

John T. Butler
Assistant General Counsel - Regulatory
Florida Power & Light Company
700 Universe Boulevard
Juno Beach, FL 33408-0420
(561) 304-5639
(561) 691-7135 (Facsimile)
Email: John.Butler@fpl.com

November 2, 2016

VIA HAND DELIVERY

Ms. Carlotta S. Stauffer
Division of the Commission Clerk and
Administrative Services
Florida Public Service Commission
Betty Easley Conference Center, Room 110
2540 Shumard Oak Boulevard
Tallahassee, Florida 32399-0850

COMMISSION

Re: Florida Power & Light Company's Request for Confidential Classification of Certain Material Provided in Connection with the Monthly Fuel Filings

Docket No. 160001-EI

Dear Ms. Stauffer:

I enclose for filing in the above-referenced matter Florida Power & Light Company's ("FPL") Request for Confidential Classification. The Request includes Attachments A, B, and C.

Attachment A contains the confidential information that is the subject of FPL's Request for Confidential Classification. Attachment A is submitted for filing separately and marked "ATTACHMENT A – CONFIDENTIAL." Attachment B is an edited version of Attachment A, in which the information FPL asserts is confidential has been redacted. Attachment C contains FPL's justification for its request for confidential classification.

In accordance with Rule 25-22.006(3)(d), FPL requests confidential treatment of the information in Attachment A pending disposition of FPL's request for Confidential Classification.

Please contact me should you or your Staff have any questions regarding this filing.

REDACTED

John T. Butler

Enclosures

cc: parties of record (w/Request for Confidential Classification)

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Fuel and purchased power cost recovery clause with generating performance incentive factor

Docket No. 160001-EI Date: November 2, 2016

REQUEST FOR CONFIDENTIAL CLASSIFICATION

Pursuant to Section 366.093, Florida Statutes ("Section 366.093"), and Rule 25-22.006, Florida Administrative Code, Florida Power & Light Company ("FPL") hereby requests confidential classification of certain information on Florida Public Service Commission ("FPSC" or "Commission") Forms 423-1(a), 423-2, 423-2(a) and 423-2(b) for July/June, August/July and September/August submitted in Docket No. 160001-EI. In support of this request, FPL states as follows:

1. Petitioner's principal business address is as follows:

Florida Power & Light Company 700 Universe Boulevard Juno Beach, Florida 33408

Orders, notices, or other pleadings related to this request should be served on:

Kenneth A. Hoffman Vice President Regulatory Affairs Florida Power & Light Company 215 S. Monroe Street, Suite 810 Tallahassee, FL 32301-1858 (850) 521-3919 (850) 521-3939 Fax

Email: Ken.Hoffman@fpl.com

John T. Butler
Assistant General Counsel - Regulatory
Florida Power & Light Company
700 Universe Boulevard
Juno Beach, FL 33408-0420
(561) 304-5639
(561) 691-7135 Fax
Email: John.Butler@fpl.com

- 2. The following attachments are included herewith and made a part hereof:
 - a. Attachment A includes the complete and unedited version of Florida Power & Light Company's (FPL) July, August and September 2016 Form 423-1(a), St. Johns River Power Park's (SJRPP) July, August and September 2016 Forms 423-2, 423-2(a) and 423-2(b) and R.W. Scherer's (Plant Scherer) June, July and August 2016 Forms 423-2, 423-2(a) and 423-2(b) which contain certain information that FPL asserts should be accorded confidential treatment. The information in Attachment A for which FPL seeks confidential classification has been highlighted. Attachment A is submitted separately in a sealed envelope marked "CONFIDENTIAL."
 - b. Attachment B is the edited version of Attachment A. All information that FPL asserts is entitled to confidential treatment has been redacted in Attachment B.
 - c. Attachment C identifies information for which confidential treatment is sought and, with regard to each item or type of information, contains a brief statement that explains the need for confidentiality and refers to the specific statutory basis or bases for the request.
- 3. Pursuant to section 366.093, FPL seeks confidential protection for the information highlighted in Attachment A. FPL submits that such information is proprietary confidential business information within the meaning of section 366.093(3). Pursuant to section 366.093, such materials are entitled to confidential treatment and are 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.
- 4. The statutory bases and support for FPL's assertion of confidentiality with regard to specific items or types of information are set forth in Attachment C. The information for which confidential classification is sought is intended to be and is treated by FPL as confidential and, to the best of FPL's knowledge and belief, has not been publicly disclosed.

5. Upon a finding by the Commission that the material in Attachment A for which FPL seeks confidential treatment is proprietary confidential business information within the meaning of section 366.093(3), pursuant to section 366.093(4) such materials should not be declassified for eighteen (18) months, or as otherwise extended by the Commission. Further, the materials should be returned to FPL as soon as the information is no longer necessary for the Commission to conduct its business.

WHEREFORE, for the above and foregoing reasons, including those set forth in the supporting materials 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 Florida Power & Light Company 700 Universe Boulevard

Juno Beach, Florida 33408-0420 Tel.: (561) 304-5639

Fax: (561) 691-7135 Email: John.Butler@fpl.com

John T. Butler

Florida Bar No. 283479

CERTIFICATE OF SERVICE

Docket No. 160001-EI

I, THE UNDERSIGNED COUNSEL, HEREBY CERTIFY that a copy of Florida Power & Light Company's Request for Confidential Classification, without attachments,* has been served via electronic mail this 2nd day of November, 2016:

Danijela Janjic, Esq.
Suzanne Brownless, Esq.
Division of Legal Services
Florida Public Service Commission
2540 Shumard Oak Blvd.
Tallahassee, Florida 32399-0850
djanjic@psc.state.fl.us
sbrownle@psc.state.fl.us

Beth Keating, Esq.
Gunster Law Firm
Attorneys for Florida Public Utilities Corp.
215 South Monroe St., Suite 601
Tallahassee, Florida 32301-1804
bkeating@gunster.com

James D. Beasley, Esq.
J. Jeffrey Wahlen, Esq.
Ashley M. Daniels, Esq.
Ausley & McMullen
Attorneys for Tampa Electric Company
P.O. Box 391
Tallahassee, Florida 32302
jbeasley@ausley.com
jwahlen@ausley.com
adaniels@ausley.com

Robert Scheffel Wright, Esq.
John T. LaVia, III, Esq.
Gardner, Bist, Wiener, et al
Attorneys for Florida Retail Federation
1300 Thomaswood Drive
Tallahassee, Florida 32308
schef@gbwlegal.com
jlavia@gbwlegal.com

Andrew Maurey
Michael Barrett
Division of Accounting and Finance
Florida Public Service Commission
2540 Shumard Oak Blvd.
Tallahassee, Florida 32399-0850
amaurey@psc.state.fl.us
mbarrett@psc.state.fl.us

Dianne M. Triplett, Esq.
Attorneys for Duke Energy Florida
299 First Avenue North
St. Petersburg, Florida 33701
dianne.triplett@duke-energy.com

Jeffrey A. Stone, Esq.
Russell A. Badders, Esq.
Steven R. Griffin, Esq.
Beggs & Lane
Attorneys for Gulf Power Company
P.O. Box 12950
Pensacola, Florida 32591-2950
jas@beggslane.com
rab@beggslane.com
srg@beggslane.com

James W. Brew, Esq. .
Laura A. Wynn, Esq.
Attorneys for PCS Phosphate - White Springs
Stone Mattheis Xenopoulos & Brew, PC
1025 Thomas Jefferson Street, NW
Eighth Floor, West Tower
Washington, DC 20007-5201
jbrew@smxblaw.com
laura.wynn@smxblaw.com

Robert L. McGee, Jr. Gulf Power Company One Energy Place Pensacola, Florida 32520 rlmcgee@southernco.com

Matthew R. Bernier, Esq. Duke Energy Florida 106 East College Avenue, Suite 800 Tallahassee, Florida 32301 matthew.bernier@duke-energy.com

J. R. Kelly, Esq.
Patricia Christensen, Esq.
Charles Rehwinkel, Esq.
Office of Public Counsel
c/o The Florida Legislature
111 West Madison Street, Room 812
Tallahassee, Florida 32399
kelly.jr@leg.state.fl.us
christensen.patty@leg.state.fl.us
rehwinkel.charles@leg.state.fl.us

Mike Cassel, Director/Regulatory and Governmental Affairs Florida Public Utilities Company 911 South 8th Street Fernandina Beach, Florida 32034 mcassel@fpuc.com

Paula K. Brown, Manager Tampa Electric Company Regulatory Coordinator Post Office Box 111 Tampa, Florida 33601-0111 regdept@tecoenergy.com

Jon C. Moyle, Esq.
Moyle Law Firm, P.A.
Attorneys for Florida Industrial Power
Users Group
118 N. Gadsden St.
Tallahassee, Florida 32301
jmoyle@moylelaw.com

By:

John T. Butler

Fla. Bar No. 283479

*Copies of Exhibits B and C are available upon request.

5577336

ATTACHMENT "A"

CONFIDENTIAL FILED UNDER SEPARATE COVER

FPL FPSC FORM 423-1(a)

SJRPP FPSC FORMS

423-2

423-2 (a)

423-2 (b)

R.W. SCHERER FPSC FORMS

423-2

423-2 (a)

423-2 (b)

ATTACHMENT "B"

EDITED VERSION

FPL FPSC FORM 423-1(a)

SJRPP FPSC FORMS

423-2

423-2 (a)

423-2 (b)

R.W. SCHERER FPSC FORMS

423-2

423-2 (a)

423-2 (b)

Page 1 of 1

FPSC FORM NO. 423-1 (a)

- 1. REPORTING MONTH: JUL YEAR: 2016
- 2. REPORTING COMPANY: FLORIDA POWER LIGHT COMPANY

MONTHLY REPORT OF COST AND QUALITY OF FUEL OIL FOR ELECTRIC PLANTS DETAIL OF INVOICE AND TRANSPORTATION CHARGES

- NAME, TITLE TELEPHONE NUMBER OF CONTACT PERSON CONCERNING DATA SUBMITTED ON THIS FORM: TERRY KEITH, REGULATORY AFFAIRS, (305)-552-4334
- 4. SIGNATURE OF OFFICIAL SUBMITTING REPORT:

5. DATE COMPLETED: 10/27/2016

(A)	(B)	(C)	(D)	(E)	(F)	(G)	(H)	(1)	(J)	(K)	(L)	(M)	(N)	(O)	(P)	(Q)	(R)
LINE NO.	PLANT	SUPPLIER	DELIVERY	DELIVERY DATE	TYPE OIL	VOLUME (BBLS)		INVOICE AMOUNT (\$)		NET AMOUNT (\$)	NET PRICE (\$/BBL)	QUALITY ADJUST. (\$/BBL)	EFFECTIVE PUR PRICE (\$/BBL)		ADDITIONAL TRANS CHGS (\$/BBL)	OTHER CHGS (\$/BBL)	DELIVERED PRICE (\$/BBL)
1 PMR		FCT&M		07/31/2016	F06	198743			15.0					0.0000			45.2625
2 GFL		VALERO		07/21/2016	F03	4257)	0.0000			64.2573
3 GFL	Trans.	VALERO		07/28/2016	F03	35369								0,0000			63.8509
4 GFL		VALERO		07/29/2016	F03	1477				88				0.0000			64.3400
5 PMR		INDIANTOWN		07/08/2016	PRO	11								0.0000		:t	70.2000



FPSC Form No. 423-2

MONTHLT REPORT OF COAST AND QUALITY OF COAL FOR ELECTRIC PLANTS ORIGIN, TONNAGE, DELIVERED PRICE AND AS RECEIVED QUALITY

1. Report for Month/Year:

July 2016

4. Name, Title & Telephone Number of Contact

Person Concerning Date Submitted on this Form:

Terry Keith (305-552-4334)

2. Reporting Company:

Florida Power & Light

5. Signature of Official Submitting Report:

Jan Brockway

3. Plant Name:

St. Johns River Power Park (SJRPP)

6. Date Completed:

August 9, 2016

As Received Coal Quality

						Effective	Total	FOB				
				Transpor-		Purchase	Trans	Plant	Sulfur	Btu	Ash	Moisture
Line		Mine	Purchase	tation		Price	Cost	Price	Content	Content	Content	Content
No.	Supplier Name	Location	Type	Mode	Tons	(\$/Ton)	(\$/Ton)	(\$/Ton)	(%)	(Btu/lb)	(%)	(%)
(a)	(b)	(c)	(d)	(e)	(f)	(g)	(h)	(i)	(j)	(k)	(1)	(m)
1.	COAL MARKETING COMPANY	IM,999	LTC	oc	22,914			69.10	0.58	10,898	12.85	11.22
2.	SUNRISE COAL, LLC	IN,021	LTC	UR	5,379			90.07	0.79	10,900	9.41	16.32



FPSC Form No. 423-2 (a)

MONTHLT REPORT OF COAST AND QUALITY OF COAL FOR ELECTRIC PLANTS DETAIL OF INVOICE PURCHASE PRICE

1. Report for Month/Year:

July 2016

4. Name, Title & Telephone Number of Contact

Person Concerning Date Submitted on this Form:

Terry Keith (305-552-4334)

2. Reporting Company:

Florida Power & Light

5. Signature of Official Submitting Report:

Zen Broken

3. Plant Name:

St. Johns River Power Park (SJRPP)

6. Date Completed:

August 9, 2016

Line No.		Mine Location	Purchase Type	Tons	FOB Mine Price (\$/Ton)	Short Haul & Loading Charge	Original Invoice Price (\$/Ton)	Retro- active Price Increases (\$/Ton)	Base Price (\$/Ton)	Quality Adjust- ments (\$/Ton)	Effective Purchas Price (\$/Ton)
(a)	(b)	(c)	(d)	(e)	(f)	(g)	(h)	(i)	(j)	(k)	(1)
1.	COAL MARKETING COMPANY	IM,999	LTC	22,914		0.00		0.00		0.00	
2.	SUNRISE COAL, LLC	IN,021	LTC	5,379		0.00		0.00		0.00	





MONTHLT REPORT OF COAST AND QUALITY OF COAL FOR ELECTRIC PLANTS DETAIL OF TRANSPORTATION CHARGES

1. Report for Month/Year:

July 2016

4. Name, Title & Telephone Number of Contact

Person Concerning Date Submitted on this Form:

Terry Keith (305-552-4334)

2. Reporting Company:

Florida Power & Light

5. Signature of Official Submitting Report:

Jen Brockway

3. Plant Name:

St. Johns River Power Park (SJRPP)

6. Date Completed:

August 9, 2016

								Rail C	harges		Water	borne Ch	arges			
Line No.	Supplier Name	Mine Location	Shipping Point	Transpor- tation Mode	Tons	Effective Purchas Price (\$/Ton)	Short Haul & Loading Charge (\$/Ton)	Rail Rate (\$/Ton)	Other Rail Charges (\$/Ton)	River Barge Rate (\$/Ton)	Trans- loading Rate (\$/Ton)	Ocean Barge Rate (\$/Ton)	Other Water Charges (\$/Ton)	Related Charges (\$/Ton)	Total Transport Charges (\$/Ton)	FOB Plant Price (\$/Ton)
(a)	(b)	(c)	(d)	(e)	(f)	(g)	(h)	(i)	(j)	(k)	(1)	(m)	(n)	(o)	(p)	(q)
1.	COAL MARKETING COMPANY	IM,999	El Cerrejon	ОС	22,914		0.00		0.00	0.00	0.00	0.00	0.00	0.00		69.10
2.	SUNRISE COAL, LLC	IN,021	Ace in the Hole	UR	5,379		0.00		0.00	0.00	0.00	0.00	0.00	0.00		90.07





FPSC Form No. 423-2

MONTHLY REPORT OF COST AND QUALITY OF COAL FOR ELECTRIC PLANTS ORIGIN, TONNAGE, DELIVERED PRICE, AND AS RECEIVED QUALITY

1. Reporting Month:

June

Year:

2016

4. Name, Title & Telephone Number of Contact Person Concerning Data Submitted on this Form: Terry Keith

(305) 552-4334

2. Reporting Company:

FLORIDA POWER & LIGHT COMPANY

3. Plant Name:

Line

No.

(a)

(1)

(2)

(2)

R.W.SCHERER

6. Date Completed:

Jen Brockray

Supplier Name (b)	Mine Location (c)	Purchase Type (d)	Transport Mode (e)	Tons (f)	Purchase Price (\$/Ton) (g)	Effective Transport Charges (\$/Ton) (h)	Total FOB Plant Price (\$/Ton) (i)	Sulfur Content (%) (j)	Btu Content (Btu/lb) (k)	Ash Content (%) (I)	Moisture Content (%) (m)	
ARCH COAL SALES CO, INC	19/WY/5	S	UR	5,269.66			43.977	0.32	8,850	4.53	27.20	
ALPHA COAL SALES CO, LI	19/WY/5	S	UR	100,290.97			38.762	0.38	8,332	4.95	30.42	
COAL SALES, LLC	19/WY/5	S	UR	25,234.91			38.093	0.25	8,807	4.28	27.39	





FPSC Form No. 423-2(a)

MONTHLY REPORT OF COST AND QUALITY OF COAL FOR ELECTRIC PLANTS DETAILED PURCHASED COAL INVOICE INFORMATION

1. Reporting Month:

June

2016

4. Name, Title & Telephone Number of Contact Person Concerning Data Submitted on this Form: Terry Keith

Reporting Company:

FLORIDA POWER & LIGHT COMPANY

Year:

Plant Name:

R.W.SCHERER

5. Signature of Official Submitting Report: Sun Broukery
6. Date Completed: 29-Aug-16

Line No. (a)	Supplier Name (b)	Mine Location (c)	Purch. Type (d)	<u>Tons</u> (e)	FOB Mine Price (\$/Ton) (f)	Shorthaul & Loading Charges (\$/Ton) (g)	Original Invoice Price (\$/Ton) (h)	Retroactive Price Increase (\$/Ton) (i)	Base Price (\$/Ton)	Quality Adjustments (\$/Ton) (k)	Effective Purchase Price (\$/Ton)
(1)	ARCH COAL SALES CO, I	N-19/WY/5	S	5,269.66		0.161		-		0.183	
(2)	ALPHA COAL SALES CO,	L 19/WY/5	S	100,290.97		0.147		-		(0.096)	
(2)	COAL SALES, LLC	19/WY/5	S	25,234.91		0.149		-		0.010	





FPSC Form No. 423-2(b)

MONTHLY REPORT OF COST AND QUALITY OF COAL FOR ELECTRIC PLANTS DETAILED TRANSPORTATION INVOICE INFORMATION

1. Reporting Month:

June

Year:

2016

2. Reporting Company:

FLORIDA POWER & LIGHT COMPANY

3. Plant Name:

R.W.SCHERER

4. Name, Title & Telephone Number of Contact Person Concerning Data

5. Signature of Official Submitting Report:
6. Date Completed: 29-Aug-16 Submitted on this Form: Terry Keith (305) 552-4334

							Additional	Rail Charg	es	Water	borne Charges	5			Total	
Line No. (a)	Supplier Name (b)	Mine Location (c)	Shipping Point (d)	Transport Mode (e)	Tons (f)	Purchase Price (\$/Ton) (g)	Shorthaul & Loading Charges (\$/Ton) (h)	Rail Rate (\$/Ton) (i)	Other Rail Charges (\$/Ton)	River Barge Rate (\$/Ton) (k)	Trans- loading Rate (\$/Ton)	Ocean Barge Rate (\$/Ton) (m)	Other Water Charges (\$/Ton) (n)	Other Related Charges (\$/Ton) (0)	Transpor- tation Charges (\$/Ton) (p)	FOB Plant Price (\$/Ton) (q)
(1)	ARCH COAL SALES CO,	19/WY/5	THUNDER JCT, W	UR	5,269.66		-			*	~	*	~	-		43.977
(2)	ALPHA COAL SALES CO	19/WY/5	EAGLE BUTTE JC	UR	100,290.97		-			-	~		-	-		38.762
(2)	COAL SALES, LLC	19/WY/5	NARM JCT., WY	UR	25,234.91				œ	-		-	*	-		38.093





Page 1 of 1

FPSC FORM NO. 423-1 (a)

- 1. REPORTING MONTH: AUG YEAR: 2016
- 2. REPORTING COMPANY: FLORIDA POWER LIGHT COMPANY

MONTHLY REPORT OF COST AND QUALITY OF FUEL OIL FOR ELECTRIC PLANTS DETAIL OF INVOICE AND TRANSPORTATION CHARGES

- NAME, TITLE TELEPHONE NUMBER OF CONTACT PERSON CONCERNING DATA SUBMITTED ON THIS FORM: TERRY KEITH, REGULATORY AFFAIRS, (305)-552-4334
- 4. SIGNATURE OF OFFICIAL SUBMITTING REPORT:

5. DATE COMPLETED: 10/27/2016

(A)	(B)	(C)	(D)	(E)	(F)	(G)	(H)	(1)	(J)	(K)	(L)	(M)	(N)	(O)	(P)	(Q)	(R)
LINE NO.	PLANT	SUPPLIER	DELIVERY LOCATION	DELIVERY DATE	TYPE OIL	VOLUME (BBLS)		INVOICE AMOUNT (\$)	DISCOUNT	NET AMOUNT (\$)	NET PRICE (\$/BBL)	QUALITY ADJUST. (\$/BBL)	EFFECTIVE PUR PRICE (\$/BBL)		ADDITIONAL TRANS CHGS (\$/BBL)	OTHER CHGS (\$/BBL)	DELIVERED PRICE (\$/BBL)
1 PMT				08/10/2016	F06	107545								0.0000			47.2302
2 PMT				08/26/2016	F06	109846								0.0000)		45.2400
3 PFL		AMERIGAS		08/12/2016	PRO	37						250		0,0000)		118.9730
4 PMT		SUBURBAN		08/01/2016	PRO	1								0.0000)		38.6200
5 PMT		SUBURBAN		08/10/2016	PRO	7								0.0000)		45.2357





FPSC Form No. 423-2

MONTHLT REPORT OF COAST AND QUALITY OF COAL FOR ELECTRIC PLANTS ORIGIN, TONNAGE, DELIVERED PRICE AND AS RECEIVED QUALITY

1. Report for Month/Year:

August 2016

4. Name, Title & Telephone Number of Contact

Person Concerning Date Submitted on this Form:

Terry Keith (305-552-4334)

2. Reporting Company:

Florida Power & Light

5. Signature of Official Submitting Report:

Zen Brockron

3. Plant Name:

St. Johns River Power Park (SJRPP)

6. Date Completed:

September 7, 2016

As Received Coal Quality

Line No.	Supplier Name	Mine Location	Purchase Type	Transpor- tation Mode	Tons	Effective Purchase Price (\$/Ton)	Total Trans Cost (\$/Ton)	FOB Plant Price (\$/Ton)	Sulfur Content (%)	Btu Content (Btu/lb)	Ash Content (%)	Moisture Content (%)
140.	Supplier Hume	Location	.,,,,	,,,,,,,,,		(4)		2005	1000		1277050	
(a)	(b)	(c)	(d)	(e)	(f)	(g)	(h)	(i)	(j)	(k)	(1)	(m)
1.	COAL MARKETING COMPANY	IM,999	LTC	oc	26,856			76.85	0.57	11,077	11.32	11.49
2.	SUNRISE COAL, LLC	IN,021	LTC	UR	2,690			90.07	0.74	11,079	7.20	17.49



FPSC Form No. 423-2 (a)

MONTHLT REPORT OF COAST AND QUALITY OF COAL FOR ELECTRIC PLANTS DETAIL OF INVOICE PURCHASE PRICE

1. Report for Month/Year:

August 2016

4. Name, Title & Telephone Number of Contact

Person Concerning Date Submitted on this Form:

Terry Keith (305-552-4334)

2. Reporting Company:

Florida Power & Light

5. Signature of Official Submitting Report:

Man Brockway

3. Plant Name:

St. Johns River Power Park (SJRPP)

6. Date Completed:

September 7, 2016

Line No.		Mine Location	Purchase Type	Tons	FOB Mine Price (\$/Ton)	Short Haul & Loading Charge	Original Invoice Price (\$/Ton)	Retro- active Price Increases (\$/Ton)	Base Price (\$/Ton)	Quality Adjust- ments (\$/Ton)	Effective Purchas Price (\$/Ton)
(a)	(b)	(c)	(d)	(e)	(f)	(g)	(h)	(i)	(j)	(k)	(1)
1.	COAL MARKETING COMPANY	IM,999	LTC	26,856		0.00		0.00		0.00	
2.	SUNRISE COAL, LLC	IN,021	LTC	2,690		0.00		0.00		0.00	





MONTHLT REPORT OF COAST AND QUALITY OF COAL FOR ELECTRIC PLANTS DETAIL OF TRANSPORTATION CHARGES

1. Report for Month/Year:

August 2016

4. Name, Title & Telephone Number of Contact

Person Concerning Date Submitted on this Form:

Terry Keith (305-552-4334)

2. Reporting Company:

Florida Power & Light

5. Signature of Official Submitting Report:

Jen Brookway

3. Plant Name:

St. Johns River Power Park (SJRPP)

6. Date Completed:

September 7, 2016

								Rail C	harges		Water	borne Ch	arges		Ī	
Line No.	Supplier Name	Mine Location	Shipping Point	Transpor- tation Mode	Tons	Effective Purchas Price (\$/Ton)	Short Haul & Loading Charge (\$/Ton)	Rail Rate (\$/Ton)	Other Rail Charges (\$/Ton)	River Barge Rate (\$/Ton)	Trans- loading Rate (\$/Ton)	Ocean Barge Rate (\$/Ton)	Other Water Charges (\$/Ton)	Related Charges (\$/Ton)	Total Transport Charges (\$/Ton)	FOB Plant Price (\$/Ton)
(a)	(b)	(c)	(d)	(e)	(f)	(g)	(h)	(i)	(j)	(k)	(1)	(m)	(n)	(o)	(p)	(q)
1.	COAL MARKETING COMPANY	IM,999	El Cerrejon	ос	26,856		0.00		0.00	0.00	0.00	0.00	0.00	0.00		76.85
2.	SUNRISE COAL, LLC	IN,021	Ace in the Hole	UR	2,690		0.00		0.00	0.00	0.00	0.00	0.00	0.00		90.07





FPSC Form No. 423-2

MONTHLY REPORT OF COST AND QUALITY OF COAL FOR ELECTRIC PLANTS ORIGIN, TONNAGE, DELIVERED PRICE, AND AS RECEIVED QUALITY

1. Reporting Month:

July

Year:

2016

 Name, Title & Telephone Number of Contact Person Concerning Data Submitted on this Form: Terry Keith

(305) 552-4334

2. Reporting Company:

FLORIDA POWER & LIGHT COMPANY

3. Plant Name:

R.W.SCHERER

5. Signature of Official Submitting Report:

6. Date Completed:

30-Sep-16

Line No. (a)	Supplier Name (b)	Mine Location (c)	Purchase Type (d)	Transport Mode (e)	Tons (f)	Purchase Price (\$/Ton)	Effective Transport Charges (\$/Ton) (h)	Total FOB Plant Price (\$/Ton) (i)	Sulfur Content (%) (j)	Btu Content (Btu/lb) (k)	Ash Content (%) (I)	Moisture Content (%) (m)
(1)	ARCH COAL SALES CO, INC	19/WY/5	S	UR	7,940.96			44.171	0.32	8,980	4.92	26.42
(2)	ALPHA COAL SALES CO, LI	19/WY/5	S	UR	66,853.82			39.147	0.39	8,396	4.82	29.92
(3)	COAL SALES, LLC	19/WY/5	S	UR	5,037.97			38.460	0.28	8,862	4.41	27.36
(4)	COAL SALES, LLC	19/WY/5	S	UR	31,960.95			38.356	0.22	8,949	4.05	26.77
(5)	BUCKSKIN MINING COMPA	19/WY/5	S	UR	47 652 19			35 924	0.38	8 373	5 11	29 40





FPSC Form No. 423-2(a)

MONTHLY REPORT OF COST AND QUALITY OF COAL FOR ELECTRIC PLANTS DETAILED PURCHASED COAL INVOICE INFORMATION

1. Reporting Month:

July

Year:

2016

4. Name, Title & Telephone Number of Contact Person Concerning Data

Submitted on this Form: Terry Keith

(305) 552-4334

2. Reporting Company:

FLORIDA POWER & LIGHT COMPANY

3. Plant Name:

R.W.SCHERER

5. Signature of Official Submitting Report:

6. Date Completed:

30-Sep-16

Line No. (a)	Supplier Name (b)	Mine Location (c)	Purch. Type (d)	<u>Tons</u> (e)	FOB Mine Price (\$/Ton) (f)	Shorthaul & Loading Charges (\$/Ton) (g)	Original Invoice Price (\$/Ton) (h)	Retroactive Price Increase (\$/Ton) (i)	Base Price (\$/Ton)	Quality Adjustments (\$/Ton) (k)	Effective Purchase Price (\$/Ton) (I)
(1)	ARCH COAL SALES CO, I	N-19/WY/5	S	7,940.96		0.161) = :		0.197	
(2)	ALPHA COAL SALES CO,	L 19/WY/5	S	66,853.82		0.147		(Section 2)		0.029	
(3)	COAL SALES, LLC	19/WY/5	S	5,037.97		0.149		(21)		0.067	
(4)	COAL SALES, LLC	19/WY/5	S	31,960.95		0.149		-		(0.017)	
(5)	BUCKSKIN MINING COMP	PA 19/WY/5	S	47,652.19		0.130		= 1		(0.114)	





FPSC Form No. 423-2(b)

MONTHLY REPORT OF COST AND QUALITY OF COAL FOR ELECTRIC PLANTS DETAILED TRANSPORTATION INVOICE INFORMATION

1. Reporting Month:

July

Vear

2016

4. Name, Title & Telephone Number of Contact Person Concerning Data Submitted on this Form: Terry Keith

(305) 552-4334

2. Reporting Company:

FLORIDA POWER & LIGHT COMPANY

3. Plant Name:

R.W.SCHERER

5. Signature of Official Submitting Report:

6. Date Completed:

30-Sep-16

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0	en Re	orkwi	4
/)	Div		

							Additional	Rail Char	ges	Water	borne Charges	S			Total	
Line No. (a)	Supplier Name (b)	Mine Location (c)	Shipping Point (d)	Transport Mode (e)	Tons (f)	Effective Purchase Price (\$/Ton) (g)	Shorthaul & Loading Charges (\$/Ton) (h)	Rail Rate (\$/Ton)	Other Rail Charges (\$/Ton)	River Barge Rate (\$/Ton) (k)	Trans- loading Rate (\$/Ton) (I)	Ocean Barge Rate (\$/Ton) (m)	Other Water Charges (\$/Ton) (n)	Other Related Charges (\$/Ton) (0)	Transpor- tation Charges (\$/Ton) (p)	FOB Plant Price (\$/Ton) (q)
(1)	ARCH COAL SALES CO,	19/WY/5	THUNDER JCT, W	UR	7,940.96				35 - 31	: €0	343	154.0	•	-		44.171
(2)	ALPHA COAL SALES CO	19/WY/5	EAGLE BUTTE JC	UR	66,853.82		*		3.45	7937	323	-	•	-		39.147
(3)	COAL SALES, LLC	19/WY/5	NARM JCT., WY	UR	5,037.97		- 23			-		9	9	<u> </u>		38,460
(4)	COAL SALES, LLC	19/WY/5	NARM JCT., WY	UR	31,960.95		+				•	-	97	100		38,356
(5)	BUCKSKIN MINING CON	19/WY/5	BUCKSKIN JCT, W	UR	47,652.19					270			er.	16		35.924



NY.



Page 1 of 1

FPSC FORM NO. 423-1 (a)

- 1. REPORTING MONTH: SEP YEAR: 2016
- 2. REPORTING COMPANY: FLORIDA POWER LIGHT COMPANY

MONTHLY REPORT OF COST AND QUALITY OF FUEL OIL FOR ELECTRIC PLANTS DETAIL OF INVOICE AND TRANSPORTATION CHARGES

- NAME, TITLE_TELEPHONE NUMBER OF CONTACT PERSON CONCERNING DATA SUBMITTED ON THIS FORM: TERRY KEITH, REGULATORY AFFAIRS, (305)-552-4334
- 4. SIGNATURE OF OFFICIAL SUBMITTING REPORT:_

5. DATE COMPLETED: 10/27/2016

(A)	(B)	(C)	(D)	(E)	(F)	(G)	(H)	(1)	(J)	(K)	(L)	(M)	(N)	(O)	(P)	(Q)	(R)
LINE NO.	PLANT	SUPPLIER	DELIVERY LOCATION	DELIVERY DATE	TYPE OIL	VOLUME (BBLS)		INVOICE AMOUNT (\$)	DISCOUNT	NET AMOUNT (\$)			EFFECTIVE PUR PRICE (\$/BBL)		ADDITIONAL TRANS CHGS (\$/BBL)		DELIVERED PRICE (\$/BBL)
1 PMT		SUBURBAN		09/14/2016	PRO	4								0.0000			41.5625





FPSC Form No. 423-2

MONTHLT REPORT OF COAST AND QUALITY OF COAL FOR ELECTRIC PLANTS ORIGIN, TONNAGE, DELIVERED PRICE AND AS RECEIVED QUALITY

1. Report for Month/Year:

September 2016

4. Name, Title & Telephone Number of Contact

Person Concerning Date Submitted on this Form:

Terry Keith (305-552-4334)

2. Reporting Company:

Florida Power & Light

5. Signature of Official Submitting Report:

Jan Brockung

3. Plant Name:

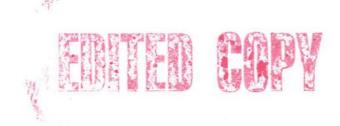
St. Johns River Power Park (SJRPP)

6. Date Completed:

October 12, 2016

As Received Coal Quality

						Effective	Total	FOB				
				Transpor-		Purchase	Trans	Plant	Sulfur	Btu	Ash	Moisture
Line		Mine	Purchase	tation		Price	Cost	Price	Content	Content	Content	Content
No.	Supplier Name	Location	Type	Mode	Tons	(\$/Ton)	(\$/Ton)	(\$/Ton)	(%)	(Btu/lb)	(%)	(%)
(a)	(b)	(c)	(d)	(e)	(f)	(g)	(h)	(i)	(j)	(k)	(1)	(m)
1.	COAL MARKETING COMPANY	IM,999	LTC	OC	38,399			66.81	0.56	10,744	13.31	11.47
2.	SUNRISE COAL, LLC	IN,021	LTC	UR	5,382			90.07	0.76	11,138	8.96	15.17



FPSC Form No. 423-2 (a)

MONTHLT REPORT OF COAST AND QUALITY OF COAL FOR ELECTRIC PLANTS DETAIL OF INVOICE PURCHASE PRICE

1. Report for Month/Year:

September 2016

4. Name, Title & Telephone Number of Contact

Person Concerning Date Submitted on this Form:

Terry Keith (305-552-4334)

2. Reporting Company:

Florida Power & Light

5. Signature of Official Submitting Report:

Jan Brokeny

3. Plant Name:

St. Johns River Power Park (SJRPP)

6. Date Completed:

October 12, 2016

Line No.		Mine Location	Purchase Type	Tons	FOB Mine Price (\$/Ton)	Short Haul & Loading Charge	Original Invoice Price (\$/Ton)	Retro- active Price Increases (\$/Ton)	Base Price (\$/Ton)	Quality Adjust- ments (\$/Ton)	Effective Purchas Price (\$/Ton)
(a)	(b)	(c)	(d)	(e)	(f)	(g)	(h)	(i)	(j)	(k)	(1)
1.	COAL MARKETING COMPANY	IM,999	LTC	38,399		0.00		0.00		0.00	
2.	SUNRISE COAL, LLC	IN,021	LTC	5,382		0.00		0.00		0.00	



MONTHLT REPORT OF COAST AND QUALITY OF COAL FOR ELECTRIC PLANTS DETAIL OF TRANSPORTATION CHARGES

1. Report for Month/Year:

September 2016

4. Name, Title & Telephone Number of Contact

Person Concerning Date Submitted on this Form:

Terry Keith (305-552-4334)

2. Reporting Company:

Florida Power & Light

5. Signature of Official Submitting Report:

Zen Brockung

3. Plant Name:

St. Johns River Power Park (SJRPP)

6. Date Completed:

October 12, 2016

								Rail C	harges		Water	borne Ch	narges			
Line No.	Supplier Name	Mine Location	Shipping Point	Transpor- tation Mode	Tons	Effective Purchas Price (\$/Ton)	Short Haul & Loading Charge (\$/Ton)	Rail Rate (\$/Ton)	Other Rail Charges (\$/Ton)	River Barge Rate (\$/Ton)	Trans- loading Rate (\$/Ton)	Ocean Barge Rate (\$/Ton)	Other Water Charges (\$/Ton)	Related Charges (\$/Ton)	Total Transport Charges (\$/Ton)	FOB Plant Price (\$/Ton)
(a)	(b)	(c)	(d)	(e)	(f)	(g)	(h)	(i)	(j)	(k)	(1)	(m)	(n)	(o)	(p)	(q)
1.	COAL MARKETING COMPANY	IM,999	El Cerrejon	ос	38,399		0.00		0.00	0.00	0.00	0.00	0.00	0.00		66.81
2.	SUNRISE COAL, LLC	IN,021	Ace in the Hole	UR	5,382		0.00		0.00	0.00	0.00	0.00	0.00	0.00		90.07



FPSC Form No. 423-2

MONTHLY REPORT OF COST AND QUALITY OF COAL FOR ELECTRIC PLANTS ORIGIN, TONNAGE, DELIVERED PRICE, AND AS RECEIVED QUALITY

1. Reporting Month:

August Year:

2016

4. Name, Title & Telephone Number of Contact Person Concerning Data Submitted on this Form: Terry Keith

(305) 552-4334

2. Reporting Company:

FLORIDA POWER & LIGHT COMPANY

3. Plant Name:

R.W.SCHERER

5. Signature of Official Submitting Report

6. Date Completed:

31-Oct-16

Line No. (a)	Supplier Name (b)	Mine Location (c)	Purchase Type (d)	Transport Mode (e)	Tons (f)	Purchase Price (\$/Ton) (g)	Effective Transport Charges (\$/Ton) (h)	Total FOB Plant Price (\$/Ton) (i)	Sulfur Content (%) (j)	Btu Content (Btu/lb) (k)	Ash Content (%) (I)	Moisture Content (%) (m)
(1)	ARCH COAL SALES CO, INC	19/WY/5	S	UR	13,265.88			44.208	0.31	8,867	4.89	27.16
(2)	ALPHA COAL SALES CO, LI	19/WY/5	S	UR	83,531.78			39.155	0.36	8,339	4.45	30.66
(3)	COAL SALES, LLC	19/WY/5	S	UR	31,852.80			38.345	0.22	8,774	4.58	27.38
(4)	BUCKSKIN MINING COMPA	19/WY/5	S	UR	55,595.11			36.151	0.32	8,403	4.83	29.59





FPSC Form No. 423-2(a)

MONTHLY REPORT OF COST AND QUALITY OF COAL FOR ELECTRIC PLANTS DETAILED PURCHASED COAL INVOICE INFORMATION

1. Reporting Month:

August

2016

4. Name, Title & Telephone Number of Contact Person Concerning Data Submitted on this Form: Terry Keith

2. Reporting Company:

FLORIDA POWER & LIGHT COMPANY

Year:

3. Plant Name:

R.W.SCHERER

5. Signature of Official Submitting Report: Submitting Report: Submitting Report:

6. Date Completed:

(305) 552-4334

Line No. (a)	Supplier Name (b)	Mine Location (c)	Purch. Type (d)	<u>Tons</u> (e)	FOB Mine Price (\$/Ton) (f)	Shorthaul & Loading Charges (\$/Ton) (g)	Original Invoice Price (\$/Ton) (h)	Retroactive Price Increase (\$/Ton) (i)	Base Price (\$/Ton)	Quality Adjustments (\$/Ton) (k)	Effective Purchase Price (\$/Ton) (I)
(1)	ARCH COAL SALES CO, IN	19/WY/5	S	13,265.88		0.154		-		0.081	
(2)	ALPHA COAL SALES CO, I	_ 19/WY/5	S	83,531.78		0.147		-		(0.073)	
(3)	COAL SALES, LLC	19/WY/5	S	31,852.80		0.149		-		(0.128)	
(4)	BUCKSKIN MINING COMP	A 19/WY/5	S	55,595.11		0.130		-		0.003	





FPSC Form No. 423-2(b)

MONTHLY REPORT OF COST AND QUALITY OF COAL FOR ELECTRIC PLANTS DETAILED TRANSPORTATION INVOICE INFORMATION

1. Reporting Month:

3. Plant Name:

August

R.W.SCHERER

Year:

2016

4. Name, Title & Telephone Number of Contact Person Concerning Data Submitted on this Form: Terry Keith

(305) 552-4334

2. Reporting Company:

FLORIDA POWER & LIGHT COMPANY

6. Date Completed:

5. Signature of Official Submitting Report:

							Additional	Rail Charg	jes	Water	borne Charges	S			Total	
Line No. (a)	Supplier Name (b)	Mine Location (c)	Shipping Point (d)	Transport Mode (e)	Tons (f)	Effective Purchase Price (\$/Ton) (g)	Shorthaul & Loading Charges (\$/Ton) (h)	Rail Rate (\$/Ton) (i)	Other Rail Charges (\$/Ton) (j)	River Barge Rate (\$/Ton) (k)	Trans- loading Rate (\$/Ton) (I)	Ocean Barge Rate (\$/Ton) (m)	Other Water Charges (\$/Ton) (n)	Other Related Charges (\$/Ton) (0)	Transpor- tation Charges (\$/Ton) (p)	FOB Plant Price (\$/Ton) (q)
(1)	ARCH COAL SALES CO,	19/WY/5	THUNDER JCT, W	UR	13,265.88		€		KE	()		•	33	9		44.208
(2)	ALPHA COAL SALES CO	19/WY/5	EAGLE BUTTE JC	UR	83,531.78		8			•	•	•		-		39.155
(3)	COAL SALES, LLC	19/WY/5	NARM JCT., WY	UR	31,852.80		-		7. 5 0		•	•	7.	-		38.345
(4)	BUCKSKIN MINING CON	19/WY/5	BUCKSKIN JCT, W	UR	55,595.11		**		(. * :	£50	3 7 8	4.70	0.50	050		36.151





Justification for Confidentiality for Florida Power & Light Company Report of July 2016:

FORM	LINE(S)	<u>COLUMN</u>	RATIONALE
423-1(a)	1-5	Н	(1)
423-1(a)	1-5	I	(2)
423-1(a)	1-5	J	(2), (3)
423-1(a)	1-5	K	(2)
423-1(a)	1-5	L	(2)
423-1(a)	1-5	M	(2), (4)
423-1(a)	1-5	N	(2), (5)
423-1(a)	1-5	P	(6), (7), (8)
423-1(a)	1-5	Q	(6), (7), (8)

Rationale for confidentiality:

(1) This information is contractual information which, if made public, "would impair the efforts of [FPL] to contract for goods or services on favorable terms." Section 366.093(3)(d), Fla. Stat. The information delineates the price per barrel FPL has paid for fuel oil for specific shipments from specific suppliers. This information would allow suppliers to compare an individual supplier's price with the market quote for that date of delivery and thereby determine the contract pricing formula between FPL and that supplier.

Contract pricing formulas generally contain two components, which are: (1) a markup in the market quoted price for that day; and (2) a transportation charge for delivery at an FPL chosen port of delivery. Discounts and quality adjustment components of fuel price contract formulas are discussed in paragraphs 3 and 4. Disclosure of the invoice price would allow suppliers to determine the contract price formula of their competitors. The knowledge of others' prices (*i.e.*, contract formulas) among fuel oil suppliers is reasonably likely to cause the suppliers to converge on a target price, or to follow a price leader, effectively eliminating

any opportunity for a major buyer like FPL to obtain price concessions from any one supplier. The end result is reasonably likely to be increased fuel oil prices and therefore increased electric rates.

- (2) The contract data found in Columns I through N are an algebraic function of Column H. That is, the publication of these Columns together, or independently, could allow a supplier to derive the invoice price of oil.
- (3) If FPL fuel contracts provide for an early payment incentive in the form of a discount from the invoice price, the existence and amount of such discount is confidential for the reasons stated in paragraph (1) relative to price concessions.
- (4) For fuel that does not meet contract requirements, FPL may reject the shipment, or accept the shipment and apply a quality adjustment. The amount of the quality adjustment is, in effect, a pricing term which is as important as the price itself and is therefore confidential for the reasons stated in paragraph (1) relative to price concessions.
- (5) Column N is as important as H from a confidentiality standpoint because of the relatively few times that there are quality or discount adjustments. That is, Column N will equal Column H most of the time. Consequently, Column N needs to be protected for the same reasons as set forth in paragraph (1).
- (6) Column R is used to mask the delivered price of fuel such that the invoice or effective price of fuel cannot be determined. Columns P and Q are algebraic variables of Column R. Consequently, disclosure of Columns P and Q would allow a supplier to calculate the invoice or effective purchase price of oil (Columns H and N) by subtracting these columnar variables from Column R.
- (7) Terminaling and transportation services in Florida tend to have the same, if not more severe, oligopolistic attributes of fuel oil suppliers. Due to the small demand in Florida for both of these services, market entry is difficult. In instances in which FPL has attempted to determine the level of interest in bidding either or both of these services, FPL has found only a very few qualified parties with such an interest. Consequently, disclosure of these contract data is reasonably likely to result in increased prices for terminaling and transportation services.
- (8) Petroleum inspection services also have the market characteristics of an oligopoly. Due to the limited number of fuel terminal operations, there are correspondingly few requirements for fuel inspection services. In FPL's last bidding process for petroleum inspection services, only six qualified bidders were found for FPL's bid solicitations. Consequently, disclosure of these contract data is reasonably likely to result in increased prices for petroleum inspection services.

Justification for Confidentiality for St. Johns River Power Park (SJRRP) Report of July 2016:

FORM	LINE(S)	<u>COLUMNS</u>	<u>RATIONALE</u>
423-2	1-2	G, H	(1)
423-2	1-2	Н	(2)

Rationale for Confidentiality:

- (1) Disclosure of the effective purchase price "would impair the efforts of [JEA, acting on its own behalf and as agent for FPL] to contract for goods or services [at the St. Johns River Power Park (SJRPP)] on favorable terms." Section 366.093(3)(d), Fla. Stat. The data informs other potential coal suppliers as to the price SJRPP is paying for coal. Disclosure of this information, which is particularly sensitive given SJRPP's reliance on long term contracts with fixed price provisions or short term spot transactions, could adversely affect FPL's interests in subsequent solicitations for coal and/or in negotiating coal supply agreements. JEA maintains this information as confidential pursuant to section 163.01(15)(m), Fla. Stat. Additionally, providing the purchase price would enable one to ascertain the total transportation charges in Column H by subtracting the effective purchase price from the delivered price at the transfer facility, shown in Column I.
- Disclosure of the total transportation cost "would impair the efforts of [JEA acting on its own behalf and as agent for FPL] to contract for goods or services [at SJRPP] on favorable terms." Section 366.093(3)(d), Fla Stat. Moreover, the service provider itself typically designates the transportation costs in the contract as confidential. JEA maintains this information as confidential pursuant to section 163.01(15)(m), Fla. Stat. Further, disclosure of this information would enable potential coal suppliers to calculate Column G which FPL seeks to protect by subtracting Column H from Column I.

Justification for Confidentiality for St. Johns River Power Park (SJRRP) Report of July 2016:

FORM	LINE(S)	<u>COLUMN</u>	RATIONALE
423-2(a)	1-2	F	(1)
423-2(a)	1-2	Н	(1)

423-2(a)	1-2	J	(1)
423-2(a)	1-2	L	(2)

Rationale for Confidentiality:

- (1) The information presented in these columns are algebraic derivations of the information in column L that FPL seeks to protect.
- Obsclosure of the effective purchase price "would impair the efforts of [JEA, acting on its own behalf and as agent for FPL] to contract for goods or services [at the St. Johns River Power Park (SJRPP)] on favorable terms." Section 366.093(3)(d), Fla. Stat. The data informs other potential coal suppliers as to the price SJRPP is paying for coal. Disclosure of this information could adversely affect FPL's interests in subsequent solicitations for coal and/or in negotiating coal supply agreements. JEA maintains this information as confidential pursuant to section 163.01(15)(m), Fla. Stat. Additionally, providing the purchase price would enable one to ascertain the total transportation charges in Column H on Form 423-2, which FPL seeks to protect, by subtracting the effective purchase price from the delivered price at the transfer facility shown in Column I on Form 423-2.

Justification for Confidentiality for St. Johns River Power Park (SJRRP) Report of July 2016:

FORM	LINE(S)	<u>COLUMN</u>	RATIONALE
423-2(b)	1-2	G	(1)
423-2(b)	1-2	I	(2)
423-2(b)	1-2	P	(2)

Rationale for Confidentiality:

(1) Disclosure of the effective purchase price "would impair the efforts of [JEA, acting on its own behalf and as agent for FPL] to contract for goods or services [at the St. Johns River Power Park (SJRPP)] on favorable terms." Section 366.093(3)(d), Fla. Stat. The data informs other potential coal suppliers as to the price SJRPP is paying for coal. Disclosure of this information, which is particularly sensitive given SJRPP's reliance on long term contracts with fixed price provisions or short term spot transactions, could adversely affect FPL's interests in subsequent solicitations for coal and/or in negotiating coal supply agreements. JEA maintains this information as confidential pursuant to section 163.01(15)(m), Fla. Stat. Additionally, providing the purchase price would enable one to

- ascertain the total transportation charges in Column P, which FPL seeks to protect, by subtracting the effective purchase price from the delivered price at the transfer facility shown in Column Q.
- (2) Disclosure of the total transportation cost "would impair the efforts of [JEA acting on its own behalf and as agent for FPL] to contract for goods or services [at SJRPP] on favorable terms." Section 366.093(3)(d), Fla Stat. Moreover, the service provider itself typically designates the transportation costs in the contract as confidential. JEA maintains this information as confidential pursuant to section 163.01(15)(m), Fla. Stat. Further, disclosure of this information would enable potential coal suppliers to calculate Column G which FPL seeks to protect, by subtracting Column P from Column Q.

Justification for Confidentiality for R.W. Scherer (Plant Scherer) Report of June 2016:

FORM	LINE(S)	COLUMNS	RATIONALE
423-2	1-3	G, H	(1)

Rationale for Confidentiality:

On April 1, 2010, FPL was contacted by the BNSF Railway, which transports coal to Plant Scherer, concerning FPL's disclosure of BNSF transportation rate information on FPL's Form 423 filing. BNSF has asserted that the transportation rate information is confidential pursuant to its Rail Transportation Agreement BNSF-C-12339 with Georgia Power Company ("GPC") and that FPL is obligated to maintain the confidentiality of that information. Accordingly, FPL is designating as confidential certain information in the Form 423 filing that, by itself or in conjunction with other information in the filing, would reveal publicly BNSF transportation rate information. FPL argues that this information is confidential under Sections 366.093(3)(d) and 366.093(3)(e), Fla. Stat., because its disclosure would "impair the efforts of [GPC, as agent for FPL] to contract for goods and services on favorable terms" and would "impair the competitive business of" BNSF.

Justification for Confidentiality for R.W. Scherer (Plant Scherer) Report of June 2016:

FORM	LINE(S)	COLUMNS	RATIONALE
423-2(a)	1-3	F, H, J, L	(1)

Rationale for Confidentiality:

(1) On April 1, 2010, FPL was contacted by the BNSF Railway, which transports coal to Plant Scherer, concerning FPL's disclosure of BNSF transportation rate information on FPL's Form 423 filing. BNSF has asserted that the transportation rate information is confidential pursuant to its Rail Transportation Agreement BNSF-C-12339 with Georgia Power Company ("GPC") and that FPL is obligated to maintain the confidentiality of that information. Accordingly, FPL is designating as confidential certain information in the Form 423 filing that, by itself or in conjunction with other information in the filing, would reveal publicly BNSF transportation rate information. FPL argues that this information is confidential under Sections 366.093(3)(d) and 366.093(3)(e), Fla. Stat., because its disclosure would "impair the efforts of [GPC, as agent for FPL] to contract for goods and services on favorable terms" and would "impair the competitive business of" BNSF.

Justification for Confidentiality for R.W. Scherer (Plant Scherer) Report of June 2016:

<u>FORM</u>	LINE(S)	<u>COLUMNS</u>	RATIONALE
423-2(b)	1-3	G, I, P	(1)

Rationale for Confidentiality:

(1) On April 1, 2010, FPL was contacted by the BNSF Railway, which transports coal to Plant Scherer, concerning FPL's disclosure of BNSF transportation rate information on FPL's Form 423 filing. BNSF has asserted that the transportation rate information is confidential pursuant to its Rail Transportation Agreement BNSF-C-12339 with Georgia Power Company ("GPC") and that FPL is obligated to maintain the confidentiality of that information. Accordingly, FPL is designating as confidential certain information in the Form 423 filing that, by itself or in conjunction with other information in the filing, would reveal publicly BNSF transportation rate information. FPL argues that this information is confidential under Sections 366.093(3)(d) and 366.093(3)(e), Fla. Stat., because its disclosure would "impair the efforts of [GPC, as agent for FPL] to contract for goods and services on favorable terms" and would "impair the competitive business of" BNSF.

Justification for Confidentiality for Florida Power & Light Company Report of August 2016:

FORM	LINE(S)	COLUMN	RATIONALE
423-1(a)	1-5	Н	(1)
423-1(a)	1-5	I	(2)
423-1(a)	1-5	J	(2), (3)
423-1(a)	1-5	K	(2)
423-1(a)	1-5	L	(2)
423-1(a)	1-5	M	(2), (4)
423-1(a)	1-5	N	(2), (5)
423-1(a)	1-5	P	(6), (7), (8)
423-1(a)	1-5	Q	(6), (7), (8)

Rationale for confidentiality:

(2) This information is contractual information which, if made public, "would impair the efforts of [FPL] to contract for goods or services on favorable terms." Section 366.093(3)(d), Fla. Stat. The information delineates the price per barrel FPL has paid for fuel oil for specific shipments from specific suppliers. This information would allow suppliers to compare an individual supplier's price with the market quote for that date of delivery and thereby determine the contract pricing formula between FPL and that supplier.

Contract pricing formulas generally contain two components, which are: (1) a markup in the market quoted price for that day; and (2) a transportation charge for delivery at an FPL chosen port of delivery. Discounts and quality adjustment components of fuel price contract formulas are discussed in paragraphs 3 and 4. Disclosure of the invoice price would allow suppliers to determine the contract price formula of their competitors. The knowledge of others' prices (i.e., contract formulas) among fuel oil suppliers is reasonably likely to cause the suppliers to converge on a target price, or to follow a price leader, effectively eliminating any opportunity for a major buyer like FPL to obtain price concessions from any one

- supplier. The end result is reasonably likely to be increased fuel oil prices and therefore increased electric rates.
- (2) The contract data found in Columns I through N are an algebraic function of Column H. That is, the publication of these Columns together, or independently, could allow a supplier to derive the invoice price of oil.
- (3) If FPL fuel contracts provide for an early payment incentive in the form of a discount from the invoice price, the existence and amount of such discount is confidential for the reasons stated in paragraph (1) relative to price concessions.
- (4) For fuel that does not meet contract requirements, FPL may reject the shipment, or accept the shipment and apply a quality adjustment. The amount of the quality adjustment is, in effect, a pricing term which is as important as the price itself and is therefore confidential for the reasons stated in paragraph (1) relative to price concessions.
- (5) Column N is as important as H from a confidentiality standpoint because of the relatively few times that there are quality or discount adjustments. That is, Column N will equal Column H most of the time. Consequently, Column N needs to be protected for the same reasons as set forth in paragraph (1).
- (6) Column R is used to mask the delivered price of fuel such that the invoice or effective price of fuel cannot be determined. Columns P and Q are algebraic variables of Column R. Consequently, disclosure of Columns P and Q would allow a supplier to calculate the invoice or effective purchase price of oil (Columns H and N) by subtracting these columnar variables from Column R.
- (9) Terminaling and transportation services in Florida tend to have the same, if not more severe, oligopolistic attributes of fuel oil suppliers. Due to the small demand in Florida for both of these services, market entry is difficult. In instances in which FPL has attempted to determine the level of interest in bidding either or both of these services, FPL has found only a very few qualified parties with such an interest. Consequently, disclosure of these contract data is reasonably likely to result in increased prices for terminaling and transportation services.
- (10) Petroleum inspection services also have the market characteristics of an oligopoly. Due to the limited number of fuel terminal operations, there are correspondingly few requirements for fuel inspection services. In FPL's last bidding process for petroleum inspection services, only six qualified bidders were found for FPL's bid solicitations. Consequently, disclosure of these contract data is reasonably likely to result in increased prices for petroleum inspection services.

Justification for Confidentiality for St. Johns River Power Park (SJRRP) Report of August 2016:

FORM	LINE(S)	<u>COLUMNS</u>	RATIONALE
423-2	1-2	G, H	(1)
423-2	1-2	Н	(2)

Rationale for Confidentiality:

- Oisclosure of the effective purchase price "would impair the efforts of [JEA, acting on its own behalf and as agent for FPL] to contract for goods or services [at the St. Johns River Power Park (SJRPP)] on favorable terms." Section 366.093(3)(d), Fla. Stat. The data informs other potential coal suppliers as to the price SJRPP is paying for coal. Disclosure of this information, which is particularly sensitive given SJRPP's reliance on long term contracts with fixed price provisions or short term spot transactions, could adversely affect FPL's interests in subsequent solicitations for coal and/or in negotiating coal supply agreements. JEA maintains this information as confidential pursuant to section 163.01(15)(m), Fla. Stat. Additionally, providing the purchase price would enable one to ascertain the total transportation charges in Column H by subtracting the effective purchase price from the delivered price at the transfer facility, shown in Column I.
- (4) Disclosure of the total transportation cost "would impair the efforts of [JEA acting on its own behalf and as agent for FPL] to contract for goods or services [at SJRPP] on favorable terms." Section 366.093(3)(d), Fla Stat. Moreover, the service provider itself typically designates the transportation costs in the contract as confidential. JEA maintains this information as confidential pursuant to section 163.01(15)(m), Fla. Stat. Further, disclosure of this information would enable potential coal suppliers to calculate Column G which FPL seeks to protect by subtracting Column H from Column I.

Justification for Confidentiality for St. Johns River Power Park (SJRRP) Report of August 2016:

<u>FORM</u>	LINE(S)	<u>COLUMN</u>	RATIONALE
423-2(a)	1-2	F	(1)
423-2(a)	1-2	Н	(1)

423-2(a)	1-2	J	(1)
423-2(a)	1-2	L	(2)

Rationale for Confidentiality:

- (1) The information presented in these columns are algebraic derivations of the information in column L that FPL seeks to protect.
- Obsclosure of the effective purchase price "would impair the efforts of [JEA, acting on its own behalf and as agent for FPL] to contract for goods or services [at the St. Johns River Power Park (SJRPP)] on favorable terms." Section 366.093(3)(d), Fla. Stat. The data informs other potential coal suppliers as to the price SJRPP is paying for coal. Disclosure of this information could adversely affect FPL's interests in subsequent solicitations for coal and/or in negotiating coal supply agreements. JEA maintains this information as confidential pursuant to section 163.01(15)(m), Fla. Stat. Additionally, providing the purchase price would enable one to ascertain the total transportation charges in Column H on Form 423-2, which FPL seeks to protect, by subtracting the effective purchase price from the delivered price at the transfer facility shown in Column I on Form 423-2.

Justification for Confidentiality for St. Johns River Power Park (SJRRP) Report of August 2016:

FORM	LINE(S)	COLUMN	RATIONALE
423-2(b)	1-2	G	(1)
423-2(b)	1-2	I	(2)
423-2(b)	1-2	P	(2)

Rationale for Confidentiality:

Obsclosure of the effective purchase price "would impair the efforts of [JEA, acting on its own behalf and as agent for FPL] to contract for goods or services [at the St. Johns River Power Park (SJRPP)] on favorable terms." Section 366.093(3)(d), Fla. Stat. The data informs other potential coal suppliers as to the price SJRPP is paying for coal. Disclosure of this information, which is particularly sensitive given SJRPP's reliance on long term contracts with fixed price provisions or short term spot transactions, could adversely affect FPL's interests in subsequent solicitations for coal and/or in negotiating coal supply agreements. JEA maintains this information as confidential pursuant to section 163.01(15)(m), Fla. Stat. Additionally, providing the purchase price would enable one to

- ascertain the total transportation charges in Column P, which FPL seeks to protect, by subtracting the effective purchase price from the delivered price at the transfer facility shown in Column Q.
- (4) Disclosure of the total transportation cost "would impair the efforts of [JEA acting on its own behalf and as agent for FPL] to contract for goods or services [at SJRPP] on favorable terms." Section 366.093(3)(d), Fla Stat. Moreover, the service provider itself typically designates the transportation costs in the contract as confidential. JEA maintains this information as confidential pursuant to section 163.01(15)(m), Fla. Stat. Further, disclosure of this information would enable potential coal suppliers to calculate Column G which FPL seeks to protect, by subtracting Column P from Column Q.

Justification for Confidentiality for R.W. Scherer (Plant Scherer) Report of July 2016:

FORM	LINE(S)	COLUMNS	RATIONALE
423-2	1-5	G, H	(1)

Rationale for Confidentiality:

On April 1, 2010, FPL was contacted by the BNSF Railway, which transports coal to Plant Scherer, concerning FPL's disclosure of BNSF transportation rate information on FPL's Form 423 filing. BNSF has asserted that the transportation rate information is confidential pursuant to its Rail Transportation Agreement BNSF-C-12339 with Georgia Power Company ("GPC") and that FPL is obligated to maintain the confidentiality of that information. Accordingly, FPL is designating as confidential certain information in the Form 423 filing that, by itself or in conjunction with other information in the filing, would reveal publicly BNSF transportation rate information. FPL argues that this information is confidential under Sections 366.093(3)(d) and 366.093(3)(e), Fla. Stat., because its disclosure would "impair the efforts of [GPC, as agent for FPL] to contract for goods and services on favorable terms" and would "impair the competitive business of" BNSF.

Justification for Confidentiality for R.W. Scherer (Plant Scherer) Report of July 2016:

FORM	LINE(S)	COLUMNS	RATIONALE
423-2(a)	1-5	F, H, J, L	(1)

Rationale for Confidentiality:

(1) On April 1, 2010, FPL was contacted by the BNSF Railway, which transports coal to Plant Scherer, concerning FPL's disclosure of BNSF transportation rate information on FPL's Form 423 filing. BNSF has asserted that the transportation rate information is confidential pursuant to its Rail Transportation Agreement BNSF-C-12339 with Georgia Power Company ("GPC") and that FPL is obligated to maintain the confidentiality of that information. Accordingly, FPL is designating as confidential certain information in the Form 423 filing that, by itself or in conjunction with other information in the filing, would reveal publicly BNSF transportation rate information. FPL argues that this information is confidential under Sections 366.093(3)(d) and 366.093(3)(e), Fla. Stat., because its disclosure would "impair the efforts of [GPC, as agent for FPL] to contract for goods and services on favorable terms" and would "impair the competitive business of" BNSF.

Justification for Confidentiality for R.W. Scherer (Plant Scherer) Report of July 2016:

<u>FORM</u>	LINE(S)	<u>COLUMNS</u>	RATIONALE
423-2(b)	1-5	G, I, P	(1)

Rationale for Confidentiality:

(1) On April 1, 2010, FPL was contacted by the BNSF Railway, which transports coal to Plant Scherer, concerning FPL's disclosure of BNSF transportation rate information on FPL's Form 423 filing. BNSF has asserted that the transportation rate information is confidential pursuant to its Rail Transportation Agreement BNSF-C-12339 with Georgia Power Company ("GPC") and that FPL is obligated to maintain the confidentiality of that information. Accordingly, FPL is designating as confidential certain information in the Form 423 filing that, by itself or in conjunction with other information in the filing, would reveal publicly BNSF transportation rate information. FPL argues that this information is confidential under Sections 366.093(3)(d) and 366.093(3)(e), Fla. Stat., because its disclosure would "impair the efforts of [GPC, as agent for FPL] to contract for goods and services on favorable terms" and would "impair the competitive business of" BNSF.

Justification for Confidentiality for Florida Power & Light Company Report of September 2016:

FORM	LINE(S)	<u>COLUMN</u>	RATIONALE
423-1(a)	1	Н	(1)
423-1(a)	1	I	(2)
423-1(a)	1	J	(2), (3)
423-1(a)	1	K	(2)
423-1(a)	1	L	(2)
423-1(a)	1	M	(2), (4)
423-1(a)	1	N	(2), (5)
423-1(a)	1	P	(6), (7), (8)
423-1(a)	1	Q	(6), (7), (8)

Rationale for confidentiality:

(3) This information is contractual information which, if made public, "would impair the efforts of [FPL] to contract for goods or services on favorable terms." Section 366.093(3)(d), Fla. Stat. The information delineates the price per barrel FPL has paid for fuel oil for specific shipments from specific suppliers. This information would allow suppliers to compare an individual supplier's price with the market quote for that date of delivery and thereby determine the contract pricing formula between FPL and that supplier.

Contract pricing formulas generally contain two components, which are: (1) a markup in the market quoted price for that day; and (2) a transportation charge for delivery at an FPL chosen port of delivery. Discounts and quality adjustment components of fuel price contract formulas are discussed in paragraphs 3 and 4. Disclosure of the invoice price would allow suppliers to determine the contract price formula of their competitors. The knowledge of others' prices (*i.e.*, contract formulas) among fuel oil suppliers is reasonably likely to cause the suppliers to converge on a target price, or to follow a price leader, effectively eliminating any opportunity for a major buyer like FPL to obtain price concessions from any one supplier. The end result is reasonably likely to be increased fuel oil prices and therefore increased electric rates.

- (2) The contract data found in Columns I through N are an algebraic function of Column H. That is, the publication of these Columns together, or independently, could allow a supplier to derive the invoice price of oil.
- (3) If FPL fuel contracts provide for an early payment incentive in the form of a discount from the invoice price, the existence and amount of such discount is confidential for the reasons stated in paragraph (1) relative to price concessions.
- (4) For fuel that does not meet contract requirements, FPL may reject the shipment, or accept the shipment and apply a quality adjustment. The amount of the quality adjustment is, in effect, a pricing term which is as important as the price itself and is therefore confidential for the reasons stated in paragraph (1) relative to price concessions.
- (5) Column N is as important as H from a confidentiality standpoint because of the relatively few times that there are quality or discount adjustments. That is, Column N will equal Column H most of the time. Consequently, Column N needs to be protected for the same reasons as set forth in paragraph (1).
- (6) Column R is used to mask the delivered price of fuel such that the invoice or effective price of fuel cannot be determined. Columns P and Q are algebraic variables of Column R. Consequently, disclosure of Columns P and Q would allow a supplier to calculate the invoice or effective purchase price of oil (Columns H and N) by subtracting these columnar variables from Column R.
- (11) Terminaling and transportation services in Florida tend to have the same, if not more severe, oligopolistic attributes of fuel oil suppliers. Due to the small demand in Florida for both of these services, market entry is difficult. In instances in which FPL has attempted to determine the level of interest in bidding either or both of these services, FPL has found only a very few qualified parties with such an interest. Consequently, disclosure of these contract data is reasonably likely to result in increased prices for terminaling and transportation services.
- (12) Petroleum inspection services also have the market characteristics of an oligopoly. Due to the limited number of fuel terminal operations, there are correspondingly few requirements for fuel inspection services. In FPL's last bidding process for petroleum inspection services, only six qualified bidders were found for FPL's bid solicitations. Consequently, disclosure of these contract data is reasonably likely to result in increased prices for petroleum inspection services.

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Justification for Confidentiality for St. Johns River Power Park (SJRRP) Report of September 2016:

FORM	LINE(S)	<u>COLUMNS</u>	RATIONALE
423-2	1-2	G, H	(1)
423-2	1-2	Н	(2)

Rationale for Confidentiality:

- Obsclosure of the effective purchase price "would impair the efforts of [JEA, acting on its own behalf and as agent for FPL] to contract for goods or services [at the St. Johns River Power Park (SJRPP)] on favorable terms." Section 366.093(3)(d), Fla. Stat. The data informs other potential coal suppliers as to the price SJRPP is paying for coal. Disclosure of this information, which is particularly sensitive given SJRPP's reliance on long term contracts with fixed price provisions or short term spot transactions, could adversely affect FPL's interests in subsequent solicitations for coal and/or in negotiating coal supply agreements. JEA maintains this information as confidential pursuant to section 163.01(15)(m), Fla. Stat. Additionally, providing the purchase price would enable one to ascertain the total transportation charges in Column H by subtracting the effective purchase price from the delivered price at the transfer facility, shown in Column I.
- (6) Disclosure of the total transportation cost "would impair the efforts of [JEA acting on its own behalf and as agent for FPL] to contract for goods or services [at SJRPP] on favorable terms." Section 366.093(3)(d), Fla Stat. Moreover, the service provider itself typically designates the transportation costs in the contract as confidential. JEA maintains this information as confidential pursuant to section 163.01(15)(m), Fla. Stat. Further, disclosure of this information would enable potential coal suppliers to calculate Column G which FPL seeks to protect by subtracting Column H from Column I.

Justification for Confidentiality for St. Johns River Power Park (SJRRP) Report of September 2016:

<u>FORM</u>	LINE(S)	<u>COLUMN</u>	RATIONALE
423-2(a)	1-2	F	(1)
423-2(a)	1-2	Н	(1)

423-2(a)	1-2	J	(1)
423-2(a)	1-2	L	(2)

Rationale for Confidentiality:

- (1) The information presented in these columns are algebraic derivations of the information in column L that FPL seeks to protect.
- Obsclosure of the effective purchase price "would impair the efforts of [JEA, acting on its own behalf and as agent for FPL] to contract for goods or services [at the St. Johns River Power Park (SJRPP)] on favorable terms." Section 366.093(3)(d), Fla. Stat. The data informs other potential coal suppliers as to the price SJRPP is paying for coal. Disclosure of this information could adversely affect FPL's interests in subsequent solicitations for coal and/or in negotiating coal supply agreements. JEA maintains this information as confidential pursuant to section 163.01(15)(m), Fla. Stat. Additionally, providing the purchase price would enable one to ascertain the total transportation charges in Column H on Form 423-2, which FPL seeks to protect, by subtracting the effective purchase price from the delivered price at the transfer facility shown in Column I on Form 423-2.

Justification for Confidentiality for St. Johns River Power Park (SJRRP) Report of September 2016:

FORM	LINE(S)	<u>COLUMN</u>	RATIONALE
423-2(b)	1-2	G	(1)
423-2(b)	1-2	I	(2)
423-2(b)	1-2	P	(2)

Rationale for Confidentiality:

Obsclosure of the effective purchase price "would impair the efforts of [JEA, acting on its own behalf and as agent for FPL] to contract for goods or services [at the St. Johns River Power Park (SJRPP)] on favorable terms." Section 366.093(3)(d), Fla. Stat. The data informs other potential coal suppliers as to the price SJRPP is paying for coal. Disclosure of this information, which is particularly sensitive given SJRPP's reliance on long term contracts with fixed price provisions or short term spot transactions, could adversely affect FPL's interests in subsequent solicitations for coal and/or in negotiating coal supply agreements. JEA maintains this information as confidential pursuant to section 163.01(15)(m), Fla. Stat. Additionally, providing the purchase price would enable one to

- ascertain the total transportation charges in Column P, which FPL seeks to protect, by subtracting the effective purchase price from the delivered price at the transfer facility shown in Column Q.
- (6) Disclosure of the total transportation cost "would impair the efforts of [JEA acting on its own behalf and as agent for FPL] to contract for goods or services [at SJRPP] on favorable terms." Section 366.093(3)(d), Fla Stat. Moreover, the service provider itself typically designates the transportation costs in the contract as confidential. JEA maintains this information as confidential pursuant to section 163.01(15)(m), Fla. Stat. Further, disclosure of this information would enable potential coal suppliers to calculate Column G which FPL seeks to protect, by subtracting Column P from Column Q.

Justification for Confidentiality for R.W. Scherer (Plant Scherer) Report of August 2016:

FORM	LINE(S)	COLUMNS	RATIONALE
423-2	1-4	G, H	(1)

Rationale for Confidentiality:

On April 1, 2010, FPL was contacted by the BNSF Railway, which transports coal to Plant Scherer, concerning FPL's disclosure of BNSF transportation rate information on FPL's Form 423 filing. BNSF has asserted that the transportation rate information is confidential pursuant to its Rail Transportation Agreement BNSF-C-12339 with Georgia Power Company ("GPC") and that FPL is obligated to maintain the confidentiality of that information. Accordingly, FPL is designating as confidential certain information in the Form 423 filing that, by itself or in conjunction with other information in the filing, would reveal publicly BNSF transportation rate information. FPL argues that this information is confidential under Sections 366.093(3)(d) and 366.093(3)(e), Fla. Stat., because its disclosure would "impair the efforts of [GPC, as agent for FPL] to contract for goods and services on favorable terms" and would "impair the competitive business of" BNSF.

Justification for Confidentiality for R.W. Scherer (Plant Scherer) Report of August 2016:

<u>FORM</u>	LINE(S)	COLUMNS	<u>RATIONALE</u>
423-2(a)	1-4	F, H, J, L	(1)

Rationale for Confidentiality:

On April 1, 2010, FPL was contacted by the BNSF Railway, which transports coal to Plant Scherer, concerning FPL's disclosure of BNSF transportation rate information on FPL's Form 423 filing. BNSF has asserted that the transportation rate information is confidential pursuant to its Rail Transportation Agreement BNSF-C-12339 with Georgia Power Company ("GPC") and that FPL is obligated to maintain the confidentiality of that information. Accordingly, FPL is designating as confidential certain information in the Form 423 filing that, by itself or in conjunction with other information in the filing, would reveal publicly BNSF transportation rate information. FPL argues that this information is confidential under Sections 366.093(3)(d) and 366.093(3)(e), Fla. Stat., because its disclosure would "impair the efforts of [GPC, as agent for FPL] to contract for goods and services on favorable terms" and would "impair the competitive business of" BNSF.

Justification for Confidentiality for R.W. Scherer (Plant Scherer) Report of August 2016:

<u>FORM</u>	LINE(S)	COLUMNS	RATIONALE
423-2(b)	1-4	G, I, P	(1)

Rationale for Confidentiality:

On April 1, 2010, FPL was contacted by the BNSF Railway, which transports coal to Plant Scherer, concerning FPL's disclosure of BNSF transportation rate information on FPL's Form 423 filing. BNSF has asserted that the transportation rate information is confidential pursuant to its Rail Transportation Agreement BNSF-C-12339 with Georgia Power Company ("GPC") and that FPL is obligated to maintain the confidentiality of that information. Accordingly, FPL is designating as confidential certain information in the Form 423 filing that, by itself or in conjunction with other information in the filing, would reveal publicly BNSF transportation rate information. FPL argues that this information is confidential under Sections 366.093(3)(d) and 366.093(3)(e), Fla. Stat., because its disclosure would "impair the efforts of [GPC, as agent for FPL] to contract for goods and services on favorable terms" and would "impair the competitive business of" BNSF.

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