

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



August 19, 2016

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

RECEIVED-FPSC  
2016 AUG 22 AM 9:43  
COMMISSION  
CLERK

RE: Docket No. 160001-EI

Dear Ms. Stauffer:

Enclosed for filing in the above referenced docket is Gulf Power Company's Request for Confidential Classification and Motion for Temporary Protective Order pertaining to certain information being produced in response to the Office of Public Counsel's Second Interrogatories to Gulf Power Company. Also included is a DVD of Gulf Power Company's Request for Confidential Classification and Motion for Temporary Protective Order in Microsoft Word format.

Sincerely,

Robert L. McGee, Jr.

**REDACTED**

COM \_\_\_\_\_  
AFD 1 & CD  
APA \_\_\_\_\_  
ECO \_\_\_\_\_  
ENG \_\_\_\_\_  
GCL \_\_\_\_\_  
IDM \_\_\_\_\_  
TEL \_\_\_\_\_  
CLK \_\_\_\_\_

md

Enclosures

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

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: August 22, 2016

\_\_\_\_\_)

**GULF POWER COMPANY'S  
REQUEST FOR CONFIDENTIAL CLASSIFICATION  
AND MOTION FOR TEMPORARY PROTECTIVE ORDER**

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 the Office of Public Counsel’s (“OPC”) Second Interrogatories (Nos. 11-18) in the above-referenced docket. As grounds for this request, the Company states:

1. A portion of the information submitted by Gulf Power in response to item Nos. 12 and 13 of OPC’s Second Interrogatories constitutes proprietary confidential business information. The information is entitled to confidential classification pursuant to section 366.093(3)(e), Florida Statutes. Specifically, the confidential information relates to Gulf’s fuel procurement strategy and consists of the percentage of hedging transactions for 2017 through 2018 which Gulf Power has entered into in accordance with the confidential target hedge percentages in its approved 2016 Risk Management Plan. Disclosure of this element of Gulf’s fuel procurement strategy to the market would provide insight into the confidential target hedge percentages in Gulf’s Risk Management Plan and impair Gulf’s efforts to hedge on the most favorable terms 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 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 19<sup>th</sup> day of August, 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: August 22, 2016

**GULF POWER COMPANY'S  
REQUEST FOR CONFIDENTIAL CLASSIFICATION  
AND MOTION FOR TEMPORARY PROTECTIVE ORDER**

**EXHIBIT "A"**

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

**EXHIBIT "B"**

12. Projected natural gas financial hedging gains or losses for 2017 as of July 31, 2016:
- a. Please provide the projected natural gas hedging gain or loss for calendar year 2017 based on the hedging positions the Company has already executed.
  - b. As part of this response, what percentage of the total anticipated natural gas burn for 2017 has already been hedged?

ANSWER:

- a. The current estimate, as of July 31, 2016, of net financial hedging loss for calendar year 2017 is approximately \$18,000,000.
- b. As of July 31, 2016, Gulf has hedged approximately [REDACTED] of the 2017 natural gas burn anticipated in its 2016 Energy Budget.

13. Projected natural gas financial hedging gains or losses for 2018 as of July 31, 2016:
- a. Please provide the projected natural gas hedging gain or loss for calendar year 2018 based on the hedging positions the Company has already executed.
  - b. As part of this response, what percentage of the total anticipated natural gas burn for 2018 has already been hedged?

ANSWER:

- a. The current estimate, as of July 31, 2016, of net financial hedging loss for calendar year 2018 is approximately \$12,000,000.
- b. As of July 31, 2016, Gulf has hedged approximately [REDACTED] of the 2018 natural gas burn anticipated in its 2016 Energy Budget.

**EXHIBIT "C"**

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

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

**Response to DR # 12(b)**  
Page 1 of 1, as highlighted

**Response to DR # 13(b)**  
Page 1 of 1, as highlighted

**Justification**

This information is entitled to confidential classification pursuant to §366.093(3), 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 19th day of August, 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  
Danijela Janjic  
2540 Shumard Oak Blvd  
Tallahassee, FL 32399-0850  
[djanjic@psc.state.fl.us](mailto:djanjic@psc.state.fl.us)  
[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**