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March 2, 2016

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
2016 MAR -2 PM 1:49
COMMISSION
CLERK

Re: Docket No. 150265-EI

REDACTED

Dear Ms. Stauffer:

I enclose for filing in the above docket Florida Power & Light Company's ("FPL's") Request for Confidential Classification of certain information provided in response to Staff's data request. The request includes Exhibits A, B (two copies), C and D.

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 the declaration in support of FPL's Request for Confidential Classification.

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

Sincerely,



Maria J. Moncada

Enclosure
cc: Devlin Higgins

COM _____
AFD _____
APA _____
ECO Redacted
ENG _____
GCL _____
IDM _____
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3822454

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Petition of Florida Power & Light Company
for Approval of its 2015 Nuclear Decommissioning
Study

Docket No: 150265-EI

Date: March 2, 2016

**FLORIDA POWER & LIGHT COMPANY'S REQUEST FOR
CONFIDENTIAL CLASSIFICATION OF CERTAIN MATERIAL PROVIDED
IN RESPONSE TO STAFF'S FIRST DATA REQUEST (Nos. 7, 79, 81, 83 and 84)**

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 material provided in response to the Staff of the Florida Public Service Commission's ("Staff") data request. In support of this request, FPL states as follows:

1. On February 1, 2016, Staff served its data request on FPL. FPL's responses to Staff's data request Nos. 7, 79, 81 83 and 84 ("Confidential Responses") 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 Staff's data request on March 2, 2016. This request is being filed contemporaneously with the service of FPL's responses to Staff's data request in order to request confidential classification of the Confidential 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 the confidential documents, on which all information that is entitled to confidential treatment under Florida law has been highlighted.

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.

Where entire pages of a work paper are confidential, FPL has included only identifying cover pages in Exhibit B.

c. Exhibit C is a table that identifies the specific line, field or page references to the confidential materials for which FPL seeks confidential treatment. The table also describes the confidential documents, references the specific statutory bases for confidentiality and the declarant who supports the requested classification.

d. Exhibit D is the declaration of Lisa Fuca.

4. FPL submits that the highlighted information in Exhibit A is proprietary confidential business information within the meaning of Section 366.093(3). 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 determines 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.

5. As more fully described in the declaration included in Exhibit D indicates, certain documents provided by FPL contain information concerning bids or other contractual data, the disclosure of which would impair the efforts of FPL to contract for goods or services on favorable terms. This information is protected by Section 366.093(3)(d), Fla. Stat.

6. Also, certain documents contain information relating to competitive interests, the disclosure of which would impair the competitive business of FPL and its vendors. This information is protected by Section 366.093(3)(e), Fla. Stat.

7. Upon a finding by the Commission that the information highlighted in Exhibit A, and referenced in Exhibit C, 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* § 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. 150265-EI

I HEREBY CERTIFY that a true and correct copy of the foregoing Request for Confidential Classification* has been furnished by electronic service this 2nd day of March 2016 to the following:

Kyesha Mapp
Devlin Higgins
dhiggins@psc.state.fl.us
Florida Public Service Commission
2540 Shumard Oak Blvd.
Tallahassee, FL 32399
kmapp@psc.state.fl.us

By: 
Maria J. Moneada

* 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

CONFIDENTIAL

Florida Power & Light Company
Docket No. 150265-EI
Staff's First Data Request
Request No. 7
Page 1 of 1

REDACTED

1 QUESTION:

- 2 The following request relates to ISFSI capital and operations & maintenance (O&M) costs.
- 3 a. Has FPL recovered any ISFSI costs through the Environmental Cost Recovery Clause
 - 4 (ECRC)?
 - 5 b. If the response to (a.) is affirmative, have any ISFSI capital costs been recovered
 - 6 through the ECRC?
 - 7 c. If the response to (a.) is affirmative, what, if any, operating and maintenance costs
 - 8 have been recovered through the ECRC?
 - 9 d. How do such costs identified in (a.) differ from the costs included in FPL's 2015
 - 10 Decommissioning Study?
 - 11 e. Please identify the number of ISFSIs in FPL's cost estimates that it anticipates for
 - 12 each site.
 - 13 f. Please identify the annual costs, excluding labor, used for O&M of the spent fuel pool
 - 14 and the ISFSI, respectively.
 - 15 g. Please identify the unit cost used for pricing internal multi-purpose canisters for use
 - 16 with the ISFSIs. Please identify the source for the unit cost.

17 RESPONSE:

- 18 a. No, FPL has not recovered any Independent Spent Fuel Storage Installation ("ISFSI") costs
- 19 through its ECRC Clause. FPL's ISFSI capital and operating and maintenance costs incurred
- 20 during plant operations are recovered as a component of base rates.
- 21 b. Not applicable.
- 22 c. Not applicable.
- 23 d. Not applicable.
- 24 e. FPL's 2015 decommissioning studies assume there is one ISFSI at each site, Turkey Point and
- 25 St. Lucie, which will accommodate the spent fuel from both units in each site.
- 26 f. The annual amount, excluding labor, used for operations and maintenance of the spent fuel
- 27 pool was estimated at approximately \$918,000 per unit at each site. The annual amount,
- 28 excluding labor, used for operations and maintenance of the ISFSI at each site was estimated at
- 29 approximately \$113,000 per site. These amounts include a 15 percent contingency.
- 30 g. The unit costs used for the internal dry shielded canister and the horizontal storage module are
- 31 [REDACTED]^a and [REDACTED]^b respectively. The costs are based upon a 2014 contract with
- 32 Transnuclear and do not include any contingency.

**2015 Decommissioning Study
FPL's response to
Data Request No. 79-Attachment 1**

**Energy Solutions
Life-of-Plant Disposal Agreement
IS CONFIDENTIAL IN ITS ENTIRETY**

**2015 Decommissioning Study
FPL's response to
Data Request No. 81-Attachment 1**

**Environmental Service Agreement
IS CONFIDENTIAL IN ITS ENTIRETY**

A B C D E F G H I

CONFIDENTIAL

Florida Power & Light Company
 Docket No. 150265-ET
 Staff's First Data Request
 Request No. 83
 Attachment No. 1
 Page 1 of 2

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St. Lucie

Local Union	Start	End	Title	ST	OT	Base Rate	Wrap Ups
Asbestos Worker						1.36	
						1.56	
						1.63	
Boilermaker						1.11	
						1.32	
						1.40	
Carpenter						1.03	
						1.15	
						1.19	
Electrician						1.26	
						1.39	
						1.45	
Iron Worker						1.21	
						1.33	
						1.45	
Laborer						0.84	
						0.88	
						0.94	
Millwright						1.18	
						1.26	
						1.30	
Operating Engineer						1.29	
						1.27	
						1.40	
Painter						1.09	
						1.13	
						1.19	
Pipe Fitter						1.29	
						1.45	
						1.50	
Sheet metal						1.10	
						1.21	
						1.32	
Teamsters						1.04	
						1.24	
						1.37	

CONFIDENTIAL

**Florida Power & Light Company
Docket No. 150265-EI
Staff's First Data Request
Request No. 83
Attachment No. 1
Page 2 of 2**

1 Rates include the following costs:

2	Union Fringe Benefits	varies by position	
3	FICA	7.65%	
4	FUI	0.6%	
5	SUI	5.4%	
6	General Liability	2%	
7	Overhead		A
8	Fee (Profit)		A
9			A
10	Wrap Up Insurance		A

**2015 Decommissioning Study
FPL's response to
Data Request No. 83- Attachment 2**

**St. Lucie-Proposal Rate Schedule
Detail Report
IS CONFIDENTIAL IN ITS ENTIRETY**

CONFIDENTIAL

**Florida Power & Light Company
Docket No. 150265-EI
Staff's First Data Request
Request No. 84
Attachment No. 1
Page 2 of 2**

1 Rates include the following costs:

2	Union Fringe Benefits	varies by position	
3	FICA	7.65%	
4	FUI	0.6%	
5	SUI	5.4%	
6	General Liability	2%	
7	Overhead		A
8	Fee (Profit)		A
9			A
10	Wrap Up Insurance		A

**2015 Decommissioning Study
FPL's response to
Data Request No. 84-Attachment 2**

**Turkey Point-Proposal
Rate Schedule Detail Report
IS CONFIDENTIAL IN ITS ENTIRETY**

EXHIBIT C

JUSTIFICATION TABLE

EXHIBIT C

COMPANY: Florida Power & Light Company
TITLE: List of Confidential Documents
DOCKET TITLE: 2015 Nuclear Decommissioning Study
DOCKET NO: 150265-EI
DATE: March 2, 2016

Data Request No.	Description	No. of Pages	Conf. Y/N	Line No./ Col No.	Florida Statute 366.093(3) Subsection	Affiant
7	FPL's Response to Staff's First Data Request No. 7	1	Y	Line 31a, 31b	(d), (e)	Lisa Fuca
79	Attachment No. 1- Energy Solutions Life-of-Plant Disposal Agreement	27	Y	ALL	(d), (e)	Lisa Fuca
81	Attachment No. 1- Environmental Service Agreement	22	Y	ALL	(d), (e)	Lisa Fuca
83	Attachment No. 1-St. Lucie Craft Labor including Wrap Up	2	Y	Pg. 1, Lns. 4b-i, 5b-i, 6b-i, 10b-i, 11b-i, 12b-i, 16b-i, 17b-i, 18b-i, 22b-i, 23b-i, 24b-i, 28b-i, 29b-i, 30b-i, 34b-i, 35b-i, 36b-i, 40b-i, 41b-i, 42b-i, 46b-i, 47b-i, 48b-i, 49b-i, 53b-i, 54b-i, 55b-i, 59b-i, 60b-i, 61b-i, 65b-i, 66b-i, 67b-i, 71b-i, 72b-i, 73b-i Pg. 2, Lns. 7a, 8a, 9a, 10a	(d), (e)	Lisa Fuca
83	Attachment No. 2-St. Lucie Proposal Rate Schedule Detail Report	107	Y	ALL	(d), (e)	Lisa Fuca
84	Attachment No. 1-Turkey Point Craft Labor including Wrap Up	2	Y	Pg. 1, Lns. 4b-i, 5b-i, 6b-i, 9b-i, 10b-i, 11b-i, 14b-i, 15b-i, 16b-i, 19b-i, 20b-i, 21b-i, 24b-i, 25b-i, 26b-i, 29b-i, 30b-i, 31 b-i, 34b-i, 35b-i, 36b-i, 39b-i, 40b-i, 41b-i, 42b-i, 45b-i, 46b-i, 47b-i, 50b-i, 51b-i, 52b-i, 55b-i, 56b-i, 57b-i, 60b-i, 61b-i, 62b-i Pg. 2, Lns. 7a, 8a, 9a, 10a	(d), (e)	Lisa Fuca
84	Attachment No. 2-Turkey Point Proposal Rate Schedule Detail Report	111	Y	ALL	(d), (e)	Lisa Fuca

EXHIBIT D

DECLARATION

FIRST REVISED EXHIBIT D

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: 2015 Nuclear Decommissioning Study,
Staff's First Data Request

Docket No: 150265-EI

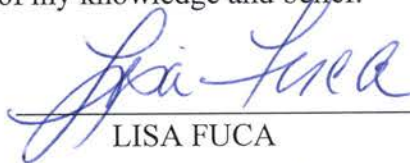
STATE OF FLORIDA)
)
COUNTY OF PALM BEACH)

WRITTEN DECLARATION OF **LISA FUCA**

1. My name is Lisa Fuca. I am currently employed by Florida Power & Light Company ("FPL") as Principal Business Analyst, Nuclear Business Operations. I have personal knowledge of the matters stated in this written declaration.

2. I have reviewed the documents referenced and incorporated in FPL's Request for Confidential Classification of Responses to Staff's First Data Request Nos. 7, 79, 81, 83 and 84. The documents or materials that I have reviewed and which are asserted by FPL to be proprietary confidential business information constitute contractual information, the disclosure of which would impair the efforts of FPL to contract for goods and services on favorable terms. These documents or materials also contain or constitute information relating to the competitive interests of FPL and its vendors, the disclosure of which would impair the competitive interests of FPL and its vendors. Specifically, the materials also include negotiated contracts between FPL and third parties, which contain express terms that require the material be kept confidential. Other documents contain negotiated contract labor rates submitted to FPL as part of a confidential bidding process. In order to continue to encourage participation from vendors and to obtain the best prices for the benefit of its customers, it is important that vendor bids be kept confidential. In particular, to the best of my knowledge, FPL has maintained the confidentiality of these documents and materials.

3. Under penalties of perjury, I declare that I have read the foregoing declaration and that the facts stated in it are true to the best of my knowledge and belief.



LISA FUCA

Date: 3/1/16