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February 22, 2017

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

Re: Docket No. 170001-El

Dear Ms. Stauffer:

Enclosed is Gulf Power Company's Request for Confidential Classification pertaining to Gulf Power's response to Staff's First Set of Interrogatories (Nos. 1-9) in the above-referenced docket.

Sincerely,

Robert L. McGee, Jr. Regulatory and Pricing Manager

Robert IM Son J.

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Enclosures

REDACTED

cc: Beggs & Lane Jeffrey A. Stone, Esq. AFD 1(+1CO)
APA ____
ECO ___
ENG ___
GCL ___

IDM ____

TEL ____

RECEIVED-FPSC

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

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

Docket No.:

170001-EI

Date:

February 23, 2017

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 in response to Commission Staff's First Set of Interrogatories to Gulf Power Company (Nos. 1-10). As grounds for this request, the Company states:

- 1. A portion of the information submitted by Gulf Power in response to interrogatories numbered 1, 2, 4, and 5 of Commission Staff's First Set of Interrogatories constitutes proprietary confidential business information concerning bids or other contractual data the disclosure of which would impair the efforts of Gulf Power to contract for goods and/or 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 terms for coal and natural gas offered to and/or purchased by Gulf Power in connection with Requests for Proposal issued by Gulf Power in 2016. Disclosure of this information would 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 these 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" 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 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 22nd day of February, 2017.

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Attorneys for Gulf Power Company

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

IN RE: Fuel and purchased power cost		
recovery clause and generating performance	Docket No.:	170001-EI
incentive factor	Date:	February 23, 2017
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REQUEST FOR CONFIDENTIAL CLASSIFICATION

EXHIBIT "A"

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

EXHIBIT "B"

Staff's First Set of Interrogatories GULF POWER COMPANY Docket No. 170001-EI February 23, 2017 Item No. 1 Page 1 of 4

 For each Request for Proposal (RFP) for coal issued in 2016 by or on behalf of Gulf, list the bids received. For each bid, include the supplier, tonnage bid, coal quality, and delivered price information, as well as the method and route of delivery.

ANSWER:

Solicitations (RFPs) were issued during 2016 on behalf of Southern Company, soliciting bids from all suppliers contained in Southern Company's Internet Bid System (CIBS), which includes approved suppliers listed on the Gulf Power Company Bid List.

Regarding the March 25, 2016 solicitation, purchases of bituminous coal were to be made for Plant Crist. The solicitation requested bids for two proposals: Proposal A with a term of April through December 2016; and Proposal B with a term of April 2016 through December 31 2017. Bids for both proposals were due on April 8, 2016.

Proposal A:

In response to Proposal A, sixty-two (62) bids were received from twenty-eight (28) different coal suppliers. The bids received from the Central Appalachian, Southern Appalachian, Northern Appalachian, Illinois Basin, Colorado and Colombian coal supply regions. Below is a listing of the bids that were received:

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(A)	(B)	(C)	(D)	(E)	(F)
Γ			1		Delivered
Bid	Supplier	Tons	Btu/lb	Transport	(\$/MMBtu)
36	ALLIANCE COAL LLC			Rail	
35	ALLIANCE COAL LLC			Rail	
58	MURRAY ENERGY CORP (SC)			Rail	
34	PEABODY COAL SALES, LLC			Rail	
41	ARMSTRONG COAL CO			Rail	
40	ARMSTRONG COAL CO			Rail	
45	DOMINION CARBON SALES LLC			Rail	
39	BLUE RIBBON COAL			Rail	
6	B & W RESOURCES, INC			Rail	
48	GLENCORE LTD			Rail	
53	KOLMAR AMERICAS INC			Rail	
47	GLENCORE LTD			Barge	
55	MURRAY ENERGY CORP			Rail	
51	ARCH COAL INC.			Rail	
49	GLENCORE LTD			Barge	
16	COAL MARKETING COMPANY USA INC			Barge	
19	COAL MARKETING COMPANY USA INC			Barge	
43	CONSOL ENERGY INC			Rail	
44	CONSOL ENERGY INC			Rail	
42	CONSOL ENERGY INC			Rail	
38	BLUE RIBBON COAL			Rail	
8	DOMINION CARBON SALES LLC			Rail	
14	COAL MARKETING COMPANY USA INC			Barge	

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TABLE 1 (continued)

(A)	LE 1 (continued) (B)	(C)	(D)	(E)	(F)
	(5)	T (5)	(2)	_/_	Delivered
Bid	Supplier	Tons	Btu/lb	Transport	
20	SMOKY MOUNTAIN COAL CORP.		l	Rail	
17	COAL MARKETING COMPANY USA INC			Barge	
5	NOBLE AMERICAS			Rail	
26	TRAFIGURA AG			Barge	
37	BLUE RIBBON COAL			Rail	
15	COAL MARKETING COMPANY USA INC			Barge	
18	COAL MARKETING COMPANY USA INC			Barge	
33	PEABODY COAL SALES, LLC			Rail	
57	MURRAY ENERGY CORP			Rail	
59	MURRAY ENERGY CORP			Rail	
46	EMERALD INTERNATIONAL CORP			Rail	
61	BLACKHAWK MINING, LLC			Rail	
3	DELTA COALS LLC			Rail	
2	DELTA COALS LLC			Rail	
54	MURRAY ENERGY CORP (Import)			Barge	
60	MURRAY ENERGY CORP (Import)			Barge	
4	DELTA COALS LLC			Rail	
1	SOLAR SOURCES INC.			Rail	
56	MURRAY ENERGY CORP (CAPP)			Rail	
7	BLACKHAWK MINING, LLC	1		Rail	
21	SMOKY MOUNTAIN COAL CORP.	ŀ		Rail	
23	ARCH COAL INC.			Rail	
62	RHINO ENERGY L.LC			Rail	
22	ARCH COAL INC.			Rail	
3	RHINO ENERGY LLC			Rail	
10	RIVER TRADING COMPANY			Rail	
50	ARCH COAL INC.			Rail	
32	PEABODY COAL SALES, LLC			Raii	
31	CAMBRIAN COAL LLC			Rail	
30	CAMBRIAN COAL LLC			Raii	
29	CAMBRIAN COAL LLC			P.ail.	
25	CAMBRIAN COAL LLC			Rail	
13	RHINO ENERGY LLC			Rail	
24	CENTRAL COAL CO			Rail	
27	JESSE CREEK MINING			Rail	
28	JESSE CREEK MINIING - 2017 bid			Rail	
52	BLACKHAWK MININ G, LLC			Rail	
12	RIVER TRADING CC MPANY			Rail	
11	RIVER TRADING CC MPANY			Rail	

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Proposal B:

In response to Proposal B, fifteen (15) bids were received from six (6) different coal suppliers. The bids received from the Central Appalachian, Southern Appalachian, Northern Appalachian, Illinois Basin and Colombian coal supply regions. Below is a listing of the bids that were received:

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(A)	(B)	(C)	(D)	(E)	(F)
Bid	Supplier	Tons	Btu/lb	Transport	Delivered (\$/MMBtu
6	ALLIANCE COAL LLC			Rail	
13	MURRAY ENERGY (SC)			Barge	
5	ALLIANCE COAL LLC			Barge	
15	MURRAY ENERGY (Williamson / AM)			Barge	
12	MURRAY ENERGY (New Era / Galatia)			Barge	
14	MURRAY ENERGY (Williamson / AM)			Barge	
11	DELTA COALS LLC			Rail	
8	STEARNS ENERGY LLC			Rail	
1	COAL MARKETING COMPANY USA INC			Rail	
9	DELTA COALS LLC			Rail	
4	CONSOL ENERGY INC			Rail	
3	COAL MARKETING COMPANY USA INC			Barge	
2	COAL MARKETING COMPANY USA INC			Barge	
10	DELTA COALS LLC			Rail	
7	MURRAY ENERGY CORP (PC)			Rail	

Regarding the May 10th solicitation, purchases of PRB coal were to be made for Plant Daniel. The solicitation requested bids for the purchase of coal for July through September and October through December deliveries. Bids were due May 17th, 2016. There were a total of 9 bids received from 7 different suppliers. Below is a listing of the bids that were received:

TABLE 3

(A)	(B)	(C)	(D)	(E)	(F)
Bid	Supplier	Tons	BTU/lb	Transport	Delivered (\$/MMBtu)
5	RWE TRADING			Rail	7
1	COECLERIC COAL NETWORK			Rail	
3	ARCH COAL INC.			Rail	
2	BUCKSKIN			Rail	
8	MABANAFT COAL TRADING INC			Rail	
4	ARCH COAL INC.			Rail	
7	PEABODY COAL SALES, LLC			Rail	
6	PEABODY COAL SALES, LLC			Rail	
9	ALPHA			Rail	

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Regarding the <u>August 11th</u> solicitation, purchases of PRB coal were to be made for Plant Daniel. The solicitation requested bids for the purchase of coal for (Option 1) September—December 2016; and (Option 2) January—December 2017. Bids were due August 18th 2016.

Option 1: There were a total of 5 bids received from 2 different suppliers. Below is a listing of the bids that were received:

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(A)	(B)	(C)	(D)	(E)	(F)
Bid	Supplier	Tons	BTU/lb	Transport	Delivered (\$/MMBtu)
7	PEABODY COAL SALES, LLC			Rail	
8	PEABODY COAL SALES, LLC			Rail	
9	ARCH COAL INC.			Rail	
10	ARCH COAL INC.			Rail	
4	PEABODY COAL SALES, LLC			Rail	

Option 2: There were a total of 8 bids received from 4 different suppliers. Below is a listing of the bids that were received:

TABLE 5

(A)	(B)	(C)	(D)	(E)	(F)
Bid	Supplier	Tons	BTU/lb	Transport	Delivered (\$/MMBtu)
6	PEABODY COAL SALES, LLC			Rail	
11	ARCH COAL INC.			Rail	
1	ALPHA / CONTURA ENERGY			Rail	
13	BUCKSKIN			Rail	
12	ARCH COAL INC.			Rail	
3	PEABODY COAL SALES, LLC			Rail	
2	ALPHA / CONTURA ENERGY			Rail	
5	PEABODY COAL SALES, LLC			Rail	

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2. Please describe the action taken for each bid identified in response to Interrogatory No. 1. Include in your response an explanation of the evaluation process and how successful proposals were selected.

ANSWER:

Regarding the March 25, 2016 bituminous solicitation, a review of Plant Crist's 1 inventory plan and burn projections for April through December 2016 (Proposal A) and 2 3 April 2016 through December 2017 (Proposal B) indicated a need to purchase low sulfur bituminous coal. The objective was to purchase either low sulfur single source 4 5 coal or a blend of two coals that conformed to the current cap of 3.00/lbsSO2 at Plant 6 Crist. The applicable bids received were evaluated on a fully delivered \$/mmBtu basis, including the value of sulfur. In support of the evaluation process, transportation rates 7 and SO₂ allowance values were provided and included as part of the analysis. Other 8 inputs to the evaluation included railcar lease and maintenance and dust suppression 9 10 costs.

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Proposal A: The least cost bituminous coal delivered into Plant Crist that was below the maximum allowable sulfur content was Bid No. 36 submitted by Alliance Coal LLC which delivered for GULF agreed to purchase 100,000 tons from Alliance Coal LLC for the period August through December 2016. This fulfilled GULF's remaining 2016 uncommitted need.

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Proposal B: For 2017, the least cost bituminous coal delivered into Plant Crist that was below the maximum allowable sulfur content and met the other minimum coal quality specifications was Bid No. 6 again submitted by Alliance Coal LLC which delivered for GULF agreed to pursue 500,000 ton minimum requirements contract in 2017 from Alliance Coal LLC.

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In both proposals, GULF was able to achieve their objective of purchasing a low sulfur coal from a single source rather than incurring the additional costs and handling associated with purchasing two blend coals.

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Regarding the May 10, 2016 PRB solicitation, a review of Plant Daniel's inventory plan and burn projections for the July through December delivery period indicated a need to purchase PRB coal. The goal of this RFP was to purchase volumes that conform to the contracting philosophy contained in the Southern Company Coal and Transportation Procurement Strategy. The nine (9) applicable bids received were evaluated on a fully delivered \$/mmBtu basis, including the value of sulfur. In support of the evaluation process, transportation rates and SO2 allowance values were provided and included as

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maintenance and dust suppression costs. Option 1: The bids from RWE trading and Coecleric were not included as they did not offer the flexibility requested for this purchase. Therefore, the least cost PRB coal delivered into Plant Daniel was Bid No. 3 submitted by Arch Coal, Inc. which delivered to Plant Daniel for a price of . MPC agreed to purchase 300,000 tons from Arch Coal's Black Thunder mine for the Q3 through Q4 delivery period, with the unilateral option to purchase an additional 300,000 tons at the same contract price if a need arose. Regarding the August 11, 2016 PRB solicitation, a review of Plant Daniel's inventory plan and burn projections for the September - December 2016 and 2017 period indicated a need to purchase PRB coal. The goal of this RFP was to purchase volumes that conform to the contracting philosophy contained in the Southern Company Coal and Transportation Procurement Strategy. For Option 1, the five (5) applicable bids received were evaluated on a fully delivered \$/mmBtu basis, including the value of sulfur. Likewise for Option 2, the eight (8) applicable bids were evaluated in a similar manner. In support of the evaluation process, transportation rates and SO2 allowance values were provided and included as part of the analysis. Other inputs to the evaluation included railcar lease and maintenance and dust suppression costs. Option 1: The bids with a BTU less than 8800 were excluded, as they did not meet the quality requirements of the plant. The least cost PRB coal delivered into Plant Daniel was Bid No. 9 submitted by Arch Coal this bid was later negotiated to a , which delivered to Plant Daniel for a price of final price of MPC agreed to purchase 210,000 tons from Arch Coal's Black Thunder mine for the Q4 delivery period. Option 2: The bids with a BTU less than 8800 were excluded, as they did not meet the quality requirements of the plant. The least cost PRB coal delivered into Plant Daniel was Bid No. 11 submitted by Arch Coal , which delivered to Plant Daniel for MPC agreed to purchase 500,000 tons from Arch Coal's Black a price of

part of the analysis. Other inputs to the evaluation included railcar lease and

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Thunder mine for the 2017 delivery period.

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Α	В	c	D	E	F	G
Bids Received - Fall 201	6 RFP					
Bidder	Pipeline	Point	Volume	Price	Begin Date	End Date
Chevron	FGT	Mobile Bay			June-17	May-18
Cross Timbers	FGT	Mobile Bay			June-17	May-18
Cross Timbers	FGT	Mobile Bay			June-17	May-18
Exelon-Constellation	FGT	Mobile Bay			June-17	May-18
Texla Energy	FGT	Mobile Bay			June-17	May-18
Texla Energy	FGT	Mobile Bay			June-17	May-18
Cross Timbers	Transco	Pine View			May-17	Sep-17
Cross Timbers	Transco	Pine View			Jun-17	Jul-19
ETC	Transco	Pine View			Jun-17	May-18
Devon	Transco	Scott Mountain			Jun-17	Aug-19
Shell	Transco	Scott Mountain			Jun-17	May-18
ConocoPhillips	Transco	Station 85 Pool			Jun-17	May-18
ВР	Transco	Station 85 Pool			Jun-17	May-18 or May-19
Laclede Energy	Transco	Station 85 Pool			Jun-17	May-18
Shell	Transco	Station 85 Pool			Jun-17	May-18
Mercuria	Transco	Station 85 Pool			Jun-17	May-18
Devon	Transco	Station 85 Pool			Jun-17	Aug-19
J Aron	Transco	Station 85 Pool			Jun-17	May-19
Exelon-Constellation	Transco	Station 85 Pool			Jun-17	May-18
Direct Energy	Transco	Station 85 Pool			Jun-17	May-18
Southeast Fuels	Transco	Station 85 Pool			Jun-17	May-18
Southeast Fuels	Transco	Station 85 Pool			Jun-17	May-19
Texla	Transco	Station 85 Pool			Jun-17	May-18
Sequent	Transco	Station 85 Pool			Jun-17	May-18
Emera Energy	Transco	Station 85 Pool			Jun-17	May-18
ConocoPhillips	Transco	Station 85 Pool			May-17	Sep-17
Macquarie	Transco	Station 85 Pool			May-17	Sep-17
ВР	Transco	Station 85 Pool			May-17	Sep-17
Shell	Transco	Station 85 Pool			May-17	Sep-17
Mercuria	Transco	Station 85 Pool			May-17	Sep-17
Sequent	Transco	Station 85 Pool			Apr-17	Oct-17
Exelon-Constellation	Transco	Station 85 Pool			May-17	Sep-17
Direct Energy	Transco	Station 85 Pool			Jun-17	Sep-17
Southeast Fuels	Transco	Station 85 Pool			May-17	Sep-17
Texla	Transco	Station 85 Pool			May-17	Sep-17
Direct Energy	Transco	Central AL			Apr-17	Oct-17

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Station 85 Pool

Transco

ΒP

Jun-17

May-19

EXHIBIT "C"

Line-by-Line/Field-by-Field Justification

Line(s)/Field(s)

Response to Interrogatory #1

Pages 1 through 4
Tables 1 through 5, Columns C, D & F as marked

Response to Interrogatory # 2

Page 1 of 2 Lines 14, 20-21, as marked Page 2 of 2 Lines 6-7, 25-26, 32-33, as marked

Response to Interrogatory #4

Page 1 of 2 Columns D and E(Table), as marked

Page 2 of 2 Columns D and E(Table), as marked

Response to Interrogatory # 5

Page 1 of 1 Columns D and E(Table), as marked

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.

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BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

IN RE: Fuel and Purchased Power Cost)	
Recovery Clause with Generating)	
Performance Incentive Factor)	Docket No.: 170001-E

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true copy of the foregoing was furnished by overnight mail this 22nd day of February, 2017 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.
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