



June 17, 2020

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

RE: Docket No. 20200001-EI; Audit Control No: 2018-058-1-1

Dear Mr. Teitzman:

Attached is Gulf Power Company's Request for Extended Confidential Classification regarding certain documents produced by Commission Staff and Gulf Power in connection with a review (ACN 2018-058-1-1) of Gulf Power's 2018 hedging settlements in the above-referenced docket. Also attached is Gulf's Request for Extended Confidential Classification in Microsoft Word format.

Sincerely,

S/Richard Hume

Richard Hume
Regulatory Issues Manager

md

Attachments

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

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: June 17, 2020

REQUEST FOR EXTENDED 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 this request that the Florida Public Service Commission enter an order extending confidential classification for certain documents produced by Commission Staff and Gulf Power in connection with a review of Gulf Power's 2018 hedging settlements (ACN 18- 058-1-1) (the "Review"). As grounds for this request, the Company states:

1. On September 20, 2018, Gulf Power filed a request for confidential classification of certain information produced in connection with the Review. (Document No. 06148-18, Docket No. 20180001-EI)

2. On December 21, 2018, the Commission entered Order No. PSC-2018-0607-CFO-EI granting Gulf's request for confidential classification.

3. As provided in section 366.093(4), Florida Statutes, and by the Commission's Order, the confidential information will be made public after a period of 18 months unless Gulf or another affected party shows, and the Commission finds, that the confidential information continues to comprise proprietary confidential business information. The 18-month extension period expires on June 21, 2020.

4. Gulf hereby requests that the Commission enter an order extending the confidential classification of the confidential information. The confidential information is entitled to continued confidential classification for the same reasons that it was initially

classified. As stated in Gulf's original request, the information relates to competitive interests, the disclosure of which would impair the competitive business of Gulf Power. Specifically, this information contains details concerning Gulf Power's hedging activities between August 2017 and July 2018, and target ranges for hedging transactions. This information is subject to non-disclosure obligations. Furthermore, to the extent that Gulf engages in future hedging transactions, hedging counterparties may refuse to conduct business with Gulf Power, or may charge higher prices, if pricing terms were made public. This information is entitled to confidential classification pursuant to section 366.093(3)(d)-(e), Florida Statutes.

5. 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.

WHEREFORE, Gulf Power Company respectfully requests that the Commission enter an order extending confidential classification of the information highlighted on Exhibit "A" of Gulf's original request from public disclosure as proprietary confidential business information.

Respectfully submitted this 17th day of June, 2020



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

STEVEN R. GRIFFIN
Florida Bar No. 627569
srg@beggslane.com
BEGGS & LANE
P.O. Box 12950
Pensacola, FL 32591-2950
(850) 432-2451
Attorneys for Gulf Power Company

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 electronic mail this 17th day of June, 2020 to the following:

Florida Public Utilities Company
Florida Division of Chesapeake
Utilities Corp
Mike Cassel, Director
Regulatory and Governmental Affairs
1750 SW 14th Street, Suite 200
Fernandina Beach, FL 32034
mcassel@fpuc.com

PCS Phosphate – White Springs
c/o Stone Mattheis Xenopoulos
& Brew, P.C.
James W. Brew/Laura Baker
Eighth Floor, West Tower
1025 Thomas Jefferson St, NW
Washington, DC 20007
jbrew@smxblaw.com
lwb@smxblaw.com

Duke Energy Florida
Dianne M. Triplett
299 First Avenue North
St. Petersburg, FL 33701
Dianne.triplett@duke-energy.com

Florida Power & Light Company
Maria J. Moncada
David Lee
700 Universe Boulevard (LAW/JB)
Juno Beach, FL 33408-0420
Maria.moncada@fpl.com
David.Lee@fpl.com

Florida Power & Light Company
Kenneth Hoffman
134 West Jefferson Street
Tallahassee, FL 32301
Kenneth.Hoffman@fpl.com

Ausley Law Firm
James D. Beasley
J. Jeffry Wahlen
Malcolm N. Means
Post Office Box 391
Tallahassee, FL 32302
jbeasley@ausley.com
jwahlen@ausley.com
mmeans@ausley.com

Gunster Law Firm
Beth Keating
215 South Monroe Street, Suite 601
Tallahassee, FL 32301-1839
bkeating@gunster.com

Office of Public Counsel
J. R. Kelly/M. Fall-Fry
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
Christensen.patty@leg.state.fl.us
fall-fry.mireille@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
FLRegulatoryLegal@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
mqualls@moylelaw.com

Tampa Electric Company
Ms. Paula K. Brown, Manager
Regulatory Coordination
P. O. Box 111
Tampa, FL 33601-0111
Regdept@tecoenergy.com

Office of the General Counsel
Suzanne Brownless
2540 Shumard Oak Blvd
Tallahassee, FL 32399-0850
sbrownle@psc.state.fl.us



RUSSELL A. BADDERS
VP & Associate General Counsel
Florida Bar No. 007455
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
Beggs & Lane
P. O. Box 12950
Pensacola FL 32591-2950
(850) 432-2451
Attorneys for Gulf Power