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R. Wade Litchfield
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ORIGINAL

RECEIVED-FPSC
02 JUN -3 PM 2:05
COMMISSION
CLERK

June 3, 2002

VIA HAND DELIVERY

Ms. Blanca S. Bayó, Director
Division of the Commission Clerk and
Administrative Services
Florida Public Service Commission
Betty Easley Conference Center, Room 110
2540 Shumard Oak Boulevard
Tallahassee, Florida 32399-0850

**Re: Florida Power & Light Company's Request for Confidential Classification of
Certain Material Provided in Connection with the Monthly Fuel Filings
Docket No. 020001-EI**

Dear Ms. Bayó:

I enclose and hand you herewith for filing in the above-referenced matter, the original and five (5) copies of Florida Power & Light Company's ("FPL") Request for Confidential Classification. The original includes Attachments A, B, and C. The five copies include only Attachments B and C.

Attachment A contains the confidential information that is the subject of FPL's Request for Confidential Classification. Attachment A is submitted for filing in a separate, sealed folder or carton marked "**ATTACHMENT A - CONFIDENTIAL**". Attachment B is an edited version of Attachment A, in which the information FPL asserts is confidential has been blocked out. Attachment C contains FPL's justification for its request for confidential classification.

In accordance with Rule 25-22.006(3)(d), FPL requests confidential treatment of the information in Attachment A pending disposition of FPL's request for Confidential Classification.

Also included herewith is a computer diskette containing FPL's Request for Confidential Classification and Attachment C, in Microsoft Word.

Please contact me should you or your Staff have any questions regarding this filing.

Sincerely,

R. Wade Litchfield

RWL/ec
Enclosures
cc: Service List (w/out Attachment A)

Doc/423 Fuel Filing/October 2001
an FPL Group company

RECEIVED & FILED
RWM
FPSC-BUREAU OF RECORDS

DOCUMENT NUMBER-DATE

05793 JUN -3 02

FPSC-COMMISSION CLERK

**BEFORE THE
FLORIDA PUBLIC SERVICE COMMISSION**

In re: Fuel and Purchased Power)
Cost Recovery Clause and Generating)
Performance Incentive Factor)

DOCKET NO. 020001-EI
FILED: June 3, 2002

REQUEST FOR CONFIDENTIAL CLASSIFICATION

NOW, BEFORE THIS COMMISSION, through undersigned counsel, comes Florida Power & Light Company ("FPL") and, pursuant to section 25-22.006 of the Florida Administrative Code and section 366.093 of the Florida Statutes, hereby requests confidential classification of certain information on Florida Public Service Commission ("FPSC" or "Commission") Forms 423-1(a), 423-2, 423-2(a) and 423-2(b) submitted in Docket No. 020001-EI. In support of its Request, FPL states as follows:

1. Petitioner's principal business address is as follows:

Florida Power & Light Company
P.O. Box 029100
Miami, Florida 33102-9100

Orders, notices, or other pleadings related to this request should be served on:

William G. Walker, III
Vice President
Florida Power & Light Company
215 South Monroe Street, Suite 810
Tallahassee, FL 32301-1859
Tel.: (850) 224-7595
Fax: (850) 224-7197

R. Wade Litchfield
Senior Attorney
Florida Power & Light Company
700 Universe Boulevard
Juno Beach, Florida 33408-0420
Tel.: (561) 691-7101
Fax: (561) 691-7103

2. The following attachments are included herewith and made a part hereof:
 - a. Attachment A includes the complete and unedited versions of FPL's October 2001 Form 423-1(a) and St. Johns River Power Park's (SJRPP) October 2001 Forms 423-2, 423-2(a) and 423-2(b) which contain certain information that FPL asserts should be accorded confidential treatment. The information in Attachment A for which FPL seeks confidential classification has been highlighted. Attachment A is submitted separately in a sealed envelope marked "CONFIDENTIAL."
 - b. Attachment B is the edited version of Attachment A. All information that FPL asserts is entitled to confidential treatment has been blocked out in Attachment B.
 - c. Attachment C identifies information for which confidential treatment is sought and, with regard to each item or type of information, contains a brief statement that explains the need for confidentiality and refers to the specific statutory basis or bases for the request.

3. Pursuant to section 366.093, FPL seeks confidential protection for the information highlighted in Attachment A. FPL submits that such information is proprietary confidential business information within the meaning of section 366.093(3). Pursuant to section 366.093, such materials are entitled to confidential treatment and are 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. The statutory bases and support for FPL's assertion of confidentiality with regard to specific items or types of information are set forth in Attachment C. The information for which confidential classification is sought is intended to be and is treated by FPL as confidential and, to the best of FPL's knowledge and belief, has not been publicly disclosed.

5. Upon a finding by the Commission that the material in Attachment A for which FPL seeks confidential treatment is proprietary confidential business information within the meaning of

section 366.093(3), pursuant to section 366.093(4) such materials should not be declassified until the end of the minimum protective period allowed for by law, or as otherwise extended by the Commission. Further, the materials should be returned to FPL as soon as the information is no longer necessary for the Commission to conduct its business.

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

Respectfully submitted,



R. WADE LITCHFIELD
Florida Authorized House Counsel
Attorney for Florida Power & Light Company
700 Universe Boulevard
Juno Beach, Florida 33408-0420
Tel.: (561) 691-7101
Fax: (561) 691-7135

CERTIFICATE OF SERVICE

I, THE UNDERSIGNED COUNSEL, HEREBY CERTIFY that a copy of Florida Power & Light Company's Request for Confidential Classification, without Attachment A, has been served via first class mail, postage prepaid to the parties listed below, this 3rd day of June, 2002:

Wm. Cochran Keating, IV, Esq.
Division of Legal Services
Florida Public Service Commission
2540 Shumard Oak Blvd.
Tallahassee, Florida 32399-0850

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James D. Beasley, Esq.
Ausley & McMullen
Attorneys for TECO
P.O. Box 391
Tallahassee, Florida 32302

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Office of Public Counsel
111 West Madison Street
Room 812
Tallahassee, Florida 32399

James A. McGee, Esq.
Florida Power Corporation
P.O. Box 14042
St. Petersburg, Florida 33733

Norman H. Horton, Esq.
Floyd R. Self, Esq.
Messer, Caparello & Self
Attorneys for FPUC
215 South Monroe Street, Suite 701
Tallahassee, Florida 32302-0551

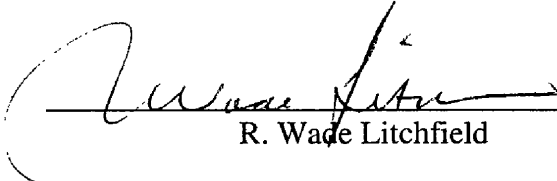
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President & CEO
Florida Public Utilities Co.
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Ms. Angela Llewellyn
Regulatory Specialist
Regulatory & Business Specialist
Tampa Electric Co.
P.O. Box 111
Tampa, Florida 33601


R. Wade Litchfield

ATTACHMENT “A”

FPL’S FPSC FORM 423-1(a)

SJRPP’S FPSC FORMS

423-2

423-2 (a)

423-2 (b)

CONFIDENTIAL

FILED UNDER SEPARATE COVER

ATTACHMENT “B”

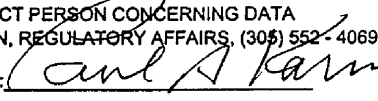
**EDITED VERSION
FPL’S FPSC FORM 423-1(a)
SJRPP’S FPSC FORMS
423-2
423-2 (a)
423-2 (b)**

EDITED COPY

MONTHLY REPORT OF COST AND QUALITY OF FUEL OIL FOR ELECTRIC PLANTS
DETAIL OF INVOICE AND TRANSPORTATION CHARGES

FPSC FORM NO. 423-1 (a)

1. REPORTING MONTH: OCT YEAR: 2001
2. REPORTING COMPANY: FLORIDA POWER LIGHT COMPANY

3. NAME, TITLE TELEPHONE NUMBER OF CONTACT PERSON CONCERNING DATA
SUBMITTED ON THIS FORM: RITA MCLELLAN, REGULATORY AFFAIRS, (305) 552-4069
4. SIGNATURE OF OFFICIAL SUBMITTING REPORT: 
5. DATE COMPLETED: 11/21/2001

(A)	(B)	(C)	(D)	(E)	(F)	(G)	(H)	(I)	(J)	(K)	(L)	(M)	(N)	(O)	(P)	(Q)	(R)
LINE NO.	PLANT	SUPPLIER	DELIVERY LOCATION	DELIVERY DATE	TYPE OIL	VOLUME (BBLs)	INVOICE PRICE (\$/BBL)	INVOICE AMOUNT (\$)	DISCOUNT (\$)	NET AMOUNT (\$)	NET PRICE (\$/BBL)	QUALITY ADJUST. (\$/BBL)	EFFECTIVE PUR PRICE (\$/BBL)	TRANSP TO TERM (\$/BBL)	ADDITIONAL TRANS CHGS (\$/BBL)	OTHER CHGS (\$/BBL)	DELIVERED PRICE (\$/BBL)
1	PT. EVERGLADES	COASTAL	PORT EVERGLADES	10/04/200	F06	270184											20.7942
2	MARTIN	GLENCORE	PALM BEACH	10/14/200	F06	120071											20.2379
3	TURKEY POINT	GLENCORE	FISHER ISLAND	10/25/200	F06	117935											19.9379
4	CAPE CANAVERAL	NOVARCO	PORT CANAVERAL	10/11/200	F06	231202											20.3685
5	MARTIN	COASTAL	PALM BEACH	10/07/200	F06	131246											21.6379
6	MARTIN	COASTAL	PALM BEACH	10/17/200	F06	127708											20.8579
7	MARTIN	COASTAL	PALM BEACH	10/22/200	F06	121287											19.9319
8	TURKEY POINT	COASTAL	FISHER ISLAND	10/15/200	F06	4913											21.2029
9	RIVIERA	FAMM	RIVIERA	10/12/200	F06	110122											21.1400
10	CAPE CANAVERAL	GLENCORE	PORT CANAVERAL	10/19/200	F06	1776											17.3945
11	PT. EVERGLADES	GLENCORE	PORT EVERGLADES	10/01/200	F06	120519											21.0342
12	MANATEE	KOCH	PORT MANATEE	10/21/200	F06	325253											20.9497
13	MARTIN	NOVARCO	PALM BEACH	10/23/200	F06	141187											19.6429
14	TURKEY POINT	NOVARCO	FISHER ISLAND	10/13/200	F06	137208											20.4299
15	MANATEE	COASTAL		10/17/200	FO2	178											30.9400
16	MANATEE	COASTAL		10/18/200	FO2	177											30.7900
17	MARTIN	ROYAL		10/31/200	FO3	1063											31.0600
18	MARTIN	ROYAL		10/30/200	FO3	1062											33.5000
19	MARTIN	ROYAL		10/29/200	FO3	710											31.7300
20	PT. EVERGLADES	AMERIGAS		10/11/200	PRO	12	39.6400	476	0	476	39.6400	0.0000	39.6400	0.0000	0.0000	0.0000	39.6400
21	PT. EVERGLADES	AMERIGAS		10/24/200	PRO	15	39.5900	594	0	594	39.5900	0.0000	39.5900	0.0000	0.0000	0.0000	39.5900
22	RIVIERA	AMERIGAS		10/09/200	PRO	6	40.0800	240	0	240	40.0800	0.0000	40.0800	0.0000	0.0000	0.0000	40.0800
23	RIVIERA	AMERIGAS		10/23/200	PRO	6	40.5500	243	0	243	40.5500	0.0000	40.5500	0.0000	0.0000	0.0000	40.5500
24	TURKEY POINT	AMERIGAS		10/17/200	PRO	5	41.2800	206	0	206	41.2800	0.0000	41.2800	0.0000	0.0000	0.0000	41.2800
25	MARTIN	INDIANTOWN		10/05/200	PRO	7	39.4800	276	0	276	39.4800	0.0000	39.4800	0.0000	0.0000	0.0000	39.4800
26	MANATEE	SUBURBAN		10/11/200	PRO	8	39.3700	315	0	315	39.3700	0.0000	39.3700	0.0000	0.0000	0.0000	39.3700
27	MANATEE	SUBURBAN		10/25/200	PRO	15	39.3300	590	0	590	39.3300	0.0000	39.3300	0.0000	0.0000	0.0000	39.3300
28	SANFORD	SUBURBAN		10/01/200	PRO	11	39.6200	436	0	436	39.6200	0.0000	39.6200	0.0000	0.0000	0.0000	39.6200
29	SANFORD	SUBURBAN		10/12/200	PRO	10	39.4100	394	0	394	39.4100	0.0000	39.4100	0.0000	0.0000	0.0000	39.4100
30	SANFORD	SUBURBAN		10/31/200	PRO	8	39.4100	315	0	315	39.4100	0.0000	39.4100	0.0000	0.0000	0.0000	39.4100

**MONTHLY REPORT OF COST AND QUALITY OF COAL FOR ELECTRIC PLANTS
ORIGIN, TONNAGE, DELIVERED PRICE AND AS RECEIVED QUALITY**

DUPLICATE COPY

1. Report For Month/Yr: **October 2001**

4. Name, Title & Telephone Number of Contact
Person Concerning Data Submitted on this Form: **Sally W. Hill (305-552-4244)**

2. Reporting Company: **Florida Power & Light**

5. Signature of Official Submitting Report:

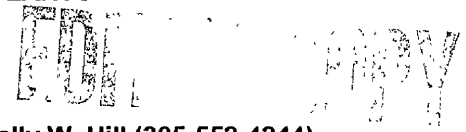
Zen Brockway

3. Plant Name: **St. Johns River Power Park (SJRPP)**

6. Date Completed: **November 5, 2001**

Line No.	Supplier Name	Mine Location	Purchase Type	Transportation Mode	Tons	Effective Purchase Price (\$/Ton)	Total Trans Cost (\$/Ton)	FOB Plant Price (\$/Ton)	As Received Coal Quality			
									Sulfur Content (%)	Btu Content (%)	Ash Content (%)	Moisture Content (%)
(a)	(b)	(c)	(d)	(e)	(f)	(g)	(h)	(i)	(j)	(k)	(l)	(m)
1	Arch Coal Sales	08,KY,195	LTC	UR	3,841			41.20	1.50	12,507	12.20	5.30
2	Consolidation Coal Company	02,PA,059	S	UR	11,526			37.11	1.83	12,976	7.10	6.50
3	DTE Clover, LLC	08,KY,095	LTC	UR	1,868			37.31	1.38	12,474	9.50	7.20
4	Intercor	45,IM,999	LTC	OC	40,530			36.08	0.60	11,810	8.00	10.80
5	James River Coal Sales, Inc.	08,KY,095	LTC	UR	2,020			40.79	1.36	12,580	10.20	5.70

**MONTHLY REPORT OF COST AND QUALITY OF COAL FOR ELECTRIC PLANTS
DETAIL OF INVOICE PURCHASE PRICE**



1. Report For Month/Yr: **October 2001**

4. Name, Title & Telephone Number of Contact
Person Concerning Data Submitted on this Form: **Sally W. Hill (305-552-4244)**

2. Reporting Company: **Florida Power & Light**

5. Signature of Official Submitting Report:

Ken Brakway

3. Plant Name: **St. Johns River Power Park (SJRPP)**

6. Date Completed: **November 5, 2001**

Line No.	Supplier Name	Mine Location	Purchase Type	Tons	FOB Mine Price (\$/Ton)	Short Haul & Loading Charge	Original Invoice Price (\$/Ton)	Retro-active Price Increases (\$/Ton)	Base Price (\$/Ton)	Quality Adjustments (\$/Ton)	Effective Purchase Price (\$/Ton)
(a)	(b)	(c)	(d)	(e)	(f)	(g)	(h)	(i)	(j)	(k)	(l)
1	Arch Coal Sales	08,KY,195	LTC	3,841		0.00		0.00			
2	Consolidation Coal Company	02,PA,059	S	11,526		0.00		0.00			
3	DTE Clover, LLC	08,KY,095	LTC	1,868		0.00		0.00			
4	Intercor	45,IM,999	LTC	40,530		0.00		0.00			
5	James River Coal Sales, Inc.	08,KY,095	LTC	2,020		0.00		0.00			

MONTHLY REPORT OF COST AND QUALITY OF COAL FOR ELECTRIC PLANTS
 DETAIL OF TRANSPORTATION CHARGES



1. Report For Month/Yr: **October 2001**

4. Name, Title & Telephone Number of Contact
 Person Concerning Data Submitted on this Form: **Sally W. Hill (305-552-4244)**

2. Reporting Company: **Florida Power & Light**

5. Signature of Official Submitting Report:

Ken Brinkman

3. Plant Name: **St. Johns River Power Park (SJRPP)**

6. Date Completed: **November 5, 2001**

Line No.	Supplier Name	Mine Location	Shipping Point	Transportation Mode	Tons	Effective Purchase Price (\$/Ton)	Short Haul & Loading Charge (\$/Ton)	Rail Charges		Waterborne Charges				Total Transport Charges (\$/Ton)	FOB Plant Price (\$/Ton)	
								Rail Rate (\$/Ton)	Other Rail Charges (\$/Ton)	River Barge Rate (\$/Ton)	Trans-loading Rate (\$/Ton)	Ocean Barge Rate (\$/Ton)	Other Water Charges (\$/Ton)			Related Charges (\$/Ton)
(a)	(b)	(c)	(d)	(e)	(f)	(g)	(h)	(i)	(j)	(k)	(l)	(m)	(n)	(o)	(p)	(q)
1	Arch Coal Sales	08,KY,195	APEX MINE	UR	3,841		0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00		41.20
2	Consolidation Coal Company	02,PA,059	BAILEY	UR	11,526		0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00		37.11
3	DTE Clover, LLC	08,KY,095	CLOVER MINE	UR	1,868		0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00		37.31
4	Intercor	45,IM,999	EL CERREJON	OC	40,530		0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00		36.08
5	James River Coal Sales, Inc.	08,KY,095	CLOVER MINE	UR	2,020		0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00		40.79

NOTES: 1) SJRPP reported coal volumes represents FPL's 20% share of total receipts.

ATTACHMENT C

**Docket No. 020001-EI
October 2001**

Justification for Confidentiality of October 2001 Report:

<u>FORM</u>	<u>LINE(S)</u>	<u>COLUMN</u>	<u>RATIONALE</u>
423-1(a)	1 - 19	H	(1)
423-1(a)	1 - 19	I	(2)
423-1(a)	1 - 19	J	(2), (3)
423-1(a)	1 - 19	K	(2)
423-1(a)	1 - 19	L	(2)
423-1(a)	1 - 19	M	(2), (4)
423-1(a)	1 - 19	N	(2), (5)
423-1(a)	1 - 19	P	(6), (7), (8)
423-1(a)	1 - 19	Q	(6), (7), (8)

Rationale for confidentiality:

- (1) This information is contractual information which, if made public, "would impair the efforts of [FPL] to contract for goods or services on favorable terms." Section 366.093(3)(d), Fla. Stat. The information delineates the price per barrel FPL has paid for fuel oil for specific shipments from specific suppliers. This information would allow suppliers to compare an individual supplier's price with the market quote for that date of delivery and thereby determine the contract pricing formula between FPL and that supplier.

Contract pricing formulas generally contain two components, which are: (1) a markup in the market quoted price for that day; and (2) a transportation charge for delivery at an FPL chosen port of delivery. Discounts and quality adjustment components of fuel price contract formulas are discussed in paragraphs 3 and 4. Disclosure of the invoice price would allow suppliers to determine the contract price formula of their competitors. The knowledge of others' prices (*i.e.*, contract formulas) among fuel oil suppliers is reasonably likely to cause

the suppliers to converge on a target price, or to follow a price leader, effectively eliminating any opportunity for a major buyer like FPL to obtain price concessions from any one supplier. The end result is reasonably likely to be increased fuel oil prices and therefore increased electric rates.

- (2) The contract data found in Columns I through N are an algebraic function of Column H. That is, the publication of these Columns together, or independently, could allow a supplier to derive the invoice price of oil.
- (3) If FPL fuel contracts provide for an early payment incentive in the form of a discount from the invoice price, the existence and amount of such discount is confidential for the reasons stated in paragraph (1) relative to price concessions.
- (4) For fuel that does not meet contract requirements, FPL may reject the shipment, or accept the shipment and apply a quality adjustment. This is, in effect, a pricing term which is as important as the price itself and is therefore confidential for the reasons stated in paragraph (1) relative to price concessions.
- (5) Column N is as important as H from a confidentiality standpoint because of the relatively few times that there are quality or discount adjustments. That is, Column N will equal Column H most of the time. Consequently, Column N needs to be protected for the same reasons as set forth in paragraph (1).
- (6) Column R is used to mask the delivered price of fuel such that the invoice or effective price of fuel cannot be determined. Columns P and Q are algebraic variables of Column R. Consequently, disclosure of Columns P and Q would allow a supplier to calculate the invoice or effective purchase price of oil (Columns H and N) by subtracting these columnar variables from Column R.
- (7) Terminaling and transportation services in Florida tend to have the same, if not more severe, oligopolistic attributes of fuel oil suppliers. Due to the small demand in Florida for both of these services, market entry is difficult. In instances in which FPL has attempted to determine the level of interest in bidding either or both of these services, FPL has found only a very few qualified parties with such an interest. Consequently, disclosure of these contract data is reasonably likely to result in increased prices for terminaling and transportation services.

Petroleum inspection services also have the market characteristics of an oligopoly. Due to the limited number of fuel terminal operations, there are correspondingly few requirements for fuel inspection services. In FPL's last bidding process for petroleum inspection services, only six qualified bidders were found for FPL's bid solicitations. Consequently, disclosure of these contract data is reasonably likely to result in increased prices for petroleum inspection services.

Justification for Confidentiality of October Report:

<u>FORM</u>	<u>LINE(S)</u>	<u>COLUMN</u>	<u>RATIONALE</u>
423-2	1-5	G, H	(1)
423-2	1-5	H	(2)

Rationale for Confidentiality:

- (1) Disclosure of the effective purchase price "would impair the efforts of [JEA, acting on its own behalf and as agent for FPL] to contract for goods or services at the St. Johns River Power Park (SJRPP) on favorable terms." Section 366.093(3)(d), Fla. Stat. The data informs other potential coal suppliers as to the price SJRPP is paying for coal. Disclosure of this information, which is particularly sensitive given SJRPP's reliance on long term contracts with fixed price provisions or short term spot transactions, could adversely affect FPL's interests in subsequent solicitations for coal and/or in negotiating coal supply agreements. JEA maintains this information as confidential pursuant to section 163.01(15)(m), Fla. Stat. Additionally, providing the purchase price would enable one to ascertain the total transportation charges in Column H by subtracting the effective purchase price from the delivered price at the transfer facility, shown in Column I.
- (2) Disclosure of the total transportation cost "would impair the efforts of [JEA acting on its own behalf and as agent for FPL] to contract for goods or services at SJRPP on favorable terms." Section 366.093(3)(d), Fla Stat. Moreover, the service provider itself typically designates the transportation costs in the contract as confidential. JEA maintains this information as confidential pursuant to section 163.01(15)(m), Fla. Stat. Further, disclosure of this information would enable potential coal suppliers to calculate Column G which FPL seeks to protect by subtracting Column H from Column I.

Justification for Confidentiality of October 2001 Report:

<u>FORM</u>	<u>LINE(S)</u>	<u>COLUMN</u>	<u>RATIONALE</u>
423-2(a)	1-5	F	(1)
423-2(a)	1-5	H	(1)
423-2(a)	1-5	J	(1)
423-2(a)	1-5	K	(1)

423-2(a) 1-5 L (2)

Rationale for Confidentiality:

- (1) The information presented in these columns are algebraic derivations of the information in column L that FPL seeks to protect.
- (2) Disclosure of the effective purchase price "would impair the efforts of [JEA, acting on its own behalf and as agent for FPL] to contract for goods or services at the St. Johns River Power Park (SJRPP) on favorable terms." Section 366.093(3)(d), Fla. Stat. The data informs other potential coal suppliers as to the price SJRPP is paying for coal. Disclosure of this information, which is particularly sensitive given SJRPP's reliance on long term contracts with fixed price provisions or short term spot transactions, could adversely affect FPL's interests in subsequent solicitations for coal and/or in negotiating coal supply agreements. JEA maintains this information as confidential pursuant to section 163.01(15)(m), Fla. Stat. Additionally, providing the purchase price would enable one to ascertain the total transportation charges in Column H on Form 423-2, which FPL seeks to protect, by subtracting the effective purchase price from the delivered price at the transfer facility shown in Column I on Form 423-2.

Justification for Confidentiality of October 2001 Report:

<u>FORM</u>	<u>LINE(S)</u>	<u>COLUMN</u>	<u>RATIONALE</u>
423-2(b)	1-5	G	(1)
423-2(b)	1-5	I	(2)
423-2(b)	1-5	P	(2)

Rationale for Confidentiality:

- (1) Disclosure of the effective purchase price "would impair the efforts of [JEA, acting on its own behalf and as agent for FPL] to contract for goods or services at the St. Johns River Power Park (SJRPP) on favorable terms." Section 366.093(3)(d), Fla. Stat. The data informs other potential coal suppliers as to the price SJRPP is paying for coal. Disclosure of this information could adversely affect FPL's interests in subsequent solicitations for coal and/or in negotiating coal supply agreements. JEA maintains this information as confidential pursuant to section 163.01(15)(m), Fla. Stat. Additionally, providing the purchase price would enable one to ascertain the total transportation charges in Column P, which FPL seeks to protect, by subtracting the effective purchase price from the delivered price at the transfer facility shown in Column Q.

- (2) Disclosure of the total transportation cost "would impair the efforts of [JEA acting on its own behalf and as agent for FPL] to contract for goods or services at SJRPP on favorable terms." Section 366.093(3)(d), Fla Stat. Moreover, the service provider itself typically designates the transportation costs in the contract as confidential. JEA maintains this information as confidential pursuant to section 163.01(15)(m), Fla. Stat. Further, disclosure of this information would enable potential coal suppliers to calculate Column G which FPL seeks to protect, by subtracting Column P from Column Q.

Date of Declassification:

<u>FORM</u>	<u>LINE(S)</u>	<u>COLUMN</u>
423-1(a)	1	H - N, P & Q
423-1(a)	2-3	H - N, P & Q
423-1 (a)	4	H-N, P & Q
423-1(a)	5-19	H - N, P & Q
423-2	1-5	G, H
423-2(a)	1-5	F, H, J - L
423-2(b)	1-5	G, I, P

FPL requests that the confidential information identified above not be disclosed for a period of eighteen (18) months.