Terry A. DavisAssistant Secretary and Assistant Treasurer

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April 2, 2012

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

Dear Ms. Cole:

Re: Docket No. 120001-El

Enclosed is Gulf Power Company's Request for Confidential Classification pertaining to Gulf Power's response to Staff's First Set of Interrogatories (Nos. 1-12) in the above referenced docket.

Sincerely,

COM

APA

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

RAD

SRC

Enclosures

ADM

OPC

CC:

Beggs & Lane
CLK

Jeffrey A. Stone, Esq.

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Ms. Ann Cole April 2, 2012 Page 2

bc: H.R. Ball

H. H. Bell, III

R. W. Dodd

C. J. Erickson

R.W. Grove

R. G. Livingston

S. D. Ritenour

R. S. Teel

J. A. Van Norman

M. A. Young

B. C. Terry (electronic)

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

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

incentive factor

Docket No.: 120001-EI

Date:

April 3, 2012

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. 1-12). As grounds for this request, the Company states:

- 1. A portion of the information submitted by Gulf Power in response to interrogatories numbered 6, 7 and 9 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 natural gas and light oil offered to and/or purchased by Gulf Power in connection with Requests for Proposal issued by Gulf Power in 2011. 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.

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3. Submitted as Exhibit "A" are copies of the subject documents, 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 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/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 2nd day of April, 2012.

JEFFREY A. STONE

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	Docket No.:	120001-E
incentive factor	Date:	April 3, 2012
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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 Docket No. 120001-El GULF POWER COMPANY April 2, 2012 Item No. 6 Page 1 of 2

6. For each RFP for natural gas issued in 2011 by Gulf, list the bids received. For each bid, include the supplier, volume bid, and delivered price information, as well as the primary pipeline delivering the gas.

ANSWER:

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Supplier: BNP Paribas

Volume and Pipeline: Annual Supply 10,000 per day Destin Pipeline into Florida Gas Transmission

Price: FGT Z3 Gas Daily (Term: 6/12 – 5/14)

• Price: FGT Z3 Gas Daily (Term: 6/12 – 5/15)

Volume and Pipeline: Summer Supply 10,000 per day Destin Pipeline into Florida Gas Transmission

• Price: FGT Z3 Gas Daily (Term: 6/12 – 9/14)

Price: FGT Z3 Gas Daily (Term: 6/12 − 9/15)

Supplier: BP

Volume and Pipeline: Annual Supply 25,000 per day Destin Pipeline into Florida Gas Transmission

Price: FGT Z3 Gas Daily (Term: 6/12 – 5/14)
 Volume and Pipeline: Summer Supply 25,000 per day Destin Pipeline into Florida Gas Transmission

Price: FGT Z3 Gas Daily
 Price: FGT Z3 Gas Daily
 (Term: 6/12 – 9/12)
 (Term: 6/13 – 9/13)

Supplier: Chevron

Volume and Pipeline: Annual Supply 30,000 per day Mobile Bay into Florida Gas Transmission

Price: FGT Zone 3 Gas Daily Average (Term: 6/12 – 5/14)
Volume and Pipeline: Annual Supply 25,000 per day Destin into Florida Gas
Transmission

Price: FGT Zone 3 Gas Daily Average (Term: 9/12 – 5/14)

Supplier: Shell

Volume and Pipeline: Annual Supply 10,000 per day Destin Pipeline into Florida Gas Transmission

• Price: FGT Z3 Gas Daily (Term: 6/12 – 5/13)

Staff's First Set of Interrogatories Docket No. 120001-El GULF POWER COMPANY April 2, 2012 Item No. 6 Page 2 of 2

	Supplier: Exxon
	Volume and Pipeline: Annual Supply 15,000 per day Mobile Bay into Florida Gas
	Transmission
/	Price: FGT Z3 Gas Daily (Term: 6/12 − 5/13)
	Volume and Pipeline: Annual Supply 8,000 per day Mobile Bay into Florida Gas
	Transmission
2	● Price: FGT Z3 Inside FERC (Term: 6/12 – 5/13)
	(10/11/2 0/12 0/10)
	Supplier: Louie Dreyfus
	Volume and Pipeline: Annual Supply 10,000 per day Destin Pipeline into Florida
	Gas Transmission
3	Price: FGT Z3 Gas Daily (Term: 6/12 – 5/17)
	Volume and Pipeline: Summer Supply 10,000 per day Destin Pipeline into
	Florida Gas Transmission
16	
<i>4 5</i>	 Price: FGT Z3 Gas Daily Price: FGT Z3 Gas Daily (Term: 6/12 – 9/15)
5	Volume and Pipeline: Annual Supply 8,000 per day Mobile Bay into Florida Gas
	Transmission
6	 Price: FGT Z3 Inside FERC Price: FGT Z3 Inside FERC (Term: 6/12 – 5/13) (Term: 6/12 – 5/15)
7	
8	
	Volume and Pipeline: Annual Supply 20,000 per day Mobile Bay into Florida Gas Transmission
4	
•	• Price: FGT Z3 Gas Daily (Term: 6/12 – 5/13)
10	• Price: FGT Z3 Gas Daily (Term: 6/12 – 5/15)
) (• Price: FGT Z3 Gas Daily (Term: 6/12 – 5/17)
	Volume and Pipeline: Summer Supply 20,000 per day Mobile Bay into Florida
	Gas Transmission
12	• Price: FGT Z3 Gas Daily (Term: 6/12 – 9/13)
	• Price: FGT Z3 Gas Daily (Term: 6/12 – 9/15)
14	Price: FGT Z3 Gas Daily (Term: 6/12 – 9/17)
	•
	Supplier: Tenaska
	Volume and Pipeline: Summer Supply 10,000 per day Destin Pipeline into
	Florida Gas Transmission
15	Price: FGT Z3 Gas Daily (Term: 6/12 – 9/12)

Staff's First Set of Interrogatories Docket No. 120001-EI GULF POWER COMPANY April 2, 2012 Item No. 7 Page 1 of 1

7. What action was taken for each bid identified in response to Interrogatory No. 6? Include in your response an explanation of the evaluation process and how successful proposals were selected.

ANSWER:

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After reviewing the gas supply needs, each bid was evaluated based on price, location, volume, term, transportation rights (firm or interruptible) and the flexibility of supply.

The following bids were accepted:

Supplier: Chevron

Volume and Pipeline: Annual Supply 30,000 per day Mobile Bay into Florida Gas Transmission

• Price: FGT Zone 3 Gas Daily Average (Term: 6/12 – 5/14)
Volume and Pipeline: Annual Supply 25,000 per day Destin into Florida Gas
Transmission

• Price: FGT Zone 3 Gas Daily Average (Term: 9/12 – 5/14)

Supplier: BP

Volume and Pipeline: Annual Supply 25,000 per day Destin Pipeline into Florida Gas Transmission

Price: FGT Z3 Gas Daily
 (Term: 6/12 – 5/14)

Supplier: Louie Dreyfus

Volume and Pipeline: Annual Supply 20,000 per day Mobile Bay into Florida Gas Transmission

• Price: FGT Z3 Gas Daily (Term: 6/12 - 5/17)

Supplier: Exxon

Volume and Pipeline: Annual Supply 15,000 per day Mobile Bay into Florida Gas Transmission

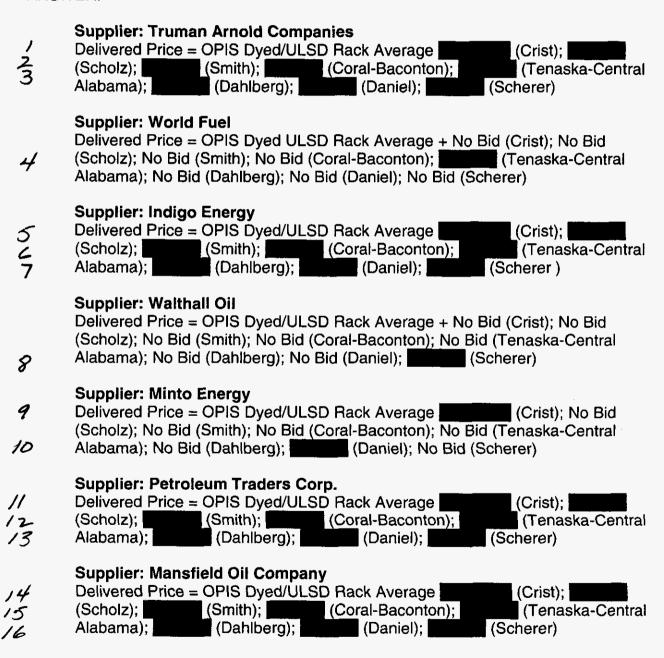
Frice: FGT Z3 Gas Daily (Term: 6/12 – 5/13)
Volume and Pipeline: Annual Supply 8,000 per day Mobile Bay into Florida Gas Transmission

• Price: FGT Z3 Inside FERC (Term: 6/12 – 5/13)

Staff's First Set of Interrogatories Docket No. 120001-El GULF POWER COMPANY April 2, 2012 Item No. 9 Page 1 of 2

9. For each RFP for light oil issued in 2011 by Gulf, list the bids received.

ANSWER:



Staff's First Set of Interrogatories Docket No. 120001-EI GULF POWER COMPANY April 2, 2012 Item No. 9 Page 2 of 2

ノ 2 3	Supplier: McPherson Oil Company Delivered Price = OPIS Dyed/ULSD Rack Average (Crist); (Scholz); (Scholz); (Coral-Baconton); (Tenaska-Central Alabama); (Dahlberg); (Daniel); (Scherer)
4 5	Supplier: RKA Petroleum Delivered Price = OPIS Dyed/ULSD Rack Average + No Bid (Crist); No Bid (Scholz); No Bid (Smith); No Bid (Coral-Baconton); (Tenaska-Central Alabama); (Dahlberg); No Bid (Daniel); No Bid (Scherer)
6 7 8	Supplier: PS Energy Delivered Price = OPIS Dyed/ULSD Rack Average (Crist); (Crist); (Scholz); (Smith); (Coral-Baconton); (Tenaska-Central Alabama); (Dahlberg); (Daniel); (Scherer)
9	Supplier: Boswell Oil Company Delivered Price = OPIS Dyed/ULSD Rack Average + No Bid (Crist); No Bid (Scholz); No Bid (Smith); (Coral-Baconton); No Bid (Tenaska-Central Alabama); (Dahlberg); No Bid (Daniel); (Scherer)
// /2	Supplier: Brad Lanier Oil Company Delivered Price = OPIS Dyed/ULSD Rack Average + No Bid (Crist); No Bid (Scholz); No Bid (Smith); (Coral-Baconton); No Bid (Tenaska-Central Alabama); No Bid (Dahlberg); No Bid (Daniel); (Scherer)

EXHIBIT "C"

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

Line(s)/Field(s)

Response to Interrogatory #6

Page 1 of 2, Lines 1-10 Page 2 of 2, Lines 1-15

Response to Interrogatory # 7

Page 1 of 2, Lines 1-6

Response to Interrogatory #9

Page 1 of 2, Lines 1-16 Page 2 of 2, Lines 1-12

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.: 120001-El

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true copy of the foregoing was furnished by U. S. mail this 2nd day of April, 2012 on the following:

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