



Florida Power & Light Company, P.O. Box 14000, Juno Beach, FL 33408-0420  
Law Department

FILED APR 27, 2015  
DOCUMENT NO. 02344-15  
FPSC - COMMISSION CLERK

Maria J. Moncada  
Principal Attorney  
Florida Power & Light Company  
700 Universe Boulevard  
Juno Beach, FL 33408-0420  
561-304-5795  
(561) 691-7135 (Facsimile)  
E-mail: Maria.Moncada@fpl.com

April 27, 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 APR 27 PM 4:04  
COMMISSION  
CLERK

**Re: Docket No. 150075-EI**

**REDACTED**

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 Certain Responses to Staff's and Office of Public Counsel's First Set of Interrogatories and First Request for Production of Documents. The original includes Exhibits A, B (two copies), Exhibit C and Exhibit 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 three affidavits 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

- COM \_\_\_\_\_
- AFD 2
- APA \_\_\_\_\_
- ECO 2 Enclosure
- ENG 2+cc+Redacted
- GCL 1
- IDM \_\_\_\_\_
- TEL \_\_\_\_\_
- CLK \_\_\_\_\_

2268110

**BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION**

In re: Petition for approval of arrangement to mitigate impact of unfavorable Cedar Bay power purchase obligation, by Florida Power & Light Company.

Docket No: 150075-EI

Date: April 27, 2015

**FLORIDA POWER & LIGHT COMPANY'S REQUEST FOR CONFIDENTIAL CLASSIFICATION OF CERTAIN RESPONSES TO STAFF'S AND OFFICE OF PUBLIC COUNSEL'S FIRST SET OF INTERROGATORIES AND FIRST REQUEST FOR PRODUCTION**

Pursuant to Section 366.093, Florida Statutes, and Rule 25-22.006, Florida Administrative Code, Florida Power & Light Company ("FPL") requests confidential classification of a its response to the Staff of the Florida Public Service Commission's ("Staff") First Set of Interrogatories (Nos. 1 and 19) and First Request for Production of Documents (Nos. 3-4), and Office of Public Counsel's ("OPC") First Set of Interrogatories (Nos. 2, 4, 5 and 10) and First Request for Production of Documents (No. 4). In support of its request, FPL states:

1. On April 27, 2015, FPL filed its response to Staff's First Set of Interrogatories and First Request for Production of Documents, and to OPC's First Set of Interrogatories and First Request for Production of Documents. FPL's responses to Staff's First Set of Interrogatories (Nos. 1 and 19) and First Request for Production of Documents (Nos. 3-4), and OPC's First Set of Interrogatories (Nos. 2, 4, 5 and 10) and First Request for Production of Documents (No. 4) contain information of a confidential nature, which is proprietary confidential business information within the meaning of Section 366.093(3), Florida Statutes (hereinafter referred to as (the "Confidential Discovery Responses").

2. FPL files this request contemporaneously with the service of its responses to Staff's and OPC's First Set of Interrogatories and First Request for Production, 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 consists of the affidavits Thomas L. Hartman, Melissa Linton and William Lavarco.

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 affidavits included in Exhibit D indicates, some of 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. Additionally, some of the Confidential Discovery Responses consist of or address

information and documents provided by CBAS Power Holdings, LLC or its affiliates, which FPL is contractually obligated to treat confidentially. This information is protected by Section 366.093(3)(d), Fla. Stat.

6. Other 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. Finally, certain Confidential Discovery Responses are comprised of a Hart-Scott-Rodino filing that FPL made with the Federal Trade Commission and the Antitrust Division of the Department of Justice. Pursuant to Federal law, HSR filings may not be made public and are exempt from disclosure under the Freedom of Information Act. 15 U.S.C. § 18a(h) (2014).

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.

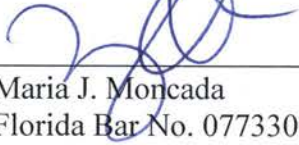
**WHEREFORE**, for the above and foregoing reasons, as more fully set forth in the supporting materials and affidavits included herewith, Florida Power & Light Company

respectfully requests that its Request for Confidential Classification be granted.

Respectfully submitted,

John T. Butler  
Assistant General Counsel - Regulatory  
Maria J. Moncada  
Principal Attorney  
Florida Power & Light Company  
700 Universe Boulevard  
Juno Beach, FL 33408  
Telephone: (561) 304-5795  
Facsimile: (561) 691-7135  
Email: maria.moncada@fpl.com

By: \_\_\_\_\_

  
Maria J. Moncada  
Florida Bar No. 0773301

**CERTIFICATE OF SERVICE**  
**Docket No. 150075-EI**

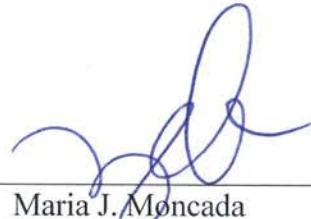
**I HEREBY CERTIFY** that a true and correct copy of the foregoing Request for Confidential Classification\* has been furnished by electronic mail on this 27th day of April, 2015 to the following:

Martha F. Barrera, Esq.  
Division of Legal Services  
Florida Public Service Commission  
2540 Shumard Oak Blvd.  
Tallahassee, Florida 32399-0850  
mbarrera@psc.state.fl.us  
*Office of the General Counsel*

J.R. Kelly, Public Counsel  
John J. Truitt, Associate Public Counsel  
Office of Public Counsel  
The Florida Legislature  
111 West Madison Street, Room 812 Tallahassee,  
Florida 32399  
kelly.jr@leg.state.fl.us  
truitt.john@leg.state.fl.us  
*Attorney for the Citizens of the State of Fla.*

Jon C. Moyle, Jr., Esq.  
Karen A. Putnal, Esq.  
Moyle Law Firm, P.A.  
118 North Gadsden Street  
Tallahassee, Florida 32301  
jmoyle@moylelaw.com  
kputnal@moylelaw.com  
*Attorney for Fla. Industrial Power Users  
Group*

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. 150075-EI  
Staff's First Request for Production  
Request No. 3  
Page 1 of 1**

**Documents responsive to Staff's First Request for Production No. 3 (Bates Nos. CB-15-00228 through CB-15-00355) are confidential in their entirety.**

**Florida Power & Light Company  
Docket No. 150075-EI  
Staff's First Request for Production  
Request No. 4  
Page 1 of 1**

**Documents responsive to Staff's First Request for Production No. 4 (Bates Nos. CB-15-00356 through CB-15-00550) are confidential in their entirety.**

**Florida Power & Light Company  
Docket No. 150075-EI  
Staff's 1st Set of Interrogatories  
Attachment I, Interrogatory No. 1  
Pages 1 through 97**

**Documents responsive to Staff's First Set of Interrogatories No. 1 are confidential in their entirety.**

	A	B	C	D	E	F	G	H	I	J	K	L	M
1	<b>Commodity Cost - Scherer 4 (\$/ton)</b>												
2	<b>Year</b>	<b>January</b>	<b>February</b>	<b>March</b>	<b>April</b>	<b>May</b>	<b>June</b>	<b>July</b>	<b>August</b>	<b>September</b>	<b>October</b>	<b>November</b>	<b>December</b>
3	2010	\$11.18	\$11.66	\$11.46	\$11.86	\$11.87	\$11.76	\$12.01	\$11.95	\$12.00	\$12.13	\$11.98	\$12.30
4	2011	\$11.95	\$12.14	\$11.85	\$12.50	\$12.57	\$12.71	\$12.22	\$12.62	\$12.09	\$12.26	\$12.61	\$12.45
5	2012	\$12.21	\$12.92	\$13.44	\$13.88	\$13.42	\$13.50	\$13.31	\$12.96	\$13.54	\$12.58	\$12.68	\$12.45
6	2013												
7	2014												
8													
9	<b>Transportation Cost - Scherer 4 (\$/ton)</b>												
10	<b>Year</b>	<b>January</b>	<b>February</b>	<b>March</b>	<b>April</b>	<b>May</b>	<b>June</b>	<b>July</b>	<b>August</b>	<b>September</b>	<b>October</b>	<b>November</b>	<b>December</b>
11	2010	\$25.20	\$25.14	\$25.17	\$25.16	\$25.34	\$25.45	\$25.10	\$25.12	\$25.20	\$25.22	\$25.20	\$25.45
12	2011	\$25.62	\$26.34	\$26.20	\$26.18	\$26.63	\$27.03	\$26.84	\$26.62	\$26.63	\$26.26	\$26.18	\$26.28
13	2012	\$26.71	\$27.28	\$27.37	\$27.43	\$27.64	\$27.56	\$27.21	\$26.74	\$26.91	\$27.20	\$27.26	\$27.14
14	2013												
15	2014												
16													
17	<b>Delivered Cost - Scherer 4 (\$/ton)</b>												
18	<b>Year</b>	<b>January</b>	<b>February</b>	<b>March</b>	<b>April</b>	<b>May</b>	<b>June</b>	<b>July</b>	<b>August</b>	<b>September</b>	<b>October</b>	<b>November</b>	<b>December</b>
19	2010	\$36.38	\$36.80	\$36.63	\$37.02	\$37.21	\$37.21	\$37.11	\$37.07	\$37.20	\$37.35	\$37.18	\$37.75
20	2011	\$37.57	\$38.48	\$38.05	\$38.68	\$39.20	\$39.74	\$39.06	\$39.24	\$38.72	\$38.52	\$38.79	\$38.73
21	2012	\$38.92	\$40.20	\$40.81	\$41.31	\$41.06	\$41.06	\$40.52	\$39.70	\$40.45	\$39.78	\$39.94	\$39.59
22	2013												
23	2014												
24													
25	Notes:												
26	Source - FPSC Form 423												

	A	B	C	D	E	F	G	H	I	J	K	L	M
1	<b>Commodity Cost - SJRPP - Rail (\$/ton)</b>												
2	Year	January	February	March	April	May	June	July	August	September	October	November	December
3	2010	\$88.48	\$103.09	\$103.00	\$102.60	\$103.98	\$102.74	\$100.69	\$98.95	\$101.18	\$98.95	\$68.12	\$80.15
4	2011	\$46.16	\$51.85	\$42.18	\$40.63	\$41.05	\$40.50	\$41.96	\$41.05	\$40.69	\$40.80	\$40.23	\$40.74
5	2012	\$41.91	\$42.33	\$43.50	\$43.50	\$43.50	\$42.33	\$43.50	\$43.50	\$43.50	\$43.50	\$43.50	\$43.50
6	2013												
7	2014												
8	<b>Transportation Cost - SJRPP - Rail (\$/ton)</b>												
9	Year	January	February	March	April	May	June	July	August	September	October	November	December
10	2010	\$37.43	\$37.60	\$37.56	\$38.03	\$39.01	\$39.04	\$38.16	\$38.23	\$38.23	\$38.46	\$39.19	\$39.87
11	2011	\$34.25	\$33.59	\$32.15	\$32.15	\$32.15	\$32.15	\$32.15	\$32.15	\$32.15	\$32.15	\$32.15	\$32.15
12	2012	\$33.14	\$33.73	\$33.73	\$33.73	\$33.95	\$33.95	\$33.75	\$33.73	\$33.73	\$33.73	\$33.87	\$33.94
13	2013												
14	2014												
15	<b>Delivered Cost - SJRPP - Rail (\$/ton)</b>												
16	Year	January	February	March	April	May	June	July	August	September	October	November	December
17	2010	\$125.91	\$140.69	\$140.56	\$140.63	\$142.99	\$141.78	\$138.85	\$137.18	\$139.41	\$137.41	\$107.31	\$120.02
18	2011	\$80.41	\$85.44	\$74.33	\$72.78	\$73.20	\$72.65	\$74.11	\$73.20	\$72.84	\$72.95	\$72.38	\$72.89
19	2012	\$75.05	\$76.06	\$77.23	\$77.23	\$77.45	\$76.28	\$77.25	\$77.23	\$77.23	\$77.23	\$77.37	\$77.44
20	2013												
21	2014												
22	<b>Notes:</b>												
23	Source - FPSC Form 423												

	A	B	C	D	E	F	G	H	I	J	K	L	M
1													
2	<b>Delivered Cost - SJRPP - Vessel (\$/ton)</b>												
3	<b>Year</b>	<b>January</b>	<b>February</b>	<b>March</b>	<b>April</b>	<b>May</b>	<b>June</b>	<b>July</b>	<b>August</b>	<b>September</b>	<b>October</b>	<b>November</b>	<b>December</b>
4	2010	\$57.58	\$57.86	\$58.21	\$58.02	\$57.43	\$57.40	\$57.42	\$57.60	\$57.52	\$57.62	\$62.64	\$62.67
5	2011	\$107.28	\$104.08	\$104.49	\$108.31	\$108.84	\$104.90	\$106.30	\$104.98	\$107.16	\$102.64	\$97.26	\$95.90
6	2012	\$91.02	\$89.48	\$89.66	\$84.07	\$84.17	\$76.11	\$75.52	\$76.64	\$81.91	\$77.61	\$74.23	\$75.36
7	2013												
8	2014												
9													
10	Notes:												
11	Source - FPSC Form 423												
12	FPL purchases Vessel Delivered coal at an all in delivered price												

**Florida Power & Light Company  
Docket No. 150075-EI  
Staff's 1st Set of Interrogatories  
Attachment I, Interrogatory No. 19  
Pages 1 through 3**

**Documents responsive to Staff's First Set of Interrogatories No. 19 are confidential in their entirety.**

**Florida Power & Light Company  
Docket No. 150075-EI  
OPC's First Request for Production  
Request No. 2  
Page 1 of 1**

**Documents responsive to OPC's First Request for Production No. 2 (Bates Nos. CB-15-00553 through CB-15-00571) are confidential in their entirety.**



**Florida Power & Light Company  
Docket No. 150075-EI  
OPC's First Request for Production  
Request No. 4  
Page 1 of 1**

**Documents responsive to OPC's First Request for Production No. 4 (Bates Nos. CB-15-00572 through CB-15-00975) are confidential in their entirety.**

**Florida Power & Light Company  
Docket No. 150075-EI  
OPC's First Request for Production  
Request No. 5  
Page 1 of 1**

**Documents responsive to OPC's First Request for Production No. 5 (Bates Nos. CB-15-00976 through CB-15-00984) are confidential in their entirety.**

**Florida Power & Light Company  
Docket No. 150075-EI  
OPC's First Request for Production  
Request No. 10  
Page 1 of 1**

**Documents responsive to OPC's First Request for Production No. 10 (Bates Nos. CB-15-01029 through CB-15-01132) are confidential in their entirety.**

	A	B	C	D	E
1					
2					
3					
4					
5	<b>Monthly O&amp;M Costs</b>				
6	Year	<b>O&amp;M (\$000)</b>	<b>Land Lease (\$000)</b>	<b>Rail Lease (\$000)</b>	<b>Total Monthly O&amp;M (\$000)</b>
7	2015				
8	2016				
9	2017				
10	2018				
11	2019				
12	2020				
13	2021				
14	2022				
15	2023				
16	2024				

# **EXHIBIT C**

## **JUSTIFICATION TABLE**

**EXHIBIT C**

**COMPANY:** Florida Power & Light Company  
**TITLE:** List of Confidential Documents  
**SUBJECT:** FPL's Responses Staff's First Set of Interrogatories and First Request for Production and Office of Public Counsel's First Set of Interrogatories and First Request for Production  
**DOCKET TITLE:** In re: Florida Power & Light Company's Petition for Approval of Arrangement To Mitigate Impact of Unfavorable Cedar Bay Power Purchase Obligation  
**DOCKET NO:** 150075-EI  
**DATE:** April 27, 2015

Discovery Set	Item No.	Bates or Page Nos.	Line No./ Column No.	Florida Statute 366.093 (3) Subsection	Affiant
Staff's 1 <sup>st</sup> Request for Production	POD No. 3	Bates Nos. CB-15-00228 through CB-15-00355	ALL	(d), (e)	T. Hartman
	POD No. 4	Bates Nos. CB-15-00356 through CB-15-00550	ALL	(d), (e)	T. Hartman
Staff's 1 <sup>st</sup> Set of Interrogatories	INT No. 1	Attachment I, Pages 1-97	ALL	(d), (e)	T. Hartman
	INT No. 2	Attachment I, Pages 2-3  Page 4	Cols. B-M, Lns. 6-7, 14-15, 22-23  Cols. B-M, Lns. 6-7	(d), (e)	T. Hartman
	INT No. 19	Attachment I, Pages 1-3	ALL	(d), (e)	T. Hartman
Office of Public Counsel's 1 <sup>st</sup> Request for Production	POD No. 2	Bates Nos. CB-15-00553 through CB-15-00571	ALL	(d), (e)	M. Linton
	POD No. 4	Bates Nos. CB-15-00572 through CB-15-00975	ALL	(d), (e)	T. Hartman
	POD No. 5	Bates Nos. CB-15-00976 through CB-15-00984  (Note: privileged information redacted on Bates Nos. CB-15-00976 through CB-15-00980 and CB-15-00984)	ALL	(d), (e)	T. Hartman
	POD No. 10	Bates Nos. CB-15-01029 through CB-15-01132	ALL	(e)	W. Lavarco
Office of Public Counsel's 1 <sup>st</sup> Set of Interrogatories	INT No. 4	Attachment I, Page 1 of 1	Cols. B-E, Lns. 7-16	(d)	T. Hartman

**EXHIBIT D**

**AFFIDAVITS**

EXHIBIT D

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Petition for approval of arrangement to mitigate impact of unfavorable Cedar Bay power purchase obligation, by Florida Power & Light Company.

Docket No: 150075-EI

STATE OF FLORIDA )
COUNTY OF PALM BEACH )

AFFIDAVIT OF THOMAS L. HARTMAN

BEFORE ME, the undersigned authority, personally appeared Thomas L. Hartman who, being first duly sworn, deposes and says:

1. My name is Thomas L. Hartman. I am currently employed by Florida Power & Light Company ("FPL") as Director - Business Development in Energy Marketing and Trading. 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 or materials that I have reviewed and which are asserted by FPL to be proprietary confidential business information contain or constitute contractual data such as pricing and other terms, payment records, and vendor and supplier rates. Specifically, the materials consist of or address information and documents provided by CBAS Power Holdings, LLC or its affiliates, which FPL is contractually obligated to treat confidentially. Other confidential materials contain information relating to competitive interests, the disclosure of which would impair FPL's competitive interests. Specifically, the documents contain detailed economic projections regarding FPL's business, which if disclosed would impair FPL's ability to negotiate favorable contracts in the future for wholesale market power, fuel, or fuel transportation. Thus, disclosure of this information would disadvantage FPL customers. 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 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 Thomas L. Hartman]

Thomas L. Hartman

SWORN TO AND SUBSCRIBED before me this 24 day of April 2015, by Thomas L. Hartman, who is personally known to me or who has produced (type of identification) as identification and who did take an oath.

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

My Commission Expires:





EXHIBIT D

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Petition for approval of arrangement to mitigate impact of unfavorable Cedar Bay power purchase obligation, by Florida Power & Light Company.

Docket No: 150075-EI

DISTRICT OF COLUMBIA )
CITY OF WASHINGTON )

AFFIDAVIT OF WILLIAM LAVARCO

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

1. My name is William Lavarco. I am currently employed by NextEra Energy Resources, LLC as a Senior Attorney, FERC/NERC Compliance Counsel. I have personal knowledge of the matters stated in this affidavit.

2. I have reviewed the documents and information included in Exhibit A to Florida Power and Light Company's ("FPL") Request for Confidential Classification. The documents I have reviewed and which are asserted by FPL to be proprietary confidential business information contain information relating to competitive interests of FPL and FPL's parent company, NextEra Energy, Inc. ("NextEra"), the disclosure of which would impair the competitive business of FPL and NextEra. These documents comprise a Hart-Scott-Rodino ("HSR") filings that FPL made with the Federal Trade Commission and the Antitrust Division of the Department of Justice. Pursuant to Federal law, HSR filings may not be made public and are exempt from disclosure under the Freedom of Information Act. 15 U.S.C. § 18a(h)(2014). Additionally, the documents contain detailed economic information regarding NextEra's revenue by specific industry, information regarding corporate subsidiaries, and information pertaining to internal business decision-making, which if disclosed would impair the competitive business of FPL and NextEra. 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 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.

William Lavarco signature and name

SWORN TO AND SUBSCRIBED before me this 22nd day of April 2015, by William Lavarco, who is personally known to me or who has produced driver's license (type of identification) as identification and who did take an oath.

Linda C. Brown signature and name: Notary Public, District of Columbia

My Commission Expires:

LINDA C. BROWN
NOTARY PUBLIC DISTRICT OF COLUMBIA
My Commission Expires August 31, 2016





EXHIBIT D

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Petition for approval of arrangement to mitigate impact of unfavorable Cedar Bay power purchase obligation, by Florida Power & Light Company.

Docket No: 150075-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 ("FPL") as Director, Finance Forecast, Strategy & Analysis. 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 or materials that I have reviewed and which are asserted by FPL to be proprietary confidential business information contain or constitute contractual data such as pricing and other terms, payment records, and vendor and supplier rates. Specifically, the documents contain information regarding negotiated terms for the operation of the Cedar Bay Generating Facility with Cedar Bay Operating Services, LLC, which FPL is contractually obligated to treat as confidential. Thus, disclosure of this information would impair the efforts of FPL to contract on favorable terms for the benefit of its customers in the future and would impair the competitive interests of Cedar Bay Operating Services, LLC. In addition, the confidential materials contain information relating to competitive interests, the disclosure of which would impair FPL's competitive interests. Specifically, the documents contain detailed economic projections regarding FPL's business, which if disclosed would allow potential future counterparties or other financial market participants to anticipate FPL's economic decisions and would impair FPL's ability to negotiate favorable contracts for the benefit of its customers. Thus, disclosure of this information would disadvantage FPL customers. 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 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 Melissa Linton]

Melissa Linton

SWORN TO AND SUBSCRIBED before me this 22 day of April 2015, by Melissa Linton, who is personally known to me or who has produced Personally known (type of identification) as identification and who did take an oath.

[Handwritten signature of Janet Kelly]

Notary Public, State of Florida

My Commission Expires: 11/24/2017



JANET KELLY
NOTARY PUBLIC
STATE OF FLORIDA
Comm# FF072656
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