



April 2, 2019

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

RE: Docket No. 20190001-EI

**REDACTED**

Dear Mr. Teitzman:

Enclosed is Gulf Power Company's Request for Confidential Classification regarding certain portions of Gulf Power's August-December, 2018 Hedging Activity Report.

Sincerely,

C. Shane Boyett  
Regulatory Issues Manager

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Enclosures

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

COM \_\_\_\_\_  
AFD I and 1 CD  
APA \_\_\_\_\_  
ECO \_\_\_\_\_  
ENG \_\_\_\_\_  
GCL \_\_\_\_\_  
IDM \_\_\_\_\_  
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COMMISSION  
CLERK

2019 APR -3 AM 10:12

RECEIVED-FPSC

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 filed: April 3, 2019

REQUEST FOR CONFIDENTIAL CLASSIFICATION

GULF POWER COMPANY ["Gulf Power", "Gulf", or the "Company"], by and through its undersigned attorney 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 portions of Gulf Power's Hedging Activity Report. As grounds for this request, the Company states:

1. Pursuant to the Order Establishing Procedure in this docket, Order No. PSC-2019-0059-PCO-EI, Gulf Power is required to file a Hedging Activity Report by April 3, 2019 detailing its hedging transactions during the months of August through December of the previous year.

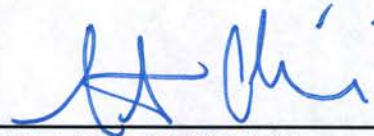
2. A portion of the information in the Hedging Activity Report constitutes proprietary and commercially sensitive information regarding competitive interests and contractual matters of Gulf Power which, if disclosed to the general public, would cause irreparable harm to Gulf Power and its customers. This information is entitled to confidential classification pursuant to section 366.093(3)(d), Florida Statutes. Specifically, the information consists of pricing terms for natural gas hedging transactions between Gulf Power and various counterparties. Gulf, its counterparties and other members of the market in which it competes consider this type of information to be competitively sensitive. Disclosure of this information would adversely affect Gulf's ability to contract for goods and services on favorable terms for the benefit of its customers, would impair the competitive interests of Gulf and its vendors, and would place Gulf at a competitive disadvantage when coupled with other information that is publicly available.

3. 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.

4. Submitted as Exhibit "A" is a copy of Gulf Power's Hedging Activity Report, on which is 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 Gulf's Hedging Activity Report 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 2<sup>nd</sup> day of April, 2019.



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**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

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Docket No.: 20190001-EI  
Date: April 3, 2019

**REQUEST FOR CONFIDENTIAL CLASSIFICATION**

**EXHIBIT "A"**

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

**EXHIBIT "B"**

	A	B	C	D	E	F	G	H	I	J	K
	Counterparty	Deal Id	Settlement Type	We Pay Index	We Pay Price	They Pay Index	They Pay Price	Settlement Source	Hedge Month	Opco Deal Volume	Dollar Amount
1	MERRIL	9187	Swaps	Fixed		Nymex LD HH		Nymex	08/2018	50,000	
2	SHELLTRADE	9239	Swaps	Fixed		Nymex LD HH		Nymex	08/2018	40,000	
3	JPMORG	9260	Swaps	Fixed		Nymex LD HH		Nymex	08/2018	60,000	
4	MERRIL	9271	Swaps	Fixed		Nymex LD HH		Nymex	08/2018	60,000	
5	MERRIL	9288	Swaps	Fixed		Nymex LD HH		Nymex	08/2018	70,000	
6	MERRIL	9345	Swaps	Fixed		Nymex LD HH		Nymex	08/2018	100,000	
7	JPMORG	9366	Swaps	Fixed		Nymex LD HH		Nymex	08/2018	60,000	
8	JPMORG	9385	Swaps	Fixed		Nymex LD HH		Nymex	08/2018	50,000	
9	MERRIL	9444	Swaps	Fixed		Nymex LD HH		Nymex	08/2018	50,000	
10	JPMORG	9494	Swaps	Fixed		Nymex LD HH		Nymex	08/2018	40,000	
11	JPMORG	9539	Swaps	Fixed		Nymex LD HH		Nymex	08/2018	40,000	
12	JPMORG	9670	Swaps	Fixed		Nymex LD HH		Nymex	08/2018	40,000	
13	MERRIL	9815	Swaps	Fixed		Nymex LD HH		Nymex	08/2018	60,000	
14	JPMORG	9827	Swaps	Fixed		Nymex LD HH		Nymex	08/2018	60,000	
15	JPMORG	9849	Swaps	Fixed		Nymex LD HH		Nymex	08/2018	60,000	
16	JPMORG	9889	Swaps	Fixed		Nymex LD HH		Nymex	08/2018	60,000	
17	MERRIL	9920	Swaps	Fixed		Nymex LD HH		Nymex	08/2018	60,000	
18	JPMORG	9926	Swaps	Fixed		Nymex LD HH		Nymex	08/2018	60,000	
19	JPMORG	9930	Swaps	Fixed		Nymex LD HH		Nymex	08/2018	30,000	
20	MERRIL	9937	Swaps	Fixed		Nymex LD HH		Nymex	08/2018	20,000	
21	JPMORG	9940	Swaps	Fixed		Nymex LD HH		Nymex	08/2018	20,000	
22	JPMORG	8654	Swaps	Fixed		Nymex LD HH		Nymex	08/2018	40,000	
23	MERRIL	8668	Swaps	Fixed		Nymex LD HH		Nymex	08/2018	40,000	
24	JPMORG	8707	Swaps	Fixed		Nymex LD HH		Nymex	08/2018	40,000	
25	MERRIL	8747	Swaps	Fixed		Nymex LD HH		Nymex	08/2018	50,000	
26	JPMORG	8768	Swaps	Fixed		Nymex LD HH		Nymex	08/2018	30,000	
27	JPMORG	8777	Swaps	Fixed		Nymex LD HH		Nymex	08/2018	20,000	
28	SHELLTRADE	8785	Swaps	Fixed		Nymex LD HH		Nymex	08/2018	20,000	
29	SHELLTRADE	8809	Swaps	Fixed		Nymex LD HH		Nymex	08/2018	30,000	
30	JPMORG	8899	Swaps	Fixed		Nymex LD HH		Nymex	08/2018	20,000	
31	JPMORG	8951	Swaps	Fixed		Nymex LD HH		Nymex	08/2018	40,000	
32										<b>Total</b>	<b>\$1,383,860.00</b>

	A	B	C	D	E	F	G	H	I	J	K
	Counterparty	Deal Id	Settlement Type	We Pay Index	We Pay Price	They Pay Index	They Pay Price	Settlement Source	Hedge Month	Opco Deal Volume	Dollar Amount
1	MERRIL	9187	Swaps	Fixed		Nymex LD HH		Nymex	09/2018	50,000	
2	SHELLTRADE	9239	Swaps	Fixed		Nymex LD HH		Nymex	09/2018	40,000	
3	JPMORG	9260	Swaps	Fixed		Nymex LD HH		Nymex	09/2018	60,000	
4	MERRIL	9271	Swaps	Fixed		Nymex LD HH		Nymex	09/2018	60,000	
5	MERRIL	9288	Swaps	Fixed		Nymex LD HH		Nymex	09/2018	70,000	
6	MERRIL	9345	Swaps	Fixed		Nymex LD HH		Nymex	09/2018	100,000	
7	JPMORG	9366	Swaps	Fixed		Nymex LD HH		Nymex	09/2018	60,000	
8	JPMORG	9385	Swaps	Fixed		Nymex LD HH		Nymex	09/2018	50,000	
9	MERRIL	9444	Swaps	Fixed		Nymex LD HH		Nymex	09/2018	50,000	
10	JPMORG	9494	Swaps	Fixed		Nymex LD HH		Nymex	09/2018	40,000	
11	JPMORG	9539	Swaps	Fixed		Nymex LD HH		Nymex	09/2018	40,000	
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15	JPMORG	9849	Swaps	Fixed		Nymex LD HH		Nymex	09/2018	60,000	
16	JPMORG	9889	Swaps	Fixed		Nymex LD HH		Nymex	09/2018	60,000	
17	MERRIL	9920	Swaps	Fixed		Nymex LD HH		Nymex	09/2018	60,000	
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25	SHELLTRADE	8785	Swaps	Fixed		Nymex LD HH		Nymex	09/2018	20,000	
26	JPMORG	8654	Swaps	Fixed		Nymex LD HH		Nymex	09/2018	40,000	
27	MERRIL	8668	Swaps	Fixed		Nymex LD HH		Nymex	09/2018	40,000	
28	JPMORG	8707	Swaps	Fixed		Nymex LD HH		Nymex	09/2018	40,000	
29	SHELLTRADE	8809	Swaps	Fixed		Nymex LD HH		Nymex	09/2018	30,000	
30	JPMORG	8899	Swaps	Fixed		Nymex LD HH		Nymex	09/2018	20,000	
31	JPMORG	8951	Swaps	Fixed		Nymex LD HH		Nymex	09/2018	40,000	
32										<b>Total</b>	<b>\$1,280,200.00</b>

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	Counterparty	Deal Id	Settlement Type	We Pay Index	We Pay Price	They Pay Index	They Pay Price	Settlement Source	Hedge Month	Opco Deal Volume	Dollar Amount
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8	JPMORG	9385	Swaps	Fixed		Nymex LD HH		Nymex	10/2018	50,000	
9	MERRIL	9444	Swaps	Fixed		Nymex LD HH		Nymex	10/2018	50,000	
10	JPMORG	9494	Swaps	Fixed		Nymex LD HH		Nymex	10/2018	40,000	
11	JPMORG	9539	Swaps	Fixed		Nymex LD HH		Nymex	10/2018	40,000	
12	JPMORG	9670	Swaps	Fixed		Nymex LD HH		Nymex	10/2018	40,000	
13	MERRIL	9815	Swaps	Fixed		Nymex LD HH		Nymex	10/2018	60,000	
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16	JPMORG	9889	Swaps	Fixed		Nymex LD HH		Nymex	10/2018	60,000	
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21	JPMORG	9940	Swaps	Fixed		Nymex LD HH		Nymex	10/2018	20,000	
22	MERRIL	8747	Swaps	Fixed		Nymex LD HH		Nymex	10/2018	50,000	
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25	SHELLTRADE	8785	Swaps	Fixed		Nymex LD HH		Nymex	10/2018	20,000	
26	JPMORG	8707	Swaps	Fixed		Nymex LD HH		Nymex	10/2018	40,000	
27	SHELLTRADE	8809	Swaps	Fixed		Nymex LD HH		Nymex	10/2018	30,000	
28	JPMORG	8899	Swaps	Fixed		Nymex LD HH		Nymex	10/2018	20,000	
29	JPMORG	8951	Swaps	Fixed		Nymex LD HH		Nymex	10/2018	40,000	
30										<b>Total</b>	<b>\$989,160.00</b>



	A	B	C	D	E	F	G	H	I	J	K
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25	JPMORG	8899	Swaps	Fixed		Nymex LD HH		Nymex	11/2018	20,000	
26	JPMORG	8951	Swaps	Fixed		Nymex LD HH		Nymex	11/2018	40,000	
27										<b>Total</b>	<b>\$631,600.00</b>

Docket No. 20190001-EI  
 August 2018 - December 2018 Hedging Report  
 GULF POWER COMPANY  
 Page 6 of 6

	A	B	C	D	E	F	G	H	I	J	K
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6	MERRIL	9345	Swaps	Fixed		Nymex LD HH		Nymex	12/2018	100,000	
7	JPMORG	9366	Swaps	Fixed		Nymex LD HH		Nymex	12/2018	60,000	
8	JPMORG	9385	Swaps	Fixed		Nymex LD HH		Nymex	12/2018	50,000	
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16	JPMORG	9889	Swaps	Fixed		Nymex LD HH		Nymex	12/2018	60,000	
17	MERRIL	9920	Swaps	Fixed		Nymex LD HH		Nymex	12/2018	60,000	
18	JPMORG	9926	Swaps	Fixed		Nymex LD HH		Nymex	12/2018	60,000	
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24	SHELLTRADE	8809	Swaps	Fixed		Nymex LD HH		Nymex	12/2018	30,000	
25	JPMORG	8899	Swaps	Fixed		Nymex LD HH		Nymex	12/2018	20,000	
26	JPMORG	8951	Swaps	Fixed		Nymex LD HH		Nymex	12/2018	40,000	
27										<b>Total</b>	<b>(\$1,235,000.00)</b>

**EXHIBIT "C"**

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

<b><u>Line(s)/Field(s)</u></b>	<b><u>Justification</u></b>
Page 2 of 6 Lines 1-31, Columns E, G and K	This information is entitled to confidential classification pursuant to §366.093(3)(d), Florida Statutes. The basis for this information being designated as confidential is more fully set forth in paragraph 2.
Page 3 of 6 Lines 1-31, Columns E, G and K	
Page 4 of 6 Lines 1-29, Columns E, G and K	
Page 5 of 6 Lines 1-26, Columns E, G and K	
Page 6 of 6 Lines 1-26, Columns E, G and K	

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 2nd day of April, 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  
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[mcassel@fpuc.com](mailto:mcassel@fpuc.com)

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c/o Stone Mattheis Xenopoulos  
& Brew, P.C.  
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1025 Thomas Jefferson St, NW  
Washington, DC 20007  
[jbrew@smxblaw.com](mailto:jbrew@smxblaw.com)  
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Florida Power & Light Company  
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[Maria.moncada@fpl.com](mailto:Maria.moncada@fpl.com)

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Patricia A. Christensen  
Associate Public Counsel  
c/o The Florida Legislature  
111 W. Madison Street, Room 812  
Tallahassee, FL 32399-1400  
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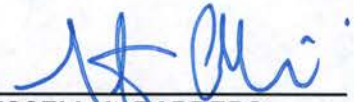
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