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11 AUG -1 AM 11:09

COMMISSION
CLERK



July 29, 2011

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

claim of confidentiality
 notice of intent
 request for confidentiality
 filed by OPC

For DN 05352-11 which
is in locked storage. You must be
authorized to view this DN.-CLK

Dear Ms. Cole:

RE: Docket No. 110001-EI

Enclosed is an original and seven copies of Gulf Power Company's Request for Confidential Classification pertaining to Schedule CCE-4 of Exhibit RWD-1 to the Direct Testimony of Richard W. Dodd dated August 1, 2011.

Regards,

Susan Ritenour (kwo)

nm

Enclosures

cc: Beggs & Lane
Jeffrey A. Stone, Esq.

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CLK |

ICD containing request and exhibit.

DOCUMENT NUMBER-DATE

05351 AUG-1 =

FPSC-COMMISSION CLERK

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

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

Docket No.: 110001-EI
Date: August 1, 2011

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 RWD-2 to the Direct Testimony of Richard W. Dodd dated August 1, 2011 (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.

DOCUMENT NUMBER-DATE

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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 29th day of July, 2011.



JEFFREY A. STONE

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RUSSELL A. BADDERS

Florida Bar No. 007455

STEVEN R. GRIFFIN

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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.: 110001-EI
Date: August 1, 2011

REQUEST FOR CONFIDENTIAL CLASSIFICATION

EXHIBIT "A"

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

REDACTED

EXHIBIT "B"

DOCUMENT NUMBER-DATE

05351 AUG-1 =

FPSC-COMMISSION CLERK

Contract/Counterparty	Term		Contract Type
	Start	End ⁽¹⁾	
Southern Intercompany Interchange	2/18/2000	5 Yr Notice	SES Opco
<u>PPAs</u>			
Coral Power, LLC	6/1/2009	5/31/2014	Firm
Southern Power Company	6/1/2009	5/31/2014	Firm
Shell Energy N.A. (U.S.), LP ⁽²⁾	11/2/2009	5/31/2023	Non-Firm
<u>Other</u>			
Alabama Electric Cooperative	1/1/2011	1/14/2011	Other
South Carolina Electric & Gas	5/9/2011	6/1/2011	Other
South Carolina PSA	9/1/2003	-	Other

REDACTED

(1) Unless otherwise noted, contract remains effective unless terminated upon 30 days prior written notice.
 (2) Contract megawatts become firm no later than June 1, 2014.

Capacity Costs
 2011

Contract	January		February		March		April		May		June	
	MW	\$	MW	\$	MW	\$	MW	\$	MW	\$	MW	\$
Southern Intercompany Interchange	321.0	738,310	289.2	295,176	(6.6)	10,576	111.7	41,326	244.5	5,381	0.0	0
<u>PPAs</u>												
Coral Power, LLC	[REDACTED]											
Southern Power Company	[REDACTED]											
Shell Energy N.A. (U.S.), LP	[REDACTED]											
<u>Other</u>												
Alabama Electric Cooperative	[REDACTED]		0.0	0	0.0	0	0.0	0	0.0	0	0.0	0
South Carolina Electric & Gas	0.0	0	0.0	0	0.0	0	0.0	0	[REDACTED]			
South Carolina PSA	[REDACTED]											
Total	2,343,362		1,831,895		1,536,219		1,589,788		2,324,521		7,426,073	

DOCUMENT NUMBER-DATE
 05351 AUG-1 =
 FPSC-COMMISSION CLERK

Gulf Power Company
2011 Capacity Contracts

Contract/Counterparty	Term		Contract Type
	Start	End ⁽¹⁾	
Southern Intercompany Interchange	2/18/2000	5 Yr Notice	SES Opco
<u>PPAs</u>			
Coral Power, LLC	6/1/2009	5/31/2014	Firm
Southern Power Company	6/1/2009	5/31/2014	Firm
Shell Energy N.A. (U.S.), LP ⁽²⁾	11/2/2009	5/31/2023	Non-Firm
<u>Other</u>			
Alabama Electric Cooperative	1/1/2011	1/14/2011	Other
South Carolina Electric & Gas	5/9/2011	6/1/2011	Other
South Carolina PSA	9/1/2003	-	Other

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

(2) Contract megawatts become firm no later than June 1, 2014.

Capacity Costs
2011

Contract	July		August		September		October		November		December		Total \$
	MW	\$	MW	\$	MW	\$	MW	\$	MW	\$	MW	\$	
Southern Intercompany Interchange	306.5	3,898,165	197.5	2,498,683	272.8	1,617,956	337.9	145,967	185.9	85,293	(68.9)	(35,537)	9,301,296
<u>PPAs</u>													
Coral Power, LLC													
Southern Power Company													
Shell Energy N.A. (U.S.), LP													
Total PPA's													39,238,494
<u>Other</u>													
Alabama Electric Cooperative	0.0	0	0.0	0	0.0	0	0.0	0	0.0	0	0.0	0	(1,522)
South Carolina Electric & Gas	0.0	0	0.0	0	0.0	0	0.0	0	0.0	0	0.0	0	(2,854)
South Carolina PSA													(38,058)
Total	10,169,993		8,771,512		7,889,785		1,618,795		1,558,122		1,437,291		48,497,356

Contract/Counterparty	Term		Contract Type
	Start	End ⁽¹⁾	
Southern Intercompany Interchange	2/18/2000	5 Yr Notice	SES Opco
<u>PPAs</u>			
Coral Power, LLC	6/1/2009	5/31/2014	Firm
Southern Power Company	6/1/2009	5/31/2014	Firm
Shell Energy N.A. (U.S.), LP ⁽²⁾	11/2/2009	5/31/2023	Non-Firm
<u>Other</u>			
Alabama Electric Cooperative	1/1/2011	1/14/2011	Other
South Carolina Electric & Gas	5/9/2011	6/1/2011	Other
South Carolina PSA	9/1/2003	-	Other

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

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Capacity Costs 2011 Contract	January		February		March		April		May		June	
	MW	\$	MW	\$	MW	\$	MW	\$	MW	\$	MW	\$
Southern Intercompany Interchange	321.0	738,310	289.2	295,176	(6.6)	10,576	111.7	41,326	244.5	5,381	0.0	0
<u>PPAs</u>												
Corai Power, LLC	[REDACTED]											
Southern Power Company	[REDACTED]											
Shell Energy N.A. (U.S.), LP	[REDACTED]											
<u>Other</u>												
Alabama Electric Cooperative	[REDACTED]				0.0	0	0.0	0	0.0	0	0.0	0
South Carolina Electric & Gas	0.0	0	0.0	0	0.0	0	0.0	0	[REDACTED]			
South Carolina PSA	[REDACTED]											
Total	2,343,362		1,831,895		1,536,219		1,589,788		2,324,521		7,426,073	

1 Gulf Power Company
2 2011 Capacity Contracts

Contract/Counterparty	Term		Contract Type
	Start	End ⁽¹⁾	
Southern Intercompany Interchange	2/18/2000	5 Yr Notice	SES Opco
<u>PPAs</u>			
Coral Power, LLC	6/1/2009	5/31/2014	Firm
Southern Power Company	6/1/2009	5/31/2014	Firm
Shell Energy N.A. (U.S.), LP ⁽²⁾	11/2/2009	5/31/2023	Non-Firm
<u>Other</u>			
Alabama Electric Cooperative	1/1/2011	1/14/2011	Other
South Carolina Electric & Gas	5/9/2011	6/1/2011	Other
South Carolina PSA	9/1/2003	-	Other

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Capacity Costs
2011

Contract	July		August		September		October		November		December		Total \$
	MW	\$	MW	\$	MW	\$	MW	\$	MW	\$	MW	\$	
Southern Intercompany Interchange	306.5	3,898,165	197.5	2,498,683	272.8	1,617,956	337.9	145,967	185.9	85,293	(68.9)	(35,537)	9,301,296
<u>PPAs</u>													
Coral Power, LLC	[REDACTED]												
Southern Power Company	[REDACTED]												
Shell Energy N.A. (U.S.), LP	[REDACTED]												
<i>Total PPAs</i>													39,238,494
<u>Other</u>													
Alabama Electric Cooperative	0.0	0	0.0	0	0.0	0	0.0	0	0.0	0	0.0	0	(1,522)
South Carolina Electric & Gas	0.0	0	0.0	0	0.0	0	0.0	0	0.0	0	0.0	0	(2,854)
South Carolina PSA	[REDACTED]												(38,058)
Total	10,169,993		8,771,512		7,889,785		1,618,795		1,558,122		1,437,291		48,497,356

EXHIBIT "C"

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

Line(s)/Field(s)

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Lines 29-31, Columns F-Q

Line 34, Columns F-I

Line 35, Columns N-Q

Line 36, Columns F-Q

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Lines 29-31, Columns W-AI

Line 36, Columns W-AH

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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05351 AUG-1 =

FPSC-COMMISSION CLERK

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

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

Docket No.: 110001-EI

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true copy of the foregoing was furnished by U.S. mail this 29th day of July, 2011, on the following:

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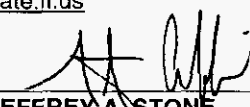
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