FILED AUG 17, 2016 DOCUMENT NO. 06787-16 FPSC - COMMISSION CLERK



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August 17, 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

Re: Docket Nos. 160021-EI, 160061-EI, 160062-EI, 160088-EI

Dear Ms. Stauffer:

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

Exhibit A consists of the confidential document, and all the information that FPL asserts is entitled to confidential treatment has been highlighted. Exhibit B consists of the cover page that identifies the Confidential Discovery Response. Because the page of the Confidential Discovery Response is confidential in its entirety, no purpose would be served by producing a redacted copy. 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.

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

Sincerely oncada Maria

Enclosure

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

COM _____ AFD _ _ ___ ECO _____ ENG _____ GCL _____ IDM _____ TEL ____ CLK

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Petition for rate increase by Florida Power & Light Company	Docket No. 160021-EI
In re: Petition for approval of 2016-2018 storm hardening plan, by Florida Power & Light Company	Docket No. 160061-EI
In re: 2016 depreciation and dismantlement study by Florida Power & Light Company	Docket No. 160062-EI
In re: Petition for limited proceeding to modify and continue incentive mechanism by Florida	Docket No. 160088-EI
Power & Light Company	Filed: August 17, 2016

FLORIDA POWER & LIGHT COMPANY'S SEVENTH REQUEST FOR CONFIDENTIAL CLASSIFICATION OF INFORMATION PROVIDED IN RESPONSE TO DISCOVERY

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 discovery requests ("Confidential Discovery Response") propounded by Staff of the Florida Public Service Commission ("Staff"). In support of its Request, FPL states as follows:

1. The Florida Public Commission Staff has requested that FPL provide copies of documents that FPL produced in response to Staff's Thirty-Second Set of Interrogatories (No. 401).

2. The following exhibits are included with and made a part of this request:

a. Exhibit A consists of a copy of the Confidential Discovery Response.

b. Exhibit B consists of the cover page that identifies the Confidential Discovery Response. Because the page of the Confidential Discovery Response is confidential in its entirety, no purpose would be served by producing a redacted copy.

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c. Exhibit C is a table containing an identification of the document provided in Exhibit A. Exhibit C also references the specific statutory bases for the claim of confidentiality and identifies the declarant who supports of the requested classification.

d. Exhibit D contains the declaration of Sam Forrest in support of this Request.

3. 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 harm of disclosure against the public interest in access to the information.

4. As described more fully in the declaration included as Exhibit D, the Confidential Discovery Response provided by FPL relate to 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.

5. The Confidential Discovery Response also relates to competitive interests, the disclosure of which would impair the competitive business of the provider of the information. This information is protected by Section 366.093(3)(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

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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 declarations 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 Senior Attorney Florida Power & Light Company 700 Universe Boulevard Juno Beach, FL 33408 Telephone: (561) 304-5795 Facsimile: (561) 691-7135 Email: maria.moncada@pl.com

By:

Maria J. Moncada Florida Bar No. 0773301

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing Request for Confidential Classification has been furnished by electronic mail this <u>17th</u> day of August 2016 to the following parties:

Suzanne Brownless Florida Public Service Commission 2540 Shumard Oak Boulevard Tallahassee, FL 32399-1400 sbrownle@psc.state.fl.us **Office of the General Counsel Florida Public Service Commission**

Jon C. Moyle, Jr. Karen A. Putnal Moyle Law Firm, PA 118 North Gadsden Street Tallahassee, FL 32301 jmoyle@moylelaw.com kputnal@moylelaw.com Attorneys for Florida Industrial Power Users Group

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Nathan A. Skop, Esq. 420 NW 50th Blvd. Gainesville, FL 32607 n_skop@hotmail.com Attorney for Daniel R. Larson and Alexandria Larson

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.

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EXHIBIT A

CONFIDENTIAL FILED UNDER SEPARATE COVER

EXHIBIT B

REDACTED COPIES

FPL's response to Staff's 32nd Request for Interrogatory No. 401 Bates Nos. STAFF 000986 is confidential in its entirety.

EXHIBIT C

JUSTIFICATION TABLE

EXHIBIT C

COMPANY:Florida Power & Light CompanyTITLE:List of Confidential DocumentsDOCKET NO:160021-EIDOCKET TITLE:Petition for Increase in Rates by Florida Power & Light CompanyDATE:August 17, 2016

Discovery Set	ltem No.	Conf. Y/N	Bates Number	Line/ Column	Florida Statute 366.093(3) Subsection	Declarant
Staff's Thirty-Second Set of Interrogatories	401	Y	STAFF 000986	ALL	(d), (e)	Sam Forrest

EXHIBIT D

DECLARATION

EXHIBIT D

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Petition for rate increase by Florida Power & Light Company Docket No: 160021-EI

DECLARATION OF SAM FORREST

STATE OF FLORIDA

COUNTY OF PALM BEACH

y name is Sam Forrest. I am currently employed by Florida Power & Lia

1. My name is Sam Forrest. I am currently employed by Florida Power & Light Company ("FPL") as Vice President of the Energy Marketing and Trading Business Unit. I have personal knowledge of the matters stated in this written declaration.

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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 information relating to competitive interests contain financial details related to FPL's asset optimization activities for natural gas storage. The disclosure of this information would impair FPL's ability to execute transactions for natural gas storage on favorable terms for the benefit of its customers, would impair the competitive interests of FPL and its vendors, and would place FPL at a competitive disadvantage when coupled with other information that is publicly available. The information provided by FPL also contains or constitutes contractual data, the disclosure of which would impair the efforts of FPL to contract for goods or services on favorable terms. To the best of my knowledge, FPL has maintained the confidentiality of this information.

3. Consistent with the provisions of the Florida Administrative Code, such materials should remain confidential for a period of eighteen (18) months. In addition, the 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.

4. 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.

SAM FORREST Date: AUG 15, 2016