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Rhonda J. Alexander

Manager Regulatory, Forecasting & Pricing

One Energy Place Pensacola, FL 32520-0780 850 444 6743 tel 850 444 6026 fax rjalexad@southernco.com

August 23, 2017

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

RE: Docket No. 20170001-EI

REDACTED

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-6 to the Direct Testimony of C. Shane Boyett dated August 24, 2017.

Sincerely,

Rhonda J. Alexander Regulatory, Forecasting and Pricing Manager

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Enclosures

cc: Gulf Power Company
Jeffrey A. Stone, Esq., General Counsel
Beggs & Lane
Russell Badders, Esq.

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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.: 20170001-EI

Date: Au

August 24, 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 contained in Schedule CCE-4 of Exhibit CSB-6 to the Direct Testimony of C. Shane Boyett dated August 24, 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.
- 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 23rd day of August, 2017.

JEFFREY A. STONE

General Counsel

Florida Bar No. 325953 jastone@southernco.com

Gulf Power Company

One Energy Place Pensacola, FL 32520-0100 (850) 444-6550

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.:

20170001-EI

Date: August 24, 2017

REQUEST FOR CONFIDENTIAL CLASSIFICATION

EXHIBIT "A"

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

EXHIBIT "B"

Gulf Power Company 2018 Capacity Contracts

| | Α | В | С | D | E | F | G | н | 1 | J | к | L | М |
|---|----------------|-----------------|-----------|-------------|----------------|-------------|-------------|---------------|------------------|----------------|-----------------|-----------------|------------|
| | 1 | erm | | Contract | | | | | | | | | |
| 1 Contract/Counterparty | Start | End (1) | | Type | | | | | | | | | |
| 2 Southern Intercompany Interchange 3 PPAs | 5/1/2007 | 5 Yr Notice | | SES Opco | | | | | | | | | |
| 4 Shell Energy N.A. (U.S.), LP 5 Other | 11/2/2009 | 5/31/2023 | | Firm | | | | | | | | | |
| 6 South Carolina PSA | 9/1/2003 | (540) | | Other | | | | | | | | | |
| 7 Capacity Costs (\$) 8 Southern Intercompany Interchange | January0 | February 0 | March 0 | April 0 | May 0 | June 0 | July | August | September | October | November | December | Total |
| 9 PPAs 10 Shell Energy N.A. (U.S.), LP 11 | 229 | | Trees. | ELECTRIC TA | 5 55E | 28.7 | Have | | APE N | | 7.2 | | Me 72 C |
| 12 <u>Other</u> 13 South Carolina PSA 14 To | otal 7,197,693 | 7,197,693 | 7,197,693 | 7,197,693 | 7,197,693 | 7,197,693 | 7,181,809 | 7,181,809 | 7,181,809 | 7,181,809 | 7,181,809 | 7,181,809 | 86,277,012 |
| 15 Capacity MW 16 Southern Intercompany Interchange 17 PPAs | January 0.0 | February 0.0 | March 0.0 | April 0.0 | May 0.0 | June 0.0 | July 0.0 | August 0.0 | September 0.0 | October 0.0 | November 0,0 | December 0.0 | |
| 18 Shell Energy N.A. (U.S.), LP 19 20 <u>Other</u> 21 South Carolina PSA | | | | | 314 | | A ALL | | 10 OF 10 | 4.7 | 15 Y 1 | | |

^{23 (1)} Unless otherwise noted, contract remains effective unless terminated upon 30 days prior written notice. 24 (2) Contract megawatts became firm on June 1, 2014.

Gulf Power Company 2018 Capacity Contracts

| | A | В | С | D | E | F | G | н | 1 | J | к | L | M |
|---|----------------|-----------------|--------------|------------------|----------------|-------------|-------------|---------------|---------------|----------------|-----------------|--------------|------------|
| 1 Contract/Counterparty | Start | erm End (1) | | Contract Type | | | | | | | | | |
| 2 Southern Intercompany Interchange 3 PPAs | 5/1/2007 | 5 Yr Notice | | SES Opco | | | | | | | | | |
| 4 Shell Energy N.A. (U.S.), LP 5 Other | 11/2/2009 | 5/31/2023 | | Firm | | | | | | | | | |
| 6 South Carolina PSA | 9/1/2003 | 1.7 | | Other | | | | | | | | | |
| 7 Capacity Costs (\$) 8 Southern Intercompany Interchange | January0 | February 0 | March | April 0 | May | June 0 | July | August | September | October | November | December | Total 0 |
| 9 <u>PPAs</u> 10 Shell Energy N.A. (U.S.), LP 11 | e talk | TARK! | | REN | Sie IE | 25,000 | 9149 | | 42.8 | | W. | | 1 |
| 12 <u>Other</u> 13 South Carolina PSA 14 Tota | 7,197,693 | 7,197,693 | 7,197,693 | 7,197,693 | 7,197,693 | 7,197,693 | 7,181,809 | 7,181,809 | 7,181,809 | 7,181,809 | 7,181,809 | 7,181,809 | 86,277,012 |
| 15 Capacity MW 16 Southern Intercompany Interchange 17 PPAs | January 0.0 | February 0.0 | March 0.0 | April 0.0 | May 0.0 | June 0.0 | July 0.0 | August 0.0 | September 0.0 | October 0.0 | November 0.0 | December 0.0 | |
| 18 Shell Energy N.A. (U.S.), LP 19 20 <u>Other</u> 21 South Carolina PSA | | | | | | | | 278 | 5 E 14 | | | | |

^{23 (1)} Unless otherwise noted, contract remains effective unless terminated upon 30 days prior written notice.
24 (2) Contract megawatts became firm on June 1, 2014.

EXHIBIT "C"

$\frac{Line\text{-by-Line/Field-by-Field Justification}}{Line(s)/Field(s)}$

Lines 10 and 13, Columns A-M Lines 18 and 21, 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 |) |

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true copy of the foregoing was furnished by overnight mail this 23rd day of August, 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.
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

Docket No.: 20170001-EI

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

Ausley Law Firm James D. Beasley J. Jeffry Wahlen Post Office Box 391 Tallahassee, FL 32302 jbeasley@ausley.com jwahlen@ausley.com

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
Sayler.erik@leg.state.fl.us

Duke Energy Florida, Inc.
Matthew R. Bernier
Cameron Cooper
106 East College Avenue,
Suite 800
Tallahassee, FL 32301-7740
Matthew.bernier@duke-energy.com
Cameron.Cooper@duke-energy.com

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
Regdept@tecoenergy.com

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

Florida Retail Federation Robert Scheffel Wright John T. LaVia c/o Gardner Law Firm 1300 Thomaswood Drive Tallahassee, FL 32308 schef@gbwlegal.com jlavia@gbwlegal.com

JEFFREY A. STONE
General Counsel
Florida Bar No. 325953
jastone@southernco.com
Gulf Power Company
One Energy Place
Pensacola, FL 32520-0100
(850) 444-6550

RUSSELL A. BADDERS
Florida Bar No. 007455
rab@beggslane.com
STEVEN R. GRIFFIN
Florida Bar No. 0627569
srg@beggslane.com
Beggs & Lane
P. O. Box 12950
Pensacola FL 32591-2950
(850) 432-2451
Attorneys for Gulf Power