



Robert L. McGee, Jr.
Regulatory & Pricing Manager

FILED JUN 16, 2017
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FPSC - COMMISSION CLERK

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June 15, 2017

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

RECEIVED-FPSC
2017 JUN 16 AM 10:54
COMMISSION
CLERK

RE: Docket No. 170001-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 January through March 2017 for Plant Scherer Unit 3.

Sincerely,

Robert L. McGee, Jr.
Regulatory and Pricing Manager

md

Enclosures

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

COM _____
AFD redacted + ICD
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.: 170001-EI
Date: June 16, 2017

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 January 2017, February 2017 and March 2017 (the “423 Reports”) relating to Gulf’s ownership interest in Plant Scherer Unit 3. 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 15th day of June, 2017.



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.: 170001-EI
Date: June 16, 2017

REQUEST FOR CONFIDENTIAL CLASSIFICATION

EXHIBIT "A"

This information has been provided to the Commission Clerk
under separate cover as confidential information.

EXHIBIT "B"

REDACTED

REDACTED

**MONTHLY REPORT OF COST AND QUALITY OF COAL FOR ELECTRIC PLANTS
ORIGIN, TONNAGE, DELIVERED PRICE, AND AS RECEIVED QUALITY
FPSC Form No. 423-2**

1. Reporting Month: JANUARY Year: 2017 4. Name, Title, & Telephone Number of Contact Person Concerning
Data Submitted on this Form: Mr. Charles T. Howton, Generation Performance Manager
(850)-444-6078
2. Reporting Company: Gulf Power Company
3. Plant Name: Scherer Electric Generating Plant 5. Signature of Official Submitting Report: C. T. Howton
6. Date Completed: June 12, 2017

Line No.	Supplier Name	Mine Location	Purchase Type	Transport Mode	MMBTUs	Effective Purchase Price (\$/Ton)	Effective Transport Charges (\$/Ton)	Total FOB Plant Price (\$/Ton)	Sulfur Content (%)	Btu Content (Btu/lb)	Ash Content (%)	Moisture Content (%)
(a)	(b)	(c)	(d)	(e)	(f)	(g)	(h)	(i)	(j)	(k)	(l)	(m)
1	CONTURA COAL SALES	169 WY	5 C	RR	244,039,700			64.054	0.40	8,423	4.87	29.55
2	CONTURA COAL SALES	169 WY	5 C	RR	167,566,290			68.594	0.41	8,389	4.91	29.80
3	PEABODY COALSLES, LLC	169 WY	5 C	RR	75,322,680			66.184	0.26	8,512	4.71	28.63
4	PEABODY COALSLES, LLC	169 WY	5 C	RR	75,197,090			75.485	0.28	8,455	4.69	28.76
5	PEABODY COALSLES, LLC	169 WY	5 C	RR	114,355,560			57.745	0.27	8,552	4.54	28.77
6	ARCH COAL SALES	169 WY	5 C	RR	9,849,440			58.270	0.30	8,400	5.54	30.45
7	Receipts True-Up for 12/2016				(101,870)							
8												
9												

(use continuation sheet if necessary)

**MONTHLY REPORT OF COST AND QUALITY OF COAL FOR ELECTRIC PLANTS
 DETAILED PURCHASED COAL INVOICE INFORMATION
 FPSC Form No. 423-2(a)**

1. Reporting Month: JANUARY Year: 2017
 2. Reporting Company: Gulf Power Company
 3. Plant Name: Scherer Electric Generating Plant
 4. Name, Title, & Telephone Number of Contact Person Concerning
 Data Submitted on this Form: Mr. Charles T. Howton, Generation Performance Manager
(850)-444-6078
 5. Signature of Official Submitting Report: C. T. Howton
 6. Date Completed: June 12, 2017

Line No.	Supplier Name	Mine Location	Purchase Type	MMBTU	FOB Mine Price (\$/Ton)	Shorthaul & Loading Charges (\$/Ton)	Original Invoice Price (\$/Ton)	Retroactive Price increases (\$/Ton)	Base Price (\$/Ton)	Quality Adjustments (\$/Ton)	Effective Purchase Price (\$/Ton)
(a)	(b)	(c)	(d)	(e)	(f)	(g)	(h)	(i)	(j)	(k)	(l)
1	CONTURA COAL SALES	169 WY	5 C	244,039,700		-		-		0.094	
2	CONTURA COAL SALES	169 WY	5 C	167,566,290		-		-		0.054	
3	PEABODY COALSALES, LLC	169 WY	5 C	75,322,680		-		-		(0.116)	
4	PEABODY COALSALES, LLC	169 WY	5 C	75,197,090		-		-		(0.215)	
5	PEABODY COALSALES, LLC	169 WY	5 C	114,355,560		-		-		(0.055)	
6	ARCH COAL SALES	169 WY	5 C	9,849,440		-		-			
7	Receipts True-Up for 12/2016			(101,870)							
8											
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(use continuation sheet if necessary)

**MONTHLY REPORT OF COST AND QUALITY OF COAL FOR ELECTRIC PLANTS
 DETAIL OF TRANSPORTATION CHARGES
 FPSC Form No. 423-(b)**

1. Reporting Month: JANUARY Year: 2017
 2. Reporting Company: Gulf Power Company
 3. Plant Name: Scherer Electric Generating Plant
 4. Name, Title, & Telephone Number of Contact Person Concerning
 Data Submitted on this Form: Mr. Charles T. Howton, Generation Performance Manager
 (850)-444-6078
 5. Signature of Official Submitting Report: C. T. Howton
 6. Date Completed: June 12, 2017

Line No.	Supplier Name	Mine Location			Shipping Point	Transport Mode	MMBTU	Effective Purchase Price (\$/Ton)	Additional Shorthaul & Loading Charges (\$/Ton)	Rail Charges				Waterborne Charges			Total Transportation charges (\$/Ton)	FOB Plant Price (\$/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)		
(a)	(b)	(c)			(d)	(e)	(f)	(g)	(h)	(i)	(j)	(k)	(l)	(m)	(n)	(o)	(p)	(q)
1	CONTURA COAL SALES	169	WY	5	EAGLE JUNCTION	RR	244,039,700		-		-	-	-	-	-		64.054	
2	CONTURA COAL SALES	169	WY	5	EAGLE JUNCTION	RR	167,566,290		-		-	-	-	-	-		68.594	
3	PEABODY COALSALS, LLC	169	WY	5	NARM JUNCTION	RR	75,322,680		-		-	-	-	-	-		66.184	
4	PEABODY COALSALS, LLC	169	WY	5	NARM JUNCTION	RR	75,197,090		-		-	-	-	-	-		75.485	
5	PEABODY COALSALS, LLC	169	WY	5	NARM JUNCTION	RR	114,355,560		-		-	-	-	-	-		57.745	
6	ARCH COAL SALES	169	WY	5	BLACK THUNDER, CAMPBELL CO	RR	9,849,440		-		-	-	-	-	-		58.270	
7	Receipts True-Up for 12/2016						(101,870)											
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(use continuation sheet if necessary)

**MONTHLY REPORT OF COST AND QUALITY OF COAL FOR ELECTRIC PLANTS
ORIGIN, TONNAGE, DELIVERED PRICE, AND AS RECEIVED QUALITY
FPSC Form No. 423-2**

1. Reporting Month: FEBRUARY Year: 2017
 2. Reporting Company: Gulf Power Company
 3. Plant Name: Scherer Electric Generating Plant
 4. Name, Title, & Telephone Number of Contact Person Concerning
 Data Submitted on this Form: Mr. Charles T. Howton, Generation Performance Manager
(850)-444-6078
 5. Signature of Official Submitting Report: C. T. Howton
 6. Date Completed: June 12, 2017

Line No.	Supplier Name	Mine Location	Purchase Type	Transport Mode	MMBTUs	Effective Purchase Price (\$/Ton)	Effective Transport Charges (\$/Ton)	Total FOB Plant Price (\$/Ton)	Sulfur Content (%)	Btu Content (Btu/lb)	Ash Content (%)	Moisture Content (%)
(a)	(b)	(c)	(d)	(e)	(f)	(g)	(h)	(i)	(j)	(k)	(l)	(m)
1	CONTURA COAL SALES	169 WY	5 C	RR	333,476,460			69.102	0.41	8,366	4.91	29.80
2	PEABODY COALSALES, LLC	169 WY	5 C	RR	125,708,560			62.369	0.26	8,518	4.71	28.63
3	PEABODY COALSALES, LLC	169 WY	5 C	RR	74,761,890			74.400	0.28	8,580	4.69	28.76
4	ARCH COAL SALES	169 WY	5 C	RR	68,211,100			58.353	0.30	8,299	5.54	30.45
5	Receipts True Up for 01/2017				675,380							
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(use continuation sheet if necessary)

**MONTHLY REPORT OF COST AND QUALITY OF COAL FOR ELECTRIC PLANTS
 DETAILED PURCHASED COAL INVOICE INFORMATION
 FPSC Form No. 423-2(a)**

1. Reporting Month: FEBRUARY Year: 2017
 2. Reporting Company: Gulf Power Company
 3. Plant Name: Scherer Electric Generating Plant
 4. Name, Title, & Telephone Number of Contact Person Concerning
 Data Submitted on this Form: Mr. Charles T. Howton, Generation Performance Manager
(850)-444-6078
 5. Signature of Official Submitting Report: C. T. Howton
 6. Date Completed: June 12, 2017

Line No.	Supplier Name	Mine Location	Purchase Type	MMBTU	FOB Mine Price (\$/Ton)	Shorthaul & Loading Charges (\$/Ton)	Original Invoice Price (\$/Ton)	Retroactive Price increases (\$/Ton)	Base Price (\$/Ton)	Quality Adjustments (\$/Ton)	Effective Purchase Price (\$/Ton)
(a)	(b)	(c)	(d)	(e)	(f)	(g)	(h)	(i)	(j)	(k)	(l)
1	CONTURA COAL SALES	169 WY	5 C	333,476,460		-		-		0.022	
2	PEABODY COALSALES, LLC	169 WY	5 C	125,708,560		-		-		(0.101)	
3	PEABODY COALSALES, LLC	169 WY	5 C	74,761,890		-		-		(0.030)	
4	ARCH COAL SALES	169 WY	5 C	68,211,100		-		-		(0.117)	
5	Receipts True Up for 01/2017			675,380							
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(use continuation sheet if necessary)

**MONTHLY REPORT OF COST AND QUALITY OF COAL FOR ELECTRIC PLANTS
 DETAIL OF TRANSPORTATION CHARGES
 FPSC Form No. 423-(b)**

1. Reporting Month: FEBRUARY Year: 2017
 2. Reporting Company: Gulf Power Company
 3. Plant Name: Scherer Electric Generating Plant

4. Name, Title, & Telephone Number of Contact Person Concerning
 Data Submitted on this Form: Mr. Charles T. Howton, Generation Performance Manager
 (850)-444-6078
 5. Signature of Official Submitting Report: C. T. Howton
 6. Date Completed: June 12, 2017

Line No.	Supplier Name	Mine Location			Shipping Point	Transport Mode	MMBTU	Effective Purchase Price (\$/Ton)	Additional Shorthaul & Loading Charges (\$/Ton)	Rail Charges			Waterborne Charges			Other Related Charges (\$/Ton)	Total Transportation charges (\$/Ton)	FOB Plant Price (\$/Ton)
										Rail Rate (\$/Ton)	Other Rail Charges (\$/Ton)	River Barge Rate (\$/Ton)	Trans-loading Rate (\$/Ton)	Ocean Barge Rate (\$/Ton)	Other Water Charges (\$/Ton)			
(a)	(b)	(c)			(d)	(e)	(f)	(g)	(h)	(i)	(j)	(k)	(l)	(m)	(n)	(o)	(p)	(q)
1	CONTURA COAL SALES	169	WY	5	EAGLE JUNCTION	RR	333,476,460					-	-	-	-			69.102
2	PEABODY COALSALES, LLC	169	WY	5	NARM JUNCTION	RR	125,708,560					-	-	-	-			62.369
3	PEABODY COALSALES, LLC	169	WY	5	NARM JUNCTION	RR	74,761,890					-	-	-	-			74.400
4	ARCH COAL SALES	169	WY	5	BLACK THUNDER, CAMPBELL CO	RR	68,211,100					-	-	-	-			58.353
5	Receipts True Up for 01/2017						675,380											
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(use continuation sheet if necessary)

**MONTHLY REPORT OF COST AND QUALITY OF COAL FOR ELECTRIC PLANTS
ORIGIN, TONNAGE, DELIVERED PRICE, AND AS RECEIVED QUALITY
FPSC Form No. 423-2**

1. Reporting Month: MARCH Year: 2017 4. Name, Title, & Telephone Number of Contact Person Concerning
Data Submitted on this Form: Mr. Charles T. Howton, Generation Performance Manager
2. Reporting Company: Gulf Power Company (850)-444-6078
3. Plant Name: Scherer Electric Generating Plant 5. Signature of Official Submitting Report: C. T. Howton
6. Date Completed: June 12, 2017

Line No.	Supplier Name	Mine Location	Purchase Type	Transport Mode	MMBTUs	Effective Purchase Price (\$/Ton)	Effective Transport Charges (\$/Ton)	Total FOB Plant Price (\$/Ton)	Sulfur Content (%)	Btu Content (Btu/lb)	Ash Content (%)	Moisture Content (%)
(a)	(b)	(c)	(d)	(e)	(f)	(g)	(h)	(i)	(j)	(k)	(l)	(m)
1	CONTURA COAL SALES	169 WY	5 C	RR	381,619,220			68.885	0.41	8,368	4.91	29.80
2	PEABODY COALSALES, LLC	169 WY	5 C	RR	124,550,880			66.277	0.26	8,498	4.71	28.63
3	PEABODY COALSALES, LLC	169 WY	5 C	RR	37,543,200			68.605	0.28	8,441	4.69	28.76
4	PEABODY COALSALES, LLC	169 WY	5 C	RR	113,636,840			56.976	0.27	8,517	4.54	28.77
5	ARCH COAL SALES	169 WY	5 C	RR	29,224,470			57.984	0.30	8,299	5.54	30.45
6	Receipts True up for Feb 2017				218,930							
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(use continuation sheet if necessary)

**MONTHLY REPORT OF COST AND QUALITY OF COAL FOR ELECTRIC PLANTS
 DETAILED PURCHASED COAL INVOICE INFORMATION
 FPSC Form No. 423-2(a)**

1. Reporting Month: MARCH Year: 2017
 2. Reporting Company: Gulf Power Company
 3. Plant Name: Scherer Electric Generating Plant
 4. Name, Title, & Telephone Number of Contact Person Concerning
 Data Submitted on this Form: Mr. Charles T. Howton, Generation Performance Manager
(850)-444-6078
 5. Signature of Official Submitting Report: C. T. Howton
 6. Date Completed: June 12, 2017

Line No.	Supplier Name	Mine Location	Purchase Type	MMBTU	FOB Mine Price (\$/Ton)	Shorthaul & Loading Charges (\$/Ton)	Original Invoice Price (\$/Ton)	Retroactive Price increases (\$/Ton)	Base Price (\$/Ton)	Quality Adjustments (\$/Ton)	Effective Purchase Price (\$/Ton)
(a)	(b)	(c)	(d)	(e)	(f)	(g)	(h)	(i)	(j)	(k)	(l)
1	CONTURA COAL SALES	169 WY	5 C	381,619,220		-		-		0.025	
2	PEABODY COALSALES, LLC	169 WY	5 C	124,550,880		-		-		(0.133)	
3	PEABODY COALSALES, LLC	169 WY	5 C	37,543,200		-		-		(0.215)	
4	PEABODY COALSALES, LLC	169 WY	5 C	113,636,840		-		-		(0.094)	
5	ARCH COAL SALES	169 WY	5 C	29,224,470		-		-		(0.116)	
6	Receipts True up for Feb 2017			218,930							
7											
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(use continuation sheet if necessary)

**MONTHLY REPORT OF COST AND QUALITY OF COAL FOR ELECTRIC PLANTS
 DETAIL OF TRANSPORTATION CHARGES
 FPSC Form No. 423-(b)**

1. Reporting Month: MARCH Year: 2017
 2. Reporting Company: Gulf Power Company
 3. Plant Name: Scherer Electric Generating Plant
 4. Name, Title, & Telephone Number of Contact Person Concerning
 Data Submitted on this Form: Mr. Charles T. Howton, Generation Performance Manager
 (850)-444-6078
 5. Signature of Official Submitting Report: C. T. Howton
 6. Date Completed: June 12, 2017

Line No.	Supplier Name	Mine Location			Shipping Point	Transport Mode	MMBTU	Effective Purchase Price (\$/Ton)	Additional Shorthaul & Loading Charges (\$/Ton)	Rail Charges				Waterborne Charges			Total Transportation charges (\$/Ton)	FOB Plant Price (\$/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)		
(a)	(b)	(c)			(d)	(e)	(f)	(g)	(h)	(i)	(j)	(k)	(l)	(m)	(n)	(o)	(p)	(q)
1	CONTURA COAL SALES	169	WY	5	EAGLE JUNCTION	RR	381,619,220		-		-	-	-	-	-		68.885	
2	PEABODY COALSALES, LLC	169	WY	5	NARM JUNCTION	RR	124,550,880		-		-	-	-	-	-		66.277	
3	PEABODY COALSALES, LLC	169	WY	5	NARM JUNCTION	RR	37,543,200		-		-	-	-	-	-		68.605	
4	PEABODY COALSALES, LLC	169	WY	5	NARM JUNCTION	RR	113,636,840		-		-	-	-	-	-		56.976	
5	ARCH COAL SALES	169	WY	5	BLACK THUNDER, CAMPBELL CO	RR	29,224,470		-		-	-	-	-	-		57.984	
6	Receipts True up for Feb 2017						218,930											
7																		
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9																		
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(use continuation sheet if necessary)

EXHIBIT "C"

Reporting Month: January 2017

Form 423-2

Plant Names	Columns	Justification
Plant Scherer, lines 1-6	(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 Scherer, lines 1-6	(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 Scherer, lines 1-6	(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 Scherer, lines 1-6	(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 Scherer, lines 1-6	(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 Scherer, lines 1-6	(l)	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 Scherer, lines 1-6	(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 Scherer, lines 1-6	(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 Scherer, lines 1-6	(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: February 2017

Form 423-2

Plant Names	Columns	Justification
Plant Scherer, lines 1-4	(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 Scherer, lines 1-4	(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 Scherer, lines 1-4	(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 Scherer, lines 1-4	(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 Scherer, lines 1-4	(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 Scherer, lines 1-4	(l)	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 Scherer, lines 1-4	(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 Scherer, lines 1-4	(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 Scherer, lines 1-4	(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: March 2017

Form 423-2

Plant Names	Columns	Justification
Plant Scherer, lines 1-5	(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 Scherer, lines 1-5	(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 Scherer, lines 1-5	(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 Scherer, lines 1-5	(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 Scherer, lines 1-5	(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 Scherer, lines 1-5	(l)	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 Scherer, lines 1-5	(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 Scherer, lines 1-5	(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 Scherer, lines 1-5	(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.: **170001-EI**

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true copy of the foregoing was furnished by overnight mail this 15th day of June, 2017 to the following:

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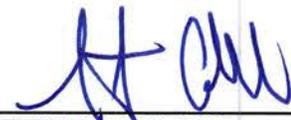
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