Transportation Charges represent the total cost reported as transportation charges. Disclosure of this information in conjunction with information disclosed in other columns of Form 423-2(b) could enable third parties to determine individual components of the Total Transportation Charge, such as Rail or River Barge Rates which are confidential for the reasons stated above.

-

### 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 28th day of July, 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 <u>mcassel@fpuc.com</u> 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 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 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 Maria.moncada@fpl.com Florida Power & Light Company Kenneth Hoffman 215 South Monroe Street, Suite 810 Tallahassee, FL 32301-1858 Ken.Hoffman@fpl.com Ausley Law Firm James D. Beasley J. Jeffry Wahlen Ashley M. Daniels Post Office Box 391 Tallahassee, FL 32302 ibeasley@ausley.com adaniels@ausley.com iwahlen@ausley.com

Gunster Law Firm Beth Keating 215 South Monroe Street, Suite 601 Tallahassee, FL 32301-1839 <u>bkeating@gunster.com</u> 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 <u>Christensen.patty@leg.state.fl.us</u> Duke Energy Florida, Inc. Matthew R. Bernier Cameron Cooper 106 East College Avenue, Suite 800 Tallahassee, FL 32301-7740 Matthew.bernier@duke-energy.com 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 Tampa Electric Company Ms. Paula K. Brown, Manager Regulatory Coordination P. O. Box 111 Tampa, FL 33601-0111 <u>Regdept@tecoenergy.com</u> Office of the General Counsel Suzanne Brownless Danijela Janjic 2540 Shumard Oak Blvd Tallahassee, FL 32399-0850 djanjic@psc.state.fl.us sbrownle@psc.state.fl.us tefarley@psc.state.fl.us ASoete@psc.state.fl.us

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

Florida Retail Federation Robert Scheffel Wright John T. LaVia c/o Gardner Law Firm 1300 Thomaswood Drive Tallahassee, FL 32308 <u>schef@gbwlegal.com</u> <u>jlavia@gbwlegal.com</u>