

Robert L. McGee, Jr. Regulatory & Pricing Manager

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July 26, 2017

# REDACTED

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

RE: Docket No. 20170001-EI

Dear Ms. Stauffer:

Enclosed is Gulf Power Company's Request for Confidential Classification regarding information submitted by Gulf Power pertaining to Schedule CCE-4 of Exhibit CSB-4 to the Direct Testimony of C. Shane Boyett dated July 27, 2017.

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.



RECEIVED-FPSC

### BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

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

Docket No.: 20170001-EI Date: July 27, 2017

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#### **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 contained in Schedule CCE-4 of Exhibit CSB-4 to the Direct Testimony of C. Shane Boyett dated July 27, 2017 (Schedule CCE-4) on behalf of Gulf Power. As grounds for this request, the Company states:

1. A portion of the information contained in Schedule CCE-4 is proprietary confidential business information regarding contractual matters which would cause irreparable harm to Gulf Power, 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. Schedule CCE-4 contains pricing information for capacity purchases between Gulf Power 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 is entitled to confidential classification pursuant to section 366.093(3)(d) and (e), Florida Statutes.

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 otherwise been publicly disclosed.

3. Submitted as Exhibit "A" is a copy of Schedule CCE-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 CCE-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 26<sup>th</sup> day of July, 2017.

JEFFREY Å. ŠTONE 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.:
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# **REQUEST FOR CONFIDENTIAL CLASSIFICATION**

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## EXHIBIT "A"

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



EXHIBIT "B"

	2017 Capacity Contracts													
		(A)	(B)	(C)	(D)	(E)	(F)	(G)	(H)	(1)	(J)	(K)	(L)	(M)
		Term			Contract									
1	Contract/Counterparty	Start	End <sup>(1)</sup>		Туре									
2 3	Southern Intercompany Interchange PPAs	5/1/2007	5 Yr Notice		SES Opco									
4 5	Shell Energy N.A. (U.S.), LP <sup>(2)</sup> Other	11/2/2009	5/31/2023		Firm									
6	South Carolina PSA	9/1/2003	a <b>n</b> ≪		Other									
7		Actual	Actual	Actual	Actual	Actual	Actual	Projected	Projected	Projected	Projected	Projected	Projected	
8	Capacity Costs (\$)	January	February (2)	March	April	May	June	July	August	September	October	November	December	Total
9 10	Southern Intercompany Interchange <u>PPAs</u>	0	795	0	0	0	0	0	0	0	0	0	0	795
11 12	Shell Energy N.A. (U.S.), LP													
13	Other													
14	South Carolina PSA													
15	Total	7,214,609	7,215,404	7,214,609	7,214,609	7,244,205	7,185,013	7,197,693	7,197,693	7,197,693	7,197,693	7,197,693	7,197,693	86,474,607
16		Actual	Actual	Actual	Actual	Actual	Actual	Projected	Projected	Projected	Projected	Projected	Projected	
17	Capacity MW	January	February	March	April	May	June	July	August	September	October	November	December	
18 19	Southern Intercompany Interchange <u>PPAs</u>	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	E S
20 21	Shell Energy N.A. (U.S.), LP	885.0	885.0	885.0	885.0	885.0	885.0	885.0	885.0	885.0	885.0	885.0	885.0	Exhibit
22 23	<u>Other</u> South Carolina PSA													t No.

**Gulf Power Company** 

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

25 (2) Southern Intercompany Interchange reserve sharing prior month true up only.

Docket No. 20170001-EI 2017 Est/Actual Schedules Exhibit No. (CSB-4), Page 33 of 33

Schedule CCE-4 Page 1 of 1

# EXHIBIT "C"

## Line-by-Line/Field-by-Field JustificationLine(s)/Field(s) Lines 11 and 14, Columns A – M

Line 23, Columns A-L

# **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

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

Docket No.: 20170001-EI

#### CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true copy of the foregoing was furnished by overnight mail this 26th day of July, 2017 to the following:

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Florida Public Utilities Company Florida Division of Chesapeake Utilities Corp Mike Cassel, Director Regulatory and Governmental Affairs 1750 SW 14<sup>th</sup> Street, Suite 200 Fernandina Beach, FL 32034 <u>mcassel@fpuc.com</u> PCS Phosphate – White Springs c/o Stone Mattheis Xenopoulos & Brew, P.C. James W. Brew/Laura A. Wynn Eighth Floor, West Tower 1025 Thomas Jefferson St, NW Washington, DC 20007 jbrew@smxblaw.com law@smxblaw.com 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

Florida Power & Light Company John T. Butler Maria J. Moncada 700 Universe Boulevard (LAW/JB) Juno Beach, FL 33408-0420 John.Butler@fpl.com Maria.moncada@fpl.com Florida Power & Light Company Kenneth Hoffman 215 South Monroe Street, Suite 810 Tallahassee, FL 32301-1858 Ken.Hoffman@fpl.com

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Florida Retail Federation Robert Scheffel Wright John T. LaVia c/o Gardner Law Firm 1300 Thomaswood Drive Tallahassee, FL 32308 <u>schef@gbwlegal.com</u> jlavia@gbwlegal.com Tampa Electric Company Ms. Paula K. Brown, Manager Regulatory Coordination P. O. Box 111 Tampa, FL 33601-0111 <u>Regdept@tecoenergy.com</u> Office of the General Counsel Suzanne Brownless Danijela Janjic 2540 Shumard Oak Blvd Tallahassee, FL 32399-0850 djanjic@psc.state.fl.us sbrownle@psc.state.fl.us ASoete@psc.state.fl.us

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