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August 4, 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
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COMMISSION
CLERK

Re: Docket Nos. 160021-EI, 160061-EI, 160062-EI, 160088-EI

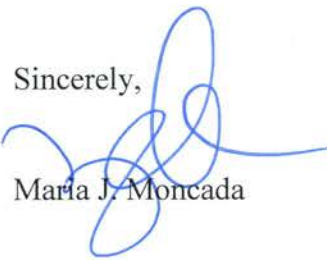
Dear Ms. Stauffer:

I enclose for filing in the above dockets Florida Power & Light Company's ("FPL's") Sixth Request for Confidential Classification of information provided in response to discovery. The request includes Exhibits A, B (two copies), C and D.

Exhibit A consists of the confidential documents, some of which are provided on a CD pursuant to a request by the Florida Public Service Commission Staff. 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.

REDACTED

Sincerely,

Maria J. Moncada

Enclosure

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

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BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Petition for rate increase by Florida Power & Light Company	Docket No. 160021-EI
In re: Petition for approval of 2016-2018 storm hardening plan, by Florida Power & Light Company	Docket No. 160061-EI
In re: 2016 depreciation and dismantlement study by Florida Power & Light Company	Docket No. 160062-EI
In re: Petition for limited proceeding to modify and continue incentive mechanism by Florida Power & Light Company	Docket No. 160088-EI Filed: August 4, 2016

**FLORIDA POWER & LIGHT COMPANY'S
SIXTH REQUEST FOR CONFIDENTIAL CLASSIFICATION
OF INFORMATION PROVIDED IN RESPONSE TO DISCOVERY**

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 discovery requests ("Confidential Discovery Responses") propounded by AARP, Office of Public Counsel ("OPC") and Staff of the Florida Public Service Commission ("Staff"). In support of its Request, FPL states as follows:

1. The Florida Public Commission Staff has requested that FPL provide copies of documents that FPL produced in response to AARP's Third Request for Interrogatories (No. 74), OPC's First Set of Interrogatories, (No. 3, Attachment 1), OPC's Eighteenth Request for Interrogatories (No. 380) and Staff's First Supplemental (Amended) Request for Interrogatories (No. 37).

2. 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.

Pursuant to Staff's request, responses produced in Microsoft Excel format are being provided in their native format on a CD attached hereto.

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. Where responsive documents are confidential in their entirety, FPL has included only the identifying cover pages in Exhibit B.

c. Exhibit C is a table containing an identification of the file provided in Exhibit A. Exhibit C also references the specific statutory bases for the claim of confidentiality and identifies the declarant who supports of the requested classification.

d. Exhibit D contains the declarations of Robert E. Barrett, Jr., Sam Forrest and Erica McNabb in support of this Request.

3. 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.

4. As described more fully in the declaration included as Exhibit D, the Confidential Discovery Response provided by FPL relate to information concerning bids or other contractual

data, the disclosure of which would impair the efforts of FPL to contract for goods or services on favorable terms. This information is protected by Section 366.093(3)(d), Fla. Stat.

5. Also, certain Confidential Discovery Responses relate to competitive interests, the disclosure of which would impair the competitive business of the provider of the information. This information is protected by Section 366.093(3)(e), Fla. Stat.

6. 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 declarations 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
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By: _____


Maria J. Moncada
Florida Bar No. 0773301

CERTIFICATE OF SERVICE

I **HEREBY CERTIFY** that a true and correct copy of the foregoing Request for Confidential Classification has been furnished by electronic mail this 4th day of August 2016 to the following parties:

Suzanne Brownless
Florida Public Service Commission
2540 Shumard Oak Boulevard
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Attorney for Sierra Club

By: _____



Maria J. Moncada
Florida Bar No. 0773301

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

EXHIBIT A

CONFIDENTIAL

FILED UNDER SEPARATE COVER

EXHIBIT B

REDACTED COPIES

CONFIDENTIAL

Florida Power & Light Company
Docket No. 160021-EI
AARP's Third Set of Interrogatories
Interrogatory No. 74
Page 1 of 2

1 QUESTION:

2 Ref: FPL Response to AARP First Set Interrogatories No. 6, parts (c) and (d) (Forecasts). In
3 response to AARP Interrogatory #6 (c), the Company stated, "FPL has only prepared a high-
4 level base projection with the Okeechobee LSA included" and in response to part (d) reference is
5 made to OPC's First Set of Interrogatories No. 3 which provided a single page summary
6 containing only a few lines of financial forecast results.
7 Please provide the following additional information:

- 8 a) Complete copies of "all available details regarding the assumptions, calculations and
9 results" with respect to the high level forecast underlying the data that was provided by
10 FPL to OPC in its Interrogatory No. 3.
- 11 b) A complete copy of all output report pages from the FPL financial forecast that was used
12 to populate OPC Interrogatory No. 3, Attachment No. 1, including projections of
13 revenues, income, balance sheet and cash flow results in each forecasted year.
- 14 c) A detailed statement of all input assumptions employed to develop the FPL financial
15 forecast that was used to populate OPC Interrogatory No. 3, Attachment No. 1.
- 16 d) Explain what is meant by the "FPLM: Rate Case v3" caption on the document provided
17 in response to OPC Interrogatory No. 3 and provide a descriptive listing of each other
18 version of long term forecast for FPL including the years 2017 and 2018 that the
19 Company possesses.
- 20 e) Provide forecast output report pages, comparable to your response to part (a), for each of
21 the financial forecast versions listed in your response to part (d).

22 RESPONSE:

23 a-b) The assumptions utilized in the high level base projection are consistent with the rate case
24 (as presented on MFR F-8) for the period 2016-2018. For 2019 and 2020, the assumptions
25 are consistent with those presented in the attachment to FPL's response to OPC's First Set
26 of Interrogatories No. 3. Retail weather-normalized delivered sales are expected to
27 increase 0.6% and 1.1% in 2019 and 2020, respectively. The capital expenditures are
28 consistent with those developed during the 2015 planning and budgeting process, which
29 produces a five-year capital forecast (2016-2020). As the planning and budgeting process
30 only produces a three-year O&M forecast (2016-2018), the O&M for 2019 and 2020 was
31 assumed to grow at [REDACTED] from the 2018 level, which is less than projected inflation.

A
32 FPL utilized these input assumptions to develop a high level base projection for 2019-2020
33 within the UI model. The UI model is configured such that it targets FPL's requested
34 return on equity of 11.50% for each period, and develops the retail base revenues that are
35 needed to achieve the targeted return on equity. As such, the output reports that FPL has
36 included as attachments to this interrogatory response reflect assumed additional retail base
37 revenues in 2019 and 2020 above and beyond what was requested in FPL's rate case filing.

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Florida Power & Light Company
Docket No. 160021-EI
AARP's Third Set of Interrogatories
Interrogatory No. 74
Page 2 of 2

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As part of the four-year proposal, FPL is not seeking to recover those additional revenues, but rather projects it will earn a [REDACTED] and [REDACTED] return on equity in 2019 and 2020, respectively, as presented in the attachment to FPL's response to OPC's First Set of Interrogatories No. 3. FPL is providing the following confidential output reports:

- Attachment No. 1 – Income Statement
- Attachment No. 2 – Balance Sheet
- Attachment No. 3 – Cash Flow
- Attachment No. 4 – Revenue Trend

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c) As noted in response to subpart (a) above, the assumptions utilized for 2016-2018 are consistent with those presented on MFR F-8. For 2019 and 2020, FPL developed high level assumptions consistent with those described previously and presented in OPC's First Set of Interrogatories No. 3.

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d) The caption references 'FPL Model – Rate Case v3,' which was the final rate case model developed and utilized to prepare the MFRs in this docket. The prior versions of the rate case forecast were superseded by the current version and as such, FPL no longer possesses the prior versions.

17

e) N/A.

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**Florida Power & Light Company
 Docket No. 160021-EI
 OPC's First Set of Interrogatories
 Interrogatory No. 3
 Attachment No. 1
 Page 1 of 1**

Florida Power & Light Company

	Scenario Description	FPLM: Rate Case v3 Base Scenario				
		2016	2017	2018	2019	2020
1						
2						
3	Regulatory ROE					
4	Equity as % of Investor Sources					
5	Equity as % of All Sources					
6	Retail Rate Base					
7	% growth					
8	Total Capital Employed/Deployed					
9						
10	UI Base Revenue Requirement at 11.50%	-	866	292	-	-
11	Revenues Recovered for New Generation (GBRA)	-	-	-	122	209
12	Retail Weather Normal Delivered Sales	107,299	107,261	107,888	108,497	109,670
13	% growth	1.1%	0.0%	0.6%	0.6%	1.1%
14	Retail Base Revenues					
15						
16	O&M - base					
17	% growth					
18	Capital Expenditures: UI Model					
19	Total CapEx					

20 ¹ Note: The ROE for 2019 and 2020 is based on the requested 11.50% filed in the case. The amounts will differ if
 21 FPL is awarded an ROE that is different from the 11.50% requested.

**FPL's response to
AARP's 3rd Request for Interrogatory No. 74**

Bates Nos.

AARP 003703

AARP 003704

AARP 003705

AARP 003706

are confidential in their entirety.

	A	B	C	D	E	F	G	H	I	J	K	L	M	N	O
1	Florida Power & Light Company			CONFIDENTIAL			OPC 091284								
2	Docket No. 180621-21						FPL RC-18								
3	OPC's Eighteenth Set of Interrogatories														
4	Interrogatory No. 380														
5	Attachment No. 1														
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92	NOTES:	Differences between aggregated monthly values and annual dollar values are due to rounding.													
93		The gains from a capacity release of idle natural gas transport, capacity release of idle electric transmission, option premiums, and administrative coal fees is the revenue received for the sale.													

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CAPACITY RELEASE OF NATURAL GAS TRANSPORT

NATURAL GAS OPTION PREMIUMS

ASSET MANAGEMENT AGREEMENT

POWER OPTION PREMIUMS

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24			\$ -			\$ -				\$ -					\$ -	
38			\$ -			\$ -				\$ -					\$ 83,440	
64			\$ 678,798			\$ 3,162,795				\$ 1,569,554					\$ 471,422	
77			\$ 1,006,558			\$ 5,895,600				\$ 2,302,391					\$ 38,442	
90			\$ 856,448			\$ 6,963,507				\$ 1,545,201					\$ 200,777	

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CAPACITY RELEASE OF ELECTRIC TRANSMISSION

COAL SALES

PURCHASE DOLLARS SALE DOLLARS GAINS DOLLARS SALE MMBTUS PURCHASE DOLLARS SALE DOLLARS GAINS DOLLARS SALE MMBTUS

\$ - \$ -

\$ 43,500 \$ -

\$ 805,766 \$ -

\$ 1,076,991 \$ -

\$ 1,659,993 \$ 20,000

\$ 2,086,021 \$ -

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Florida Power & Light Company
Docket No. 160021-EI
Staff's First Set of Interrogatories
Interrogatory No. 37 - Supplemental - Amended
Attachment No. 1
 Page 1 of 1

1 **FIN-RISK MANAGEMENT**
 2 **FPL PROPERTY & LIABILITY INSURANCE EXPENSE SUMMARY - CORRECTED**

	2011 ACTUAL	2012 ACTUAL	2013 ACTUAL	2014 ACTUAL	2015 ACTUAL	Three months ended March 31, 2016	2017 TEST YEAR
3							
4	Acct 924 PROPERTY INSURANCE:						
5	Property Insurance - Other	\$8,678,025	\$9,474,366	\$9,641,386	\$9,748,229	\$8,461,477	\$1,999,428 \$11,540,035
6	Property Insurance - Nuclear (PSL and PTN)	\$7,619,701	\$8,091,008	\$9,559,134	\$8,866,481	\$8,422,121	\$2,073,794 \$8,579,408
7	Property Insurance - Nuclear Distribution Refund (PSL and PTN)	(\$4,614,418)	\$0	\$0	(\$3,673,842)	(\$5,232,967)	(\$1,299,978) (\$5,232,967)
8	Property Insurance - Nuclear Outage (PSL and PTN)	\$2,126,558	\$2,081,923	\$2,054,612	\$1,975,627	\$2,024,147	\$514,627 \$2,207,222
9	Property Insurance - Nuclear Outage Distribution Refund (PSL and PTN)	(\$3,237,258)	\$0	\$0	(\$2,670,083)	(\$1,097,191)	(\$280,846) (\$1,097,191)
10	Property Insurance - Storm	\$571,221	\$570,744	\$581,152	\$594,832	\$462,106	\$112,758 \$482,874
11	Orot Flagler	\$258,149	\$0	\$0	\$0	\$0	\$0 \$0
12	FMPA and Participation Agreement Reimbursement	(\$69,419)	(\$357,831)	(\$409,136)	(\$371,695)	(\$385,374)	\$0 (\$347,359)
13	Other miscellaneous	\$56,909	\$107,611	(\$25,421)	\$0	(\$28,394)	\$0 \$0
14	Total	\$11,389,468	\$19,967,822	\$21,401,726	\$14,469,549	\$12,625,925	\$3,119,783 \$16,132,022
15	Acct 925 LIABILITY INSURANCE:						
16							
17							
18	Liability Insurance - Nuclear (PSL and PTN)	\$2,689,356	\$2,595,785	\$2,098,361	\$2,705,475	\$2,452,500	\$1,057,281 \$3,152,427
19	Employee Workers Comp-- 925.103	\$4,523,184	\$5,246,040	\$4,164,418	\$3,870,797	\$3,229,702	\$688,487 \$2,915,215
20	Contractor Workers Comp -- 925.102	\$1,185,428	\$3,733,504	\$291,855	\$860,450	\$963,200	\$166,633 \$682,450
21	St. Lucie 2 Participant Credit -- 925.102	(\$39,385)	(\$222,722)	(\$111,313)	(\$123,239)	(\$163,489)	(\$541,878) (\$140,522)
22	Clause - Nuclear Contractor -- 925.104	\$600,300	\$431,418	\$442,565	\$352,907	\$292,915	\$80,772 \$719,034
23	Clause - Capacity -- 925.112	\$137,011	\$313,947	\$269,164	\$275,508	\$185,413	\$25,447 \$108,801
24	Other Clauses -- 925.114, 925.115, 925.118	\$10,917	\$18,833	\$11,211	\$17,329	\$20,451	\$6,589 \$20,360
25	Total	\$17,735,445	\$20,587,106	\$15,271,726	\$16,600,256	\$15,851,147	\$3,304,831 \$16,687,416
26	Acct 926						
27	Life Insurance & Long Term Disability	\$4,940,729	\$5,154,848	\$2,966,231	(\$133,797)	\$3,177,159	\$1,425,155 \$5,606,966
28	Acct 588 FLEET LIABILITY INSURANCE:						
29	Vehicle Liability Insurance Premium 588.000	\$2,461,752	\$2,399,818	\$2,467,808	\$2,504,358	\$2,812,815	\$790,628 \$3,527,600
30	Grand Total	\$36,527,394	\$48,109,594	\$42,107,491	\$33,440,366	\$34,467,046	\$8,640,397 \$41,954,004

EXHIBIT C

JUSTIFICATION TABLE

EXHIBIT C

COMPANY: Florida Power & Light Company
TITLE: List of Confidential Documents
DOCKET NO: 160021-EI
DOCKET TITLE: Petition for Increase in Rates by Florida Power & Light Company
DATE: August 4, 2016

Discovery Set	Item No.	Conf Y/N	Bates Number	Line / Column	Florida Statute 366.093(3) Subsection	Declarant
AARP Third Set of Interrogatories	74	Y	AARP 003701	Ln. 31a	(e)	Robert E. Barrett, Jr.
		Y	AARP 003702	Lns. 2a, 2b		
	74 (provided on CD)	Y	AARP 003703	ALL		
		Y	AARP 003704	ALL		
		Y	AARP 003705	ALL		
		Y	AARP 003706	ALL		
OPC First Set of Interrogatories	3 (attachm. 1)	Y	Page 1	Lns. 4a, 5a, 6a, 7a, 8a, 9a, 14a, 15a, 16a, 17a, 18a, 19a	(e)	Robert E. Barrett, Jr.
OPC Eighteenth Set of Interrogatories	380 (provided on CD)	Y	OPC 031284	Pg. 1, Cols. B-D, F-I, K-M, O (Lns. 13-90) Cols. E, J, and N (Lns 13-24, 26-37, 39-50, 52-63, 65-76, 78-89) Pg. 2, Cols. P-Q, S-U, W-Y, AA-AC, AE, (Lns. 13-90) Cols. R, V, Z, AD (Lns. 13-24, 26-37, 39-50, 52-63, 65-76, 78-89) Pg. 3, Cols. AF-AG, AI-AK, AM, (Lns. 13-90) Cols. AH, AL (Lns. 13-24, 26-37, 39-50, 52-63, 65-76, 78-89)	(d), (e)	Sam Forrest
Staff's First Set of Interrogatories - Supplemental (Amended) Response	37	Y	STAFF 000924	Lns. 16 and 17	(d), (e)	Erica McNabb

EXHIBIT D

DECLARATIONS

EXHIBIT D

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Petition for rate increase by Florida
Power & Light Company

Docket No: 160021-EI

STATE OF FLORIDA)
)
COUNTY OF PALM BEACH)

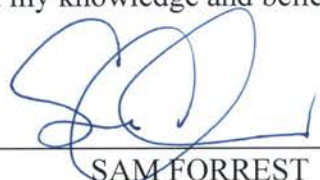
DECLARATION OF SAM FORREST

1. My name is Sam Forrest. I am currently employed by Florida Power & Light Company ("FPL") as Vice President of the Energy Marketing and Trading Business Unit. I have personal knowledge of the matters stated in this written declaration.

2. I have reviewed the documents and information included in Exhibit A to FPL's Request for Confidential Classification. The documents and materials in Exhibit A which are asserted by FPL to be proprietary confidential business information relating to competitive interests contain financial details related to FPL's asset optimization activities for natural gas and electric transmission. The disclosure of this information would impair FPL's ability to execute transactions for natural gas commodity sales, natural gas storage, natural gas transportation, natural gas options, asset management agreements, power options and electricity transmission on favorable terms for the benefit of its customers, would impair the competitive interests of FPL and its vendors, and would place FPL at a competitive disadvantage when coupled with other information that is publicly available. The information provided by FPL also contains or constitutes contractual data, the disclosure of which would impair the efforts of FPL to contract for goods or services on favorable terms. To the best of my knowledge, FPL has maintained the confidentiality of this information.

3. Consistent with the provisions of the Florida Administrative Code, such materials should remain confidential for a period of eighteen (18) months. In addition, the 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.

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.



SAM FORREST

Date: 8/2/16

EXHIBIT D

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Petition for rate increase by Florida
Power & Light Company.

Docket No: 160021-EI

STATE OF FLORIDA)
)
COUNTY OF PALM BEACH)

WRITTEN DECLARATION OF **ROBERT E. BARRETT, Jr.**

1. My name is Robert E. Barrett, Jr. I am currently employed by Florida Power & Light Company ("FPL") as Vice President, Finance. 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. The documents or materials that I have reviewed and which are asserted by FPL to be proprietary confidential business information contain competitive business information regarding our financial forecasts. The release of this information could impair our competitive interests and would violate Securities and Exchange Commission rules regarding the disclosure of material non-public information. 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.



Robert E. Barrett, Jr.

Date: 8 / 2 / 16

EXHIBIT D

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Petition for rate increase by Florida
Power & Light Company.

Docket No: 160021-EI

STATE OF FLORIDA)
)
COUNTY OF PALM BEACH)

WRITTEN DECLARATION OF **ERICA MCNABB**

1. My name is Erica McNabb. I am currently employed by Florida Power & Light Company ("FPL") as Director of Risk Management. I have personal knowledge of the matters stated in this written declaration.

2. I have reviewed the document and information included in Exhibit A to FPL's Request for Confidential Classification filed this date, for which I am listed as the declarant on Exhibit C. The document that I have reviewed and which is asserted by FPL to be proprietary confidential business information contain or constitute information relating to bids or other contractual data, the disclosure of which would impair the competitive business of the public utility or its affiliates to contract for goods or services on favorable terms. Specifically, the document contains negotiated liability insurance premiums. 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.



ERICA MCNABB

Date: 8-2-16