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FILED JAN 11, 2016  
 DOCUMENT NO. 00171-16  
 FPSC - COMMISSION CLERK

January 11, 2016

**-VIA HAND DELIVERY-**

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

RECEIVED-FPSC  
 2016 JAN 11 PM 2:41  
 COMMISSION  
 CLERK

**Re: Docket No. 150263-EI  
 Petition for determination of need for Duval-Raven 230 kV transmission line in Baker,  
 Columbia, Duval, and Nassau Counties, by Florida Power and Light Company**

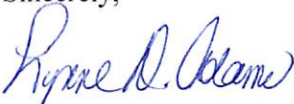
Dear Ms. Stauffer:

I enclose for filing in the above docket, Florida Power & Light Company's ("FPL") Request for Confidential Classification of certain information contained in Exhibit A to the Petition, and Exhibit FP-3 to the prefiled direct testimony of FPL witness Francisco Prieto.

Exhibit A consists of a copy of the relevant portions of the Petition, supporting testimony, and exhibits in which all of the confidential information is highlighted. Exhibit B consists of two copies of the relevant portions of the Petition, supporting testimony, and exhibits in which all of the Confidential Information is redacted. Exhibit C is a table that identifies by page, line or column the Confidential Information, together with references to the specific statutory bases for the claim of confidentiality and to the affiant who supports the requested classification. Exhibit D is the affidavit of Francisco Prieto in support of this request.

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

Sincerely,

*for*   
 William P. Cox  
 Senior Attorney  
 Florida Bar No. 0093531

WPC/msw  
 Enclosures

cc: Leslie Ames, Esq., Office of the General Counsel (via e-mail)  
 Lee Eng Tan, Esq., Office of the General Counsel (via e-mail)

COM  
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**BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION**

In re: Petition for determination of need for Duval-Raven 230 kV transmission line in Baker, Columbia, Duval, and Nassau Counties, by Florida Power & Light Company

Docket No: 150263-EI

Date: January 11, 2016

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

Pursuant to Section 366.093, Florida Statutes, and Florida Public Service Commission (“Commission”) Rule 25-22.006, Florida Administrative Code, Florida Power & Light Company (“FPL”) requests confidential classification of certain information contained in FPL’s petition for determination of need for Duval-Raven 230 kV transmission line, supporting prefiled testimony, and exhibits (the “Confidential Information”). In support of its request, FPL states as follows:

1. On January 11, 2016, FPL filed its petition for determination of need for Duval-Raven 230 kV transmission line (“Petition”) and supporting prefiled direct testimony of Francisco Prieto in this docket. Portions of FPL’s Petition, supporting testimony, and exhibits contain proprietary confidential business information. Specifically, portions of Exhibit A to the Petition (redactions on pages 11, 12, and 13, Attachments 4 and 8, and Appendices A and B) and Exhibit FP-3 to the prefiled direct testimony of FPL witness Prieto contain the following confidential information: (1) FPL’s load flow diagrams and results (including specific contingencies and customer outage information) and (2) a detailed map identifying the proposed project and the specific locations of FPL’s electrical facilities in the corresponding study area. This Request seeks confidential classification of the Confidential Information consistent with Rule 25-22.006.

2. The following exhibits are included with this Request:

a. Exhibit A consists of a copy of the relevant portions of the Petition, supporting testimony, and exhibits in which all of the confidential information is highlighted.

b. Exhibit B consists of two copies of the relevant portions of the Petition, supporting testimony, and exhibits in which all of the Confidential Information is redacted.

c. Exhibit C is a table that identifies by page, line, or column the Confidential Information, together with references to the specific statutory bases for the claim of confidentiality and to the affiant who supports the requested classification.

d. Exhibit D is the affidavit of Frank Prieto in support of this request.

3. FPL submits that the highlighted information in Exhibit A of this request 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 has 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. FPL seeks confidential protection for the highlighted information contained in the relevant portions of the Petition, supporting testimony, and exhibits. The highlighted information consists of information related to security measures, systems, or procedures. Such information constitutes protected proprietary confidential business information pursuant to Section 366.093(3)(c), Florida Statutes. As described in more detail in the affidavit attached as Exhibit D, the information contains or constitutes critical energy infrastructure information, as defined in Section 388.113 of the Code of Federal Regulations (18 C.F.R. §388.113). Federal Energy Regulatory Commission (“FERC”) Order 630 (issued February 21, 2003) and Order 683

(issued October 3, 2006) protect from public disclosure documents relating to critical energy infrastructure. This type of information previously has been granted confidential classification in Commission Order No. PSC-03-0551-FOF-EI and Order No. PSC-06-0631-CFO-EI.

5. Upon a finding by the Commission that the Confidential Information is proprietary confidential business information under Section 366.093(3), such 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. § 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 the Commission grant its Request for Confidential Classification.

Respectfully submitted,

William P. Cox  
Senior Attorney  
Florida Power & Light Company  
700 Universe Boulevard  
Juno Beach, FL 33408  
Telephone: (561) 304-5662  
Facsimile: (561) 691-7135

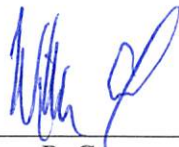
By: \_\_\_\_\_

  
William P. Cox  
Fla. Bar No. 0093531

**CERTIFICATE OF SERVICE**  
**Docket No. 150263-EI**

I **HEREBY CERTIFY** that a true and correct copy of the foregoing(\*) has been furnished by electronic mail on this 11th day of January 2016 to the following:

Leslie Ames, Esq.  
Lee Eng Tang, Esq.  
Office of General Counsel  
Florida Public Service Commission  
2540 Shumard Oak Blvd.  
Tallahassee, FL 32399-0850  
lames@psc.state.fl.us  
ltan@psc.state.fl.us

By:   
\_\_\_\_\_  
William P. Cox  
Fla. Bar No. 0093531

\* 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**

## Load Flow Results Without the DRP

Page A.1 of Appendix A provides a "Load Flow Diagram Key" to assist in interpreting the load flow maps contained in Appendices A and B. Page A.2 shows a load flow output diagram of the 2018 winter peak load condition without the DRP in-service. The diagram represents what is called the base case scenario or normal condition (*i.e.*, no contingencies) for the year 2018/19 winter peak load. The diagram shows that all facilities are operating within normal equipment ratings (*i.e.*, no overloads or low voltages).

In accordance with NERC Reliability Standards TPL-003-0 - System Performance Following Loss of Two or More Bulk Electric System Elements (Category C) and TPL-001-4 – Transmission System Planning Performance Requirements, Table 1 (Steady State & Stability Performance Planning Events) Categories P1 through P6, effective January 1, 2016), FPL must have a valid assessment and corrective plan to ensure that reliable systems are developed to meet specified performance requirements.

Page A.3 shows the power flows without the DRP in 2018 assuming the loss of the [REDACTED] and [REDACTED] line sections of the [REDACTED] and [REDACTED] lines. This results in the [REDACTED] line section loading to as high as [REDACTED] of its [REDACTED] amp thermal rating (see Attachment 8). This would potentially require interruption of service to approximately [REDACTED] customers in 2018 to reduce loading on this line to acceptable levels.



Page A.4 shows the flows without the DRP in 2018 assuming the loss of the [REDACTED] [REDACTED] and [REDACTED] line sections of the [REDACTED] [REDACTED] and [REDACTED] lines. This would potentially require interruption of service to approximately [REDACTED] customers in 2018 to reduce loading on this line to acceptable levels.

In addition, Pages A.5 through A.13 show overloads ranging from 121% to a high of 164% (See Attachment 8) of the thermal SOL<sup>1</sup> has MVA facility rating or voltages below 0.95 per unit caused by any of the following contingencies:

[REDACTED]	(Page A.5)
[REDACTED]	(Page A.6)
[REDACTED]	(Page A.7)
[REDACTED]	(Page A.8)
[REDACTED]	(Page A.9)
[REDACTED]	(Page A.10)
[REDACTED]	(Page A.11)
[REDACTED]	(Page A.12)
[REDACTED]	(Page A.13)

In order to mitigate the overloads and low voltages shown on Pages A.5 through A.13, it would potentially be necessary to interrupt the service of approximately [REDACTED] to up to [REDACTED] customers (approximately [REDACTED] to [REDACTED] people) depending on the specific outage.

Load Flow Results – With the DRP

<sup>1</sup> SOL (System Operating Limits): The value (such as MW, MVar, Amperes, Frequency or Volts) that satisfies the most limiting of the prescribed operating criteria for a specified system configuration to ensure operation within acceptable reliability criteria. System Operating Limits are based upon certain operating criteria.

Page A.14 is a loadflow output diagram showing 2018 winter peak conditions with the DRP in-service. The construction of the DRP provides a new 230 kV injection to reinforce the existing 115 kV network between Baldwin, Columbia, and Bradford Substations.

Page A.15 shows that with the DRP in-service, the loss of the [REDACTED] [REDACTED] and [REDACTED] line sections does not result in the overloading of any transmission facility and an adequate voltage profile is maintained. This is due to the reinforcement of the existing transmission network provided by the DRP.

Page A.16 shows that with the DRP in service, the loss of the [REDACTED] [REDACTED] and [REDACTED] line sections does not result in the overloading of any transmission facility and an adequate voltage profile is maintained. Again, this is due to the transmission network reinforcement provided by the DRP.

Pages A.17 through A.25 show that with the DRP in service, the same or similar contingencies shown on Pages A.5 through A.13 (See Attachment 8) will not cause overloads or low voltage conditions at any of the transmission facilities in the Project Service Area.

#### C. Project Benefits

The construction of the DRP provides the following benefits to the Project Service Area:

- Maintains reliability by providing an independent 230 kV injection to the existing 115 kV network.

**Raven-Duval Transmission Line  
Appendix A to Exhibit A of the Petition  
A.2 - A. 25  
ARE CONFIDENTIAL IN  
THEIR ENTIRETY**

**Raven-Duval Transmission Line  
Appendix B to Exhibit A of the Petition  
B.1 - B.12  
ARE CONFIDENTIAL IN  
THEIR ENTIRETY**

**Raven-Duval Transmission Line  
Attachment 4 to Exhibit A of the  
Petition**

**IS CONFIDENTIAL IN  
THEIR ENTIRETY**

**Raven-Duval Transmission Line  
Attachment 8 to Exhibit A of the  
Petition**

**IS CONFIDENTIAL IN  
THEIR ENTIRETY**

**Raven-Duval Transmission Line  
Exhibit FP-3 Contingency to Francisco  
Prieto's Pre-filed Direct Testimony  
IS CONFIDENTIAL IN  
THEIR ENTIRETY**

# **EXHIBIT C**

## **JUSTIFICATION TABLE**



**EXHIBIT C**

**COMPANY:** Florida Power & Light Company  
**TITLE:** List of Confidential Documents  
**DOCKET TITLE:** Petition for Duval-Raven Transmission Line  
**DOCKET NO.:** 150263  
**DATE:** January 11, 2016

<b>Description</b>	<b>Page Number</b>	<b>Conf. Y/N</b>	<b>Line/Column</b>	<b>366.093(3) F.S.</b>	<b>Affiant</b>
Exhibit A to the Petition	11	Y	Line 1a, 1b Line 2a, 2b Line 3a, 3b, 3c Line 4a	(c)	Frank Prieto
Exhibit A to the Petition	12	Y	Line 1a, Line 2a, 2b, 2c Line 3a, 3b Line 4a Line 5a Line 6a Line 7a Line 8a Line 9a Line 10a Line 11a Line 12a Line 13a Line 14a, 14b Line 15a, 15b	(c)	Frank Prieto
Exhibit A to the Petition	13	Y	Line 1a Line 2a, 2b Line 3a Line 4a, 4b	(c)	Frank Prieto
Attachment 4 – Transmission Facilities Map	N/A	Y	ALL	(c)	Frank Prieto
Attachment 8 – Load Flow Summary Table	N/A	Y	ALL	(c)	Frank Prieto

**EXHIBIT C**

**COMPANY:** Florida Power & Light Company  
**TITLE:** List of Confidential Documents  
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<b>Description</b>	<b>Page Number</b>	<b>Conf. Y/N</b>	<b>Line/Column</b>	<b>366.093(3) F.S.</b>	<b>Affiant</b>
Exhibit A to the Petition	11	Y	Line 1a, 1b Line 2a, 2b Line 3a, 3b, 3c Line 4a	(c)	Frank Prieto
Exhibit A to the Petition	12	Y	Line 1a, Line 2a, 2b, 2c Line 3a, 3b Line 4a Line 5a Line 6a Line 7a Line 8a Line 9a Line 10a Line 11a Line 12a Line 13a Line 14a, 14b Line 15a, 15b	(c)	Frank Prieto
Exhibit A to the Petition	13	Y	Line 1a Line 2a, 2b Line 3a Line 4a, 4b	(c)	Frank Prieto
Attachment 4 – Transmission Facilities Map	N/A	Y	ALL	(c)	Frank Prieto
Attachment 8 – Load Flow Summary Table	N/A	Y	ALL	(c)	Frank Prieto

<b>Description</b>	<b>Page Number</b>	<b>Conf. Y/N</b>	<b>Line/Column</b>	<b>366.093(3) F.S.</b>	<b>Affiant</b>
Exhibit FP-3 - Contingencies	N/A	Y	ALL	(c)	Frank Prieto
Load Flow Diagrams – Without Duval-Raven Project	A.2 - A.13	Y	All	(c)	Frank Prieto
Loan Flow Diagrams – With Duval-Raven Project	A.14 – A.25	Y	All	(c)	Frank Prieto
Load Flow Diagrams - Alternative 1	B.1-B.12	Y	All	(c)	Frank Prieto

**EXHIBIT D**

**AFFIDAVIT**

**EXHIBIT D**

**BEFORE THE  
FLORIDA PUBLIC SERVICE COMMISSION**

In re: Petition for determination of need for Duval-Raven 230 kV transmission line in Baker, Columbia, Duval, and Nassau Counties, by Florida Power & Light Company.

Docket No. 150263-EI

Filed: January 11, 2016

STATE OF FLORIDA            )  
  )  
COUNTY OF MIAMI-DADE    )

**AFFIDAVIT OF FRANCISCO PRIETO**

**BEFORE ME**, the undersigned authority, personally appeared Francisco Prieto who, being first duly sworn, deposes and says:

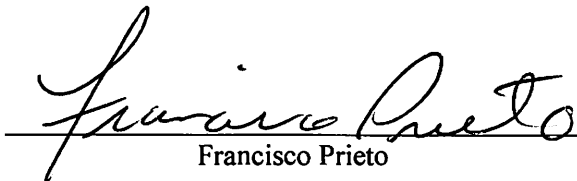
1. My name is Francisco Prieto. I am currently employed by Florida Power & Light Company ("FPL") as Senior Manager, System Planning in the Transmission Services and Planning department. My business address is 4200 W. Flagler Street, Miami, Florida 33134. I have personal knowledge of the matters stated in this affidavit.

2. With respect to Exhibit C, I have reviewed the documents that are included in Exhibit A to FPL's Request for Confidential Classification for which I am listed as the affiant. Such documents or materials that I have reviewed and which, in whole or in part, are asserted by FPL to be proprietary confidential business information, as defined under Section 366.093(3), Florida Statutes, contain or constitute information related to security measures, systems, and procedures.

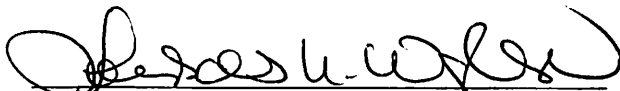
3. Specifically, the information contains or constitutes critical energy infrastructure information, as defined in Section 388.113 of the Code of Federal Regulations (18 C.F.R. §388.113). The information provides details regarding the specific configuration of FPL's transmission facilities and length and magnitude of potential outages depending on the occurrence of certain severe or catastrophic events. This information related to the transmission of energy should be protected because it could be useful to a person planning an attack on critical infrastructure, as it provides detailed information on specific transmission line segments. To the best of my knowledge, FPL has maintained the confidentiality of these documents and materials.

4. Consistent with the provisions of the Florida Administrative Code, such materials should remain confidential for a period of not less than 18 months. These materials 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.

5. Affiant says nothing further.

  
Francisco Prieto

**SWORN TO AND SUBSCRIBED** before me this 11<sup>th</sup> day of January 2016, by Francisco Prieto, who is personally known to me or who has produced \_\_\_\_\_ (type of identification) as identification and who did take an oath.

  
Notary Public, State of Florida  
My Commission Expires:

