



February 28, 2020

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

REDACTED

RE: Docket No. 20200001-EI

Dear Mr. Teitzman:

Enclosed is Gulf Power Company's Request for Confidential Classification pertaining to Schedule CCA-4 of Exhibit RLH-1 to the Direct Testimony of Richard L. Hume dated March 2, 2020.

Sincerely,

Richard Hume
Regulatory Issues Manager

COM	_____
AFD	<u>1</u> Exh B
APA	_____
ECO	_____
ENG	_____
GCL	_____
IDM	_____
CLK	_____

md

Enclosures

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

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BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

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

Docket No.: 20200001-EI

Date: March 2, 2020

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 RLH-1 to the Direct Testimony of C. Richard Hume dated March 2, 2020 on behalf of Gulf Power. As grounds for this request, the Company states:

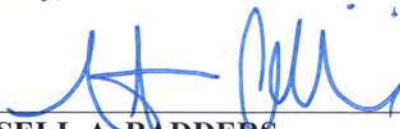
1. A portion of the information contained in Schedule CCA-4 of Exhibit RLH-1 is proprietary confidential business information regarding contractual matters which would cause irreparable harm to Gulf Power, the entities with whom it has contracted, and most importantly, to Gulf’s customers if such information 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 2019. 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 RLH-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 RLH-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 28th day of February, 2020.



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BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

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

Docket No.: 20200001-EI
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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
2019 Capacity Contracts

	(A)	(B)	(C)	(D)	(E)	(F)	(G)	(H)	(I)	(J)	(K)	(L)	(M)	
	Term			Contract										
1	Contract/Counterparty	Start	End ⁽¹⁾	Type										
2	Southern Intercompany Interchange	5/1/2007	5 Yr Notice	SES Opco										
3	<u>PPAs</u>													
4	Shell Energy N.A. (U.S.), LP	11/2/2009	5/31/2023	Firm										
5	<u>Other</u>													
6	South Carolina PSA	9/1/2003	-	Other										
7	TEA Corporation	1/1/2019	12/31/2019	Other										
8	Rainbow Energy Marketing Corporation	1/1/2019	2/28/2019	Other										
9	<u>Capacity Costs (\$)</u>	Actual	Actual	Actual	Actual	Actual	Actual	Actual	Actual	Actual	Actual	Actual	Total	
10	Southern Intercompany Interchange	January	February	March	April ⁽²⁾	May	June	July	August	September	October	November	December ⁽²⁾	
11	<u>PPAs</u>													
12	Shell Energy N.A. (U.S.), LP													
13														
14	<u>Other</u>													
15	South Carolina PSA													
16	TEA Corporation													
17	Rainbow Energy Marketing Corporation													
18	Total	7,185,428	7,197,645	7,178,454	7,177,821	7,263,198	7,195,836	7,075,296	7,076,269	7,076,269	7,076,269	7,076,269	6,973,698	85,552,453
19		Actual	Actual	Actual	Actual	Actual	Actual	Actual	Actual	Actual	Actual	Actual	Actual	
20	<u>Capacity MW</u>	January	February	March	April	May	June	July	August	September	October	November	December	
21	Southern Intercompany Interchange													
22	<u>PPAs</u>													
23	Shell Energy N.A. (U.S.), LP													
24														
25	<u>Other</u>													
26	South Carolina PSA													
27	TEA Corporation													
28	Rainbow Energy Marketing Corporation													

29 (1) Unless otherwise noted, contract remains effective unless terminated upon 30 days prior written notice.
30 (2) Southern Intercompany Interchange reserve sharing .

EXHIBIT "C"

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

Line(s)/Field(s)

Justification

RLH-1, Schedule CCA-4

Lines 10, 12 and 15 through 17, Columns A-M
Lines 21, 23 and 26 through 28, 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.: **20200001-EI**

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true copy of the foregoing was furnished by overnight mail this 28th day of February, 2020 to the following:

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