



February 28, 2019

Mr. Adam Teitzman, Commission Clerk  
Florida Public Service Commission  
2540 Shumard Oak Boulevard  
Tallahassee, FL 32399-0850

**REDACTED**

RE: Docket No. 20190001-EI

Dear Mr. Teitzman:

Enclosed is Gulf Power Company's Request for Confidential Classification pertaining to Schedule CCA-4 of Exhibit CSB-1 to the Direct Testimony of C. Shane Boyett dated March 1, 2019.

Sincerely,

C. Shane Boyett  
Regulatory Issues Manager

md

Enclosures

cc: Gulf Power Company  
Russell Badders, Esq., VP & Associate General Counsel

COM	___
AFD	<u>1</u> and <u>1 CD</u>
APA	___
ECO	___
ENG	___
GCL	___
IDM	___
CLK	___

COMMISSION  
CLERK

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RECEIVED-FPSC

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

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

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Docket No.: 20190001-EI  
Date: March 1, 2019

**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 information contained in Schedule CCA-4 of Exhibit CSB-1 to the Direct Testimony of C. Shane Boyett dated March 1, 2019 on behalf of Gulf Power. As grounds for this request, the Company states:

1. A portion of the information contained in Schedule CCA-4 of Exhibit CSB-1 is proprietary confidential business information regarding contractual matters which would cause irreparable harm to Gulf Power, the entities with whom it has contracted, and most importantly, to Gulf’s customers if such information was disclosed to the general public. In addition, the Schedule contains information relating to competitive interests in capacity markets which would cause irreparable harm to Gulf Power and the entities with whom it has contracted if such information was disclosed to the general public. The information is entitled to confidential classification pursuant to section 366.093(3) (d) and (e), Florida Statutes. Schedule CCA-4 provides the price terms for capacity contracts which were active in 2018. The price terms in these contracts are regarded by both Gulf and the counterparties as confidential. The pricing, which resulted from negotiations between Gulf and the counterparties, is specific to the individual contracts and is not publicly known. Disclosure of this information would negatively impact Gulf’s ability to negotiate pricing favorable to its customers in future capacity contracts because potential counterparties may refuse to enter into contracts with Gulf, or may charge higher prices if the price terms were made public.

2. The information filed pursuant to this Request is intended to be, and is treated as, confidential by Gulf Power and, to this attorney's knowledge, has not been otherwise publicly disclosed.

3. Submitted as Exhibit "A" is a copy of Exhibit CSB-1, Schedule CCA-4, with highlighted 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 Exhibit CSB-1, Schedule CCA-4, 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 28<sup>th</sup> day of February, 2019.



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**RUSSELL A. BADDERS**  
**Vice President & Associate General Counsel**  
Florida Bar No. 007455  
Russell.Badders@nexteraenergy.com  
**Gulf Power Company**  
Once Energy Place  
Pensacola FL 32520-0100  
(850)444-6550

**STEVEN R. GRIFFIN**  
Florida Bar No. 0627569  
srg@beggslane.com  
**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.: 20190001-EI  
Date: March 1, 2019

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**REQUEST FOR CONFIDENTIAL CLASSIFICATION**

**EXHIBIT "A"**

Provided to Commission Clerk under separate  
cover as confidential information.

EXHIBIT "B"

Gulf Power Company  
2018 Capacity Contracts

	(A)	(B)	(C)	(D)	(E)	(F)	(G)	(H)	(I)	(J)	(K)	(L)	(M)
1	<b>Contract/Counterparty</b>		<b>Term</b>		<b>Contract</b>								
2		<b>Start</b>	<b>End <sup>(1)</sup></b>	<b>Type</b>									
3	Southern Intercompany Interchange												
4	PPAs												
5	Shell Energy N.A. (U.S.), LP												
6	Other												
7	South Carolina PSA												
8	Exelon Corporation												
9	PowerSouth Energy Cooperative												
9	<b>Capacity Costs (\$)</b>												
10	<b>January</b>	<b>February</b>	<b>March</b>	<b>April <sup>(2)</sup></b>	<b>May <sup>(2)</sup></b>	<b>June</b>	<b>July</b>	<b>August</b>	<b>September</b>	<b>October</b>	<b>November</b>	<b>December</b>	<b>Total</b>
11	Southern Intercompany Interchange												
12	PPAs												
13	Shell Energy N.A. (U.S.), LP												
14	Other												
15	South Carolina PSA												
16	Exelon Corporation												
17	PowerSouth Energy Cooperative												
18	Total												
19	<b>Capacity MW</b>												
20	<b>January</b>	<b>February</b>	<b>March</b>	<b>April</b>	<b>May</b>	<b>June</b>	<b>July</b>	<b>August</b>	<b>September</b>	<b>October</b>	<b>November</b>	<b>December</b>	
21	Southern Intercompany Interchange												
22	PPAs												
23	Shell Energy N.A. (U.S.), LP												
24	Other												
25	South Carolina PSA												
26	Exelon Corporation												
27	PowerSouth Energy Cooperative												

28 (1) Unless otherwise noted, contract remains effective unless terminated upon 30 days prior written notice.

29 (2) Southern Intercompany Interchange reserve sharing prior month true up only.



EXHIBIT "C"

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

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

**Justification**

**CSB-1, Schedule CCA-4**

Lines 12 and 15 through 16, Columns A-M  
Lines 25 through 27, Columns A-L

This information is entitled to confidential classification pursuant to §366.093(3) (d) and (e), Florida Statutes. The basis for this information being designated as confidential is more fully set forth in paragraph 1.

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

IN RE: **Fuel and Purchased Power Cost** )  
**Recovery Clause with Generating** )  
**Performance Incentive Factor** )

Docket No.: **20190001-EI**

**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that a true copy of the foregoing was furnished by overnight mail this 28th day of February, 2019 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  
Dianne M. Triplett  
299 First Avenue North  
St. Petersburg, FL 33701  
[Dianne.triplett@duke-energy.com](mailto:Dianne.triplett@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. Jeffry Wahlen  
Post Office Box 391  
Tallahassee, FL 32302  
[jbeasley@ausley.com](mailto:jbeasley@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  
J. R. Kelly  
Patricia A. Christensen  
Associate Public Counsel  
c/o The Florida Legislature  
111 W. Madison Street, Room 812  
Tallahassee, FL 32399-1400  
[Kelly.jr@leg.state.fl.us](mailto:Kelly.jr@leg.state.fl.us)  
[Christensen.patty@leg.state.fl.us](mailto:Christensen.patty@leg.state.fl.us)

Duke Energy Florida, Inc.  
Matthew R. Bernier  
106 East College Avenue,  
Suite 800  
Tallahassee, FL 32301-7740  
[Matthew.bernier@duke-energy.com](mailto:Matthew.bernier@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)

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)

Office of the General Counsel  
Suzanne Brownless  
Johana Nieves  
2540 Shumard Oak Blvd  
Tallahassee, FL 32399-0850  
[sbrownle@psc.state.fl.us](mailto:sbrownle@psc.state.fl.us)  
[jnieves@psc.state.fl.us](mailto:jnieves@psc.state.fl.us)

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)



**RUSSELL A. BADDERS**  
**VP & Associate General Counsel**  
Florida Bar No. 007455  
[Russell.Badders@nexteraenergy.com](mailto:Russell.Badders@nexteraenergy.com)  
**Gulf Power Company**  
One Energy Place  
Pensacola FL 32520-0100  
(850) 444-6550

**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**