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March 2, 2015

REDACTED

Ms. Carlotta Stauffer, Commission Clerk Florida Public Service Commission 2540 Shumard Oak Boulevard Tallahassee, FL 32399-0850

RE: Docket No. 150001-EI

Dear Ms. Stauffer:

Enclosed is Gulf Power Company's Request for Confidential Classification pertaining to Schedule CCA-4 of Exhibit CSB-1 to the Direct Testimony of C. Shane Boyett dated March 3, 2015.

Sincerely,

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Robert L. McGee, Jr. Regulatory and Pricing Manager

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Enclosures

cc: Beggs & Lane Jeffrey A. Stone, Esq. AFD Eco APA ECO ENG GCL IDM TEL CLK

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BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

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

Docket No.: 150001-EI Date: March 3, 2015

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 its request that the Florida Public Service Commission enter an order protecting from public disclosure certain information contained in Schedule CCA-4 of Exhibit CSB-1 to the Direct Testimony of C. Shane Boyett dated March 3, 2015, (Schedule CCA-4) on behalf of Gulf Power. As grounds for this request, the Company states:

A portion of the information contained in Schedule CCA-4 is proprietary 1. confidential business information regarding contractual matters which would cause irreparable harm to Gulf Power, the entities with whom it has contracted, and most importantly, to Gulf's customers if such information was disclosed to the general public. In addition, the Schedule contains information relating to competitive interests in capacity markets which would cause irreparable harm to Gulf Power and the entities with whom it has contracted if such information was disclosed to the general public. The information is entitled to confidential classification pursuant to section 366.093(3) (d) and (e), Florida Statutes. Schedule CCA-4 provides the price terms for capacity contracts which were active in 2014. The price terms in these contracts are 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 because potential counterparties may refuse to enter into contracts with Gulf, or may charge higher prices if the price terms were made public.

2. 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.

3. Submitted as Exhibit "A" is a copy of Schedule CCA-4, on which is 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 Schedule CCA-4, 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 2nd day of March, 2015.

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.: Date: 150001-EI March 3, 2015

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REQUEST FOR CONFIDENTIAL CLASSIFICATION

EXHIBIT "A"

Provided to Commission Clerk under separate

cover as confidential information.

EXHIBIT "B"

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Gulf Power Company 2014 Capacity Contracts

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М Schedule CCA-4 Page 1 of 1

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		1	Contract		
2	Contract/Counterparty	Start	End (1)	Туре	
2	Southern Intercompany Interchange	5/1/2007	5 Yr Notice	SES Opco	
3	PPAs				
4	Coral Power,LLC	6/1/2009	5/31/2014	Firm	
5	Southern Power Company	6/1/2009	5/31/2014	Firm	
6	Shell Energy N.A. (U.S.), LP (2)	11/2/2009	5/31/2023	Firm	
7	Other				
8	Alabama Electric Cooperative	1/4/2014	12/1/2014	Other	
9	Cargill Power, LLC	1/1/2014	1/3/2014	Other	
10	South Carolina PSA	9/1/2003		Other	
11	South Carolina Electric & Gas	1/1/2014	12/4/2014	Other	
12	The Energy Authority	4/17/2014	4/17/2014	Other	

A

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C

D

13 Capacity Costs (\$)		January	February ⁽³⁾	March	April	May ⁽³⁾	June	July	August	September	October	November	December (3)	Total
14 Southern Intercompany Interchange 15 PPAs		(2,318)	3,659	(1,453)	(7,492)	549	0	0	0	0	0	(6,942)	(4,050)	(18,047)
16 Coral Power,LLC	1				A		0	0	0	0	0	0	0	
 Southern Power Company Shell Energy N.A. (U.S.), LP 							0	0	0	0	0	0	0	
19 20 <i>Other</i>	8							1 A 174 (410)	10000		100			56,504,948
21 Alabama Electric Cooperative 22 Cargill Power, LLC	l	-Alerta					e v Mr. St	24,2 0 0,000,000	Sec. 2	2 10 10 10 10	0	0	a de dans de la	(99,149)
23 South Carolina PSA	8	hier Bar	0	0	0	0	0	0	0	0	0	0	0	
24 South Carolina Electric & Gas		Sector Sec	N - 20 14 2										and the second second	(40,464) (279,834)
25 The Energy Authority		0	0	0	a and a state of the	0	0	0	0	0	0	0	0	112- Constant of Constants
26	Total	2,262,869	2,313,161	2,214,461	2,157,914	2,781,480	7,388,160	7,462,155	7,376,306	(28,813)	7,388,375	7,381,340	7,371,186	56,068,594

27 Capacity MW	January	February ⁽³⁾	March	April	May (3)	June	July	August	September	October	November	December ⁽³⁾
28 Southern Intercompany Interchange 29 PPAs	(82.5)	(193.7)	(34.9)	(217.5)	(119.2)	0.0	0.0	0.0	0.0	0.0	(380.8)	0.0
30 Coral Power,LLC 31 Southern Power Company	REAL ST			10.54		0.0	0.0	0.0	0.0	0.0	0.0	0.0
				the second second		0.0	0.0	0.0	0.0	0.0	0.0	0.0
32 Shell Energy N.A. (U.S.), LP 33	885.0	885.0	885.0	885.0	885.0	885.0	885.0	885.0	885.0	885.0	885.0	885.0
34 <u>Other</u> 35 Alabama Electric Cooperative	and the second se					20.73/81			and the second	n i sa	-	and the state of the state
36 Cargill Power, LLC	A DE STUDIE	1.1.2			41.00.0	and the second	and the second		a second	0.0	0.0	100 BEELLER
37 South Carolina PSA		0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
38 South Carolina Electric & Gas	251153			1.1-2.2			1. n	2 - 2 - 1 - 2 - 1 - 2	04164419	1982 I		
39 The Energy Authority	0.0	0.0	0.0		0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0

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

(2) Contract megawatts became firm on June 1, 2014.

(3) Southern Intercompany Interchange reserve sharing charge consists of prior month true up only

Docket No. 150001-EI 2014 Final True-Up Filing Exhibit CSB-1, Page 6 of 211

EXHIBIT "C"

<u>Line-by-Line/Field-by-Field Justification</u> <u>Line(s)/Field(s)</u>

Line 16-17, Columns A-E, and M Line 18, Columns A-M

Line 21, Columns A-I and L Line 22, Columns A and M Lines 23-24, Columns A-L Line 25, Columns D and M

Lines 30-31, Columns A-E Line 35, Columns A-I and L Line 36, Column A Line 37-38, Columns A-L Line 39, Column D

Justification

This information is entitled to confidential classification pursuant to §366.093(3) (d) and (e), Florida Statutes. The basis for this information being designated as confidential is more fully set forth in paragraph 1.

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

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

Docket No.: 150001-EI

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true copy of the foregoing was furnished by overnight mail this 2nd day of March, 2015 to the following:

Florida Public Utilities Company Cheryl M. Martin, Director Regulatory Affairs 911 South 8th Street Fernandina Beach, FL 32034 <u>Cheryl_Martin@fpuc.com</u>

Florida Power & Light Company John T. Butler 700 Universe Boulevard (LAW/JB) Juno Beach, FL 33408-0420 John.Butler@fpl.com PCS Phosphate – White Springs c/o Brickfield Law Firm James W. Brew/Owen J. Kopon Laura A. Wynn Eighth Floor, West Tower 1025 Thomas Jefferson St, NW Washington, DC 20007 jbrew@bbrslaw.com owen.kopon@bbrslaw.com laura.wynn@bbrslaw.com

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Gunster Law Firm Beth Keating 215 South Monroe Street, Suite 601 Tallahassee, FL 32301-1839 bkeating@gunster.com Office of Public Counsel Patricia A. Christensen Associate Public Counsel c/o The Florida Legislature 111 W. Madison Street, Room 812 Tallahassee, FL 32399-1400 Christensen.patty@leg.state.fl.us

Florida Industrial Power Users Group c/o Moyle Law Firm Jon C. Moyle, Jr. 118 North Gadsden Street Tallahassee, FL 32301 jmoyle@moylelaw.com Tampa Electric Company Ms. Paula K. Brown, Manager Regulatory Coordination P. O. Box 111 Tampa, FL 33601-0111 <u>Regdept@tecoenergy.com</u> Duke Energy Florida John T. Burnett Dianne M. Triplett 299 First Avenue North St. Petersburg, FL 33701 Dianne.triplett@duke-energy.com John.burnett@duke-energy.com

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