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JIL 31 PH 3:51

July 31, 2007

Ann Cole, Commission Clerk Florida Public Service commission Office of the Commission Clerk 2540 Shumard Oak Boulevard Tallahassee, Florida 32399-0850

070007-EI

Re: Notice of Intent to Request Confidential Classification Docket No. 07007-EI

Dear Ms Cole:

records

Enclosed for filing with the Commission are the original and seven copies of Gulf Power Company's Notice of Intent to Request Confidential Classification in Docket No. 07007-EI. Also enclosed in a separate envelope labeled "CONFIDENTIAL" is a CD containing CONFIDENTIAL portions of Gulf response to Staff's July 27, 2007 Data Request to Gulf Power Company in Docket No. 07007-EI. Copies of this letter without the CONFIDENTIAL CD are being served upon counsel of the parties of record. If you have any questions regarding this filing, please contact me at (850) 222-2300.

CMP	Respectfully,
COM	Charles A Sunto
CTR	Charles A. Guyton
ECR)	Squire, Sanders & Dempsey L.L.P.
GCL	Attorney for Gulf Power Company
OPC	•
RCA MARINE CONTROL (1)	
SCR AND	This docketed notice of intent was filed with Confidential
SGA	Document No. <u>06534-07</u> The document has been placed in confidential storage pending timely receipt of a
SEC	request for confidentiality.
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### BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION



N RE: Environmental Cost )	1
Recovery Clause.	)
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Docket No. 070007-EI Filed: July 31, 2007

# NOTICE OF INTENT TO REQUEST CONFIDENTIAL CLASSIFICATION

Pursuant to Rule 25-22.006(3)(a)1., Florida Administrative Code, Gulf Power Company ("Gulf") files this Notice of Intent to Request Confidential Classification of the information contained in the CD in the enclosed envelope labeled "CONFIDENTIAL," which contains the confidential portions of Gulf's Response to Staff's Data Request dated July 27, 2007 in Docket No. 070007-EI, a copy of which is attached to this Notice:

Respectfully submitted,

Charles A. Guyton Florida Bar No. 0398039 Squire, Sanders & Dempsey L.L.P. 215 South Monroe St. Suite 601 Tallahassee, FL 32301 Jeffrey A. Stone, Esquire Florida Bar No. 325953 Beggs & Lane Post Office Box 12950 Pensacola, FL 32576-2950 (850) 432-2451

By: Charles A Gu

DOCUMENT NUMBER - DATE

06533 JUL31 5

# Data Requests to Gulf Power on CAIR/CAMR/CAVR Compliance 7/27/06

- 1. Please provide the data, assumptions, and analysis that supports the calculations of Net Contributions for each generating unit in Table 4.3-2 of Exhibit A of Gulf's March 29, 2007 Supplemental Petition for Environmental Compliance Program.
- 2. Please provide the calculations of Net Contributions for each generating unit in Table 4.3-2 of Exhibit A of Gulf's March 29, 2007 Supplemental Petition assuming replacement of each unit by an equivalent amount of combined cycle capacity. In addition to this analysis based on a mid-range natural gas price forecast, provide sensitivities based on low and high natural gas price forecasts.
- Provide a reasonable range of the Net Contribution for each generating unit in Gulf Power's compliance program, assuming the inclusion of carbon capture technology (carbon dioxide and other greenhouse gases) to reduce such emissions to 2000 levels by 2017 and to 1990 levels by 2025. In addition, provide all assumptions, analyses, technologies used, and calculations. Comment on the technical feasibility given the site specific characteristics of Plant Crist.
- 4. Please identify all aspects of Gulf Power's compliance plan for which the Company issued Requests for Proposals (RFPs) on a project by project and unit by unit basis. Include a list of such RFP solicitations, copies of the solicitations, the entities who received the solicitations, the method of evaluating the bids received, the timeframes of the solicitation, and the results of each RFP bid evaluation.
- 5. For compliance projects/services for which RFP's were not issued but for which a vendor/supplier has been identified by the Company, please explain in detail how Gulf Power ensured that it has or will obtain the best market price for each project/service.
- 6. Provide a detailed cost comparison of Chiyoda jet bubbling reactor and Advatech spray tower technologies as may be implemented for Crist Units 4-7.
- 7. Identify any other technologies that were considered for Flue Gas Desulfurization for each unit for which Gulf proposes scrubbing (other than Smith units) and why they were rejected.
- 8. Provide all contracts or agreements in excess of \$1 million which Gulf Power has entered into related to Gulf's Environmental Compliance Program, including but not limited to any contract or agreement contract with Southern Power Services.
- 9. Identify the milestones for each project which has been completed and those milestones that are scheduled for future completion, and the costs which have been incurred to date for each project.

- 10. If Gulf evaluated a second-best compliance option (such as a mixture of retrofit, fuel mix, retirement, and/or allowance purchases), please provide the details of that option and the related cost comparison to the selected option.
- 11. What actions, if any, are currently underway by Gulf in revising its strategic planning for environmental compliance in light of state (Florida) and federal actions pertaining to carbon capture legislation, rules, and orders?
- 12. Is Gulf Power's arrangement for engineering, procurement, and construction of the various compliance projects based on an open-ended "time and materials" contract structure or a firm, lump sum price? Explain how and why the choice was made for the option used.

#### CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a copy of the foregoing has been furnished this 31st day of July, 2007, by Regular U. S. Mail and/or hand delivery (\*) to the following:

Martha Carter Brown, Esq.\* Senior Counsel FL Public Service Comm. 2540 Shumard Oak Blvd. Tallahassee FL 32399-0850

John T. Butler, Esq. Florida Power & Light Company 700 Universe Boulevard Juno Beach FL 33408-0420

Patricia Ann Christensen, Esq.\* Office of Public Counsel 111 W. Madison St., Room 812 Tallahassee FL 32399-1400

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Charles A. Guyton

Attorney for Gulf Power Company

## State of Florida



# Public Service Commission

CAPITAL CIRCLE OFFICE CENTER • 2540 SHUMARD OAK BOULEVARD TALLAHASSEE, FLORIDA 32399-0850

-M-E-M-O-R-A-N-D-U-M-

DATE: TO: FROM: RE:	Charles Guyton Esq.  Mission of the Commission Clerk & Administrative Services  Acknowledgment of Receipt of Confidential Filing
This	will acknowledge receipt of a CONFIDENTIAL DOCUMENT filed in Docket
No. () ()	or (if filed in an undocketed matter) concerning
No. <u> </u>	or (if fried in an undocketed matter) concerning
GUIF A	Cesponse to stages 7/27/07 data request, and
filed on beh	alf of GPC. The
document will be maintained in locked storage.	
Any	questions regarding this matter should be directed to Marguerite Lockard at (850)
413-6770	

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PSC/CCA019-C(Rev 12/06)

DOCUMENT NUMBER-DATE

06534 JUL318

FPSC-COMMISSION CLERK