



William P. Cox
Senior Attorney
Florida Power & Light Company
700 Universe Boulevard
Juno Beach, FL 33408-0420
561-304-5662
(561) 691-7135 (Facsimile)
E-mail: Will.Cox@fpl.com

February 17, 2016

VIA HAND DELIVERY

Ms. Carlotta S. Stauffer
Division of the Commission Clerk and Administrative Services
Florida Public Service Commission
2540 Shumard Oak Blvd.
Tallahassee, FL 32399-0850

RECEIVED-FPSC
2016 FEB 17 PM 2:13
COMMISSION
CLERK

Re: Docket No. 150263-EI

REDACTED

Dear Ms. Stauffer:

I enclose for filing in the above docket Florida Power & Light Company's ("FPL's") Request for Confidential Classification. The request includes Exhibits A, B (two copies), C and D.

Exhibit A consists of the confidential documents, and all the information that FPL asserts is entitled to confidential treatment 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 Confidential Classification. Exhibit D contains the declaration in support of FPL's Request for Confidential Classification.

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

Sincerely,

William P. Cox
William P. Cox

Enclosure

COM _____ cc: Counsel for Parties of Record (w/ copy of FPL's Request for Confidential Classification)

AFD _____

APA _____ 3760262

ECO _____

ENG Redacted

GCL _____

IDM _____

TEL _____

CLK _____

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Petition for determination of need for
Duval-Raven 230 kV transmission line in
Baker, Columbia, Duval, and Nassau Counties,
by Florida Power & Light Company

Docket No: 150263-EI

Date: February 17, 2016

**FLORIDA POWER AND LIGHT COMPANY'S
REQUEST FOR CONFIDENTIAL CLASSIFICATION**

Pursuant to Section 366.093, Florida Statutes, and Florida Public Service Commission ("Commission") Rule 25-22.006, Florida Administrative Code, Florida Power & Light Company ("FPL") requests confidential classification of certain information contained in FPL's Second Errata Sheet of Francisco Prieto ("Second Errata") and Page 11 of Exhibit A to the petition for determination of need for Duval-Raven 230 kV transmission line ("Petition"), sponsored by FPL Witness Francisco Prieto (the "Confidential Information"). In support of its request, FPL states as follows:

1. On January 11, 2016, FPL filed a Request for Confidential Classification of certain confidential information contained in FPL's Petition, supporting testimony, and exhibits, which included confidential information contained on Page 11, Exhibit A to the Petition ("January 11, 2016 Request"). By Order No. PSC-16-0059-CFO-EI, dated February 1, 2016 ("Order 0059"), the Commission granted FPL's January 11, 2016 Request. FPL adopts and incorporates by reference the January 11, 2016 Request and Order 0059.

2. On February 17, 2016, FPL filed the Second Errata Sheet of Francisco Prieto on Exhibit A to the Petition in this proceeding, which included one correction to the confidential information on Page 11 of Exhibit A to the Petition. This confidential information on Page 11 of Exhibit A to the Petition that was the subject of FPL's January 11, 2016 Request and Order 0059, along with the new corrected confidential information in the Second Errata, warrants continued treatment as proprietary and confidential business information within the meaning of Section 366.093(3).

3. The following exhibits are included with this Request:

a. Exhibit A consists of a copy of the Second Errata Sheet of Francisco Prieto and page 11 of Exhibit A of FPL's Petition in which all of the confidential information is highlighted.

b. Exhibit B consists of two copies of the Second Errata Sheet of Francisco Prieto and page 11 of Exhibit A FPL's Petition in which all of the Confidential Information is redacted.

c. Exhibit C is a table that identifies by page, line, or column the Confidential Information, together with references to the specific statutory bases for the claim of confidentiality and to the affiant who supports the requested classification.

d. Exhibit D is the written declaration of Francisco Prieto in support of this request.

4. FPL submits that the highlighted information in Exhibit A of this request is proprietary confidential business information within the meaning of Section 366.093(3), Florida Statutes. This information is intended to be and is treated by FPL as private, and its confidentiality has been maintained. Pursuant to Section 366.093, such information is entitled to confidential treatment and is exempt from the disclosure provisions of the public records law. Thus, once the Commission has determined 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.

5. FPL seeks confidential protection for the highlighted information contained in the relevant portions of the Petition, supporting testimony, and exhibits. The highlighted

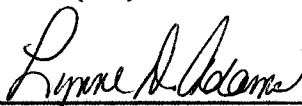
information consists of information related to security measures, systems, or procedures. Such information constitutes protected proprietary confidential business information pursuant to Section 366.093(3)(c), Florida Statutes. As described in more detail in the affidavit attached as Exhibit D, the information contains or constitutes critical energy infrastructure information, as defined in Section 388.113 of the Code of Federal Regulations (18 C.F.R. §388.113). Federal Energy Regulatory Commission ("FERC") Order 630 (issued February 21, 2003) and Order 683 (issued October 3, 2006) protect from public disclosure documents relating to critical energy infrastructure. This type of information previously has been granted confidential classification in Commission Order No. PSC-03-0551-FOF-EI and Order No. PSC-06-0631-CFO-EI.

6. Upon a finding by the Commission that the Confidential Information is proprietary confidential business information under Section 366.093(3), such information should not be declassified for at least eighteen (18) months and should be returned to FPL as soon as the information is no longer necessary for the Commission to conduct its business. § 366.093(4), Fla. Stat.

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

Respectfully submitted,

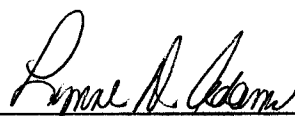
William P. Cox
Senior Attorney
Florida Power & Light Company
700 Universe Boulevard
Juno Beach, FL 33408
Telephone: (561) 304-5662
Facsimile: (561) 691-7135

By: 
for William P. Cox
Fla. Bar No. 0093531

CERTIFICATE OF SERVICE
Docket No. 150263-EI

I HEREBY CERTIFY that a true and correct copy of the foregoing(*) has been furnished by electronic mail on this 17th day of February 2016 to the following:

Lee Eng Tang, Esq.
Office of General Counsel
Florida Public Service Commission
2540 Shumard Oak Blvd.
Tallahassee, FL 32399-0850
ltan@psc.state.fl.us

By 

William P. Cox
Fla. Bar No. 0093531

* The exhibits to this Request are not included with the service copies, but copies of Exhibits B, C and D are available upon request.

3760088

EXHIBIT A

CONFIDENTIAL

FILED UNDER SEPARATE COVER

EXHIBIT B

REDACTED COPIES

**BEFORE THE
FLORIDA PUBLIC SERVICE COMMISSION**

In re: Petition for determination of)
 Need for Duval-Raven 230 kV)
 transmission line in Baker, Columbia)
 Duval, and Nassau Counties, by)
Florida Power & Light Company)

DOCKET NO. 150263-EI
 FILED: February 17, 2016

REDACTED

SECOND ERRATA SHEET OF FRANCISCO PRIETO

January 11, 2016 – Exhibit A to FPL’s Petition

<u>PAGE #</u>	<u>LINE #</u>	<u>CORRECTION</u>
8 of 20	“Estimated Total Project Cost”	Change “79.9” to “82.0”
1	11 of 20	20 Change ^A [REDACTED] to ^B [REDACTED]
16 of 20	4	Change “95.1” to “96.3”
Attachment 9*	“Minimize Price (Present value of Revenue requirements)”	Change “\$77,900,000” to “82,000,000”
Attachment 9*	“Minimize Price (Present value of Revenue requirements)”	Change “\$90,500,000” to “96,300,000”
Appendix A, Table of Contents	All	Change “Winter 2019/20” to “Winter 2018/19”
Appendix B, Table of Contents	All	Change “Winter 2019/20” to “Winter 2018/19”

**Changes to Attachment 9 described herein replace and supersede the Errata Sheet of Francisco Prieto filed by FPL on February 9, 2016.*

EXHIBIT A TO FPL'S PETITION (CORRECTED 2/17/2016)

Load Flow Results Without the DRP

Page A.1 of Appendix A provides a "Load Flow Diagram Key" to assist in interpreting the load flow maps contained in Appendices A and B. Page A.2 shows a load flow output diagram of the 2018 winter peak load condition without the DRP in-service. The diagram represents what is called the base case scenario or normal condition (*i.e.*, no contingencies) for the year 2018/19 winter peak load. The diagram shows that all facilities are operating within normal equipment ratings (*i.e.*, no overloads or low voltages).

In accordance with NERC Reliability Standards TPL-003-0 - System Performance Following Loss of Two or More Bulk Electric System Elements (Category C) and TPL-001-4 – Transmission System Planning Performance Requirements, Table 1 (Steady State & Stability Performance Planning Events) Categories P1 through P6, effective January 1, 2016), FPL must have a valid assessment and corrective plan to ensure that reliable systems are developed to meet specified performance requirements.

Page A.3 shows the power flows without the DRP in 2018 assuming the loss of the ^A [REDACTED] and ^B [REDACTED] line sections of the ^A [REDACTED] and ^B [REDACTED] lines. This results in the ^A [REDACTED] line section loading to as high as ^B % of its ^C amp thermal rating (see Attachment 8). This would potentially require interruption of service to approximately ^A [REDACTED] customers in 2018 to reduce loading on this line to acceptable levels.

EXHIBIT C

JUSTIFICATION TABLE

EXHIBIT C

COMPANY: Florida Power & Light Company

TITLE: List of Confidential Documents

DOCKET TITLE: Petition for Duval-Raven Transmission Line

DOCKET NO.: 150263

DATE: February 17, 2016

Description	Page Number	Conf. Y/N	Line/Column	366.093(3) F.S.	Affiant
Second Errata Sheet of Francisco Prieto, Filed 2/17/2016	1	Y	Line 1a, 1b	(c)	Francisco Prieto
Exhibit A to FPL's Petition (Corrected 2/17/2016)	11	Y	Line 1a, 1b Line 2a, 2b Line 3a, 3b, 3c Line 4a	(c)	Francisco Prieto

EXHIBIT D

DECLARATION

EXHIBIT D

BEFORE THE
FLORIDA PUBLIC SERVICE COMMISSION

In re: Petition for determination of need for Duval-Raven 230 kV transmission line in Baker, Columbia, Duval, and Nassau Counties, by Florida Power & Light Company.

Docket No. 150263-EI

STATE OF FLORIDA)
)
COUNTY OF MIAMI-DADE)

WRITTEN DECLARATION OF FRANCISCO PRIETO

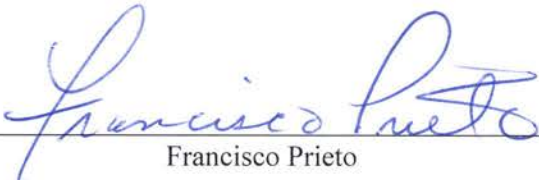
1. My name is Francisco Prieto. I am currently employed by Florida Power & Light Company ("FPL") as Senior Manager, System Planning in the Transmission Services and Planning department. My business address is 4200 W. Flagler Street, Miami, Florida 33134. I have personal knowledge of the matters stated in this affidavit.

2. With respect to Exhibit C, I have reviewed the documents that are included in Exhibit A to FPL's Request for Confidential Classification for which I am listed as the affiant. Such documents or materials that I have reviewed and which, in whole or in part, are asserted by FPL to be proprietary confidential business information, as defined under Section 366.093(3), Florida Statutes, contain or constitute information related to security measures, systems, and procedures.

3. Specifically, the information contains or constitutes critical energy infrastructure information, as defined in Section 388.113 of the Code of Federal Regulations (18 C.F.R. §388.113). The information provides details regarding the specific configuration of FPL's transmission facilities and length and magnitude of potential outages depending on the occurrence of certain severe or catastrophic events. This information related to the transmission of energy should be protected because it could be useful to a person planning an attack on critical infrastructure, as it provides detailed information on specific transmission line segments. To the best of my knowledge, FPL has maintained the confidentiality of these documents and materials.

4. Consistent with the provisions of the Florida Administrative Code, such materials should remain confidential for a period of not less than 18 months. These materials 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.

5. Affiant says nothing further.


Francisco Prieto

Date: 2/16/16