



March 29, 2021

VIA HAND DELIVERY

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

RE: Docket No. 20210001-EI

REDACTED

Dear Mr. Teitzman:

Enclosed is Gulf Power Company's Request for Confidential Classification for Gulf Power Company's Revised Form 423 Fuel Report for the months of October and November 2020. Gulf Power discovered miscalculations for Plant Scherer which did not materially change the reported rates; however, the Company believed corrections were warranted. The revised pages for those months are intended to replace those pages originally filed on January 29, 2021.

Sincerely,

Richard Hume
Regulatory Issues Manager

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Enclosures

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

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CLK _____

COMMISSION
CLERK

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RECEIVED-PPSC

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

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

Docket No.: 20210001-EI

Date: March 29, 2021

**GULF POWER COMPANY'S
REQUEST FOR CONFIDENTIAL CLASSIFICATION OF INFORMATION**

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 confidential classification of certain information on Florida Public Service Commission ("Commission") Revised Form Nos. 423-2, 423-2(a), and 423-2(b) for the months of October and November 2020 (the "Revised 423 Forms") for Plant Scherer (Scherer). In support of this Request, Gulf states as follows:

1. On March 29, 2021 Gulf will file with the Commission and serve on all parties of record the Revised 423 Forms. This request is being filed in order to request confidential classification of certain information contained in those documents, 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 the Revised 423 Forms 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.

3. Gulf submits that a portion of the information contained in the Revised 423 Forms 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. The Revised 423 Forms contain 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 the Revised 423 Forms is proprietary and confidential business information, the information should not be declassified for at least an eighteenth (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 29th day of March 2021.

Russell A. Badders
Vice President & Associate General Counsel
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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 with Generating)
Performance Incentive Factor)

Docket No.: **20210001-EI**

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true copy of the foregoing was furnished by hand delivery to the Commission Clerk and via electronic mail this 29th day of March, 2021 to the following:

Florida Public Utilities Company
Florida Division of Chesapeake
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(850) 444-6550
Attorney for Gulf Power

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

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

Docket No.: 20210001-EI

Date: March 29, 2021

REQUEST FOR CONFIDENTIAL CLASSIFICATION

EXHIBIT "B"

REDACTED

**MONTHLY REPORT OF COST AND QUALITY OF COAL FOR ELECTRIC PLANTS
ORIGIN, TONNAGE, DELIVERED PRICE, AND AS RECEIVED QUALITY
FPSC Form No. 423-2**

1. Reporting Month: OCTOBER Year: 2020 4. Name, Title, & Telephone Number of Contact Person Concerning
Data Submitted on this Form: Jarvis Van Norman, Budget Supervisor
850-444-6655

2. Reporting Company: Gulf Power Company

3. Plant Name: Scherer Electric Generating Plant 5. Signature of Official Submitting Report: J. Van Norman

6. Date Completed: Revised March 25, 2021

Line No.	Supplier Name	Mine Location	Purchase Type	Transport Mode	Tons	Effective Purchase Price (\$/Ton)	Effective Transport Charges (\$/Ton)	Total FOB Plant Price (\$/Ton)	Sulfur Content (%)	Btu Content (Btu/lb)	Ash Content (%)	Moisture Content (%)
(a)	(b)	(c)	(d)	(e)	(f)	(g)	(h)	(i)	(j)	(k)	(l)	(m)
1	BUCKSKIN MINING CO.	19/WY/5	S	UR	5,867			41.793	0.34	8,374	5.55	29.21
2	BUCKSKIN MINING CO.	19/WY/6	S	UR	4,354			42.259	0.29	8,418	4.78	29.81
3	KENNECOTT	19/WY/7	S	UR	1,648			42.390	0.25	8,451	5.31	29.23
4	PEABODY COALSALES, LLC	19/WY/8	S	UR	1,966			43.493	0.21	8,551	4.61	28.38
5	PEABODY COALSALES, LLC	19/WY/9	S	UR	17,339			42.446	0.33	8,530	5.16	29.03
6	PEABODY COALSALES, LLC	19/WY/10	S	UR	227			42.433	0.31	8,507	5.62	28.64
7	EAGLE SPECIALTY MATERIALS	19/WY/11	S	UR	9,958			43.166	0.23	8,623	4.02	29.25
8	CONTURA	19/WY/12	S	UR	4,306			27.785	0.36	8,322	4.78	30.54
9	Receipts True-ups				(7,963)							

(use continuation sheet if necessary)

**MONTHLY REPORT OF COST AND QUALITY OF COAL FOR ELECTRIC PLANTS
 DETAILED PURCHASED COAL INVOICE INFORMATION
 FPSC Form No. 423-2(a)**

1. Reporting Month: OCTOBER Year: 2020 4. Name, Title, & Telephone Number of Contact Person Concerning
 Data Submitted on this Form: Jarvis Van Norman, Budget Supervisor
 2. Reporting Company: Gulf Power Company 850-444-6655
 3. Plant Name: Scherer Electric Generating Plant 5. Signature of Official Submitting Report: J. Van Norman
 6. Date Completed: Revised March 25, 2021

Line No.	Supplier Name	Mine Location	Purchase Type	Tons	FOB Mine Price (\$/Ton)	Shorthaul & Loading Charges (\$/Ton)	Original Invoice Price (\$/Ton)	Retroactive Price increases (\$/Ton)	Base Price (\$/Ton)	Quality Adjustments (\$/Ton)	Effective Purchase Price (\$/Ton)
(a)	(b)	(c)	(d)	(e)	(f)	(g)	(h)	(i)	(j)	(k)	(l)
1	BUCKSKIN MINING CO.	19/WY/5	S	5,867		0.125		-		(0.128)	
2	BUCKSKIN MINING CO.	19/WY/6	S	4,354		0.125		-		0.020	
3	KENNECOTT	19/WY/7	S	1,648		0.259		-		(0.017)	
4	PEABODY COALSALES, LLC	19/WY/8	S	1,966		0.348		-		(0.245)	
5	PEABODY COALSALES, LLC	19/WY/9	S	17,339		0.336		-		0.047	
6	PEABODY COALSALES, LLC	19/WY/10	S	227		0.337		-		0.008	
7	EAGLE SPECIALTY MATERIALS	19/WY/11	S	9,958		0.147		-		0.041	
8	CONTURA	19/WY/12	S	4,306		(2.948)		-		(0.251)	
9	Receipts True-ups			(7,963)							

(use continuation sheet if necessary)

**MONTHLY REPORT OF COST AND QUALITY OF COAL FOR ELECTRIC PLANTS
 DETAIL OF TRANSPORTATION CHARGES
 FPSC Form No. 423-2(b)**

1. Reporting Month: OCTOBER Year: 2020
 2. Reporting Company: Gulf Power Company
 3. Plant Name: Scherer Electric Generating Plant
 4. Name, Title, & Telephone Number of Contact Person Concerning
 Data Submitted on this Form: Jarvis Van Norman, Budget Supervisor
 850-444-6655
 5. Signature of Official Submitting Report: J. Van Norman
 6. Date Completed: Revised March 25, 2021

Line No.	Supplier Name	Mine Location	Shipping Point	Transport Mode	Tons	Effective Purchase Price (\$/Ton)	Additional Shorthaul & Loading Charges (\$/Ton)	Rail Charges				Waterborne Charges				Total Transportation charges (\$/Ton)	FOB Plant Price (\$/Ton)
								Rail Rate (\$/Ton)	Other Rail Charges (\$/Ton)	River Barge Rate (\$/Ton)	Trans-loading Rate (\$/Ton)	Ocean Barge Rate (\$/Ton)	Other Water Charges (\$/Ton)	Other Related Charges (\$/Ton)			
(a)	(b)	(c)	(d)	(e)	(f)	(g)	(h)	(i)	(j)	(k)	(l)	(m)	(n)	(o)	(p)	(q)	
1	BUCKSKIN MINING CO.	19/WY/5	BUCKSKIN JUNCTION, WY	UR	5,867		-		-	-	-	-	-	-		41.793	
2	BUCKSKIN MINING CO.	19/WY/6	BUCKSKIN JUNCTION, WY	UR	4,354		-		-	-	-	-	-	-		42.259	
3	KENNECOTT	19/WY/7	CORDERO	UR	1,648		-		-	-	-	-	-	-		42.390	
4	PEABODY COALSALSAES, LLC	19/WY/8	NARM JUNCTION, WY	UR	1,966		-		-	-	-	-	-	-		43.493	
5	PEABODY COALSALSAES, LLC	19/WY/9	CABALLO	UR	17,339		-		-	-	-	-	-	-		42.446	
6	PEABODY COAL.SALSAES, LLC	19/WY/10	CABALLO	UR	227		-		-	-	-	-	-	-		42.433	
7	EAGLE SPECIALTY MATERIALS	19/WY/11	BELLE AYR/EAGLE BUTTE WY	UR	9,959		-		-	-	-	-	-	-		43.166	
8	CONTURA	19/WY/12	EAGLE BUTTE WY	UR	4,306		-		-	-	-	-	-	-		27.786	
9	Receipts True-ups				(7,963)												

(use continuation sheet if necessary)

**MONTHLY REPORT OF COST AND QUALITY OF COAL FOR ELECTRIC PLANTS
ORIGIN, TONNAGE, DELIVERED PRICE, AND AS RECEIVED QUALITY
FPSC Form No. 423-2**

1. Reporting Month: NOVEMBER Year: 2020 4. Name, Title, & Telephone Number of Contact Person Concerning
Data Submitted on this Form: Jarvis Van Norman, Budget Supervisor
850-444-6655

2. Reporting Company: Gulf Power Company

3. Plant Name: Scherer Electric Generating Plant 5. Signature of Official Submitting Report: J. Van Norman

6. Date Completed: Revised March 25, 2021

Line No.	Supplier Name	Mine Location	Purchase Type	Transport Mode	Tons	Effective Purchase Price (\$/Ton)	Effective Transport Charges (\$/Ton)	Total FOB Plant Price (\$/Ton)	Sulfur Content (%)	Btu Content (Btu/lb)	Ash Content (%)	Moisture Content (%)
(a)	(b)	(c)	(d)	(e)	(f)	(g)	(h)	(i)	(j)	(k)	(l)	(m)
1	BUCKSKIN MINING CO.	19/WY/5	S	UR	1,759			41.962	0.33	8,333	4.99	30.26
2	KENNECOTT	19/WY/6	S	UR	3,272			42.414	0.32	8,450	6.01	28.71
3	PEABODY COALSALLES, LLC	19/WY/7	S	UR	18,850			42.528	0.33	8,618	4.85	28.86
4	BLUEGRASS COMMODITIES, LP	19/WY/8	S	UR	14,148			43.143	0.31	8,665	4.59	28.56
5	Receipts True-ups				1,441							

(use continuation sheet if necessary)

**MONTHLY REPORT OF COST AND QUALITY OF COAL FOR ELECTRIC PLANTS
 DETAILED PURCHASED COAL INVOICE INFORMATION
 FPSC Form No. 423-2(a)**

1. Reporting Month: NOVEMBER Year: 2020 4. Name, Title, & Telephone Number of Contact Person Concerning
 Data Submitted on this Form: Jarvis Van Norman, Budget Supervisor
 2. Reporting Company: Gulf Power Company 850-444-6655
 3. Plant Name: Scherer Electric Generating Plant 5. Signature of Official Submitting Report: J. Van Norman
 6. Date Completed: Revised March 25, 2021

Line No.	Supplier Name	Mine Location	Purchase Type	Tons	FOB Mine Price (\$/Ton)	Shorthaul & Loading Charges (\$/Ton)	Original Invoice Price (\$/Ton)	Retroactive Price increases (\$/Ton)	Base Price (\$/Ton)	Quality Adjustments (\$/Ton)	Effective Purchase Price (\$/Ton)
(a)	(b)	(c)	(d)	(e)	(f)	(g)	(h)	(i)	(j)	(k)	(l)
1	BUCKSKIN MINING CO.	19/WY/5	S	1,759		0.125		-		(0.287)	
2	KENNECOTT	19/WY/6	S	3,272		0.259		-		0.009	
3	PEABODY COALSALES, LLC	19/WY/7	S	18,850		0.337		-		0.111	
4	BLUEGRASS COMMODITIES, LP	19/WY/8	S	14,148		0.147		-		0.008	
5	Receipts True-ups			1,441				-			

(use continuation sheet if necessary)

**MONTHLY REPORT OF COST AND QUALITY OF COAL FOR ELECTRIC PLANTS
DETAIL OF TRANSPORTATION CHARGES
FPSC Form No. 423-2(b)**

1. Reporting Month: NOVEMBER Year: 2020
 2. Reporting Company: Gulf Power Company
 3. Plant Name: Scherer Electric Generating Plant
 4. Name, Title, & Telephone Number of Contact Person Concerning
 Data Submitted on this Form: Jarvis Van Norman, Budget Supervisor
 850-444-6655
 5. Signature of Official Submitting Report: J. Van Norman
 6. Date Completed: Revised March 25, 2021

Line No.	Supplier Name	Mine Location	Shipping Point	Transport Mode	Tons	Effective Purchase Price (\$/Ton)	Additional Shorthaul & Loading Charges (\$/Ton)	Rail Charges				Waterborne Charges			Total Transportation charges (\$/Ton)	FOB Plant Price (\$/Ton)
								Rail Rate (\$/Ton)	Other Rail Charges (\$/Ton)	River Barge Rate (\$/Ton)	Trans-loading Rate (\$/Ton)	Ocean Barge Rate (\$/Ton)	Other Water Charges (\$/Ton)	Other Related Charges (\$/Ton)		
(a)	(b)	(c)	(d)	(e)	(f)	(g)	(h)	(i)	(j)	(k)	(l)	(m)	(n)	(o)	(p)	(q)
1	BUCKSKIN MINING CO.	19/WY/5	BUCKSKIN JUNCTION, WY	UR	1,759		-		-	-	-	-	-	-		41.962
2	KENNECOTT	19/WY/6	CORDERO	UR	3,272		-		-	-	-	-	-	-		42.414
3	PEABODY COALSALSALES, LLC	19/WY/7	CABALLO	UR	18,850		-		-	-	-	-	-	-		42.528
4	BLUEGRASS COMMODITIES, LP	19/WY/8	BELLE AYR/EAGLE BUTTE WY	UR	14,148		-		-	-	-	-	-	-		43.143
5	Receipts True-ups				1,441											

(use continuation sheet if necessary)

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

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

Docket No.: 20210001-EI

Date: March 29, 2021

REQUEST FOR CONFIDENTIAL CLASSIFICATION

EXHIBIT “C”

Reporting Month: October 2020

Form 423-2

Plant Names	Columns	Justification
Plant Scherer, lines 1-8	(g)	The Effective Purchase Price represents the contract coal commodity price net of Quality Adjustments found in column (k) on form 423-2(a). This information is considered confidential and competitively sensitive by Gulf Power’s coal suppliers. Additionally, disclosure of this information, in conjunction with the information disclosed under other columns in this filing, would enable coal suppliers to determine the prices being charged by their competitors. This, in turn, could lead to less competitive pricing and impact Gulf’s ability to bargain for price concessions with its coal suppliers. This information is confidential pursuant to section 366.093(3)(d)-(e), Florida Statutes.
Plant Scherer, lines 1-8	(h)	The Effective Transport Charges represent per ton transport charges incurred by Gulf to transport coal to its plants. This information is considered confidential and competitively sensitive by Gulf’s transportation providers. Additionally, disclosure of Gulf’s Effective Transport Charges in conjunction with the Total FOB Plant Price in column (i) would enable disclosure of the Effective Purchase Price in column (g) by subtracting the Effective Transport Charges in column (h) from the Total FOB Plant Price in column (i). This information is confidential pursuant to section 366.093(3)(d)-(e), Florida Statutes.

Form 423-2(a)

Plant Names	Columns	Justification
Plant Scherer, lines 1-8	(f)	The FOB Mine Price is the current contract price of coal purchased by Gulf from each supplier. Disclosure of this information would enable suppliers to compare prices with their competitors which could lead to less competitive coal pricing in future bidding. Disclosure could also result in reduced ability for Gulf Power to bargain for price concessions from individual suppliers. This information is confidential pursuant to section 366.093(3)(d)-(e), Florida Statutes.
Plant Scherer, lines 1-8	(h)	The Original Invoice Price is the same as the FOB Price in column (f) except in cases when the supplier discloses its short haul and loading costs (column (g)), if any, included in the contract price of coal. Disclosure of this information would therefore be detrimental for the same reasons as are articulated above in connection with the FOB Mine Price.
Plant Scherer, lines 1-8	(j)	The Base Price is the same as the Original Invoice Price in column (h), since retroactive pricing adjustments (column (i)) are normally received, if at all, after the reporting month and are included on Form 423-C, if necessary. Disclosure of this information would therefore be detrimental for the same reasons as are articulated above in connection with the FOB Mine Price.
Plant Scherer, lines 1-8	(l)	The Effective Purchase Price represents the Base Price in column (j) adjusted by the Quality Adjustments in column (k). Disclosure of this information would therefore be detrimental for the same reasons as are articulated above in connection with FOB Mine Price.

Form 423-2(b)

Plant Names	Columns	Justification
Plant Scherer, lines 1-8	(g)	The Effective Purchase Price, as described above, is contract coal commodity price net of Quality Adjustments found in column (k) on form 423-2(a) and is confidential for the reasons previously stated.
Plant Scherer, lines 1-8	(i)	The Rail Rate is the current rate that Gulf Power pays to transport coal to its plants via rail. This information is considered confidential by Gulf's rail transportation providers. Additionally, disclosure of this information would enable rail transport providers to compare rates with their competitors which, in turn, could lead to less competitive rail rates in future negotiations. Disclosure would also result in reduced ability for Gulf Power to bargain for price concessions from individual providers. This information is confidential pursuant to section 366.093(3)(d), Florida Statutes.
Plant Scherer, lines 1-8	(p)	The Total Transportation Charges represent the total cost reported as transportation charges. Disclosure of this information in conjunction with information disclosed in other columns of Form 423-2(b) could enable third parties to determine individual components of the Total Transportation Charge, such as Rail or River Barge Rates which are confidential for the reasons stated above.

EXHIBIT "C"

Reporting Month: November 2020

Form 423-2

Plant Names	Columns	Justification
Plant Scherer, lines 1-4	(g)	The Effective Purchase Price represents the contract coal commodity price net of Quality Adjustments found in column (k) on form 423-2(a). This information is considered confidential and competitively sensitive by Gulf Power's coal suppliers. Additionally, disclosure of this information, in conjunction with the information disclosed under other columns in this filing, would enable coal suppliers to determine the prices being charged by their competitors. This, in turn, could lead to less competitive pricing and impact Gulf's ability to bargain for price concessions with its coal suppliers. This information is confidential pursuant to section 366.093(3)(d)-(e), Florida Statutes.
Plant Scherer, lines 1-4	(h)	The Effective Transport Charges represent per ton transport charges incurred by Gulf to transport coal to its plants. This information is considered confidential and competitively sensitive by Gulf's transportation providers. Additionally, disclosure of Gulf's Effective Transport Charges in conjunction with the Total FOB Plant Price in column (i) would enable disclosure of the Effective Purchase Price in column (g) by subtracting the Effective Transport Charges in column (h) from the Total FOB Plant Price in column (i). This information is confidential pursuant to section 366.093(3)(d)-(e), Florida Statutes.

Form 423-2(a)

Plant Names	Columns	Justification
Plant Scherer, lines 1-4	(f)	The FOB Mine Price is the current contract price of coal purchased by Gulf from each supplier. Disclosure of this information would enable suppliers to compare prices with their competitors which could lead to less competitive coal pricing in future bidding. Disclosure could also result in reduced ability for Gulf Power to bargain for price concessions from individual suppliers. This information is confidential pursuant to section 366.093(3)(d)-(e), Florida Statutes.
Plant Scherer, lines 1-4	(h)	The Original Invoice Price is the same as the FOB Price in column (f) except in cases when the supplier discloses its short haul and loading costs (column (g)), if any, included in the contract price of coal. Disclosure of this information would therefore be detrimental for the same reasons as are articulated above in connection with the FOB Mine Price.
Plant Scherer, lines 1-4	(j)	The Base Price is the same as the Original Invoice Price in column (h), since retroactive pricing adjustments (column (i)) are normally received, if at all, after the reporting month and are included on Form 423-C, if necessary. Disclosure of this information would therefore be detrimental for the same reasons as are articulated above in connection with the FOB Mine Price.
Plant Scherer, lines 1-4	(l)	The Effective Purchase Price represents the Base Price in column (j) adjusted by the Quality Adjustments in column (k). Disclosure of this information would therefore be detrimental for the same reasons as are articulated above in connection with FOB Mine Price.

Form 423-2(b)

Plant Names	Columns	Justification
Plant Scherer, lines 1-4	(g)	The Effective Purchase Price, as described above, is contract coal commodity price net of Quality Adjustments found in column (k) on form 423-2(a) and is confidential for the reasons previously stated.
Plant Scherer, lines 1-4	(i)	The Rail Rate is the current rate that Gulf Power pays to transport coal to its plants via rail. This information is considered confidential by Gulf's rail transportation providers. Additionally, disclosure of this information would enable rail transport providers to compare rates with their competitors which, in turn, could lead to less competitive rail rates in future negotiations. Disclosure would also result in reduced ability for Gulf Power to bargain for price concessions from individual providers. This information is confidential pursuant to section 366.093(3)(d), Florida Statutes.
Plant Scherer, lines 1-4	(p)	The Total Transportation Charges represent the total cost reported as transportation charges. Disclosure of this information in conjunction with information disclosed in other columns of Form 423-2(b) could enable third parties to determine individual components of the Total Transportation Charge, such as Rail or River Barge Rates which are confidential for the reasons stated above.