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January 31, 2003

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. 030001-EI**

Dear Ms. Bayó:

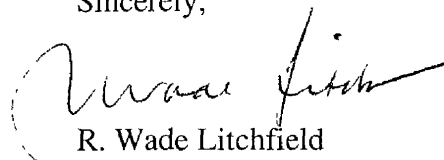
I enclose and hand you herewith for filing in the above-referenced matter, the original and five (5) copies of Florida Power & Light Company's ("FPL") Request for Confidential Classification. The original includes Attachments A, B, and C. The five copies include only Attachments B and C.

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)

**BEFORE THE
FLORIDA PUBLIC SERVICE COMMISSION**

In re: Fuel and Purchased Power)	DOCKET NO. 030001-EI
Cost Recovery Clause and Generating)	
Performance Incentive Factor)	FILED: January 31, 2003

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. 030001-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) 521-3900
Fax: (850) 521-3939

R. Wade Litchfield
Senior Attorney
Florida Power & Light Company
700 Universe Boulevard
Juno Beach, Florida 33408-0420
Tel.: (561) 691-7101
Fax: (561) 691-7135

2. The following attachments are included herewith and made a part hereof:
 - a. Attachment A includes the complete and unedited version of FPL's November 2002 Form 423-1(a) and St. Johns River Power Park's (SJRPP) November 2002 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,

A handwritten signature in black ink, appearing to read "R. Wade Litchfield", is written over a solid horizontal line.

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 31st day of January, 2003:

Wm. Cochran Keating, IV, Esq.
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Florida Public Service Commission
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Tallahassee, Florida 32399-0850

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Ausley & McMullen
Attorneys for TECO
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Tallahassee, Florida 32302

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Jack Shreve, Esq.
Office of Public Counsel
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Room 812
Tallahassee, Florida 32399

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Florida Power Corporation
P.O. Box 14042
St. Petersburg, Florida 33733

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Floyd R. Self, Esq.
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Davidson, et al.
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P.O. Box 3350
Tampa, Florida 33602

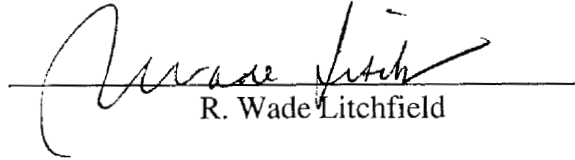
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Regulatory & Business Specialist
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Susan D. Ritenour
Richard McMillan
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Pensacola, FL 32520-0780

Paul Lewis, Jr./Bonnie Davis
Progress Energy Florida, Inc.
106 East College Avenue
Suite 800
Tallahassee, FL 32301-7740



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: NOV YEAR: 2002

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: *Michael G. Kleason*

5. DATE COMPLETED: 01/17/2003

(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 (BBL)	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	CAPE CANAVERAL	EL PASO	PORT CANAVERAL	11/24/2002	F06	77764											25.6045
2	PT. EVERGLADES	EL PASO	PORT EVERGLADES	11/09/2002	F06	146932											25.0922
3	SANFORD	EL PASO	JACKSONVILLE	11/22/2002	F06	69585											26.3151
4	MANATEE	VITOL	PORT MANATEE	11/30/2002	F06	174833											25.3037
5	MARTIN	VPEM	PALM BEACH	11/20/2002	F06	144947											25.1879
6	TURKEY POINT	VPEM	FISHER ISLAND	11/07/2002	F06	144313											25.8328
7	MANATEE	FAMM	PORT MANATEE	11/06/2002	F06	239260											27.4207
8	MANATEE	FAMM	PORT MANATEE	11/09/2002	F06	387674											27.3317
9	PT. EVERGLADES	GLENCORE	PORT EVERGLADES	11/04/2002	F06	110915											29.0842
10	RIVIERA	GLENCORE	RIVIERA	11/16/2002	F06	109864											25.3220
11	TURKEY POINT	GLENCORE	FISHER ISLAND	11/24/2002	F06	116450											25.8128
12	CAPE CANAVERAL	VITOL	PORT CANAVERAL	11/13/2002	F06	212476											24.5915
13	PT. EVERGLADES	VITOL	PORT EVERGLADES	11/10/2002	F06	104587											24.2792
14	MANATEE	WPI	PORT MANATEE	11/04/2002	F06	121078											28.0087
15	MANATEE	WPI	PORT MANATEE	11/15/2002	F06	121859											23.5087
16	MANATEE	WPI	PORT MANATEE	11/23/2002	F06	148023											23.1337
17	MANATEE	EL PASO		11/18/2002	F02	354											35.9500
18	PFL	CHEVRON		11/25/2002	F03	50008											31.7500
19	PFL	EL PASO		11/14/2002	F03	14973											30.3700
20	MARTIN	PORT		11/30/2002	F03	17483											38.0000
21	FT. MYERS	ROYAL		11/22/2002	F03	16658											36.0000
22	TURKEY POINT	AMERIGAS		11/26/2002	PRO	7	44.6700	313	0	313	44.6700	0.0000	44.6700	0.0000	0.0000	0.0000	44.6700
23	RIVIERA	FERRELL		11/01/2002	PRO	2	41.3000	83	0	83	41.3000	0.0000	41.3000	0.0000	0.0000	0.0000	41.3000
24	RIVIERA	FERRELL		11/05/2002	PRO	3	40.9700	123	0	123	40.9700	0.0000	40.9700	0.0000	0.0000	0.0000	40.9700
25	RIVIERA	FERRELL		11/12/2002	PRO	4	41.1700	165	0	165	41.1700	0.0000	41.1700	0.0000	0.0000	0.0000	41.1700
26	RIVIERA	FERRELL		11/15/2002	PRO	2	40.8100	82	0	82	40.8100	0.0000	40.8100	0.0000	0.0000	0.0000	40.8100
27	RIVIERA	FERRELL		11/19/2002	PRO	4	41.2700	165	0	165	41.2700	0.0000	41.2700	0.0000	0.0000	0.0000	41.2700
28	RIVIERA	FERRELL		11/22/2002	PRO	2	41.6700	83	0	83	41.6700	0.0000	41.6700	0.0000	0.0000	0.0000	41.6700
29	RIVIERA	FERRELL		11/26/2002	PRO	2	41.5700	83	0	83	41.5700	0.0000	41.5700	0.0000	0.0000	0.0000	41.5700
30	RIVIERA	FERRELL		11/29/2002	PRO	2	41.5900	83	0	83	41.5900	0.0000	41.5900	0.0000	0.0000	0.0000	41.5900

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

FPSC FORM NO. 423-1 (a)

3. NAME, TITLE, TELEPHONE NUMBER OF CONTACT PERSON CONCERNING DATA
 SUBMITTED ON THIS FORM: RITA MCLELLAN, REGULATORY AFFAIRS, (305) 552 - 4069

1. REPORTING MONTH: NOV YEAR: 2002

4. SIGNATURE OF OFFICIAL SUBMITTING REPORT: *Michael B. Robinson*

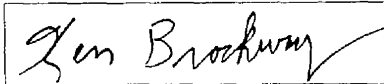
2. REPORTING COMPANY: FLORIDA POWER LIGHT COMPANY

5. DATE COMPLETED: 01/17/2003

(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 (BBL)	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)
31	CAPE CANAVERAL	SUBURBAN		11/12/2002	PRO	7	42.8100	300	0	300	42.8100	0.0000	42.8100	0.0000	0.0000	0.0000	42.8100
32	MANATEE	SUBURBAN		11/01/2002	PRO	4	42.4600	170	0	170	42.4600	0.0000	42.4600	0.0000	0.0000	0.0000	42.4600
33	MANATEE	SUBURBAN		11/08/2002	PRO	3	42.3800	127	0	127	42.3800	0.0000	42.3800	0.0000	0.0000	0.0000	42.3800
34	PT. EVERGLADES	SUBURBAN		11/22/2002	PRO	13	43.5800	567	0	567	43.5800	0.0000	43.5800	0.0000	0.0000	0.0000	43.5800

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

EDITED COPY

1. Report For Month/Yr: **November 2002**
 2. Reporting Company: **Florida Power & Light**
 3. Plant Name: **St. Johns River Power Park (SJRPP)**
 4. Name, Title & Telephone Number of Contact Person Concerning Data Submitted on this Form: **Korel M. Dubin (305-552-4910)**
 5. Signature of Official Submitting Report: 
 6. Date Completed: **December 10, 2002**

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,119	LTC	UR	13,458			41.29	1.64	12,497	10.03	7.79
2	Arch Coal Sales	08,KY,195	LTC	UR	3,832			41.87	1.15	12,693	9.71	6.19
3	Arch Coal Sales	13,KY,08	LTC	UR	2,028			41.81	1.24	12,596	8.79	7.24
4	DTE Clover, LLC	08,KY,095	LTC	UR	19,844			37.38	1.29	12,429	9.08	8.03

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

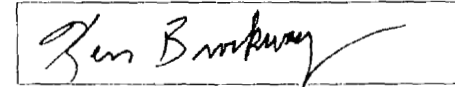
EDITED COPY

1. Report For Month/Yr: **November 2002**

4. Name, Title & Telephone Number of Contact
 Person Concerning Data Submitted on this Form: **Korel M. Dubin (305-552-4910)**

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

5. Signature of Official Submitting Report:



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

6. Date Completed: **December 10, 2002**

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,119	LTC	13,458		0.00		0.00		0.00	
2	Arch Coal Sales	08,KY,195	LTC	3,832		0.00		0.00		0.00	
3	Arch Coal Sales	13,KY,08	LTC	2,028		0.00		0.00		0.00	
4	DTE Clover, LLC	08,KY,095	LTC	19,844		0.00		0.00		0.00	

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

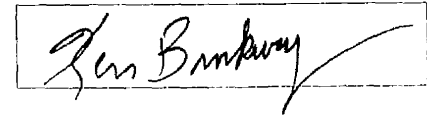
EDITED COPY

1. Report For Month/Yr: **November 2002**

4. Name, Title & Telephone Number of Contact Person Concerning Data Submitted on this Form: **Korel M. Dubin (303-552-4910)**

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

5. Signature of Official Submitting Report:



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

6. Date Completed:

December 10, 2002

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	3,832		0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00		41.87
2	Arch Coal Sales	08,KY,119	DIAMOND MAY	UR	5,632		0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00		41.21
3	Arch Coal Sales	13,KY,08	HIGNITE MINE	UR	2,028		0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00		41.81
4	Arch Coal Sales	08,KY,119	KY MAY	UR	7,826		0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00		41.35
5	DTE Clover, LLC	08,KY,095	CLOVER DTE	UR	19,844		0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00		37.38

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

ATTACHMENT C

**Docket No. 030001-EI
November 2002**

Justification for Confidentiality of November 2002 Report:

<u>FORM</u>	<u>LINE(S)</u>	<u>COLUMN</u>	<u>RATIONALE</u>
423-1(a)	1 - 21	H	(1)
423-1(a)	1 - 21	I	(2)
423-1(a)	1 - 21	J	(2), (3)
423-1(a)	1 - 21	K	(2)
423-1(a)	1 - 21	L	(2)
423-1(a)	1 - 21	M	(2), (4)
423-1(a)	1 - 21	N	(2), (5)
423-1(a)	1 - 21	P	(6), (7), (8)
423-1(a)	1 - 21	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 November 2002 Report:

<u>FORM</u>	<u>LINES</u>	<u>COLUMNS</u>	<u>RATIONALE</u>
423-2	1-4	G, H	(1)
423-2	1-4	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 November 2002 Report:

<u>FORM</u>	<u>LINE(S)</u>	<u>COLUMN</u>	<u>RATIONALE</u>
423-2(a)	1-4	F	(1)
423-2(a)	1-4	H	(1)
423-2(a)	1-4	J	(1)
423-2(a)	1-4	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 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 November 2002 Report:

FORM	LINE(S)	COLUMN	RATIONALE
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, 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 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)	1-3	H - N, P & Q
423-1(a)	4	H - N, P & Q
423-1(a)	5-6	H - N, P & Q
423-1(a)	7-21	H - N, P & Q
423-2	1-4	G, H
423-2(a)	1-4	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.