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October 6, 2014

VIA HAND DELIVERY

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

RECEIVED-FPSC
14 OCT - 6 PM 12: 24
COMMISSION
CLERK

Re: **Docket No. 140001-EI**

REDACTED

Dear Ms. Stauffer:

I enclose for filing in the above docket an original and seven (7) copies of Florida Power & Light Company's ("FPL's") Request for Confidential Classification of Certain Material Provided in Response to Staff's Fourth Set of Interrogatories. The original includes Exhibits A, B (two copies), C and D. The seven copies do not include copies of the Exhibits.

Exhibit A consists of the confidential material that FPL asserts is entitled to confidential treatment and has been highlighted. Exhibit B is an edited version of Exhibit A, in which the information FPL asserts is confidential has been redacted. Exhibit C is a justification table in support of FPL's Request for Confidential Classification. Exhibit D contains three affidavits in support of FPL's Request for Confidential Classification. Also included in this filing is a compact disc containing FPL's Request for Confidential Classification and Exhibit C, in Microsoft Word format.

Please contact me if you or your Staff has any questions regarding this filing.

Sincerely,

Jessica Cano for

Scott A. Goorland

COM	
AFD	2 + Redacted Ex B and CD
APA	1
ECO	1
ENG	1
GCL	1
IDM	1
TEL	
CLK	

Enclosure

cc: Counsel for Parties of Record (w/Request for Confidential Classification)

#1473162

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Fuel and Purchased Power Clause with
Generating Performance Incentive Factor

Docket No: 140001-EI
Date: October 6, 2014

**FLORIDA POWER AND LIGHT COMPANY'S REQUEST FOR
CONFIDENTIAL CLASSIFICATION OF CERTAIN MATERIAL PROVIDED
IN RESPONSE TO STAFF'S FOURTH SET OF INTERROGATORIES (NOS. 135-153)
TO FLORIDA POWER & LIGHT COMPANY**

Pursuant to Section 366.093, Florida Statutes (2013), and Rule 25-22.006, Florida Administrative Code (2013), Florida Power & Light Company ("FPL") submits its Request for Confidential Classification of certain material provided in response to Staff's Fourth Set of Interrogatories (Nos. 135-153), Nos. 140 and 145, to Florida Power & Light Company. In support of its request, FPL states as follows:

1. On August 26, 2014, Staff served its Fourth Set of Interrogatories (Nos. 135 – 153) on FPL. On September 15, 2014, FPL served its Responses to Staff's Fourth Set of Interrogatories to Florida Power & Light Company (Nos. 135 - 153)("Responses"). FPL's Response Nos. 140 and 145 contain information of a confidential nature, which is proprietary confidential business information within the meaning of Section 366.093(3), Florida Statutes. On September 15, 2014, FPL filed a Notice of Intent to Request Confidential Classification of its responses to Staff's Fourth Set of Interrogatories (Nos. 135-153). Pursuant to Rule 25-22.006(3)(a), Florida Administrative Code, FPL has 21 days from the date of the Notice of Intent to file a formal request for confidential classification. Accordingly, FPL is filing this Request for Confidential Classification to maintain continued confidential handling of the information contained in the discovery responses provided to Staff with the Notice of Intent. Some of FPL's responsive documents contained confidential information.

2. The following exhibits are included with, and made part of this request:
 - a. Exhibit A consists of a copy of the confidential material on which all information that FPL asserts is entitled to confidential treatment has been highlighted.
 - b. Exhibit B consists of the confidential material, on which all information that FPL asserts is entitled to confidential treatment has been redacted.
 - c. Exhibit C is a table containing a column-by-column and line-by-line identification of the information for which confidential treatment is sought and references to the specific statutory basis or bases for the claim of confidentiality and to the affidavits in support of the requested classification.
 - d. Exhibit D consists of the affidavits of Kim Ousdahl, Melissa Linton and Timothy D. Taylor, PhD.

3. FPL submits that the highlighted information in Exhibit A is proprietary and confidential business information within the meaning of Section 366.093(3), F.S. This information is intended to be and is treated by FPL as private, and its confidentiality has been maintained. Pursuant to Section 366.093, F.S., such information is entitled to confidential treatment and is exempt from the disclosure provisions of the public records law. Thus, once the Commission determines that the information in question is proprietary confidential business information, the Commission is not required to engage in any further analysis or review such as weighing the harm of disclosure against the public interest in access to the information.

4. As the affidavits included in Exhibit D indicate, the documents and materials included in Exhibits A and B, and identified in Exhibit C contain information which relates to

competitive interests, the disclosure of which would impair the competitive business of FPL, its affiliates or its vendors. Specifically, the documents contain information regarding forecast monthly cash flows, as well as gas reserve estimates, projected economics and other terms. The disclosure of this proprietary confidential business information would provide other participants in the fuel and financial markets insight into FPL's hedging practices that would allow them to anticipate FPL's trading decisions and impair FPL's ability to negotiate, to the detriment of FPL and its customers. Disclosure of this information would also place FPL at a competitive disadvantage when coupled with other information that is publicly available. Such information is protected pursuant to Section 366.093(3)(e), F.S.

5. Upon a finding by the Commission that the information highlighted in Exhibit A, and referenced in Exhibits B, C and D is proprietary confidential business information, the information should not be declassified for a period of at least eighteen (18) months and should be returned to FPL as soon as it is no longer necessary for the Commission to conduct its business. *See* § 366.093(4), Fla. Stat.

WHEREFORE, for the above and foregoing reasons, as more fully set forth in the supporting materials and affidavits included herewith, Florida Power & Light Company respectfully requests that its Request for Confidential Classification be granted.

Respectfully submitted this 6th day of October, 2014.

R. Wade Litchfield, Vice President
and General Counsel
John T. Butler, Assistant General Counsel -
Regulatory
Scott A. Goorland, Principal Attorney
Attorneys for Florida Power & Light Company
700 Universe Boulevard
Juno Beach, Florida 33408-0420
Telephone: (561) 304-5633
Facsimile: (561) 691-7135

By: Jessica Conroy
Scott A. Goorland
Florida Bar No. 0066834

CERTIFICATE OF SERVICE
Docket No. 140001-EI

I HEREBY CERTIFY that a true and correct copy of the foregoing has been furnished
by hand delivery (**) or electronic service on this 6th day of October, 2014 to the following:

Martha F. Barrera, Esq.**
Division of Legal Services
Florida Public Service Commission
2540 Shumard Oak Blvd.
Tallahassee, Florida 32399-0850
mbarrera@psc.state.fl.us

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Charles Rehwinkel, Esq.
Erik L. Sayler, Esq.
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Michael Barrett
Division of Economic Regulation
Florida Public Service Commission
2540 Shumard Oak Blvd.
Tallahassee, Florida 32399-0850
mbarrett@psc.state.fl.us

By: Jessica Cano per
Scott A. Goorland
Florida Bar No. 0066834

#147269

EXHIBIT A

CONFIDENTIAL

FILED UNDER SEPARATE COVER

EXHIBIT B

REDACTED COPIES

Results of FPL's Economic Evaluation - All Consent Case

A	B	C	D	E	F = C + D + E	G = F / B	H	I = B x (H-G)	J	K = I x J
Year	Annual Production (Bcf)	Operating Expenses (\$MM)	Depreciation (\$MM)	Return Rate ⁽²⁾ (\$MM)	Revenue Requirement (\$MM)	Effective Cost (\$/MMBtu)	FPL Market Price Forecast (\$/MMBtu)	Undiscounted Customer Savings (\$MM)	FPL Discount Factor	Discounted Customer Savings (\$MM)
2015	9.3					\$3.67	\$4.02	\$3.3	0.9302	\$3.1
2016	10.9					\$3.63	\$4.30	\$7.3	0.8649	\$6.3
2017	7.2					\$4.10	\$4.70	\$4.4	0.8043	\$3.5
2018	5.5					\$4.53	\$5.74	\$6.7	0.7480	\$5.0
2019	4.5					\$5.11	\$5.89	\$3.5	0.6956	\$2.4
2020	3.9					\$4.89	\$6.03	\$4.4	0.6468	\$2.9
2021	3.4					\$5.05	\$6.13	\$3.6	0.6015	\$2.2
2022	3.0					\$5.19	\$6.33	\$3.4	0.5594	\$1.9
2023	2.7					\$5.33	\$6.63	\$3.5	0.5202	\$1.8
2024	2.5					\$5.46	\$7.03	\$3.9	0.4837	\$1.9
2025	2.3					\$5.47	\$7.33	\$4.2	0.4498	\$1.9
2026	2.1					\$5.57	\$7.63	\$4.4	0.4183	\$1.8
2027	2.0					\$5.65	\$7.93	\$4.5	0.3890	\$1.8
2028	1.9					\$5.72	\$8.33	\$4.9	0.3617	\$1.8
2029	1.8					\$5.80	\$8.63	\$5.0	0.3364	\$1.7
2030	1.6					\$5.86	\$8.83	\$4.9	0.3129	\$1.5
2031	1.5					\$5.95	\$9.17	\$5.0	0.2910	\$1.4
2032	1.5					\$6.02	\$9.52	\$5.1	0.2705	\$1.4
2033	1.4					\$6.12	\$9.88	\$5.1	0.2516	\$1.3
2034	1.3					\$6.22	\$10.26	\$5.2	0.2340	\$1.2
2035	1.2					\$6.32	\$10.65	\$5.2	0.2176	\$1.1
2036	1.1					\$6.42	\$11.06	\$5.3	0.2023	\$1.1
2037-65	14.6					\$8.66	\$17.16	\$124.4	0.0902	\$11.2
Totals⁽¹⁾	87.4	\$220.0	\$125.4	\$128.4	\$473.8			\$227.3		\$60.3

Notes:

(1) Totals are for 2015-2065, an assumed 50 year project life. Totals may not add due to rounding.

(2) Return rate includes return on the assets and return of financing costs.

(3) Based on discount rate of 7.5%, which reflects FPL's weighted average cost of capital

**Staff's Fourth Set
of Interrogatories No. 145
Attachment I pages 1 through 34
ARE CONFIDENTIAL IN
THEIR ENTIRETY**

EXHIBIT C

JUSTIFICATION TABLE

EXHIBIT C

COMPANY: Florida Power & Light Company

TITLE: List of Confidential Documents to Staff's 4th Set of Interrogatories (Nos. 140 & 145)

DOCKET NO.: 140001-EI

DATE: October 6, 2014

Description	Page Number	Conf. Y/N	Line/Column	366.093(3) F.S.	Affiant
Staff's Fourth Set of Interrogatories No. 140 Attachment V	1	Y	Cols C – F Lines 5 – 27	(e)	Melissa Linton
Staff's Fourth Set of Interrogatories No. 145 Attachment 1	1 - 34	Y	All	(e)	Kim Ousdahl And Timothy D. Taylor, PhD

EXHIBIT D

AFFIDAVITS

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Fuel and Purchased Power Clause with
Generating Performance Incentive Factor

Docket No: 140001-EI

STATE OF FLORIDA)
)
COUNTY OF PALM BEACH)

AFFIDAVIT OF MELISSA LINTON

BEFORE ME, the undersigned authority, personally appeared Melissa Linton who, being first duly sworn, deposes and says:

1. My name is Melissa Linton. I am currently employed by Florida Power & Light Company as Director of Finance, Forecast, Strategy and Analysis. My business address is 700 Universe Blvd., Juno Beach, Florida, 33408. I have personal knowledge of the matters stated in this affidavit.

2. I have reviewed Exhibit C and the document that is included in Florida Power & Light Company's ("FPL") Request for Confidential Classification concerning information provided with its Petition for Prudence Determination Regarding Acquisition of Gas Reserves for which I am identified on Exhibit C as the affiant. The document and materials that I have reviewed (Staff 4th Set of Interrogatories No.140) contain proprietary confidential business information, relating to competitive interests, the disclosure of which would impair the competitive business of FPL, its affiliates or its vendors. This document contains information regarding forecast results of FPL's Economic Evaluation, specifically, Operating Expenses, Depreciation, Return Rate and Revenue Requirement. The disclosure of this information would place FPL at a competitive disadvantage when coupled with other information that is publicly available. To the best of my knowledge, FPL has maintained the confidentiality of this document and materials.

3. Consistent with the provisions of the Florida Administrative Code, such materials should remain confidential for a period of not less than eighteen (18) months. In addition, the document should be returned to FPL as soon as the information is no longer necessary for the Commission to conduct its business so that FPL can continue to maintain the confidentiality of this document.

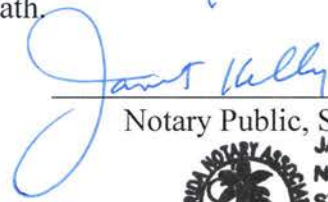
4. Affiant says nothing further.



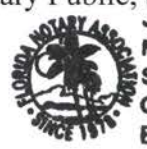
Melissa Linton

SWORN TO AND SUBSCRIBED before me this 1st day of October 2014, by Melissa Linton who is personally known to me or who has produced (personally known) (type of identification) as identification and who did take an oath.

My Commission Expires: 11/24/2017



Notary Public, State of Florida
JANET KELLY
NOTARY PUBLIC
STATE OF FLORIDA
Comm# FF072656
Expires 11/24/2017



BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Fuel and Purchased Power Clause with
Generating Performance Incentive Factor

Docket No: 140001-EI

STATE OF FLORIDA)
COUNTY OF PALM BEACH)

AFFIDAVIT OF KIM OUSDAHL

BEFORE ME, the undersigned authority, personally appeared Kim Ousdahl who, being first duly sworn deposes and says:

1. My name is Kim Ousdahl. I am currently employed by Florida Power & Light Company ("FPL") as Vice President, Controller and Chief Accounting Officer. My business address is 700 Universe Boulevard, Juno Beach, Florida 33408. I have personal knowledge of the matters stated in this affidavit.

2. I have reviewed Exhibit C and the documents that are included in Florida Power & Light Company's ("FPL") Request for Confidential Classification concerning information provided with its Petition for Prudence Determination Regarding Acquisition of Gas Reserves for which I am identified on Exhibit C as the co-affiant. The documents and materials that I have reviewed (Staff 4th Set of Interrogatories No.145) contain proprietary confidential business information, including information relating to competitive interests, the disclosure of which would impair the competitive business of FPL, its affiliates or its vendors. Specifically, the documents contain information regarding depletion calculations for Units of Production. The disclosure of this information would place FPL at a competitive disadvantage when coupled with other information that is publicly available. To the best of my knowledge, FPL has maintained the confidentiality of these documents and materials.

3. Consistent with the provisions of the Florida Administrative Code, such materials should remain confidential for a period of eighteen (18) months. In addition, they should be returned to FPL as soon as the information is no longer necessary for the Commission to conduct its business so that FPL can continue to maintain the confidentiality of these documents.

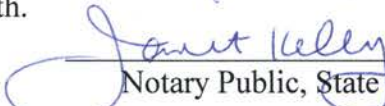
4. Affiant says nothing further.



Kim Ousdahl

SWORN TO AND SUBSCRIBED before me this 1st day of October, 2014, by Kim Ousdahl, who is personally known to me or who has produced (personally known) (type of identification) as identification and who did take an oath.

My Commission Expires 11/24/2017



Notary Public, State of Florida

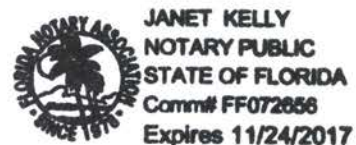


EXHIBIT DBEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Fuel and Purchased Power Clause with
Generating Performance Incentive Factor

Docket No: 140001-EI

STATE OF TEXAS)
)
COUNTY OF HARRIS)

AFFIDAVIT OF TIMOTHY D. TAYLOR, PhD

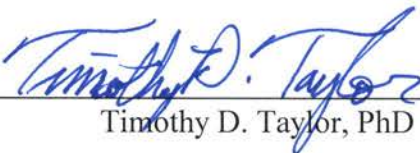
BEFORE ME, the undersigned authority, personally appeared Timothy D. Taylor, PhD who, being first duly sworn, deposes and says:

1. My name is Timothy D. Taylor, PhD. I am currently employed by NextEra Energy Project Management, LLC, as Chief Technology Officer of the Gas Infrastructure and Development business unit. My business address is 601 Travis, Suite 1900 Houston, Texas, 77002. I have personal knowledge of the matters stated in this affidavit.

2. I have reviewed Exhibit C and the documents that are included in Florida Power & Light Company's ("FPL") Request for Confidential Classification concerning information provided with its Petition for Prudence Determination Regarding Acquisition of Gas Reserves for which I am identified on Exhibit C as the co-affiant. The documents and materials that I have reviewed (Staff 4th Set of Interrogatories No.145) contain proprietary confidential business information, including information relating to competitive interests, the disclosure of which would impair the competitive business of FPL, its affiliates or its vendors. Specifically, the documents contain information regarding Aggregate Monthly Cash Flow Calculations for Proved Developed Wells, Proven Undeveloped Wells and Probable Wells. The disclosure of this information would place FPL at a competitive disadvantage when coupled with other information that is publicly available. To the best of my knowledge, FPL has maintained the confidentiality of these documents and materials.

3. Consistent with the provisions of the Florida Administrative Code, such materials should remain confidential for a period of eighteen (18) months. In addition, they should be returned to FPL as soon as the information is no longer necessary for the Commission to conduct its business so that FPL can continue to maintain the confidentiality of these documents.

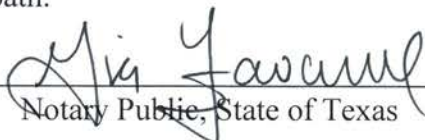
4. Affiant says nothing further.



Timothy D. Taylor, PhD

SWORN TO AND SUBSCRIBED before me this 30 day of September 2014, by Timothy D. Taylor, PhD who is personally known to me or who has produced Timothy D. Taylor (type of identification) as identification and who did take an oath.

My Commission Expires:



Notary Public, State of Texas

