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August 3, 2016

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

RE: Docket No. 160001-EI  
Docket No. 160096-EI

**REDACTED**

RECEIVED-FPSC  
2016 AUG -4 AM 9:23  
COMMISSION  
CLERK

Dear Ms. Stauffer:

Enclosed is Gulf Power Company's Request for Confidential Classification regarding Gulf's Risk Management Plan dated August 4, 2016.

Sincerely,

Robert L. McGee, Jr.  
Regulatory and Pricing Manager

md

Enclosures

cc: Beggs & Lane  
Jeffrey A. Stone, Esq.

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AFD 1 + CD  
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BEFORE THE PUBLIC SERVICE COMMISSION

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

Date filed: August 4, 2016  
Docket No.: 160001-EI

Joint petition for approval of  
modifications to risk management  
plans by Duke Energy Florida,  
Florida Power & Light Company,  
Gulf Power Company and Tampa  
Electric Company

Docket No.: 160096-EI

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**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 its request that the Florida Public Service Commission enter an order protecting from public disclosure certain portions of Gulf Power's Risk Management Plan for Fuel Procurement. As grounds for this request, the Company states:

1. Portions of Gulf Power's Risk Management Plan for Fuel Procurement are entitled to confidential classification pursuant to section 366.093(3)(d) and (e), Florida Statutes, as information, the public disclosure of which could cause irreparable harm to the competitive interests of Gulf Power and the ability of Gulf to enter into contracts on terms favorable to it and its customers. The Risk Management Plan for Fuel Procurement contains, in a single resource, detailed information about Gulf's fuel procurement strategy, including technology selection criteria, for the near term and into the future. Gulf Power and the other market participants for fuel, fuel transportation and fuel storage consider this detailed information to be competitively sensitive. The document discusses how Gulf manages its fuel procurement with specific details regarding Gulf's fuel needs, market position, and trends it sees in those markets in which it

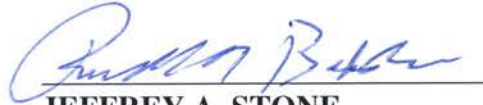
addresses its fuel needs. In addition, the fuel procurement strategy utilized by Gulf is discussed in detail. Pricing information is also included in this document. Similar information is not made public by other fuel market participants. Making this information public would give these other market participants a competitive advantage over Gulf which would prevent Gulf from procuring its fuel needs in a manner that secures the best price and terms for its customers.

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" is a highlighted copy of Gulf Power's Risk Management Plan for Fuel Procurement. Exhibit "A" should be treated as confidential pending a ruling on this request. Attached as Exhibit "B" are two (2) edited copies of Gulf Power's Risk Management Plan for Fuel Procurement, 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 3<sup>rd</sup> day of August, 2016.



**JEFFREY A. STONE**

Florida Bar No. 325953

**RUSSELL A. BADDERS**

Florida Bar No. 007455

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Florida Bar No. 627569

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**Attorneys for Gulf Power**

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Docket No.: 160096-EI

**REQUEST FOR CONFIDENTIAL CLASSIFICATION**

**Exhibit "A"**

Provided to the Commission Clerk

under separate cover as confidential information.

**Exhibit "B"**

15

1 **GULF POWER**  
2 **COAL PROCUREMENT STRATEGY FOR 2017**  
3

4 **Coal Procurement Plan**

5 Based on the burn forecast from the July update to the Energy Budget, Gulf Power's  
6 50% ownership in Plant Daniel has an estimated uncommitted coal supply need of  
7 [REDACTED] tons in 2017 and Gulf Power's 25% ownership in Plant Scherer Unit 3 has  
8 an estimated uncommitted coal supply need of [REDACTED] tons in 2017. Because Gulf  
9 Power's Plant Crist has a requirements contract in place for 2017 there is no  
10 uncommitted coal supply in that year. Coal burn continues to remain depressed as  
11 a result of low natural gas pricing and decreased loads. Our procurement plan below  
12 is based on the following assumptions:

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14 **Plant Crist**

- 15 • Short Term: Its current marginal fuel selection consists of a requirement  
16 contract of low-sulfur Illinois Basin (IB) sourced coal.
  - 17 • Long term: Current plan is to continue to utilize the most economic source of  
18 coal, which is anticipated to be either a blend of IB and other bituminous low-  
19 sulfur sourced coal or low-sulfur IB coal.
  - 20 • Plant Crist is forecasted to have a capacity factor of [REDACTED] through  
21 2020. An evaluation of the timing of when Crist units will be generating  
22 electricity provides insight into how coal deliveries should be procured. We  
23 forecast Crist to have at least one unit on line a majority of the time.
- 24  
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1 **Plant Daniel**

- 2 • Short Term: Its current marginal fuel selection consists of an 80% Powder  
3 River Basin (PRB) and 20% bituminous low sulfur blend (either Colombian or  
4 Colorado depending on market price).
- 5 • Long term: Current plan is to continue to utilize the 80/20 blend of PRB and  
6 other bituminous low-sulfur sourced coal
- 7 • Plant Daniel is forecasted to have a capacity factor of [REDACTED] through  
8 2020. An evaluation of the timing of when Daniel units will be generating  
9 electricity provides insight into how coal deliveries should be procured. We  
10 forecast Daniel to have at least one unit on line a majority of the time

11  
12 **Plant Scherer Unit 3**

- 13 • Short Term: Its current marginal fuel selection is 100% PRB.
- 14 • Long term: Current plan is to continue to utilize 100% PRB
- 15 • Plant Scherer Unit 3 is forecasted to have a capacity factor of [REDACTED]  
16 [REDACTED] through 2020. An evaluation of the timing of when Scherer units  
17 will be generating electricity provides insight into how coal deliveries should  
18 be procured.

19  
20 **State of the Program:**

21 The relationship between burn projections, current commitment levels, commitment  
22 targets per the coal procurement strategy, and corresponding future needs are  
23 detailed in the following charts:

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1 Gulf Program Plant Crist

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15 MPC Program Plant Daniel-Gulf Ownership (50%)

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1 GPC Program Plant Scherer-Gulf Ownership (25% of Unit 3)

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14 **Spot Coal Plan:**

15 Quarterly system-wide bituminous and sub-bituminous solicitations will be issued as  
16 needed to address short term coal supply needs that may develop. With the  
17 uncertainty of burn that still exists today and with many coal units being displaced by  
18 natural gas generation, this quarterly process provides flexibility to better manage  
19 burn volatility. Gulf will purchase spot coal under these quarterly solicitations as the  
20 need arises.

21

22 **Long-term Coal Plan:**

23 Due to a requirements coal contract in place for 2017 Gulf's Plant Crist is fully  
24 committed that year. [Redacted]

25 Gulf's 50% ownership in MPC Plant Daniel has [Redacted]

26 [Redacted] Gulf's 25% ownership in Plant Scherer Unit 3 results in [Redacted]

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System-wide long-term bituminous and sub bituminous solicitations will be issued late 2016 and/or early 2017 and Gulf will evaluate the need for long-term purchases for delivery beginning in 2017. The purchases made will adhere to the percentage commitment guidelines set forth in the Coal Procurement Strategy.

1 purchases when gas burn variations occur and gas supply reliability when normal  
2 gas supply interruptions occur.

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4 **Procurement Strategy**

5 Gulf's strategy for gas procurement is to purchase the commodity using long term  
6 and spot agreements at market prices. Fuel purchased at market over a long period  
7 is a low cost option for customers.

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16 For Gulf, spot-market contracts have a term of less than one year and long-term  
17 contracts have a term of 1 year or longer. All natural gas, regardless of whether it is  
18 bought under long-term contracts or spot-market contracts, is purchased at market  
19 based prices. While fuel purchased at market over long periods is a low cost option  
20 for customers, it does expose the customers to short-term price volatility. Since  
21 these price fluctuations can be severe, Gulf Power, at the direction of the Florida  
22 Public Service Commission, will attempt to protect its customers against short-term  
23 price volatility by utilizing hedging tools. It is understood that the cost of hedging will  
24 sometimes lead to fuel costs that are higher than market prices but that this is a  
25 reasonable trade-off for reducing the customers' exposure to fuel cost increases that

1 would result if fuel prices actually settle at higher prices than when the hedges were  
2 placed.

3

4 The following graph of actual natural gas prices is an indication of price volatility in  
5 the gas commodity market:

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7 **Historical Natural Gas Prices – NYMEX**

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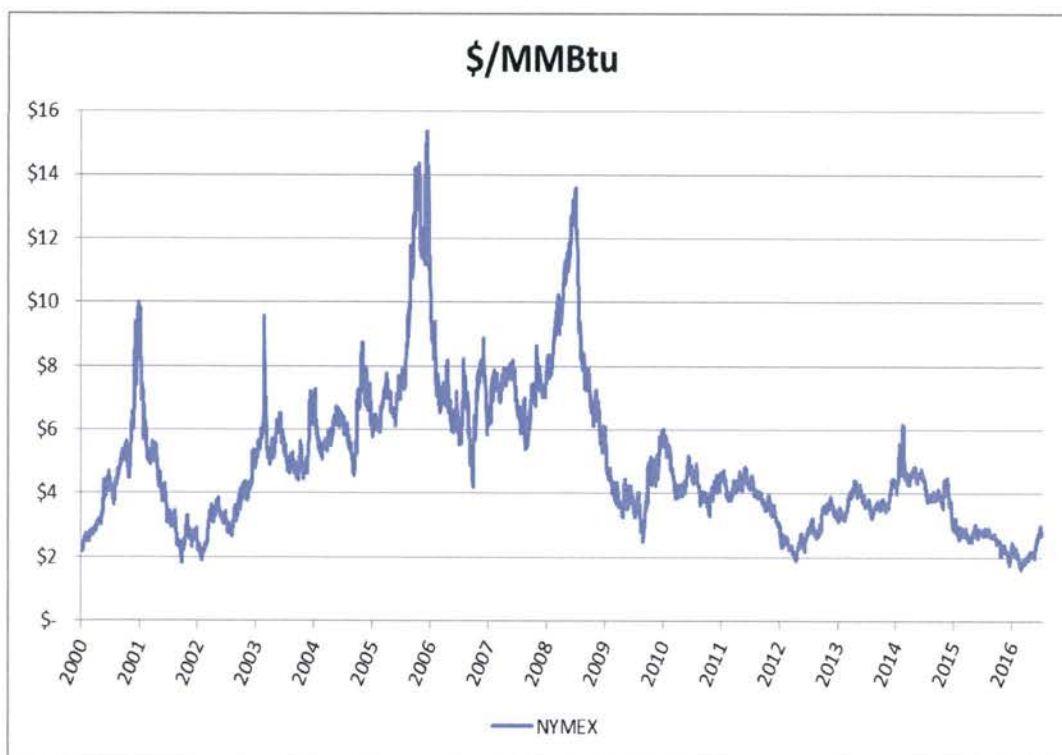
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21 **Pricing Strategy**

22 Gulf Power will continue to purchase gas, both under long-term and spot contracts at  
23 market based prices. However, pursuant to Commission order, Gulf Power will  
24 financially hedge gas prices for some portion, generally between [REDACTED] percent of  
25 Gulf Power's projected annual gas burn for the current year, in order to protect  
26 against short-term price swings and to provide some level of price certainty. This [REDACTED]

1 [REDACTED] percent hedge range allows Gulf Power to provide a degree of price certainty  
 2 and protection against short-term price swings while still allowing the customers to  
 3 participate in markets where natural gas prices are low. Gulf Power will secure  
 4 natural gas hedges over a time period not to exceed [REDACTED] months, per the following  
 5 schedule:

6

	(A)	(B)
Period	Lower Target Hedge %	Upper Target Hedge %
Prompt Year (2017)	[REDACTED]	[REDACTED]
Year 2 (2018)	[REDACTED]	[REDACTED]
Year 3 (2019)	[REDACTED]	[REDACTED]
Year 4 (2020)	[REDACTED]	[REDACTED]

7 **Note: The annual hedge percentage is based on the budgeted annual gas**  
 8 **burn**

9  
 10 Although SCS will target the levels shown in the table above, SCS may accelerate or  
 11 decelerate the plan accordingly based on market conditions. Gulf's hedging targets  
 12 are expressed on an annual basis due to the potential for large variances in month  
 13 to month gas consumption. The monthly variance in gas burn is due to Gulf's units  
 14 being dispatched on an economic basis with the other generating units in the  
 15 Southern electric system and the impact of unit outages on Gulf's total gas burn.

16  
 17 SCS, working in partnership with Gulf Power, develops short-term hedge strategies  
 18 based on current and projected market conditions. [REDACTED]

19 [REDACTED]  
 20 [REDACTED]

21 [REDACTED] SCS will employ both technical and  
 22 fundamental analysis to determine appropriate times to hedge. However, the

1 objective is not to speculate on market price or attempt to outguess or “beat the  
2 market”. Gulf will utilize fixed priced swaps as its primary financial gas price hedging  
3 instrument but may also utilize options when appropriate.

4  
5 While the hedging program will protect the customer from short-term price spikes,  
6 hedges can also lead to higher costs when natural gas prices fall subsequent to  
7 entering hedges. Gulf Power will limit the amount of fixed-price hedges to a  
8 maximum of [REDACTED] percent of the projected fuel burn for the upcoming year. In  
9 addition, Gulf Power will limit option priced hedges to [REDACTED] percent of its projected  
10 burn. Finally, in order to protect its customers from market exposure in subsequent  
11 years, Gulf Power will take forward hedge positions for up to [REDACTED] months into the  
12 future.

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1 III. Business Objectives

2 The Approved Business Objectives for the trading activities performed by Authorized  
3 Individuals are defined in Appendix A.

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5 IV. Business Strategies

6 The business objectives are achieved by entering into transactions involving the  
7 approved commodities shown in Appendix B.

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19 Various contract types or financial instruments will be used to achieve the Approved  
20 Business Objectives. The Approved Risk Management Instruments are listed in  
21 Appendix C. SCS Risk Control must be consulted before the execution of any  
22 Approved Risk Management Instruments that have not been previously used,  
23 including combinations of instruments not previously used. SCS Risk Control must  
24 ensure that the requirements set forth in this RMP can be followed with respect to  
25 those instruments.

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1 V. Authorizations

2 Appendix D contains the individuals, boards, and committees authorized to carry out  
3 various activities, reviews, and approvals.

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5 VI. Segregation of Duties

6 The following functions are separated to ensure that the risk management activities  
7 are properly carried out:

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18 Appendix E shows the organizational separation of function required by this RMP.

19 The following is a summary of the responsibilities of the different functions:

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21 Origination, Structuring, and Execution: The functions of origination, structuring, and  
22 execution include the following responsibilities:

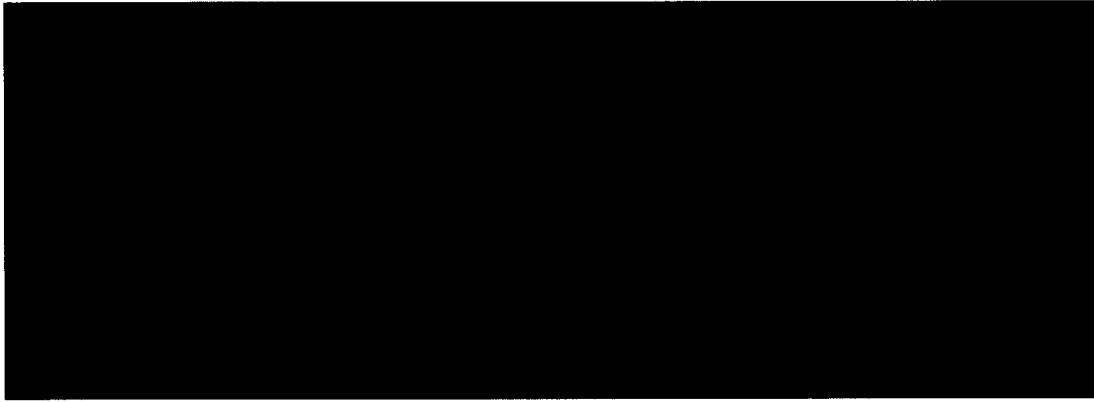
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Confirmation, Monitoring, Reporting and Disclosure: The functions of trade confirmation, risk monitoring, risk reporting, and disclosure include the following responsibilities:



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3 Settlement: The function of settlement includes the following responsibilities:

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11 Cash Management: SCS Treasury is responsible for receiving and disbursing all  
12 funds from or to counterparties and for the delivery of margin / collateral  
13 requirements. SCS Treasury will also be responsible for investment of collateral  
14 provided by counterparties.

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16 Accounting: SCS Accounting is responsible for posting transactions to the general  
17 ledger and reconciling the subledgers to the general ledger.

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19 VII. Market Risk Identification

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1 VIII. Market Risk Measurement and Valuation

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17 IX. Market Risk Limits

18 Exposure Limits

19 The maximum exposure limit for each business objective should not exceed the  
20 limits specified in Appendix H.

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22 Notifications

23 Certain notifications to management are required as defined in Appendix G.

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1 Volumetric Position Limits

2 Volumetric Position limits as defined by the Commodity Futures Trading Commission  
3 (CFTC), will be monitored and reported as necessary, according to CFTC rules.

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5 X. Credit Risk

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17 XI. New Products

18 Structured transactions and new products may be developed from time to time that  
19 contain new risks or require new infrastructure support. The responsibilities  
20 associated with the approval of each structured transaction and new product include  
21 the following:

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17 XII. Funding Liquidity

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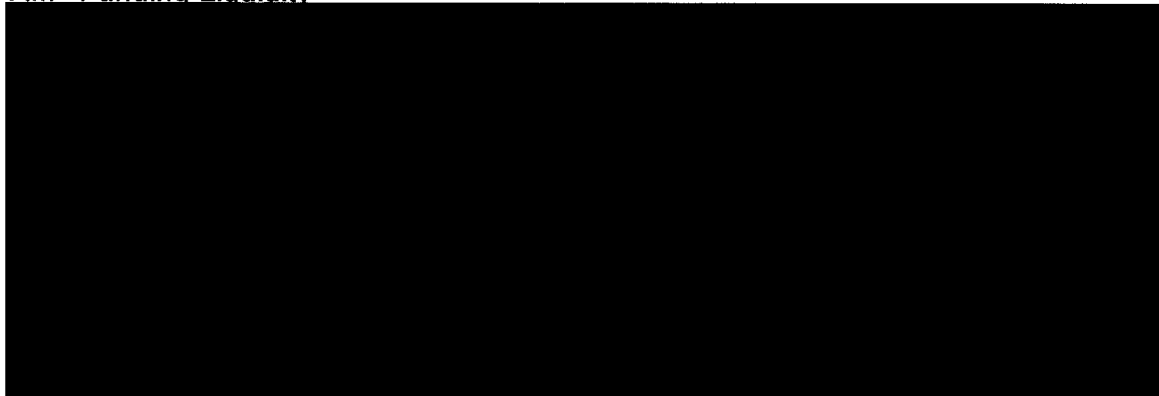
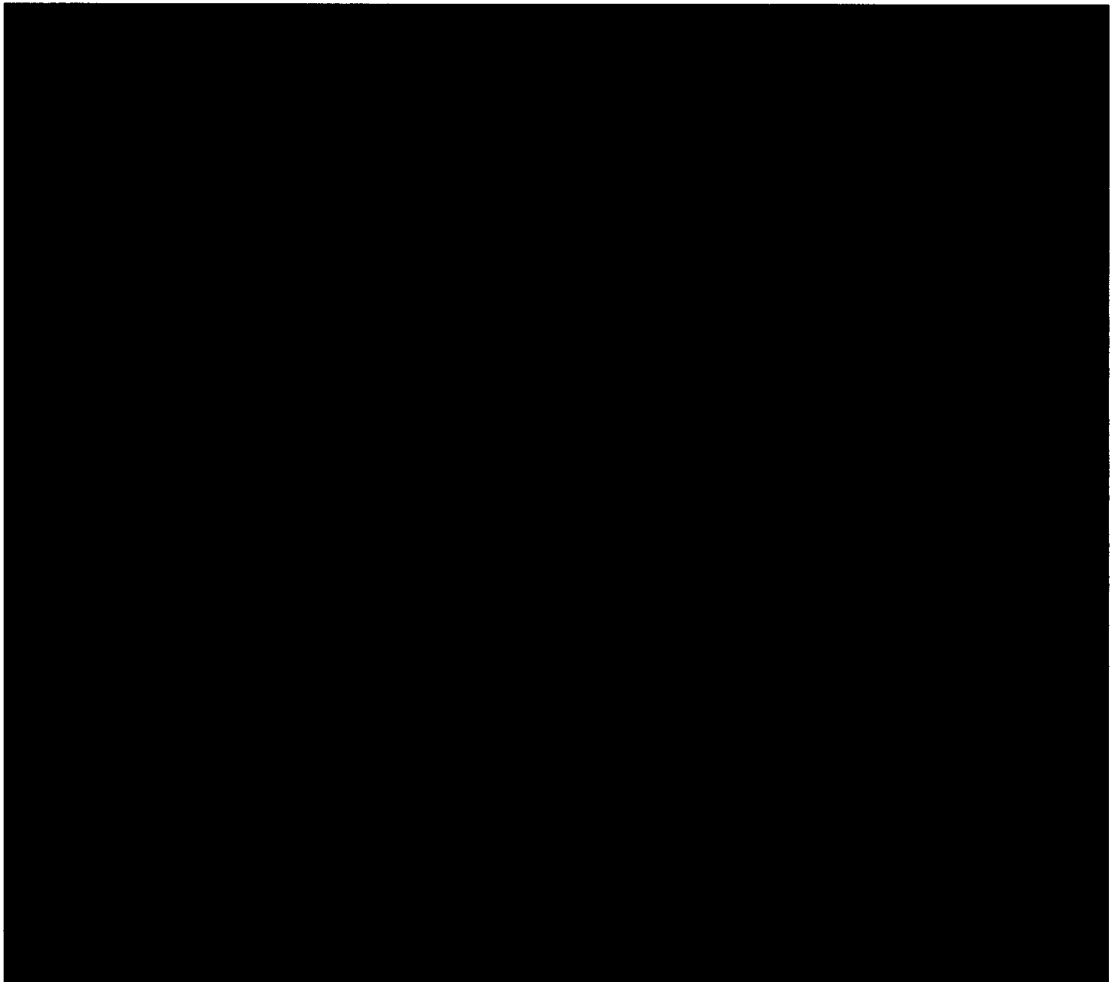
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1 XIII. Operating Procedures and Systems

2 Processes.

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7 Recording Transactions.

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14 Contract Administration.

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1 Operating Procedures.

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6 XIV. Accounting, Tax, and Regulatory Reporting

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22 XV. Legal

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**XVI. Monitoring and Reporting**

SCS Risk Control personnel will calculate and report the following items on a daily basis:

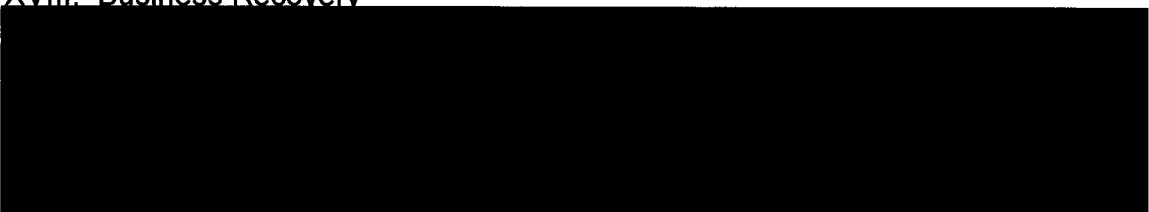


The Portfolio Management group will prepare regular position reports. The Energy Analysis group will report preliminary gross margins or P&L on a daily basis.

**XVII. Personal Trading**

All employees whose activities are governed by this RMP as defined in Section XIX are prohibited from trading any approved commodity for their own account or for the benefit of any party except as specifically authorized as part of the individual's duties with the Company.

**XVIII. Business Recovery**



1 XIX. Compliance

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17 XX. Independent Review

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1 XXI. Policy Amendments

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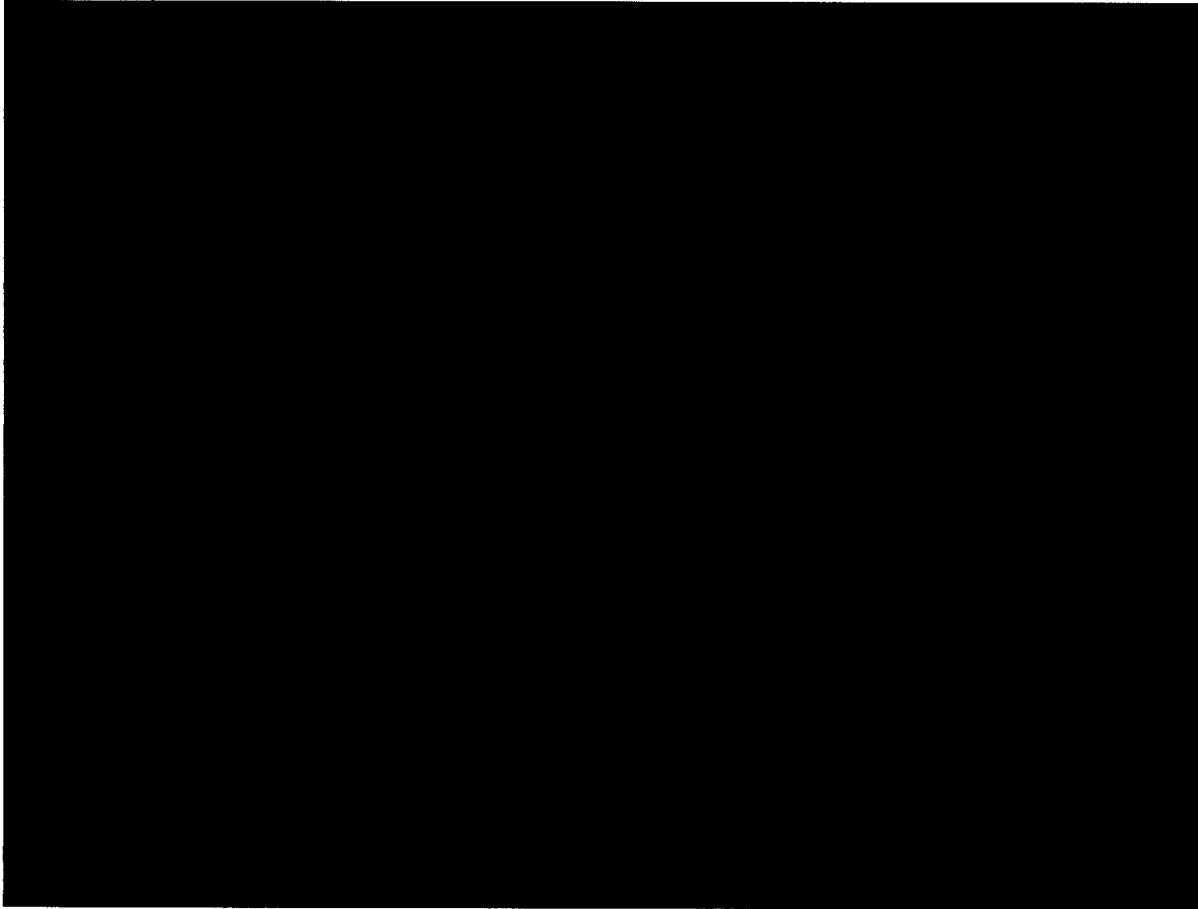
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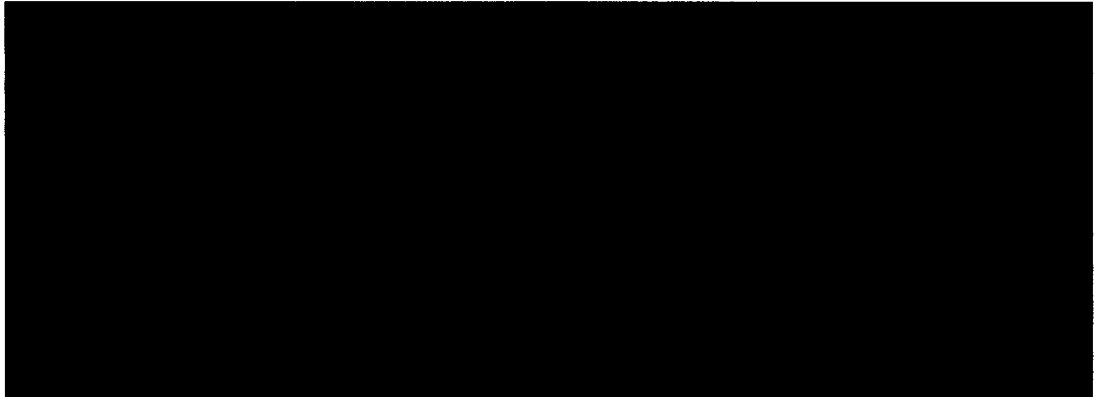


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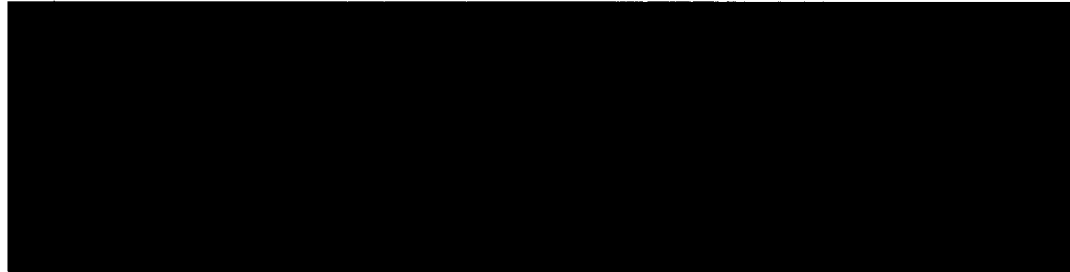
APPENDIX A  
APPROVED BUSINESS OBJECTIVES

Fleet Operations and Trading

The primary objectives of Fleet Operations and Trading are to:



In addition to the primary objectives, Fleet Operations and Trading may execute secondary activities as limited by Appendix H to achieve the following secondary objectives to the extent permitted by all applicable policies and regulations:



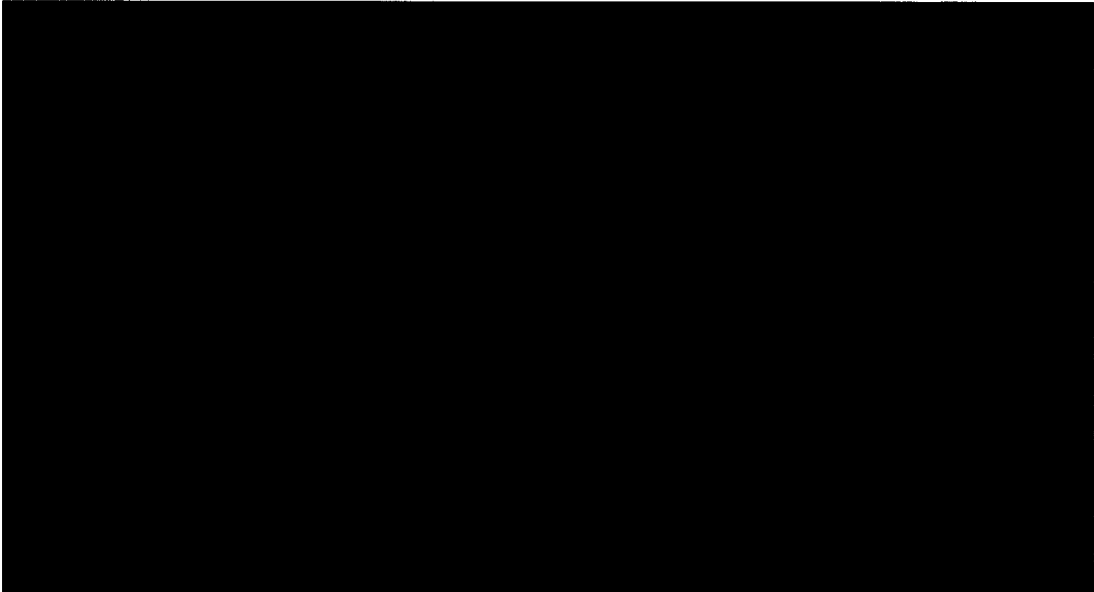
Any Primary or Secondary Strategies that would require clearing and / or posting of margin must be approved by the Risk Advisory and Controls Committee prior to execution.

1 Southern Power Company Trading & Asset Management

2 The primary objectives of the SPC Trading and Asset Management activities are the  
3 following:

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10 In addition to the primary objectives, SPC Trading & Asset Management may  
11 execute secondary activities as limited by Appendix H to achieve the following  
12 secondary objectives to the extent permitted by all applicable policies and  
13 regulations (including, but not limited to the IIC and Separation Protocol):

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25 All SPC Secondary Strategies must be approved by the SPC Chief Financial Officer  
26 and the SPC Chief Commercial Officer.

1 Any SPC Primary or Secondary Strategies that would require clearing and / or  
2 posting of margin must be approved by the SPC Chief Financial Officer and the SPC  
3 Chief Commercial Officer.

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5 Natural Gas Fulfillment Function

6 The primary objectives of the Natural Gas Fulfillment Function are to:

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17 Secondary activities of the natural gas fulfillment function are restricted to positions  
18 intended to hedge secondary power positions, and which have been requested by  
19 Fleet Operations and Trading or SPC Trading & Asset Management.

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21 Environmental Products Management Function

22 The primary objectives of the Environmental Products Management Function are to:

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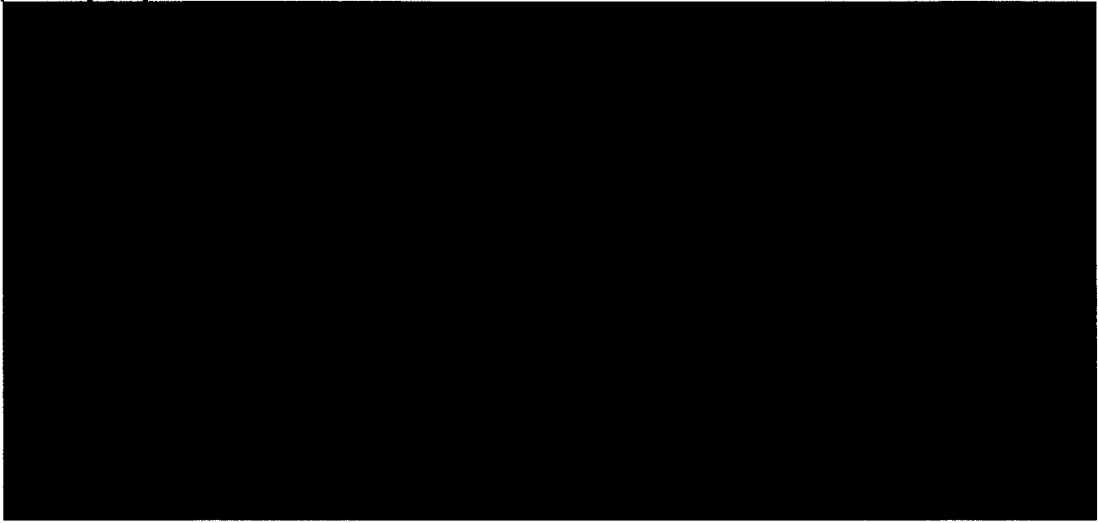
7 Secondary activities of the Environmental Products Management Function are  
8 restricted to positions intended to hedge secondary power positions, and which have  
9 been requested by Fleet Operations and Trading or SPC Trading & Asset  
10 Management.

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12 Coal Fulfillment Function

13 The primary objectives of the Coal Fulfillment Function are to:

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24 Secondary activities of the Coal Fulfillment Function are restricted to positions  
25 intended to hedge secondary power positions, and which have been requested by  
26 Fleet Operations and Trading or SPC Trading & Asset Management.

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APPENDIX B  
APPROVED COMMODITIES

The approved commodities for this RMP are:





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APPENDIX C  
APPROVED INSTRUMENTS

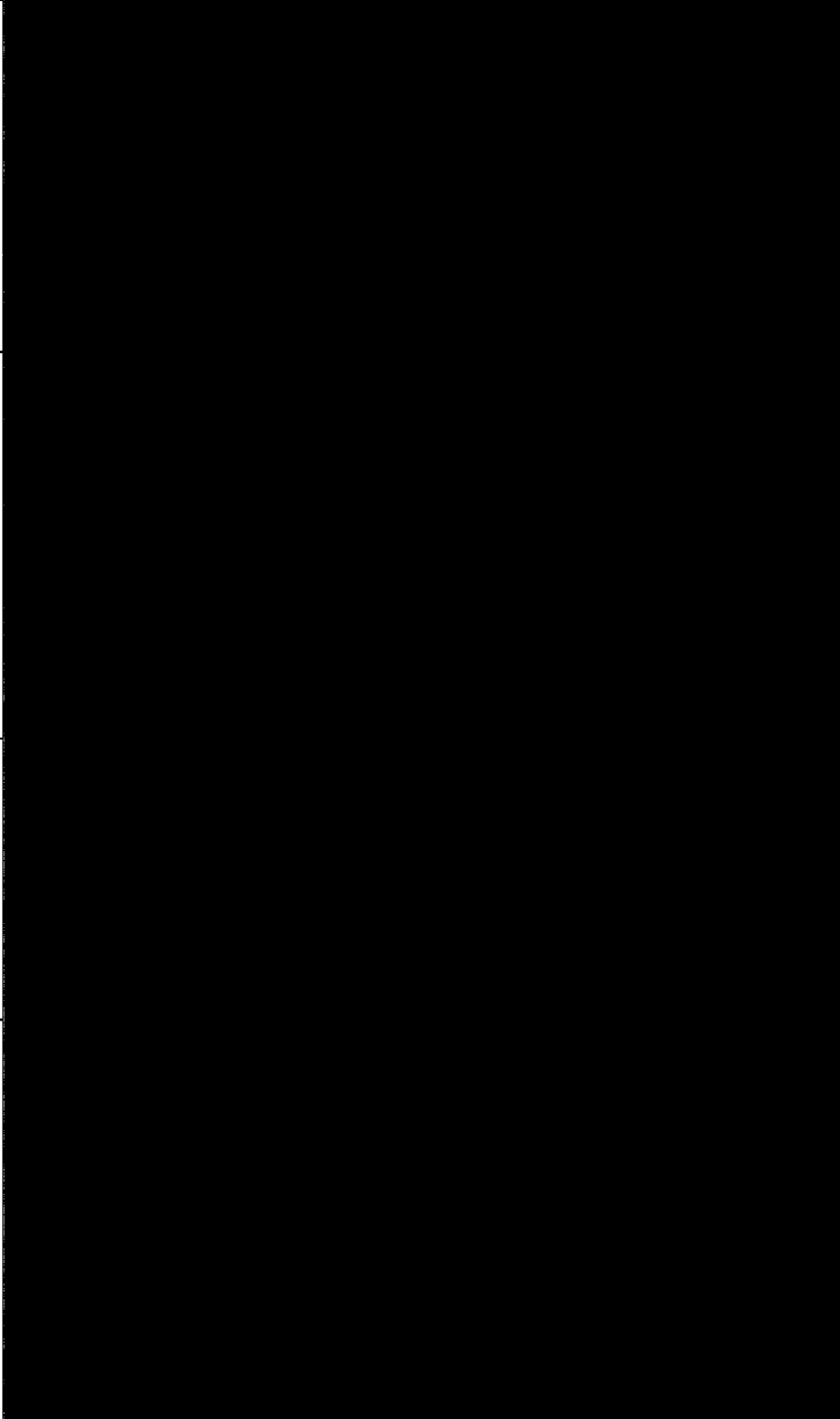
The approved instruments are:



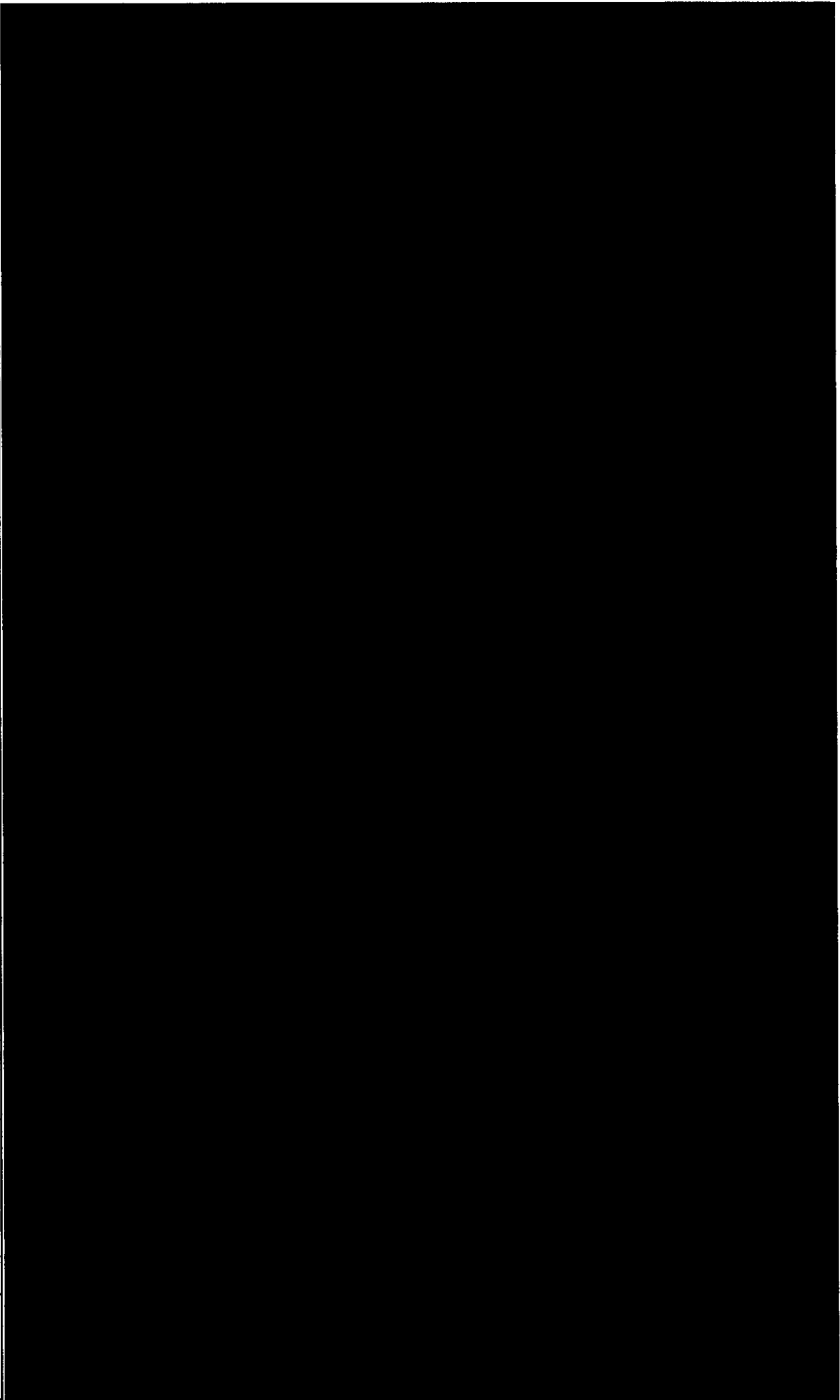
APPENDIX D  
AUTHORIZATIONS

Name	Authority
Southern Company Risk Oversight Committee (SROC)	
Generation Risk Oversight Committee (GROC)	
Southern Power Risk Oversight Committee (SPROC)	
Risk Advisory and Controls Committee (RACC)	
Southern Company Generation Energy Credit Committee (ECC)	
Manager, Risk Control	

APPENDIX D  
AUTHORIZATIONS (continued)  
Energy Marketing

Name	Authority
Vice President, Commercial Operations & Services	
Vice President, Chief Commercial Officer, SPC	
Sr. Vice President, Chief Financial Officer, SPC	
Vice President, Fleet Operations and Trading	

Energy Trading Manager
Manager, SPC Trading and Asset Management
Term Traders
Energy Coordinators
Transmission Project Coordinators and Energy Schedulers

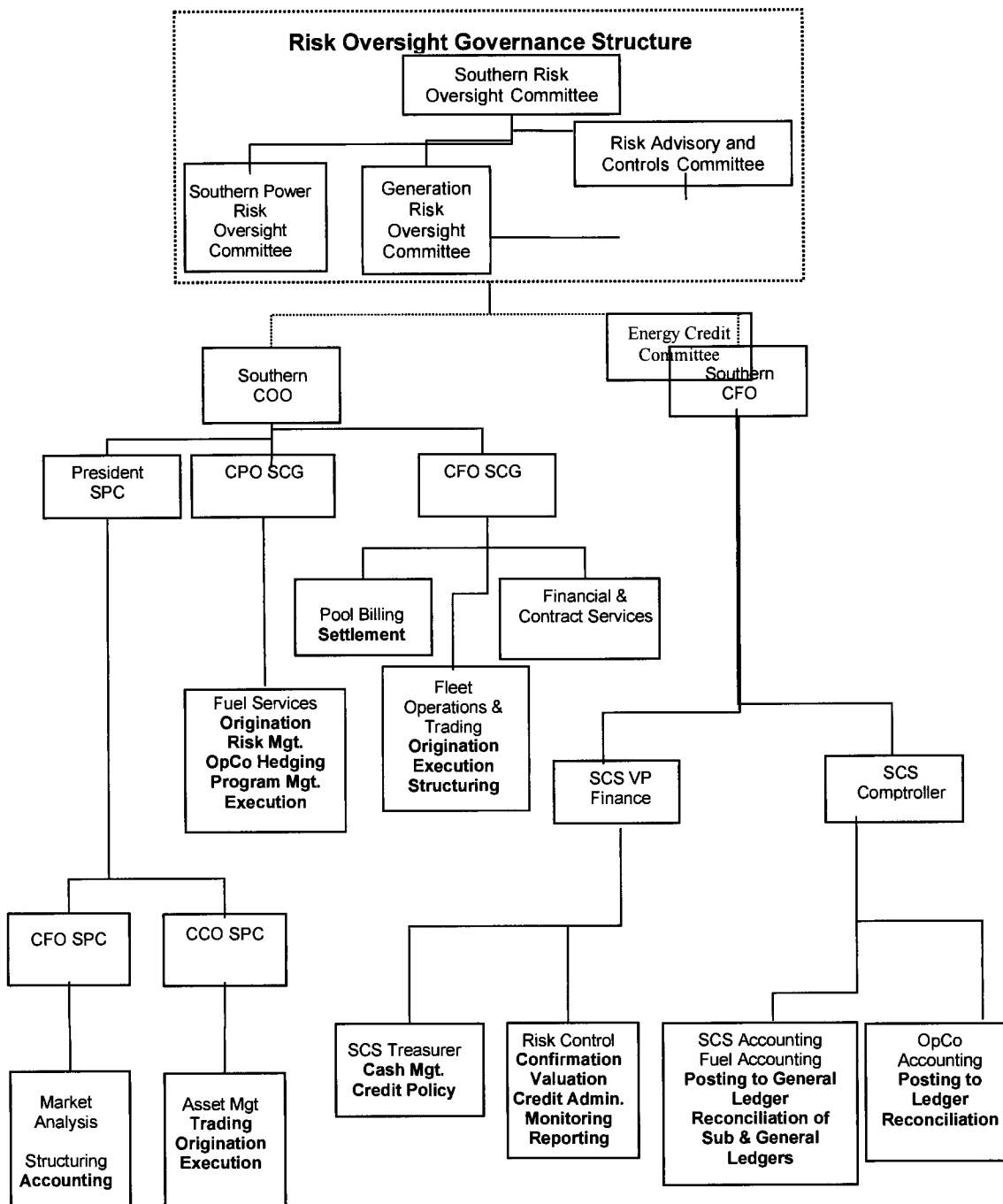


APPENDIX D  
 AUTHORIZATIONS (continued)  
 SCS Fuel Services

Name	Authority
Vice President, Fuel Services	
Gas Services Director	
Gas Operations Manager	
Gas Trading Manager	
Natural Gas Trader - Physical	
Natural Gas Trader - Financial	
Natural Gas Schedulers	
Coal Services Director	

**APPENDIX E**  
**SEGREGATION OF DUTIES**

To ensure that risk management activities are properly carried out, certain functions will be separated. The following chart identifies these functions (depicted as **BOLD** bullet items) and their reporting process.



APPENDIX F  
MARKET RISK MEASUREMENT

Approved Commodities	
Electrical Power	
Natural Gas	
Coal	
Environmental Products Oil Products RECs	

Parametric VaR Methodology

Formula Components

Component	Symbol	Comments
Value at Risk	VaR	See Equation Below
Position	PSN	Given in Applicable Measurement Units
Daily Standard Deviation of Price Change	$\Delta P$	Given in \$/Applicable Measurement Units
Holding Period – Business Days	HP	Taken From Parameters Table Shown Below
Confidence Interval Multiplier	CI	For Example: CI = 1.65 for 95-% Confidence Interval

Equation

$$\text{VaR} = \text{PSN} * \square P * \text{Square Root of HP} * \text{CI}$$

ParametersCommodity	Holding Period (HP)	Multiplier (CI)
Electric Power Term <= 1 Year Term > 1 Year		
Natural Gas Term <= 1 Year Term > 1 Year		

**APPENDIX F  
STRESS TESTING METHODOLOGY**

The purpose of stress testing is to generate percentage price changes for the forward curve that answer this question:

If an extreme event occurs, what can we expect to happen to prices and the portfolio value?

The stress test is designed to capture the expected value of an extreme event as defined by an extreme value distribution. To differentiate, there is a downward and an upward stress test.

Specifically, the expected downward stress is calculated as:

$$E[\Delta p/p \mid \Delta p/p < \Theta] = \text{the Integral of } f(x)dx \text{ from negative infinity to } \Theta$$

and the expected upward stress is calculated as:

$$E[\Delta p/p \mid \Delta p/p > \Theta] = \text{the Integral of } f(x)dx \text{ from } \Theta \text{ to infinity}$$

where  $\Theta$  is the threshold that defines classification as an extreme event,  $f(x)$  is an extreme value distribution fitted to a specific contract, and  $x$  is a percentage price change.

Price Return Distribution	
Holding Period	
Extreme Event Threshold	

**Ad Hoc Stress Testing**

Ad hoc stress testing will be performed as appropriate based on price scenarios determined using alternative methods including, but not limited to, the following:

- specific historical scenarios;
- rating agency defined price changes;
- analysis of out-of-the money option trading; and
- subjectively determined price changes.



APPENDIX G  
NOTIFICATION LEVELS

Position Classification	Income Change	Notify
Secondary Objectives		
Secondary Objectives		
Secondary Objectives		

APPENDIX G  
NOTIFICATION LEVELS

Position Classification	Income Change	Notify
All positions with mark-to-market changes immediately reflected in income (both primary and secondary activities)		
All positions with mark-to-market changes immediately reflected in income (both primary and secondary activities)		

APPENDIX G  
NOTIFICATION LEVELS

Position Classification	Value-at-Risk	Notify
All positions, except hedges associated with a commission approved program which provides for its own limits and/or cost recovery		

**NOTE: Recipients of notification events will only receive detailed information pertinent to their business needs, and any correspondence will be in compliance with the Separation Protocol.**

APPENDIX G  
NOTIFICATION LEVELS

Position Classification	Income Change	Notify
SPC Secondary Objectives		
SPC Secondary Objectives		
SPC Secondary Objectives		

Position Classification	Income Change	Notify
All SPC positions with mark-to-market changes immediately reflected in income		
All SPC positions with mark-to-market changes immediately reflected in income		

Position Classification	Value-at-Risk	Notify
All SPC positions		

APPENDIX H  
MARKET RISK LIMITS

Net Open Position Limits

		Value -at- Risk Limit
Secondary Activities		
All positions with marked-to-market changes immediately reflected in income		

NOTE: Although the value-at-risk limit applies to positions marked to market through income, VaR is calculated and monitored for all positions, and there are notification requirements as defined in Appendix G.

**If such open position limits are exceeded, SCS Risk Control will calculate and equitably allocate the responsibilities to bring the positions back into compliance.**

APPENDIX J  
ACCOUNTING AND TAX

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FASB Accounting Standards Codification ("ASC") 815 Derivatives and Hedging, ASC 820 Fair Value Measurements and related GAAP standards are the primary pronouncements addressing hedge accounting and provides guidance for exchange-traded contracts.

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

**Exhibit "C": Line-by-Line/Field-by-Field Justification**

<u>Line(s)/Field(s)<sup>1</sup></u>	<u>Justification</u>
Page 3 of 65 Lines 7, 8 and 20	The information delineated in Exhibit "C" 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.
Page 4 of 65 Lines 7, 15 and 16	
Page 5 of 65 Chart, lines 2 through 13 Chart, lines 16 through 26	
Page 6 of 65 Chart, lines 2 through 12 Lines 24 through 26	
Page 7 of 65 Lines 1 through 3	
Page 13 of 65 Lines 7 through 15	
Page 14 of 65 Lines 24 and 26	
Page 15 of 65 Lines 1 and 4 (Table) Line 6, columns A and B Lines 18 through 21	
Page 16 of 65 Lines 8, 9 and 11	
Page 25 of 65 Lines 9 through 12 Lines 14 through 17	
Page 26 of 65 Lines 8 through 12 Lines 14 through 16 Lines 23 through 25	

<sup>1</sup> Page number references correspond with the page numbers printed in the bottom center of each page.

<u>Line(s)/Field(s)</u>	<u>Justification</u>
Page 27 of 65 Lines 1 through 6 Lines 11 through 26	The information delineated in Exhibit "C" 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.
Page 28 of 65 Line 1 Lines 4 through 9 Lines 20 through 24	
Page 29 of 65 Lines 2 through 9 Lines 11 through 15	
Page 30 of 65 Lines 6 through 15 Lines 22 through 26	
Page 31 of 65 Lines 1 through 15 Lines 18 through 23	
Page 32 of 65 Lines 2 through 5 Lines 7 through 12 Lines 14 through 25	
Page 33 of 65 Lines 1 through 4 Lines 7 through 20 Lines 23 through 26	
Page 34 of 65 Lines 1 through 4 Lines 9 through 12 Lines 24 through 26	
Page 35 of 65 Lines 2 through 9 Lines 11 through 15 Lines 18 through 23	



<u>Line(s)/Field(s)</u>	<u>Justification</u>
Page 36 of 65 Lines 2 through 15	The information delineated in Exhibit "C" 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.
Page 37 of 65 Lines 7 through 12 Lines 18 through 21	
Page 38 of 65 Lines 5 through 8 Lines 15 through 23	
Page 39 of 65 Lines 8 through 15 Lines 23 through 26	
Page 40 of 65 Lines 1 through 6 Lines 14 through 21	
Page 41 of 65 Lines 5 through 14	
Page 42 of 65 Lines 5 through 10	
Page 43 of 65 (Table), as marked	
Page 44 of 65 (Table), as marked	
Page 45 of 65 (Table), as marked	
Page 46 of 65 (Table), as marked	

<b><u>Line(s)/Field(s)</u></b>	<b><u>Justification</u></b>
Page 48 of 65 (Tables), as marked	The information delineated in Exhibit "C" 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.
Page 49 of 65 (Table), as marked	
Page 50 of 65 (Table), as marked	
Page 51 of 65 (Table), as marked	
Page 52 of 65 (Table), as marked	
Page 53 of 65 (Tables), as marked	
Page 54 of 65 (Table), as marked	
Page 60 of 65 Lines 9 through 13 Lines 15 through 20 Lines 22 through 26 Lines 28 through 29 Lines 31 through 36 Lines 38 through 44	

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

IN RE: **Fuel and Purchased Power Cost** )  
**Recovery Clause with Generating** )  
**Performance Incentive Factor** ) Docket No.: **160001-EI**

**Joint Petition for Approval of Modifications** )  
**To Risk Management Plans by Duke Energy** )  
**Florida, Florida Power & Light Company, Gulf** )  
**Power Company and Tampa Electric Company** ) Docket No.: **160096-EI**

**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that a true copy of the foregoing was furnished by overnight mail this 3rd day of August, 2016 to the following:

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