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May 20, 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 MAY 20 AM 11:59
COMMISSION
CLERK

Re: Docket No. 160000-EI

REDACTED

Dear Ms. Stauffer:

I enclose for filing in the above docket Florida Power & Light Company's ("FPL's") Request for Confidential Classification of Information Provided in Response to Staff's First Supplemental Data Request (Nos. 29, 55 and 58). 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 for Confidential Classification. Exhibit D contains the declarations in support of FPL's request.

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

- COM _____
- AFD Redacted
- APA _____
- ECO _____
- ENG _____
- GCL _____
- IDM _____
- TEL _____
- CLK _____

Sincerely,

Kevin I.C. Donaldson

Enclosure

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

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Florida Power & Light Company's
2016 Ten Year Site Plan

Docket No. 160000-EI
Filed: May 20, 2016

**FLORIDA POWER & LIGHT COMPANY'S
REQUEST FOR CONFIDENTIAL CLASSIFICATION
OF INFORMATION PROVIDED IN RESPONSE TO
STAFF OF THE FLORIDA PUBLIC SERVICE COMMISSION'S
FIRST SUPPLEMENTAL DATA REQUEST (NOS. 29, 55 AND 58)**

Pursuant to Section 366.093, Florida Statutes, and Rule 25-22.006, Florida Administrative Code, Florida Power & Light Company ("FPL") requests confidential classification of certain information provided in response to the Staff of the Florida Public Service Commission's ("Staff") First Supplemental Data Request (Nos. 29, 55 and 58) ("Confidential Discovery Responses"). In support of its Request, FPL states as follows:

1. On March 1, 2016, Staff served its First Supplemental Data Request (Nos. 1-73) on FPL. FPL's Response to Staff's First Supplemental Data Request (Nos. 29, 55 and 58) contain information of a confidential nature within the meaning of Section 366.093(3), Florida Statutes.

2. FPL served its responses to Staff's First Supplemental Data Request (Nos. 1-73) on May 20, 2016. This request is being filed contemporaneously with the service of the responses to Staff's discovery in order to request confidential classification of the Confidential Discovery Responses consistent with Rule 25-22.006, Florida Administrative Code.

3. The following exhibits are included with and made a part of this request:

a. Exhibit A consists of a copy of the Confidential Discovery Responses on which all information that FPL asserts is entitled to confidential treatment is highlighted.

b. Exhibit B consists of an edited version of the Confidential Discovery Responses on which all information that FPL asserts is entitled to confidential treatment is redacted.

c. Exhibit C is a table containing a page-and-line identification of the information highlighted in Exhibit A and a brief description of the Confidential Information. Exhibit C also references the specific statutory bases for the claim of confidentiality and identifies the declarants who support the requested classification.

d. Exhibit D contains the declarations of Tom Hartman and Tomey Tuttle in support of this Request.

4. FPL submits that the highlighted information in Exhibit A 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 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. As the description included in Exhibit C and the declarations included in Exhibit D indicate, the Confidential Discovery Responses provided by FPL contains information concerning bids or other contractual data, the disclosure of which would impair the efforts of FPL to contract for goods and services on favorable terms. This information is protected by Section 366.093(3)(d), Fla. Stat.

6. Additionally, certain information relates to the competitive interests of FPL and its vendors, the disclosure of which would impair their competitive interests. This information is protected by Section 366.093(3)(e), Fla. Stat.

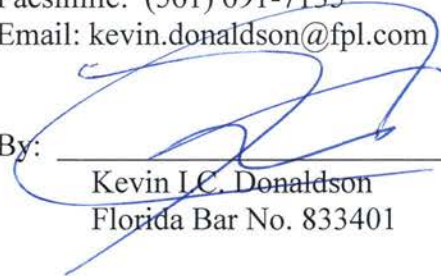
7. Upon a finding by the Commission that the Confidential Information remains proprietary and confidential business information, the information should not be declassified for at least an additional eighteen (18) month period and should be returned to FPL as soon as it is no longer necessary for the 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,

John T. Butler
Assistant General Counsel - Regulatory
Kevin I.C. Donaldson
Senior Attorney
Florida Power & Light Company
700 Universe Boulevard
Juno Beach, FL 33408
Telephone: (561) 304-5170
Facsimile: (561) 691-7135
Email: kevin.donaldson@fpl.com

By: _____

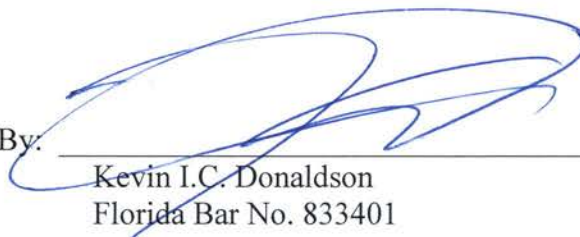

Kevin I.C. Donaldson
Florida Bar No. 833401

CERTIFICATE OF SERVICE
Docket No. 160000-EI

I **HEREBY CERTIFY** that a true and correct copy of the foregoing Request for Confidential Classification* has been furnished by electronic service this 20th day of May 2016 to the following:

Moniaishi Mtenga
Division of Engineering
Florida Public Service Commission
2540 Shumard Oak Blvd.
Tallahassee, FL 32399

By: _____



Kevin I.C. Donaldson
Florida Bar No. 833401

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

4231091

EXHIBIT A

CONFIDENTIAL

FILED UNDER SEPARATE COVER

EXHIBIT B

REDACTED COPIES

CONFIDENTIAL

Florida Power & Light Company
2016 Ten-Year Site Plan - Staff's Supplemental Data Request # 1
Question No. 29 - CONFIDENTIAL
Page 1 of 1

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QUESTION:

Please refer to the list of renewable purchased power agreements that are anticipated to begin delivering capacity and/or energy to the Company during the period 2016 through 2025. Discuss the current status of each project.

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RESPONSE:

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

CONFIDENTIAL

Florida Power & Light Company
2016 Ten-Year Site Plan - Staff's Supplemental Data Request # 1
Question No. 55
Page 2 of 2

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16.

e. FPL does anticipate seeking cost recovery for the additional costs attributed to the CCR rule requiring early closure of the Scherer ash pond and construction of a new landfill that is compliant with the new design standard.

| Year | Estimated Coal Combustion Residuals Rule (CCR) Impacts (2015 \$ millions) | | | |
|------|---|-----------|------------|-------------|
| | Capital Costs | O&M Costs | Fuel Costs | Total Costs |
| | | * | NA | |
| | | * | NA | |
| | | * | NA | |
| | | * | NA | |
| | | * | NA | |
| | | * | NA | |
| | | * | NA | |
| | | * | NA | |
| | | * | NA | |
| | | * | NA | |
| | | * | NA | |
| | | * | NA | |
| | | * | NA | |
| | | * | NA | |

Notes

*Costs projections are not available for the period.

Capital costs include initial phases of closure of existing Scherer ash pond and constructions of a new landfill for CCR management.

CONFIDENTIAL

| Unit | Unit Type**** | Fuel Type | Estimated Unit Cost of EPA's New and Proposed Rules | | | | | | |
|-----------------------------------|---------------|-----------|---|--|----------------------------------|-------|--------------------------------------|---------------------|--------|
| | | | Net Summer Capacity | Estimated Cost of New or Proposed EPA Rules Impacts (2015 \$ millions) | | | | | |
| | | | (MW) | MATS | CSAPR/CAIR | CWIS | CCR Non-Hazardous Waste | Anticipated Impacts | Total* |
| Cape Canaveral 3 | CC | NG, ULSD | 1210 | N/A | 0 | 7.59 | N/A | | 16-255 |
| Fort Myers Gas Turbines 1-12 | GT | DFO | 594 | N/A | 0 | N/A | N/A | | 0 |
| Fort Myers 2 | CC | NG | 1470 | N/A | 0 | 13.59 | N/A | | 17-220 |
| Fort Myers CT's | GT | NG, ULSD | 314 | N/A | 0 | N/A | N/A | | 0 |
| Lauderdale 4 | CC | NG, DFO | 442 | N/A | 0 | 5.77 | N/A | | 7.59 |
| Lauderdale 5 | CC | NG, DFO | 442 | N/A | 0 | 5.77 | N/A | | 7.59 |
| Lauderdale Gas Turbines 1-12 | GT | NG, DFO | 412 | N/A | 0 | N/A | N/A | | 0 |
| Lauderdale Gas Turbines 13-24 | GT | NG, DFO | 412 | N/A | 0 | N/A | N/A | | 0 |
| Port Everglades Gas Turbines 1-12 | GT | NG, DFO | 412 | N/A | 0 | N/A | N/A | | 0 |
| Port Everglades 5 | CC | NG, ULSD | 1219 | N/A | 0 | 12.67 | N/A | | 18-235 |
| Riviera 5 | CC | NG, ULSD | 1212 | N/A | 0 | 7.42 | N/A | | 14-205 |
| Sanford 4 | CC | NG | 1005 | N/A | 0 | 0.05 | N/A | | 0.5 |
| Sanford 5 | CC | NG, DFO | 1005 | N/A | 0 | 0.05 | N/A | | 0.5 |
| Turkey Point 1 | ST | NG, RFO | 396 | 0 | 0 | N/A | N/A | | 0 |
| Turkey Point 3 | PWR | NUC | 811 | N/A | N/A | N/A | N/A | | 0 |
| Turkey Point 4 | PWR | NUC | 821 | N/A | N/A | N/A | N/A | | 0 |
| Turkey Point 5 | CC | NG, ULSD | 1187 | N/A | 0 | N/A | N/A | | 0 |
| Manatee 1 | ST | NG, RFO | 809 | ESP Installation Completed 2013 | 800 MW Cycling Project Completed | 0.03 | N/A | | 0 |
| Manatee 2 | ST | NG, RFO | 809 | ESP Installation Completed 2012 | 800 MW Cycling Project Completed | 0.03 | N/A | | 0 |
| Manatee 3 | CC | NG | 1141 | N/A | 0 | 0.03 | N/A | | 0.03 |
| Martin 1 | ST | NG, RFO | 823 | ESP Installation Completed 2014 | 800 MW Cycling Project Completed | 0.02 | N/A | | 55.8 |
| Martin 2 | ST | NG, RFO | 803 | ESP Installation Completed 2015 | 800 MW Cycling Project Completed | 0.02 | N/A | | 55.8 |
| Martin 3 | CC | NG | 469 | N/A | 0 | 0.02 | N/A | | 0.02 |
| Martin 4 | CC | NG | 469 | N/A | 0 | 0.02 | N/A | | 0.02 |
| Martin 8 | CC | NG, ULSD | 1135 | N/A | 0 | 0.02 | N/A | | 0.02 |
| Martin SOLAR | ST | SUN | 75*** | N/A | N/A | 0.02 | N/A | | 0.02 |
| St Lucie 1 | PWR | NUC | 981 | N/A | N/A | 8.02 | N/A | | 17-221 |
| St Lucie 2 | PWR | NUC | 840** | N/A | N/A | 8.02 | N/A | | 17-221 |
| West County Energy Center 1 | CC | NG, ULSD | 1219 | N/A | 0 | N/A | N/A | | 0 |
| West County Energy Center 2 | CC | NG, ULSD | 1219 | N/A | 0 | N/A | N/A | | 0 |
| West County Energy Center 3 | CC | NG, ULSD | 1219 | N/A | 0 | N/A | N/A | | 0 |
| SJRPP 1 | ST | BIT | 127** | Completed April 2015 | SCR Installed 2010 | 0.00 | Estimate Not Available from operator | | 0 |
| SJRPP 2 | ST | BIT | 127** | Completed April 2015 | SCR Installed 2010 | 0.00 | Estimate Not Available from operator | | 0 |
| Scherer 4 | ST | SUB | 634** | Hg Control Installed 2010, FGD Installation 2012 | SCR & FGD Installed 2012 | | | | |
| Cedar Bay | ST | BIT | 250 | N/A | N/A | N/A | N/A | | N/A |
| Space Coast Solar Energy | PV | SUN | 10 | N/A | N/A | N/A | N/A | | N/A |
| Desoto Solar Energy | PV | SUN | 25 | N/A | N/A | N/A | N/A | | N/A |

Unit Type: ST = Steam Turbine, GT = Gas Turbine, CC = Combined Cycle, PV = Photovoltaic
 Fuel Type: NG = Natural Gas, DFO = Distillate Fuel Oil, RFO = Residual Fuel Oil, ULSD = Ultra-Low Sulfur Distillate, BIT = Bituminous Coal, SUB = Sub-Bituminous Coal,
 SUN = Solar (PV & thermal), NUC = Nuclear
 Notes: * Total includes anticipated total project capital expenses for installation
 ** FPL Ownership Share only
 *** Unit capability also included in Martin Unit 8 Net Summer Capability
 **** Most of the existing GT's will be retired by the end of the year

EXHIBIT C

JUSTIFICATION TABLE

EXHIBIT C

COMPANY: Florida Power & Light Company
TITLE: List of Confidential Documents
DOCKET NO: 160000-EI
DOCKET TITLE: Ten Year Site Plan
DATE: May 20, 2016

| Set | Data Request | Conf. Y/N | Line/Column | Florida Statute 366.093(3) Subsection | Declarant |
|---------------------------------------|---------------------|---------------------|--|--|------------------|
| Staff 1 st Supplemental | 29 | Y | Lines: 6-20 | (d), (e) | T. Hartman |
| | 55 | N | Pg. 1 | (d), (e) | T. Tuttle |
| | | Y | Pg. 2, Col. A, Lns: 5-14, Col. B, Lns: 5-14, Col. E, Lns: 5-14 | | |
| 58 | Y | Cols: G-J, Line: 38 | (d), (e) | T. Tuttle | |

EXHIBIT D

DECLARATIONS

EXHIBIT D

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Florida Power & Light's 2016-2025 Ten
Year Site Plan.

Docket No: 160000-EI

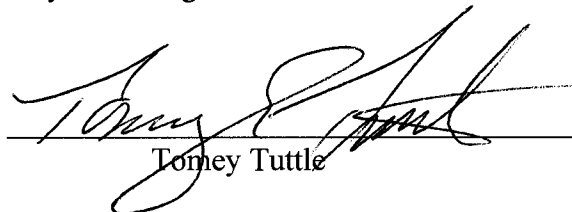
STATE OF FLORIDA)
)
COUNTY OF PALM BEACH) **WRITTEN DECLARATION OF**
) **TOMEY TUTTLE**

1. My name is Tomey Tuttle. I am currently employed by Florida Power & Light Company ("FPL") as Project Manager, Environmental Services. I have personal knowledge of the matters stated in this written declaration.

2. I have reviewed the documents referenced and incorporated in FPL's Request for Confidential Classification for which I am identified as a declarant. The documents or materials that I have reviewed and which are asserted by FPL to contain information concerning bids or other contractual data, the disclosure of which would impair the efforts of the FPL or its affiliates to contract for goods and services on favorable terms (SECTION 366.093(3)(D), F.S.). The information also relates to competitive interests, the disclosure of which would impair the competitive business of the provider of the information (SECTION 366.093(3)(E), F.S.). Specifically, the documents contain information related to FPL's contract with a particular vendor. Release of this information would put FPL at a competitive disadvantage because it would negatively impact our ability to negotiate with vendors in the future, to the detriment of customers. 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 not less than 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. Under penalties of perjury, I declare that I have read the foregoing declaration and that the facts stated in it are true to the best of my knowledge and belief.



Tomey Tuttle

Date: May 18, 2016

EXHIBIT D

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Florida Power & Light's 2016-2025 Ten
Year Site Plan.

Docket No: 160000-EI

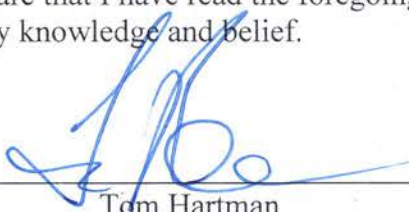
STATE OF FLORIDA)
)
COUNTY OF PALM BEACH) **WRITTEN DECLARATION OF**
) **TOM HARTMAN**

1. My name is Tom Hartman. I am currently employed by Florida Power & Light Company ("FPL") as Director, Business Development, EMT. I have personal knowledge of the matters stated in this written declaration.

2. I have reviewed the documents referenced and incorporated in FPL's Request for Confidential Classification for which I am identified as a declarant. The documents or materials that I have reviewed and which are asserted by FPL to contain information concerning bids or other contractual data, the disclosure of which would impair the efforts of the FPL or its affiliates to contract for goods and services on favorable terms (SECTION 366.093(3)(D), F.S.). The information also relates to competitive interests, the disclosure of which would impair the competitive business of the provider of the information (SECTION 366.093(3)(E), F.S.). Specifically, the documents contain information related to FPL's contract with a particular vendor. Release of this information would put FPL at a competitive disadvantage because it would negatively impact our ability to negotiate with vendors in the future, to the detriment of customers. 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 not less than 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. Under penalties of perjury, I declare that I have read the foregoing declaration and that the facts stated in it are true to the best of my knowledge and belief.



Tom Hartman

Date: May 17, 2016