

Terry A. Davis
Assistant Secretary and
Assistant Treasurer

One Energy Place
Pensacola, Florida 32520-0786

Tel 850.444.6664
Fax 850.444.6026
TADAVIS@southernco.com

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COMMISSION
CLERK



October 31, 2011

claim of confidentiality
notice of intent
 request for confidentiality
filed by OPC

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Ms. Ann Cole, Commission Clerk
2540 Shumard Oak Boulevard
Tallahassee, FL 32399-0850

Dear Ms. Cole:

RE: Docket No. 110001-EI

Enclosed is Gulf Power Company's Request for Confidential Classification for
Gulf Power Company's Form 423-2 for August, 2011.

Sincerely,

Terry A. Davis

COM _____
APA _____
ECR LCD
GCL _____ Enclosures
RAD _____
SRC _____ cc: Beggs & Lane
ADM _____ Jeffrey A. Stone, Esq.
OPC _____
CLK copy

made for
M. McLean
-DM

DOCUMENT NUMBER-DATE

08056 NOV-1 =

FPSC-COMMISSION CLERK

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

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

Docket No.: 110001-EI
Date: October 31, 2011

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 a request that the Florida Public Service Commission enter an order protecting from public disclosure certain information submitted by Gulf Power on its FPSC Form 423 Fuel Report for the month of August, 2011 (the "423 Report"). As grounds for this request, the Company states:

1. A portion of the information contained in Gulf Power's 423 Report constitutes proprietary confidential business information concerning bids and other contractual data, the disclosure of which would impair the efforts of Gulf Power to contract for goods and services on favorable terms. The information is entitled to confidential classification pursuant to section 366.093(3)(d) and(e), Florida Statutes. Specifically, the confidential information consists of pricing for coal and related transportation services purchased by Gulf Power. Gulf Power and the counterparties involved in these transactions consider the foregoing information to be confidential and competitively sensitive. Disclosure of this information could negatively impact Gulf's ability to negotiate pricing favorable to its customers in the future. In addition, potential counterparties may refuse to enter into future contracts with Gulf, or may charge higher prices, if the confidential information is publicly disclosed.

2. To this attorney's knowledge, the pricing information regarding shipments in this month's report has not been otherwise publicly disclosed. This information is intended to be, and is treated as, confidential by Gulf Power.

DOCUMENT NUMBER - DATE

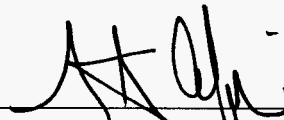
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FPSC-COMMISSION CLERK

3. Submitted as Exhibit "A" are copies of the subject documents, on which are highlighted the 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 the subject documents, 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 31st day of October, 2011.



JEFFREY A. STONE

Florida Bar No. 325953

RUSSELL A. BADDERS

Florida Bar No. 007455

STEVEN R. GRIFFIN

Florida Bar No. 0627569

Beggs & Lane

P. O. Box 12950

Pensacola, FL 32591

(850) 432-2451

Attorneys 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.: 110001-EI
Date: October 31, 2011

_____)

REQUEST FOR CONFIDENTIAL CLASSIFICATION

EXHIBIT "A"

This information has been provided to the Commission Clerk
under separate cover as confidential information.

EXHIBIT "C"

Reporting Month: August

Form 423-2

Plant Names	Column	Justification
Plant Crist, lines 1-5 Plant Smith, line 1 Plant Scholz, line 1 Plant Daniel, lines 1-3	(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 Crist, lines 1-5 Plant Smith, line 1 Plant Scholz, line 1 Plant Daniel, lines 1-3	(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	Column	Justification
Plant Crist, lines 1-5 Plant Smith, line 1 Plant Scholz, line 1 Plant Daniel, lines 1-3	(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 Crist, lines 1-5 Plant Smith, line 1 Plant Scholz, line 1 Plant Daniel, lines 1-3	(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 Crist, lines 1-5 Plant Smith, line 1 Plant Scholz, line 1 Plant Daniel, lines 1-3	(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 Crist, lines 1-5 Plant Smith, line 1 Plant Scholz, line 1 Plant Daniel, lines 1-3	(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	Column	Justification
Plant Crist, lines 1-5 Plant Smith, line 1 Plant Scholz, line 1 Plant Daniel, lines 1-3	(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 Crist, line 2-5 Plant Scholz, line 1 Plant Daniel, lines 1-3	(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.

<p>Plant Crist, lines 1-5</p> <p>Plant Smith, line 1</p>	<p>(k)</p>	<p>The River Barge Rate is the current rate that Gulf Power pays to transport coal to its plants via barge. This information is considered confidential by Gulf's barge transportation providers. Additionally, disclosure of this information would enable barge transport providers to compare rates with their competitors which, in turn, could lead to less competitive barge rates in future negotiations. Disclosure could 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.</p>
<p>Plant Crist, lines 1-5</p>	<p>(l)</p>	<p>The Transloading Rate is the contract price to unload coal from vessels and trains and reload coal into Gulf's barges at the associated port facilities. The terms of the transloading agreement state that these rates shall remain confidential between the parties of the contract. Revealing this information would harm Gulf's and its suppliers' competitive interests. This information is confidential pursuant to section 366.093(3)(d), Florida Statutes</p>
<p>Plant Crist, lines 1-5</p> <p>Plant Smith, line 1</p> <p>Plant Scholz, line 1</p> <p>Plant Daniel, lines 1-3</p>	<p>(p)</p>	<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.</p>

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

IN RE: **Fuel and Purchased Power Cost**)
Recovery Clause with Generating)
Performance Incentive Factor)

Docket No.: **110001-EI**

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true copy of the foregoing was furnished by overnight deliver and/or U.S. mail this 31st day of October, 2011, on the following:

John T. Burnett
Dianne M. Triplett
Progress Energy Service Co.
P. O. Box 14042
St. Petersburg FL 33733-4042
john.burnett@pgnmail.com

John T. Butler, Esq.
Senior Attorney
Florida Power & Light Company
700 Universe Boulevard
Juno Beach FL 33408-0420
john_butler@fpl.com

Jennifer Crawford, Sr.
Attorney
Office of General Counsel
FL Public Service
Commission
2540 Shumard Oak
Boulevard
Tallahassee FL 32399-0850
jcrawfor@psc.state.fl.us

Patrick K. Wiggins
Grossman, Furlow & Bayo,
L.L.C.
2022-2 Raymond Diehl Road
Tallahassee, FL 32308
p.wiggins@gfblawfirm.com

Paula K. Brown
Tampa Electric Company
P. O. Box 111
Tampa FL 33601
Regdept@tecoenergy.com

Kenneth Hoffman
Florida Power & Light Co.
215 S. Monroe Street, Ste.
810
Tallahassee FL 32301-1859
Ken.Hoffman@fpl.com

Randy B. Miller
White Springs Agricultural
Chemicals
PO Box 300
15483 Southeast 78th Street
White Springs, FL 32096
RMiller@pcsposphosphate.com

James D. Beasley, Esq.
J. Jeffrey Wahlen
Attorneys for Tampa Electric Co.
Ausley & McMullen
P. O. Box 391
Tallahassee FL 32302
jbeasley@ausley.com

Mr. Thomas A. Geoffroy
Florida Public Utilities
Company
PO Box 3395
West Palm Beach, FL 33402-3395
tgeoffroy@fpuc.com

Paul Lewis, Jr.
Progress Energy Florida, Inc.
106 E. College Ave., Ste. 800
Tallahassee FL 32301
paul.lewisjr@pgnmail.com

Robert Scheffel Wright
c/o Gardner Law Firm
1300 Thomaswood Drive
Tallahassee, FL 32308
schef@gbwlegal.com

Beth Keating
Gunster, Yoakley & Stewart,
P.A.
215 South Monroe St., Suite
618
Tallahassee, Florida 32301
bkeating@gunster.com

Vicki Kaufman
Jon Moyle
Keefe Anchors Gordon &
Moyle PA
118 N. Gadsden St.
Tallahassee, FL 32301
vkaufman@kagmlaw.com
jmoyle@kagmlaw.com

JR. Kelly
P. Christensen
C. Rehwinkel
Associate Public Counsel
Office of Public Counsel
111 West Madison Street, Rm.
812
Tallahassee, FL 32399- 1400
christensen.patty@leg.state.fl.us
Rehwinkel.Charles@leg.state.fl.us
Kelly.ir@leg.state.fl.us

James W. Brew
F. Alvin Taylor
Brickfield, Burchette, et al.,
P.C.
1025 Thomas Jefferson St.,
NW
Eighth Floor, West Tower
Washington, DC 20007-5201
jbrew@bbrslaw.com
ataylor@bbrslaw.com

Karen S. White, Staff Attorney
AFLSA/JACL-ULGSC
139 Barnes Drive, Suite 1
Tyndall AFB, FL 32403-5319
karen.white@tyndall.af.mil

Michael C. Barrett
Div Of Economic Regulation
FL Public Service Commission
2540 Shumard Oak Blvd
Tallahassee, FL 32399-0850
mbarrett@psc.state.fl.us

Lisa Bennett
Office of General Counsel
FL Public Service
Commission
2540 Shumard Oak
Boulevard
Tallahassee FL 32399-0850
lbennett@psc.state.fl.us

City of Marianna
City Hall
2898 Green Street
Marianna, FL 32446
deanj@cityofmarianna.com

Florida Association for Fairness
in Rate Making
Dan Moore
316 Maxwell Road, Suite 400
Alpharetta, GA 30009
dmoore@ecoconsult.com



JEFFREY A. STONE
Florida Bar No. 325953
RUSSELL A. BADDERS
Florida Bar No. 007455
STEVEN R. GRIFFIN
Florida Bar No. 0627569
BEGGS & LANE
P. O. Box 12950
Pensacola FL 32591-2950
(850) 432-2451
Attorneys for Gulf Power Company