



Gulf Power®

August 8, 2019

Mr. Adam Teitzman, Commission Clerk
Florida Public Service Commission
2540 Shumard Oak Boulevard
Tallahassee, FL 32399-0850

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

RE: Docket No. 20190001-EI

Dear Mr. Teitzman:

Enclosed is Gulf Power Company's Request for Confidential Classification regarding certain portions of Gulf Power's January-July, 2019 Hedging Activity Report.

Sincerely,

C. Shane Boyett
Regulatory, Forecasting and Pricing Manager

md

Enclosures

cc: Gulf Power Company
Russell Badders, Esq., VP & Associate General Counsel

RECEIVED-FPSC
2019 AUG -9 AM 10:51
COMMISSION
CLERK

REDACTED

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

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

Docket No.: 20190001-EI
Date filed: August 9, 2019

REQUEST FOR CONFIDENTIAL CLASSIFICATION

GULF POWER COMPANY ["Gulf Power", "Gulf", or the "Company"], by and through its undersigned attorney 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 portions of Gulf Power's Hedging Activity Report. As grounds for this request, the Company states:

1. Pursuant to the Order Establishing Procedure in this docket, Order No. PSC-2019-0059-PCO-EI, Gulf Power is required to file a Hedging Activity Report by August 9, 2019 detailing its hedging transactions during the months of January through July of the current year.
2. A portion of the information in the Hedging Activity Report constitutes proprietary and commercially sensitive information regarding competitive interests and contractual matters of Gulf Power which, if disclosed to the general public, would cause irreparable harm to Gulf Power and its customers. This information is entitled to confidential classification pursuant to section 366.093(3)(d), Florida Statutes. Specifically, the information consists of pricing terms for natural gas hedging transactions between Gulf Power and various counterparties. Gulf, its counterparties and other members of the market in which it competes consider this type of information to be competitively sensitive. Disclosure of this information would adversely affect Gulf's ability to contract for goods and services on favorable terms for the benefit of its customers, would impair the competitive interests of Gulf and its vendors, and would place Gulf at a competitive disadvantage when coupled with other information that is publicly available.

3. 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.

4. Submitted as Exhibit "A" is a copy of Gulf Power's Hedging Activity Report, 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 Gulf's Hedging Activity Report 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 8th day of August, 2019.



RUSSELL A. BADDERS

Vice President & Associate General Counsel

Florida Bar No. 007455

Russell.Badders@nexteraenergy.com

Gulf Power Company

One Energy Place

Pensacola, FL 32520-0100

(850) 444-6550

STEVEN R. GRIFFIN

Florida Bar No. 627569

srg@beggsllane.com

BEGGS & LANE

P.O. Box 12950

Pensacola, FL 32591-2950

(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.: 20190001-EI
Date: August 9, 2019

REQUEST FOR CONFIDENTIAL CLASSIFICATION

EXHIBIT "A"

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

EXHIBIT "B"

GULF POWER COMPANY
Hedging Activity Report
January 2019 - July 2019

Line No.	A Contract Month	B Counterparty	C Deal Type	D Deal ID	E Description	F Fixed Price	G Receive Price	I Volume	J Period-End Gain/(Loss)
1	201901	Citigroup Energy Inc. [CITI INC]	Swap	2462168				30,000	
2	201901	JPMorgan Chase Bank, NA [JPM CHASE]	Swap	2462021				40,000	
3	201901	JPMorgan Chase Bank, NA [JPM CHASE]	Swap	2462023				60,000	
4	201901	JPMorgan Chase Bank, NA [JPM CHASE]	Swap	2462024				40,000	
5	201901	JPMorgan Chase Bank, NA [JPM CHASE]	Swap	2462025				40,000	
6	201901	JPMorgan Chase Bank, NA [JPM CHASE]	Swap	2462041				40,000	
7	201901	JPMorgan Chase Bank, NA [JPM CHASE]	Swap	2462094				30,000	
8	201901	JPMorgan Chase Bank, NA [JPM CHASE]	Swap	2462128				40,000	
9	201901	Merrill Lynch Commodities, Inc. [MLC]	Swap	2461994				60,000	
10	201901	Merrill Lynch Commodities, Inc. [MLC]	Swap	2461996				30,000	
11	201901	Merrill Lynch Commodities, Inc. [MLC]	Swap	2462000				40,000	
12								TOTAL	450,000
13	201902	Citigroup Energy Inc. [CITI INC]	Swap	2462168				30,000	
14	201902	JPMorgan Chase Bank, NA [JPM CHASE]	Swap	2462021				40,000	
15	201902	JPMorgan Chase Bank, NA [JPM CHASE]	Swap	2462023				60,000	
16	201902	JPMorgan Chase Bank, NA [JPM CHASE]	Swap	2462024				40,000	
17	201902	JPMorgan Chase Bank, NA [JPM CHASE]	Swap	2462025				40,000	
18	201902	JPMorgan Chase Bank, NA [JPM CHASE]	Swap	2462041				40,000	
19	201902	JPMorgan Chase Bank, NA [JPM CHASE]	Swap	2462094				30,000	
20	201902	JPMorgan Chase Bank, NA [JPM CHASE]	Swap	2462128				40,000	
21	201902	Merrill Lynch Commodities, Inc. [MLC]	Swap	2461994				60,000	
22	201902	Merrill Lynch Commodities, Inc. [MLC]	Swap	2461996				30,000	
23	201902	Merrill Lynch Commodities, Inc. [MLC]	Swap	2462000				40,000	
24								TOTAL	450,000
25	201903	Citigroup Energy Inc. [CITI INC]	Swap	2462168				30,000	
26	201903	JPMorgan Chase Bank, NA [JPM CHASE]	Swap	2462021				40,000	
27	201903	JPMorgan Chase Bank, NA [JPM CHASE]	Swap	2462023				60,000	
28	201903	JPMorgan Chase Bank, NA [JPM CHASE]	Swap	2462024				40,000	
29	201903	JPMorgan Chase Bank, NA [JPM CHASE]	Swap	2462025				40,000	
30	201903	JPMorgan Chase Bank, NA [JPM CHASE]	Swap	2462041				40,000	
31	201903	JPMorgan Chase Bank, NA [JPM CHASE]	Swap	2462094				30,000	
32	201903	JPMorgan Chase Bank, NA [JPM CHASE]	Swap	2462128				40,000	
33	201903	Merrill Lynch Commodities, Inc. [MLC]	Swap	2461994				60,000	
34	201903	Merrill Lynch Commodities, Inc. [MLC]	Swap	2461996				30,000	
35	201903	Merrill Lynch Commodities, Inc. [MLC]	Swap	2462000				40,000	
36								TOTAL	450,000
37	201904	Citigroup Energy Inc. [CITI INC]	Swap	2462168				30,000	
38	201904	JPMorgan Chase Bank, NA [JPM CHASE]	Swap	2462021				40,000	
39	201904	JPMorgan Chase Bank, NA [JPM CHASE]	Swap	2462023				60,000	
40	201904	JPMorgan Chase Bank, NA [JPM CHASE]	Swap	2462024				40,000	
41	201904	JPMorgan Chase Bank, NA [JPM CHASE]	Swap	2462025				40,000	
42	201904	JPMorgan Chase Bank, NA [JPM CHASE]	Swap	2462041				40,000	
43	201904	JPMorgan Chase Bank, NA [JPM CHASE]	Swap	2462094				30,000	
44	201904	JPMorgan Chase Bank, NA [JPM CHASE]	Swap	2462128				40,000	
45	201904	Merrill Lynch Commodities, Inc. [MLC]	Swap	2461994				60,000	
46	201904	Merrill Lynch Commodities, Inc. [MLC]	Swap	2461996				30,000	
47	201904	Merrill Lynch Commodities, Inc. [MLC]	Swap	2462000				40,000	
48								TOTAL	450,000

GULF POWER COMPANY
Hedging Activity Report
January 2019 - July 2019

Line No.	A Contract Month	B Counterparty	C Deal Type	D Deal ID	E Description	F Fixed Price	G Receive Price	I Volume	J Period-End Gain/(Loss)
1	201905	Citigroup Energy Inc. [CITI INC]	Swap	2462168				30,000	
2	201905	JPMorgan Chase Bank, NA [JPM CHASE]	Swap	2462021				40,000	
3	201905	JPMorgan Chase Bank, NA [JPM CHASE]	Swap	2462023				60,000	
4	201905	JPMorgan Chase Bank, NA [JPM CHASE]	Swap	2462024				40,000	
5	201905	JPMorgan Chase Bank, NA [JPM CHASE]	Swap	2462025				40,000	
6	201905	JPMorgan Chase Bank, NA [JPM CHASE]	Swap	2462041				40,000	
7	201905	JPMorgan Chase Bank, NA [JPM CHASE]	Swap	2462094				30,000	
8	201905	JPMorgan Chase Bank, NA [JPM CHASE]	Swap	2462128				40,000	
9	201905	Merrill Lynch Commodities, Inc. [MLC]	Swap	2461994				60,000	
10	201905	Merrill Lynch Commodities, Inc. [MLC]	Swap	2461996				30,000	
11	201905	Merrill Lynch Commodities, Inc. [MLC]	Swap	2462000				40,000	
12								TOTAL	450,000
13	201906	Citigroup Energy Inc. [CITI INC]	Swap	2462168				30,000	
14	201906	JPMorgan Chase Bank, NA [JPM CHASE]	Swap	2462021				40,000	
15	201906	JPMorgan Chase Bank, NA [JPM CHASE]	Swap	2462023				60,000	
16	201906	JPMorgan Chase Bank, NA [JPM CHASE]	Swap	2462024				40,000	
17	201906	JPMorgan Chase Bank, NA [JPM CHASE]	Swap	2462025				40,000	
18	201906	JPMorgan Chase Bank, NA [JPM CHASE]	Swap	2462041				40,000	
19	201906	JPMorgan Chase Bank, NA [JPM CHASE]	Swap	2462094				30,000	
20	201906	JPMorgan Chase Bank, NA [JPM CHASE]	Swap	2462128				40,000	
21	201906	Merrill Lynch Commodities, Inc. [MLC]	Swap	2461994				60,000	
22	201906	Merrill Lynch Commodities, Inc. [MLC]	Swap	2461996				30,000	
23	201906	Merrill Lynch Commodities, Inc. [MLC]	Swap	2462000				40,000	
24								TOTAL	450,000
25	201907	Citigroup Energy Inc. [CITI INC]	Swap	2462168				30,000	
26	201907	JPMorgan Chase Bank, NA [JPM CHASE]	Swap	2462021				40,000	
27	201907	JPMorgan Chase Bank, NA [JPM CHASE]	Swap	2462023				60,000	
28	201907	JPMorgan Chase Bank, NA [JPM CHASE]	Swap	2462024				40,000	
29	201907	JPMorgan Chase Bank, NA [JPM CHASE]	Swap	2462025				40,000	
30	201907	JPMorgan Chase Bank, NA [JPM CHASE]	Swap	2462041				40,000	
31	201907	JPMorgan Chase Bank, NA [JPM CHASE]	Swap	2462094				30,000	
32	201907	JPMorgan Chase Bank, NA [JPM CHASE]	Swap	2462128				40,000	
33	201907	Merrill Lynch Commodities, Inc. [MLC]	Swap	2461994				60,000	
34	201907	Merrill Lynch Commodities, Inc. [MLC]	Swap	2461996				30,000	
35	201907	Merrill Lynch Commodities, Inc. [MLC]	Swap	2462000				40,000	
36								TOTAL	450,000

EXHIBIT "C"

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

<u>Line(s)/Field(s)</u>	<u>Justification</u>
Page 1 of 2 Lines 1-11, Columns E, F, G, and J Lines 13-23, Columns E, F, G, and J Lines 25-35, Columns E, F, G, and J Lines 37-47, Columns E, F, G, and J Page 2 of 2 Lines 1-11, Columns E, F, G, and J Lines 13-23, Columns E, F, G, and J Lines 25-35, Columns E, F, G, and J	This information is entitled to confidential classification pursuant to §366.093(3)(d), Florida Statutes. The basis for this information being designated as confidential is more fully set forth in paragraph 2.

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

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

Docket No.: **20190001-EI**

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true copy of the foregoing was furnished by overnight this 8th day of August, 2019 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
Dianne M. Triplett
299 First Avenue North
St. Petersburg, FL 33701
Dianne.triplett@duke-energy.com

Florida Power & Light Company
Maria J. Moncada
Joel T. Baker
700 Universe Boulevard (LAW/JB)
Juno Beach, FL 33408-0420
Maria.moncada@fpl.com
joel.baker@fpl.com

Florida Power & Light Company
Kenneth Hoffman
134 West Jefferson Street
Tallahassee, FL 32301
Ken.Hoffman@fpl.com

Ausley Law Firm
James D. Beasley
J. Jeffrey Wahlen
Malcolm N. Means
Post Office Box 391
Tallahassee, FL 32302
jbeasley@ausley.com
jwahlen@ausley.com
mmeans@ausley.com

Gunster Law Firm
Beth Keating
215 South Monroe Street, Suite 601
Tallahassee, FL 32301-1839
bkeating@gunster.com

Office of Public Counsel
J. R. Kelly
Patricia A. Christensen
Associate Public Counsel
c/o The Florida Legislature
111 W. Madison Street, Room 812
Tallahassee, FL 32399-1400
Kelly.jr@leg.state.fl.us
Christensen.patty@leg.state.fl.us

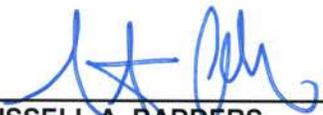
Duke Energy Florida, Inc.
Matthew R. Bernier
106 East College Avenue,
Suite 800
Tallahassee, FL 32301-7740
Matthew.bernier@duke-energy.com

Florida Industrial Power Users Group
c/o Moyle Law Firm
Jon C. Moyle, Jr.
118 North Gadsden Street
Tallahassee, FL 32301
jmoyle@moylelaw.com

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

Office of the General Counsel
Suzanne Brownless
2540 Shumard Oak Blvd
Tallahassee, FL 32399-0850
sbrownle@psc.state.fl.us

Tampa Electric Company
Ms. Paula K. Brown, Manager
Regulatory Coordination
P. O. Box 111
Tampa, FL 33601-0111
Regdept@tecoenergy.com



RUSSELL A. BADDERS
VP & Associate General Counsel
Florida Bar No. 007455
Russell.Badders@nexteraenergy.com
Gulf Power Company
One Energy Place
Pensacola FL 32520-0100
(850) 444-6550

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