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September 30, 2014

-VIA HAND DELIVERY -

Ms. Carlotta S. Stauffer
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

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14 SEP 30 PM 3:59
COMMISSION
CLERK

REDACTED

**Re: Florida Power & Light Company's Request for Confidential Classification of
Certain Material Provided in Connection with its Petition for Prudence Determination
Regarding Acquisition of Gas Reserves
Docket No. 140001-EI**

Dear Ms. Stauffer:

Enclosed for filing in the above referenced matter, please find the original and seven (7) copies of Florida Power & Light Company's ("FPL's") Request for Confidential Classification of Certain Information Contained in the Testimony and Exhibits of Jeffrey Pollock on behalf of The Florida Industrial Power Users Group. The original includes Exhibits A, B (two copies), C, and D. The seven copies do not include copies of the Exhibits.

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 one affidavit in support of FPL's Request for Confidential Classification. Also included in this filing is a compact disc containing FPL's Request for Confidential Classification and Exhibit C, in Microsoft Word format.

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

Please contact me if you have any questions regarding this filing

Sincerely,

Scott A. Goorland

COM	_____
(AFD)	2 + Handwritten
APA	1
ECO	1
ENG	1
GCL	1
IDM	1
TEL	_____
CLK	_____

Handwritten: EXP B + CD

Enclosure

cc: Parties of Record (without exhibits)

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

IN RE: Fuel and Purchase Power Cost
Recovery Clause with Generating Performance
Incentive Factor

Docket No: 140001-EI
Filed: September 30, 2014

**FLORIDA POWER AND LIGHT COMPANY'S
REQUEST FOR CONFIDENTIAL CLASSIFICATION OF
CERTAIN INFORMATION CONTAINED IN THE TESTIMONY
AND EXHIBITS OF JEFFRY POLLOCK ON BEHALF OF
THE FLORIDA INDUSTRIAL POWER USERS GROUP**

Pursuant to Section 366.093, Florida Statutes (2013), and Rule 25-22.006, Florida Administrative Code (2013), Florida Power & Light Company ("FPL") requests confidential classification of certain information (the "Confidential Information") contained in the testimony and exhibits of Jeffrey Pollock ("Pollock") on behalf of The Florida Industrial Power Users Group ("FIPUG"). In support of its Request, FPL states as follows:

1. On September 22, 2014, FPL filed a Notice of Intent to Request Confidential Classification to the testimony and exhibits of FIPUG witness Jeffrey Pollock. Pursuant to Rule 25-22.006(3)(a)1, FPL is required to file a Request for Confidential Classification for the confidential information within 21 days. Accordingly, FPL is filing this Request for Confidential Classification to maintain continued confidential handling of the information contained in Pollock's testimony and exhibits.

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

a. Exhibit A is a copy of Pollock's Exhibits JP-1 and JP-3 in which all of the Confidential Information has been highlighted.

b. Exhibit B consists of two copies of Pollock's Exhibits JP-1 and JP-3 in which all the Confidential Information has been redacted (where entire pages are confidential, FPL includes only identifying cover pages in Exhibit B).

c. Exhibit C is a table that identifies the specific line and page references to the Confidential Information for which FPL seeks confidential treatment. The table also references the specific statutory basis for confidentiality and the affiant who supports the requested classification.

d. Exhibit D is the affidavit of Melissa Linton.

3. FPL submits that the highlighted information in Exhibit A is proprietary confidential business information within the meaning of Section 366.093(3). 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 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. As the affidavit in Exhibit D indicates, certain documents contained in Pollock's Exhibits JP-1 and JP-3 contain information relating to FPL's competitive interests, the disclosure of which would impair the competitive business of FPL, its affiliates or its vendors. Specifically, the documents contain information regarding gas reserves estimates, projected economics and other terms. The disclosure of this proprietary confidential business information would provide other participants in the fuel and financial markets insight into FPL's hedging practices that would allow them to anticipate FPL's trading decisions and impair FPL's ability to negotiate for these commodities, to the detriment of FPL and its customers. Disclosure of this information would also place FPL at a competitive disadvantage when coupled with other information that is publicly available. This information is protected by Section 366.093(3)(e), Fla. Stat.

5. Upon a finding by the Commission that the Confidential Information highlighted in Exhibit A and referenced in Exhibit C is proprietary confidential business information, the information should not be declassified for at least eighteen (18) months and should be returned to FPL as soon as the information is no longer necessary for the Commission to conduct its business. *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,
R. Wade Litchfield, Esq.
Vice President and General Counsel
John T. Butler, Esq.
Assistant General Counsel – Regulatory
Scott A. Goorland
Principal Attorney
Florida Power & Light Company
700 Universe Boulevard
Juno Beach, FL 33408
Telephone: (561) 304-5633
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By: 

Scott A. Goorland
Fla. Bar No. 0066834

CERTIFICATE OF SERVICE

Docket No. 140001-EI

I HEREBY CERTIFY that a true and correct copy of the foregoing (*) has been furnished by electronic service this 30th day of September, 2014 to the following:

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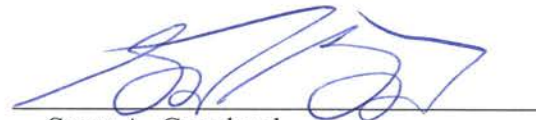
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mbarrett@psc.state.fl.us

By:



Scott A. Goorland
Fla. Bar No. 0066834

* 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 B

REDACTED COPIES

FLORIDA POWER AND LIGHT COMPANY
Base Production Cost/Benefit Analysis
with Escalated Production and Transportation Costs
(\$ in Millions)

Line	Year	A Annual Production (Bcf)	B Operating Expenses	C Depreciation	D Return Rate	E Revenue Requirement	F Effective Cost (\$/MMBtu)	FPL Gas Price Forecast (\$/MMBtu)	Undiscounted Customer Savings	FPL Discount Factor	Discounted Customer Savings
		(1)	(2)	(3)	(4)	(5)	(6)	(7)	(8)	(9)	(10)
1	2015	15.6					\$3.48	\$4.02	\$8.4	0.9302	\$7.8
2	2016	16.8					\$3.58	\$4.30	\$12.0	0.8649	\$10.4
3	2017	11.3					\$4.05	\$4.70	\$7.4	0.8043	\$5.9
4	2018	8.7					\$4.48	\$5.74	\$10.9	0.7480	\$8.1
5	2019	7.1					\$5.09	\$5.89	\$5.7	0.6956	\$3.9
6	2020	6.1					\$4.92	\$6.03	\$6.8	0.6468	\$4.4
7	2021	5.3					\$5.10	\$6.13	\$5.4	0.6015	\$3.3
8	2022	4.7					\$5.28	\$6.33	\$5.0	0.5594	\$2.8
9	2023	4.3					\$5.45	\$6.63	\$5.0	0.5202	\$2.6
10	2024	3.9					\$5.62	\$7.03	\$5.5	0.4837	\$2.7
11	2025	3.6					\$5.53	\$7.33	\$6.5	0.4498	\$2.9
12	2026	3.3					\$5.65	\$7.63	\$6.6	0.4183	\$2.8
13	2027	3.1					\$5.76	\$7.93	\$6.8	0.3890	\$2.6
14	2028	2.9					\$5.87	\$8.33	\$7.2	0.3617	\$2.6
15	2029	2.8					\$5.99	\$8.63	\$7.3	0.3364	\$2.4
16	2030	2.6					\$6.10	\$8.83	\$7.1	0.3129	\$2.2
17	2031	2.4					\$6.22	\$9.17	\$7.2	0.2910	\$2.1
18	2032	2.3					\$6.35	\$9.52	\$7.3	0.2705	\$2.0
19	2033	2.2					\$6.50	\$9.88	\$7.3	0.2516	\$1.8
20	2034	2.0					\$6.66	\$10.26	\$7.3	0.2340	\$1.7
21	2035	1.9					\$6.82	\$10.65	\$7.3	0.2176	\$1.6
22	2036	1.8					\$6.98	\$11.06	\$7.3	0.2023	\$1.5
23	2037-65	23.1					\$10.96	\$17.16	\$142.9	0.0894	\$12.8
24	Totals	137.8							\$300.0		\$91.0

Source: Response to OPC POD No. 12.

(2) Reflects 2% annual escalation of Transportation and Production O&M expenses.

CONFIDENTIAL

Docket No. 140001-EI
 Natural Gas Price Sensitivity
 Exhibit JP-3

FLORIDA POWER AND LIGHT COMPANY
 Base Production Cost/Benefit Analysis
 Updated Gas Price Forecast

Line	Year	(\$ in Millions)									
		Annual Production (Bcf)	Operating Expenses	Depreciation	Return Rate	Revenue Requirement	Effective Cost (\$/MMBtu)	Current Price Forecast (\$/MMBtu)	Undiscounted Customer Savings	FPL Discount Factor	Discounted Customer Savings
		(1)	(2)	(3)	(4)	(5)	(6)	(7)	(8)	(9)	(10)
1	2015	15.6					\$3.48	\$3.86	\$5.9	0.9302	\$5.5
2	2016	16.8					\$3.56	\$4.01	\$7.5	0.8649	\$6.5
3	2017	11.3					\$4.00	\$4.15	\$1.7	0.8043	\$1.4
4	2018	8.7					\$4.40	\$4.25	(\$1.2)	0.7480	(\$0.9)
5	2019	7.1					\$4.96	\$4.35	(\$4.4)	0.6956	(\$3.0)
6	2020	6.1					\$4.79	\$4.49	(\$1.8)	0.6468	(\$1.2)
7	2021	5.3					\$4.94	\$4.62	(\$1.7)	0.6015	(\$1.0)
8	2022	4.7					\$5.08	\$4.74	(\$1.6)	0.5594	(\$0.9)
9	2023	4.3					\$5.21	\$4.82	(\$1.7)	0.5202	(\$0.9)
10	2024	3.9					\$5.34	\$4.90	(\$1.7)	0.4837	(\$0.8)
11	2025	3.6					\$5.24	\$4.97	(\$1.0)	0.4498	(\$0.4)
12	2026	3.3					\$5.32	\$5.08	(\$0.8)	0.4183	(\$0.3)
13	2027	3.1					\$5.39	\$5.51	\$0.4	0.3890	\$0.1
14	2028	2.9					\$5.46	\$5.73	\$0.8	0.3617	\$0.3
15	2029	2.8					\$5.52	\$6.00	\$1.3	0.3364	\$0.4
16	2030	2.6					\$5.58	\$6.35	\$2.0	0.3129	\$0.6
17	2031	2.4					\$5.65	\$6.69	\$2.5	0.2910	\$0.7
18	2032	2.3					\$5.71	\$7.01	\$3.0	0.2705	\$0.8
19	2033	2.2					\$5.80	\$7.39	\$3.4	0.2516	\$0.9
20	2034	2.0					\$5.88	\$7.77	\$3.8	0.2340	\$0.9
21	2035	1.9					\$5.97	\$8.13	\$4.1	0.2176	\$0.9
22	2036	1.8					\$6.05	\$8.59	\$4.5	0.2023	\$0.9
23	2037-65	23.1					\$7.88	\$15.82	\$183.1	0.0894	\$16.4
24	Totals	137.8							\$208.2		\$26.8

Source: Response to OPC POD No. 12.

(7) Current gas price forecast shown on Exhibit JP-2.

EXHIBIT C

JUSTIFICATION TABLE

EXHIBIT C

COMPANY: Florida Power & Light Company

TITLE: List of Confidential Documents

DOCKET TITLE: Fuel and purchased power cost recovery clause with generating performance incentive factor

DOCKET NO.: 140001

DATE: September 30, 2014

Description	Pages	Conf. Y/N	Column/Line	366.093(3) F.S.	Affiant
FIPUG / Pollock Testimony Exhibit JP-1	1 of 1	Y	Col. C-F, Line 1-24	(e)	Melissa Linton
FIPUG / Pollock Testimony Exhibit JP-3	1 of 1	Y	Col. C-F, Line 1-24	(e)	Melissa Linton

EXHIBIT D

AFFIDAVITS

EXHIBIT D
BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

Fuel and purchased power cost recovery clause
with generating performance incentive factor

Docket No: 140001-EI

STATE OF FLORIDA)
)
COUNTY OF PALM BEACH)

AFFIDAVIT OF MELISSA LINTON


BEFORE ME, the undersigned authority, personally appeared Melissa Linton who, being first duly sworn, deposes and says:

1. My name is Melissa Linton. I am currently employed by Florida Power & Light Company as Director of Finance, Forecast, Strategy and Analysis. My business address is 700 Universe Blvd., Juno Beach, Florida, 33408. I have personal knowledge of the matters stated in this affidavit.

2. I have reviewed Exhibit C and the documents that are included in the testimony and exhibits of Jeffry Pollock filed on behalf of Florida Industrial Power Users Group ("FIPUG") in regards to Florida Power & Light Company's ("FPL") Petition for Prudence Determination Regarding Acquisition of Gas Reserves for which I am identified on Exhibit C as the affiant. The documents and materials that I have reviewed (Exhibits JP-1 and JP-3), contain proprietary confidential business information, including information relating to competitive interests, the disclosure of which would impair the competitive business of FPL, its affiliates or its vendors. Specifically, the documents contain information regarding gas reserves estimates, projected economics and other terms. The disclosure of this proprietary confidential business information would provide other participants in the fuel and financial markets insight into FPL's hedging practices that would allow them to anticipate FPL's trading decisions and impair FPL's ability to negotiate for these commodities, to the detriment of FPL and its customers. Disclosure of this information would also place FPL at a competitive disadvantage when coupled with other information that is publicly available. 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 eighteen (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.

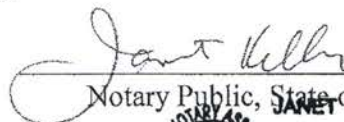
4. Affiant says nothing further.



Melissa Linton

SWORN TO AND SUBSCRIBED before me this 30th day of September 2014, by Melissa Linton who is personally known to me or who has produced drivers license (type of identification) as identification and who did take an oath.

My Commission Expires: 11/24/17



Notary Public, State of Florida
JANET KELLY
NOTARY PUBLIC
STATE OF FLORIDA
Comm# FF072658
Expires 11/24/2017

