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March 23, 2015

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
15 MAR 23 PM 12:49
COMMISSION
CLERK

Re: Docket No. 150001-EI

Dear Ms. Stauffer:

I enclose for filing in the above docket an original and seven (7) copies of Florida Power & Light Company's ("FPL's") Request for Confidential Classification of Information Provided in Response to Office of Public Counsel's First Request for Production of Documents (Nos. 6, 8, 12 and 13). 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.

Please contact me if you or your Staff has any questions regarding this filing.

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: Fuel and purchase power cost recovery
clause with generating performance incentive
factor

Docket No: 150001-EI
Date: March 23, 2015

**FLORIDA POWER & LIGHT COMPANY'S REQUEST FOR
CONFIDENTIAL CLASSIFICATION OF INFORMATION PROVIDED
IN RESPONSE TO THE OFFICE OF PUBLIC COUNSEL'S
FIRST REQUEST FOR PRODUCTION OF DOCUMENTS (Nos. 6, 8, 12 and 13)**

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 the Office of Public Counsel's ("OPC") First Request for Production of Documents (Nos. 6, 8, 12 and 13) ("Confidential Discovery Responses"). In support of its Request, FPL states as follows:

1. On February 19, 2015, OPC served its First Request for Production of Documents (Nos. 1-14) on FPL. FPL's Response to OPC's First Request for Production of Documents (Nos. 6, 8, 12 and 13) contain information of a confidential nature, which is proprietary confidential business information within the meaning of Section 366.093(3), Florida Statutes.

2. FPL served its responses to OPC's First Request for Production of Documents (Nos. 1-14) on March 23, 2015. This request is being filed contemporaneously with the service of the responses to OPC, in order to request confidential classification of the Confidential Discovery Responses consistent with Rule 25-22.006, Florida Administrative Code.

3. 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 on which all information that FPL asserts is entitled to confidential treatment is highlighted.

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.

c. Exhibit C is a table containing an identification of the information highlighted in Exhibit A, together with references to the specific statutory bases for the claim of confidentiality and to the affidavit in support of the requested classification.

d. Exhibit D is the affidavit of Don Grissette, General Manager of Change Management and Organizational Development in the Nuclear Business Unit.

4. 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 hard of disclosure against the public interest in access to the information.

5. As the affidavit included in Exhibit D indicates, the Confidential Discovery Responses provided by FPL contains information related to contractual data, the disclosure of which would impair FPL's ability to contract for goods or services on favorable terms. This information is protected by Section 366.093(3)(d), Fla. Stat.

6. In addition, the Confidential Discovery Responses also consist of competitive interests, the disclosure of which would impair the competitive business of FPL or its suppliers. This information is protected by Section 366.093(3)(e), Fla. Stat.

7. The confidential documents relate to competitive interests of third party suppliers who FPL engages for outage-related services, equipment and evaluations. The confidential documents also contain information prepared pursuant to FPL's contracts with third parties, Areva, Inc. ("Areva") and the Institute for Nuclear Power Operations ("INPO") which expressly prohibit FPL from disclosing the subject data. Thus, the disclosure of this information would impair FPL's efforts to contract with Areva and INPO for these services on favorable terms in the future.

8. 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 affidavits 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
Maria J. Moncada
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Florida Power & Light Company
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Juno Beach, FL 33408
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Email: maria.moncada@fpl.com

By: _____

Maria J. Moncada
Florida Bar No. 0773301

CERTIFICATE OF SERVICE

Docket No. 150001-EI

I HEREBY CERTIFY that a true and correct copy of the foregoing* has been furnished by electronic mail on this 23rd day of March, 2015 to the following:

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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

**Florida Power & Light Company
Docket No. 150001-EI
OPC's First Request for Production
Request No. 6
Page 1 of 1**

Documents responsive to OPC's First Request for PODs No. 6 (Bates Nos. FCR-15-01346 through FCR-15-01434) are confidential in their entirety.

**Florida Power & Light Company
Docket No. 150001-EI
OPC's First Request for Production
Request No. 8
Page 1 of 1**

Documents responsive to OPC's First Request for PODs No. 8 (Bates Nos. FCR-15-03854 through FCR-15-03929) are confidential in their entirety.

**Florida Power & Light Company
Docket No. 150001-EI
OPC's 1st Request for POD's
Request No. 12**

Documents listed below, responsive to OPC's First Request for POD's No. 12, are confidential in their entirety.

**Bates Nos. FCR-15-02136 through FCR-15-02660
Bates Nos. FCR-15-02934 through FCR-15-03123
Bates Nos. FCR-15-03190 through FCR-15-03267
Bates Nos. FCR-15-03321 through FCR-15-03398**

EXHIBIT C

JUSTIFICATION TABLE

EXHIBIT C

COMPANY: Florida Power & Light Company
TITLE: List of Confidential Documents
SUBJECT: FPL's Responses to OPC's First Request for Production of Documents No. 1
DOCKET TITLE: Fuel and Purchased Power Cost Recovery Clause
DOCKET NO: 150001-EI
DATE: March 23, 2015

OPC's 1 st Request for POD's No.	Page No.	Conf Y/N	Line No./Column No.	Florida Statute 366.093 (3) Subsection	Affiant
6	Bates Nos. FCR-15-01346 through FCR-15-01434	Y	ALL	(d), (e)	D. Grissette
8	Bates Nos. FCR-15-03854 through FCR-15-03929	Y	ALL	(d), (e)	D. Grissette
12	Bates Nos. FCR-15-02136 through FCR-15-02660	Y	ALL	(d), (e)	D. Grissette
12	Bates Nos. FCR-15-02934 through FCR-15-03123	Y	ALL	(d), (e)	D. Grissette
12	Bates Nos. FCR-15-03190 through FCR-15-03267	Y	ALL	(d), (e)	D. Grissette
12	Bates Nos. FCR-15-03321 through FCR-15-03398	Y	ALL	(d), (e)	D. Grissette
13	Bates Nos. FCR-15-01468 through FCR-15-01469	Y	ALL	(d), (e)	D. Grissette

EXHIBIT D

AFFIDAVIT

EXHIBIT D

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In RE: Fuel and purchase power cost recovery clause with generating performance incentive factor

Docket No: 150001-EI

STATE OF FLORIDA)
COUNTY OF PALM BEACH)

AFFIDAVIT OF DON GRISSETTE

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

1. My name is Don Grissette. I am currently employed by Florida Power & Light Company ("FPL") as General Manager of Change Management and Organizational Development in the Nuclear Business Unit. I have personal knowledge of the matters stated in this affidavit.

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 relate to competitive interests of third party suppliers who FPL engages for outage-related services, equipment and evaluations. The confidential documents also contain information prepared pursuant to FPL's contracts with third parties, Areva, Inc. ("Areva") and the Institute for Nuclear Power Operations ("INPO"), which expressly prohibit FPL from disclosing the subject data. Thus, disclosure of this information would impair FPL's efforts to contract with Areva and INPO for these services on favorable terms in the future. The data supplied pursuant to the contract, which FPL has identified on Exhibit C, are considered and treated as confidential by the FPL, Areva or INPO. This information is protected within the meaning of Sections 366.093(3)(d) and (e).

3. Consistent with the provisions of the Florida Administrative Code, such materials should remain confidential for a period of 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.

[Handwritten signature of Don Grissette]
Don Grissette

SWORN TO AND SUBSCRIBED before me this 18 day of March 2015, by Don Grissette, who is personally known to me or who has produced (type of identification) as identification and who did take an oath.

[Handwritten signature of Carla J. Heibold]
Notary Public, State of Florida

My Commission Expires: 4/30/17

