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COM
AFD *1 redacted copy*
APA _____
ECO _____
ENG _____
GCL _____
IDM _____
CLK _____

March 1, 2018

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

REDACTED

RE: Docket No. 20180001-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 2, 2018.

Sincerely,

Rhonda J. Alexander
Regulatory, Forecasting and Pricing Manager

md

Enclosures

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

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COMMISSION
CLERK

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

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

Docket No.: 20180001-EI
Date: March 2, 2018

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 2, 2018 on behalf of Gulf Power. As grounds for this request, the Company states:

1. A portion of the information contained in Schedule CCA-4 of Exhibit CSB-1 is proprietary 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 2017. 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 Exhibit CSB-1, Schedule CCA-4, with highlighted 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 Exhibit CSB-1, 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 1st day of March, 2018.



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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
incentive factor

Docket No.: 20180001-EI
Date: March 2, 2018

_____)

REQUEST FOR CONFIDENTIAL CLASSIFICATION

EXHIBIT "A"

Provided to Commission Clerk under separate
cover as confidential information.

EXHIBIT "B"

REDACTED

Gulf Power Company
2017 Capacity Contracts

	(A)	(B)	(C)	(D)	(E)	(F)	(G)	(H)	(I)	(J)	(K)	(L)	(M)	
1	Term		Contract											
	Start	End ⁽¹⁾	Type											
2	Southern Intercompany Interchange	5/1/2007	5 Yr Notice	SES Opco										
3	<u>PPAs</u>													
4	Shell Energy N.A. (U.S.), LP	11/2/2009	5/31/2023	Firm										
5	<u>Other</u>													
6	South Carolina PSA	9/1/2003	-	Other										
7	Cargill Power Markets, LLC	7/1/2017	7/31/2017	Other										
8		Actual	Actual	Actual	Actual	Actual	Actual	Actual	Actual	Actual	Actual	Actual		
9	Capacity Costs (\$)	January ⁽²⁾	February	March	April	May	June	July	August	September	October	November	December	Total
10	Southern Intercompany Interchange	795	0	0	0	0	0	0	0	0	0	0	0	795
11	<u>PPAs</u>													
12	Shell Energy N.A. (U.S.), LP	[REDACTED]												
13	<u>Other</u>													
14	South Carolina PSA	[REDACTED]												
15	Cargill Power Markets, LLC	[REDACTED]												
16	Total	7,215,404	7,214,609	7,214,609	7,214,609	7,244,205	7,185,013	7,199,534	7,197,693	7,197,693	7,183,780	7,194,215	7,194,215	86,455,579
18		Actual	Actual	Actual	Actual	Actual	Actual	Actual	Actual	Actual	Actual	Actual	Actual	
19	Capacity MW	January	February	March	April	May	June	July	August	September	October	November	December	
20	Southern Intercompany Interchange	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
21	<u>PPAs</u>													
22	Shell Energy N.A. (U.S.), LP	[REDACTED]												
23	<u>Other</u>													
24	South Carolina PSA	[REDACTED]												
25	Cargill Power Markets, LLC	[REDACTED]												

27 (1) Unless otherwise noted, contract remains effective unless terminated upon 30 days prior written notice.
 28 (2) Southern Intercompany Interchange reserve sharing prior month true up only.

EXHIBIT "C"

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

Line(s)/Field(s)

Justification

CSB-1, Schedule CCA-4

Lines 12, 15 & 16, Columns A-M
Lines 22, 25 & 26 Columns A-L

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.: **20180001-EI**

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true copy of the foregoing was furnished by overnight mail this 1st day of March, 2018 to the following:

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