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July 10, 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 JUL 10 PM 2:57
COMMISSION
CLERK

Re: Docket No. 150075-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 Certain Responses to Staff of the Florida Public Service Commission's Sixth Set of Interrogatories (No. 38). 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 one affidavit in support of FPL's Request for Confidential Classification.

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

Sincerely,

Kevin I.C. Donaldson
Kevin I.C. Donaldson

Enclosure

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

COM _____
AFD 2
APA _____
ECO 2
ENG 2 + CP + Redacted
GCL 1
IDM _____
TEL _____
CLK _____

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: July 10, 2015

FLORIDA POWER & LIGHT COMPANY'S REQUEST FOR CONFIDENTIAL CLASSIFICATION OF RESPONSE TO STAFF OF THE FLORIDA PUBLIC SERVICE COMMISSION'S SIXTH SET OF INTERROGATORIES

Pursuant to Section 366.093, Florida Statutes, and Rule 25-22.006, Florida Administrative Code, Florida Power & Light Company ("FPL") requests confidential classification of its response to Staff of the Florida Public Service Commission's ("Staff") Sixth Set of Interrogatories (No. 38). In support of its request, FPL states:

1. On June 26, 2015, FPL served its response to Staff's Sixth Set of Interrogatories. FPL's responses to Staff's Sixth Set of Interrogatories (No. 38) contain information of a confidential nature that comprises 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 to Staff's Sixth Set of Interrogatories (No. 38), 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 the original request and this request:

a. Exhibit A consists of the Confidential Discovery Responses produced in response to Staff's Sixth Set of Interrogatories (No. 38).

b. Exhibit B consists of a copy of the confidential documents, on which all the information that is entitled to confidential treatment under Florida law has been redacted.

c. Exhibit C is a table containing an identification of the information highlighted in Exhibit A, together with a brief description of the documents designated confidential. Exhibit C also sets forth references to the specific statutory bases for the claim of confidentiality and to the affiant who supports the requested classification.

d. Exhibit D consists of the affidavit of David Herr.

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 of David Herr included as Exhibit D indicates, the Confidential Discovery Responses provided by FPL constitute proprietary business information related to competitively sensitive confidential business information, in that it contains information related to the third party's competitively interests. The disclosure of this information to third parties would adversely impact FPL by placing it at a competitive disadvantage and the valuation of the tangible and intangible assets of CBAS Power were performed by Duff and Phelps which would impair its competitive business and, which FPL and Duff and Phelps are contractually obligated

to treat confidentially. This information is protected by Sections 366.093(3)(d) and (e), Fla. Stat.

6. 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 affidavit 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
Kevin I.C. Donaldson
Senior Attorney
Maria J. Moncada
Principal Attorney
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Juno Beach, FL 33408
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Email: kevin.donaldson@fpl.com

By: 

 _____
Kevin I.C. Donaldson
Florida Bar No. 0833401

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 10th, day of July, 2015 to the following:

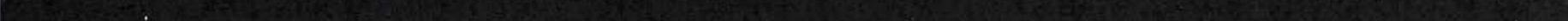
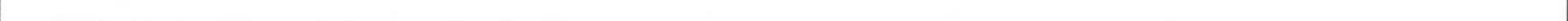
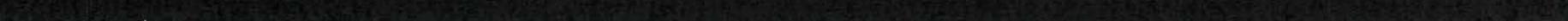
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*Attorney for Fla. Industrial Power Users
Group*

By: 
 _____
Kevin I.C. Donaldson
Florida Bar No. 0833401

*The exhibits to this Request are not included with the service copies, but copies of Exhibits B, C and D are available upon request.

	A	B	C	D	E	F
1	DOCKET NO. 150075 EI (Staff POD 38.a)					Support 1
2	Source : SNL					
3	Cedar Bay Generating					
4	Plant Financials					
5	SNL Power Plant Key :	2198				
6						
7						
8	Operational Statistics					
9	Operating Capacity (MW)					
10	Summer Peak Capacity (MW)					
11	Winter Peak Capacity (MW)					
12	Net Generation (MWh)					
13	Capacity Factor (%)					
14	Heat Rate					
15						
16						
17						
18						
19						
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27						
28						
29						

	A	B	C	D	E	F	G	H	I	J
1	DOCKET NO. 150075 EI (Staff POD 38.a)									
2	Source : SNL									
3	Cedar Bay Generating									
4	Fuels									
5										
6	Periods	Last Seven Years (Annual)								
7										
8		2008 Y	2009 Y	2010 Y	2011 Y	2012 Y	2013 Y	2014 Y		
9										3 Year Avg (D&P Calculation)
10	Primary Coal Deliveries									
11	Type									
12	Region									
13	Primary Transport Mode									
14	Secondary Transport Mode									
15	Amount Delivered (1000 tons)									
16	Heat Content (Btu/lb)									
17	Sulfur Content (%)									
18	Ash Content (%)									
19										
20	Basin Cost (\$/ton)									
21	Transportation Cost (\$/ton)									
22	Delivered Cost (\$/ton)									
23										
24	Basin Cost (\$/mmbtu)									
25	Transportation Cost (\$/mmbtu)									
26	Delivered Cost (\$/mmbtu)									
27										
28										
29										

	A	B	C	D	E	F	G	H	I	J	K	L
1	DOCKET NO. 150075 EI (Staff POD 38.b)											Support 1
2												
3	IHS Energy Rivalry Scenario, H2 2014											
4	06 February 2015											
5												
6	Annual fuel prices (nominal)¹											
7												
8	Annual spot coal prices by US basin (nominal \$/ton)											
9	Central Appalachia CSX ³											
10												
11	Notes:											
12	[REDACTED]											
13	[REDACTED]											
14	[REDACTED]											
15	Sources: IHS Energy, Energy Information Administration, Intelligence Press and SNL Energy Coal Report for historical data.											
16	IHS Energy Rivalry Scenario—Outlook to 2040.											
17	February 2015 update.											
18												
19	Cedar Bay - Calculation of Delivered Coal Price											
20												
21												
22	Spot Basin Coal Price (nominal \$/ton) - per IHS											
23	Transportation Cost (nominal \$/ton) - based on SNL, escalated at 2%											
24	Delivered Fuel Cost (nominal \$/ton)											
25												
26	Spot Basin Coal Price (nominal \$/mmbtu) - per IHS											
27	Transportation Cost (nominal \$/mmbtu) - based on SNL, escalated at 2%											
28	Delivered Fuel Cost (nominal \$/mmbtu)											
29												
30												
31												