



Gulf Power®

July 24, 2020

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

RECEIVED-FPSC
2020 JUL 27 PM 12:23
COMMISSION
CLERK

RE: Docket No. 20200001-EI

REDACTED

Dear Mr. Teitzman:

Enclosed is Gulf Power Company's Request for Confidential Classification regarding information submitted by Gulf Power pertaining to Schedule CCE-4 of Exhibit RLH-3 to the Direct Testimony of Richard L. Hume dated July 27, 2020.

Sincerely,

S/Richard Hume

Richard Hume
Regulatory Issues Manager

md

Enclosures

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

COM _____
AFD 1 Exh B
APA _____
ECO _____
ENG _____
GCL _____
IDM _____
CLK _____

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: July 27, 2020

**GULF POWER COMPANY'S
REQUEST FOR CONFIDENTIAL CLASSIFICATION OF INFORMATION INCLUDED
IN THE DIRECT TESTIMONY AND EXHIBITS OF RICHARD L. HUME**

Gulf Power Company ("Gulf"), pursuant to Rule 25-22.006, Florida Administrative Code ("F.A.C.") and Section 366.093, Florida Statutes ("F.S."), hereby requests that the Florida Public Service Commission ("Commission") enter an order protecting from public disclosure certain information contained in Schedule CCE-4 of Exhibit RLH-3 ("Schedule CCE-4") to the Direct Testimony of Richard L. Hume, dated July 27, 2020. In support of this Request, Gulf states as follows:

1. On July 27, 2020 Gulf will file with the Commission and serve on all parties of record the Prepared Direct Testimony & Exhibits of Richard L. Hume, including Schedule CCE-4. This request is being filed in order to request confidential classification of certain information contained in Schedule CCE-4, consistent with Rule 25-22.006, F.A.C.
2. The following exhibits are attached to and made a part of this Request:
 - a. Exhibit "A" consists of Schedule CCE-4, and all the information that Gulf asserts is entitled to confidential treatment has been highlighted.
 - b. Exhibit "B" is an edited version of Exhibit "A" on which the specific information Gulf asserts is confidential has been blocked out.
 - c. Exhibit "C" is a line-by-line justification table in support of Gulf's Request for Confidential Classification in which Gulf demonstrates that the

information Gulf asserts is confidential qualifies as one of the statutory examples listed in section 364.183(3), 366.093(3), or 367.156(3), F.S.

- d. Exhibit “D” is the written declaration of Richard L. Hume in support of this Request, which affirms that the information for which Gulf seeks confidential classification is intended to be and is treated by Gulf as private and has not been disclosed.

3. Gulf submits that a portion of the information contained in Schedule CCE-4 is proprietary confidential business information regarding contractual matters which would cause irreparable harm to Gulf, the entities with whom it has entered into contracts and most importantly to Gulf’s customers, if such information was disclosed to the general public. Schedule CCE-4 contains pricing information for capacity purchases between Gulf and various counterparties. The pricing information is 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. In addition, potential counterparties may refuse to enter into contracts with Gulf, or may charge higher prices, if the price terms are made public. The information has not been publicly disclosed and is entitled to confidential classification pursuant to sections 366.093(3)(d) and (e), F.S.

4. Upon a finding by the Commission that the confidential information contained in Schedule CCE-4 is proprietary and confidential business information, the information should not be declassified for at least eighteen (18) month period and should be returned to Gulf as soon as it is no longer necessary for the Commission to conduct its business. *See* Section 366.093(4), F.S.

WHEREFORE, for the above and foregoing reasons, as more fully set forth in the supporting materials, Gulf Power Company respectfully requests that the Commission grant Gulf's Request for Confidential Classification and enter an order protecting the information highlighted on Exhibit "A" to this Request from public disclosure.

Respectfully submitted this 24th day of July, 2020.

Russell A. Badders
Vice President & Associate General Counsel
Gulf Power Company
One Energy Place
Pensacola, FL 32520-0100
(850) 444-6550
Russell.Badders@nexteraenergy.com

Jason A. Higginbotham
Senior Attorney
Florida Power & Light Company
700 Universe Boulevard
Juno Beach, FL 33408-0420
(561) 691-7135
Jason.Higginbotham@fpl.com

By: *s/ Jason A. Higginbotham*
Jason A. Higginbotham
Fla. Auth. House Counsel No. 1017875
Attorney 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.: 20200001-EI

Date: July 27, 2020

REQUEST FOR CONFIDENTIAL CLASSIFICATION

EXHIBIT "A"

CONFIDENTIAL

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

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: July 27, 2020

REQUEST FOR CONFIDENTIAL CLASSIFICATION

EXHIBIT "B"

REDACTED

Gulf Power Company
2020 Capacity Contracts

ACTUAL FOR THE PERIOD JANUARY 2020 - JUNE 2020 / ESTIMATED FOR JULY 2020 - DECEMBER 2020

(A) (B) (C) (D) (E) (F) (G) (H) (I) (J) (K) (L) (M)

Contract/Counterparty	Term		Contract Type
	Start	End ⁽¹⁾	
Southern Intercompany Interchange <i>PPAs</i>	5/1/2007	5 Yr Notice	SES Opco
Shell Energy N.A. (U.S.), LP <i>Other</i>	11/2/2009	5/31/2023	Firm
South Carolina PSA	9/1/2003	-	Other
Rainbow Energy Marketing Corporation	1/1/2020	2/29/2030	Other

Capacity Costs Description	January Actual	February Actual	March Actual	April Actual	May Actual	June Actual	July Projection	August Projection	September Projection	October Projection	November Projection	December Projection	TOTAL
Southern Intercompany Interchange <i>PPAs</i>	377	111	0	0	0	0	0	0	0	0	0	0	488
Shell Energy N.A. (U.S.), LP <i>Other</i>													
South Carolina PSA													
Rainbow Energy Marketing Corporation													
Total	7,101,412	7,095,801	7,075,227	7,075,227	7,075,227	7,075,227	7,148,521	7,148,521	7,148,521	7,148,521	7,148,521	7,148,521	85,389,241

Capacity MW Description	January Actual	February Actual	March Actual	April Actual	May Actual	June Actual	July Projection	August Projection	September Projection	October Projection	November Projection	December Projection
Southern Intercompany Interchange <i>PPAs</i>	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
Shell Energy N.A. (U.S.), LP <i>Other</i>												
South Carolina PSA												
Rainbow Energy Marketing Corporation												

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

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: July 27, 2020

REQUEST FOR CONFIDENTIAL CLASSIFICATION

EXHIBIT "C"

COMPANY: Gulf Power Company

TITLE: List of Confidential Documents

DOCKET NO.: 20200001-EI

DOCKET TITLE: In re: Fuel and purchased power cost recovery clause and generating performance incentive factor

SUBJECT: Prepared Direct Testimony & Exhibits of Richard L. Hume, dated July 27, 2020

Description	Line No./Col. No.	Section of Florida Statutes	Declarant
Gulf Power 2020 Capacity Contracts – Actual for 1/20 – 6/20; Estimated for 7/20 – 12/20 (Schedule CCE-4)	Lines 9, 11, 12 Columns A – M	§366.093(3)(d) and (e)	Richard L. Hume
Gulf Power 2020 Capacity Contracts – Actual for 1/20 – 6/20; Estimated for 7/20 – 12/20 (Schedule CCE-4)	Lines 16, 18 and 19 Columns A – L	§366.093(3)(d) and (e)	Richard L. Hume

EXHIBIT "D"

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: July 27, 2020

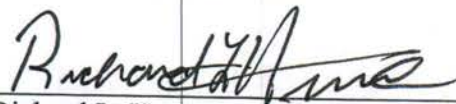
STATE OF FLORIDA)
) WRITTEN DECLARATION OF RICHARD L. HUME
COUNTY OF PALM BEACH)

1. My name is Richard L. Hume. I am currently employed by Gulf Power Company ("Gulf") as Regulatory Issues Manager. I have personal knowledge of the matters stated in this written declaration.

2. I have reviewed the documents and information included in Exhibit "A" to Gulf's Request for Confidential Classification filed this date, for which I am listed as a declarant on Exhibit "C". The documents that I have reviewed and which are asserted by Gulf to be proprietary confidential business information contain or constitute contractual data, and information related to competitive interests, the disclosure of which would impair the competitive business of Gulf, its affiliates and its contractors, vendors and suppliers. Specifically, the documents and exhibits contains the names, rates, quantity, contractual provisions, invoices of our third-party contractors, vendors and suppliers, payments to our contractors, vendors and suppliers, all of which was agreed upon exclusively with these contractors, vendors, and suppliers. Disclosure of this information would impair Gulf's contractor, vendor, and supplier relationships, and impair or negate the commercial interests of Gulf as Gulf negotiates contracts and seeks to obtain contractors, vendors and suppliers. Disclosure of this information would also impair or negate the commercial interests of Gulf's contractors, vendors and suppliers as they negotiate with others for the services they provide. The disclosure of this information will also impact the efforts of Gulf or its affiliates to contract for goods and services on favorable terms in the future, which in turn increases costs to Gulf and its customers. To the best of my knowledge, Gulf has maintained the confidentiality of this information.

3. Consistent with the provisions of the Florida Administrative Code, such materials should remain confidential for a period of eighteen (18) months. In addition, they should be returned to Gulf as soon as the information is no longer necessary for the Commission to conduct its business so that Gulf can continue to maintain the confidentiality of these documents.

4. Under penalties of perjury, I declare that I have read the foregoing declaration and that the facts stated therein are true and to the best of my knowledge and belief.


Richard L. Hume

Date: 7-27-20

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 24th day of July, 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