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March 3, 2015

VIA HAND DELIVERY

Ms. Carlotta S. Stauffer
Commission Clerk
Florida Public Service Commission
2540 Shumard Oak Boulevard
Tallahassee, FL 32399-0850

REDACTED

RECEIVED-FPSC
15 MAR -3 AM 11:05
COMMISSION
CLERK

Re: Docket No. 150001-EI

Dear Ms. Stauffer:

Enclosed for filing on behalf of Florida Power & Light Company ("FPL") are an original and seven (7) copies of FPL's Request for Confidential Classification. The original includes Exhibits A through 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.

Please contact me if you or your Staff have any questions regarding the filing.

Sincerely,

Maria J. Moncada
Maria J. Moncada

Enclosures

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

COM	
AFD	3 + CD 3 + Reduct.
APA	
ECO	1
ENG	
GCL	2
IDM	1
TEL	
CLK	

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

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

Docket No. 150001-EI

Filed: March 3, 2015

**FLORIDA POWER AND LIGHT COMPANY'S
REQUEST FOR CONFIDENTIAL CLASSIFICATION**

Pursuant to Section 366.093, Florida Statutes, and Rule 25-22.006, Florida Administrative Code, Florida Power & Light Company ("FPL"), hereby requests confidential classification of certain information provided in exhibits to the prepared direct testimony of FPL witnesses Terry J. Keith (TJK-2) and Gerard J. Yupp (GJY-1) in this proceeding. In support of this Request, FPL states:

1. On March 3, 2015, FPL filed the testimony of FPL witnesses Terry J. Keith and Gerard J. Yupp. Exhibits TJK-2 and GJY-1 to the testimony contains confidential information. Pursuant to Rule 25-22.006, F.A.C., FPL files this Request for Confidential Classification.

2. The following exhibits are included with this Request:

a. Exhibit A consists of a copy of the confidential material on which all of the information that FPL asserts is entitled to confidential treatment has been highlighted.

b. Exhibit B consists of a copy of the confidential material on which all information that FPL asserts is entitled to confidential treatment has been redacted. A copy of the redacted Exhibits also is included in the copy of the prepared testimony of FPL witnesses Terry J. Keith and Gerard J. Yupp.

c. Exhibit C is a table that identifies by column and line the information for which confidential treatment is sought and references the specific statutory bases for the claim of confidentiality and the affiant who supports the requested classification.

d. Exhibit D is the affidavit of Gerard J. Yupp in support of this Request for Confidential Classification.

3. FPL submits that the highlighted information in Exhibit A is proprietary confidential business information within the meaning of Section 366.093(3), F.S. 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 the affidavit included as Exhibit D indicates, the information provided by FPL contains information concerning contractual data, the disclosure of which would impair the efforts of FPL or its affiliates to contract for goods or services on favorable terms. § 366.093(3)(d), F.S. Specifically, the information contains information related to the pricing for short-term capacity purchases, the disclosure of which would impair FPL's ability to contract for capacity on favorable terms. Additionally, this information is related to the competitive interests of FPL and of suppliers from whom FPL purchases capacity, the disclosure of which would impair the competitive businesses of the provider of the information. § 366.093(3)(e), F.S.


5. In addition, the confidential information contains information regarding the financial details related to FPL's asset optimization activities for natural gas and electric transmission. This information, if disclosed, would impair the efforts of FPL to execute transactions for natural gas commodity sales, natural gas storage, natural gas transportation, and

electricity transmission on favorable terms for the benefit of its customers and it would also 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. This information is protected under Sections 366.093(3)(d) and (e), F.S.

6. Upon a finding by the Commission that the information provided in Exhibit A and referenced in Exhibits B, C, and D is proprietary confidential business information, the information should not be declassified for a period of 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* § 399.093(4), F.S.

Respectfully submitted this 3rd day of March, 2015.

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By: 

Maria J. Moncada
Florida Bar No. 0773301

CERTIFICATE OF SERVICE
Docket 150001-EI

I HEREBY CERTIFY that a true and correct copy of the foregoing* has been furnished by electronic service this 3rd day of March, 2015, to the following persons:

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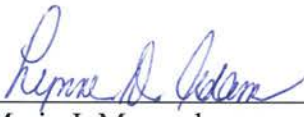
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By: 

for 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 B

REDACTED COPIES

	B	C	D	E	F	G	H	I	J	K	L	M	
1	Florida Power & Light Company												
2	Schedule A12 - Capacity Costs												
3	Page 2 of 2												
4													
5													
6													
7	For the Month of Dec-14												
8													
9													
10	<u>Contract</u>	<u>Counterparty</u>							<u>Identification</u>	<u>Contract Start Date</u>	<u>Contract End Date</u>		
11	1	Southern Co. - UPS Scherer							Other Entity	June, 2010	December 31, 2015		
12	2	Southern Co. - UPS Harris							Other Entity	June, 2010	December 31, 2015		
13	3	Southern Co. - UPS Franklin							Other Entity	June, 2010	December 31, 2015		
14	4	JEA - SJRPP							Other Entity	April, 1982	September 30, 2021		
15	5	Seminole Electric Cooperative							Other Entity	August, 2014	August 31, 2014		
16													
17	<u>2014 Capacity in MW</u>												
18													
19	<u>Contract</u>	<u>Jan</u>	<u>Feb</u>	<u>Mar</u>	<u>Apr</u>	<u>May</u>	<u>Jun</u>	<u>Jul</u>	<u>Aug</u>	<u>Sep</u>	<u>Oct</u>	<u>Nov</u>	<u>Dec</u>
20	1	163	163	163	163	163	163	163	163	163	163	163	163
21	2	600	600	600	600	600	600	600	600	600	600	600	600
22	3	190	190	190	190	190	190	190	190	190	190	190	190
23	4	375	375	375	375	375	375	375	375	375	375	375	375
24	5								150				
25	Total	1,328	1,328	1,328	1,328	1,328	1,328	1,328	1,478	1,328	1,328	1,328	1,328
26													
27	<u>2014 Capacity in Dollars</u>												
28													
29		<u>Jan</u>	<u>Feb</u>	<u>Mar</u>	<u>Apr</u>	<u>May</u>	<u>Jun</u>	<u>Jul</u>	<u>Aug</u>	<u>Sep</u>	<u>Oct</u>	<u>Nov</u>	<u>Dec</u>
30	Total	15,981,900	16,233,234	16,358,713	16,555,580	16,366,782	15,991,037	16,262,201	16,357,770	18,065,228	14,327,837	13,524,020	13,664,413
31													
32	Year-to-date Short Term Capacity Payments				189,688,716								
33													
34													
35	<u>Contract</u>	<u>Jan</u>	<u>Feb</u>	<u>Mar</u>	<u>Apr</u>	<u>May</u>	<u>Jun</u>	<u>Jul</u>	<u>Aug</u>	<u>Sep</u>	<u>Oct</u>	<u>Nov</u>	<u>Dec</u>
36	1	█	█	█	█	█	█	█	█	█	█	█	█
37	2	█	█	█	█	█	█	█	█	█	█	█	█
38	3	█	█	█	█	█	█	█	█	█	█	█	█
39	4	█	█	█	█	█	█	█	█	█	█	█	█
40	5	█	█	█	█	█	█	█	█	█	█	█	█
41													
42	<u>True ups</u>												
43	1		█			█							
44	2						█			█			
45	3						█	█					
46	4	█	█	█	█	█	█	█	█	█	█	█	█
47	5								█				

	A	B	C	D	E	F	G	H	I	J
1	ASSET OPTIMIZATION DETAIL									
2	Actual for the Period of: January 2014 through December 2014									
3										
4	(1)	(2)	(3)	(4)	(5)	(6)	(7)	(8)	(9)	(10)
5		Natural Gas	Natural Gas	Natural Gas	Natural Gas	Natural Gas	Natural Gas	Coal	Electric Transmission	Total
6		Delivered City-Gate	Production Area	Capacity Release	Option	Storage	AMA	Sales	Capacity Release	Asset Optimization
7		Sales	Sales	Firm Transport	Premiums	Optimization	Gains	Gains	Firm Transmission	Gains
8	Month	(\$)	(\$)	(\$)	(\$)	(\$)	(\$)	(\$)	(\$)	(\$)
9										
10	January									2,046,044
11										
12	February									1,064,077
13										
14	March									1,411,207
15										
16	April									826,424
17										
18	May									961,429
19										
20	June									1,709,376
21										
22	July									933,564
23										
24	August									906,071
25										
26	September									923,907
27										
28	October									895,393
29										
30	November									960,785
31										
32	December									984,394
33										
34	Total	744,104	964,123	1,006,558	5,895,600	1,030,023	2,302,331	20,000	1,659,932	13,622,670

EXHIBIT C

JUSTIFICATION TABLE

EXHIBIT C

COMPANY: Florida Power & Light Company
TITLE: List of Confidential Exhibits
DOCKET TITLE: Fuel Cost Recovery and Capacity Cost Recovery
DOCKET NO: 150001-EI
DATE: March 3, 2015

Exhibit No.	Description	Pages	Conf Y/N	Column No./Line No.	Florida Statute 366.093 (3) Subsection	Affiant
TJK-2	Schedule A12 - Capacity Costs (page 2 of 2)	1	Y	Lines 36-40 and 46, Cols. B-M, Line 43, Cols. C, F Line 44, Cols. G and K Line 45, Cols. G and H Line 47, Col. J	(d), (e)	G. Yupp
GJY-1	Asset Optimization Detail (page 3 of 4)	4	Y	Pg. 3, Lines 10, 12, 14, 16, 18, 20, 22, 24, 26, 28, 30, 32, Cols. B-I	(e)	G. Yupp

EXHIBIT D

AFFIDAVIT

EXHIBIT D

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

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

Docket No: 150001-EI

STATE OF FLORIDA)
PALM BEACH COUNTY)

AFFIDAVIT OF GERARD J. YUPP

BEFORE ME, the undersigned authority, personally appeared Gerard J. Yupp who, being first duly sworn, deposes and says:

1. My name is Gerard J. Yupp. I am currently employed by Florida Power & Light Company ("FPL") as Senior Director of Wholesale Operations in the Energy Marketing and Trading Division. I have personal knowledge of the matters stated in this affidavit.

2. I have reviewed Exhibits A, B and C to FPL's Request for Confidential Classification of Information included in Appendix II to the prefiled testimony of FPL witness Terry J. Keith (Exhibit TJK-2) and Appendix III to the prefiled testimony of FPL witness Gerard J. Yupp (Exhibit GJY-1). The documents and materials in Exhibit A which are asserted by FPL to be proprietary confidential business information contain or constitute contractual data, the disclosure of which would impair the efforts of FPL to contract for goods or services on favorable terms. Specifically, the documents contain information related to the pricing for short-term capacity purchases, the disclosure of which would impair FPL's ability to contract for capacity on favorable terms for the benefit of its customers. The information provided by FPL also contains information related to the competitive interests of suppliers from whom FPL purchases capacity, the disclosure of which would impair the competitive businesses of the provider of the information. Additionally, the documents 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, 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. 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 information should remain confidential for a period of at least eighteen (18) months. In addition, it 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.

[Signature of Gerard J. Yupp]
Gerard J. Yupp

SWORN TO AND SUBSCRIBED before me this 19 day of February 2015, by Gerard J. Yupp, who is personally known to me or who has produced (type of identification) as identification and who did take an oath.

[Signature of Maritza Miranda-Wise]
Notary Public, State of Florida

My Commission Expires:
1981177

