



Maria J. Moncada
Senior Attorney
Florida Power & Light Company
700 Universe Boulevard
Juno Beach, FL 33408-0420
(561) 304-5795
(561) 691-7135 (Facsimile)
E-mail: maria.moncada@fpl.com

June 14, 2017

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
2017 JUN 14 PM 4:35
COMMISSION
CLERK

Re: Docket No. 170001-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 Information Provided in Response to Staff's Third Set of Interrogatories (No. 24). The request includes Exhibits A, B (two copies) and C.

Exhibit A consists of the confidential document, 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 is the declaration in support of FPL's request.

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

Sincerely,

Maria J. Moncada

Enclosure

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

- COM _____
- AFD 1 redacted
- APA _____
- ECO _____ 0023310
- ENG _____
- GCL _____
- IDM _____
- TEL _____
- CLK _____

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

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

Docket No: 170001-EI

Date: June 14, 2017

**FLORIDA POWER & LIGHT COMPANY'S REQUEST
FOR CONFIDENTIAL CLASSIFICATION OF INFORMATION
PROVIDED IN RESPONSE TO THE STAFF OF THE FLORIDA PUBLIC
SERVICE COMMISSION'S THIRD SET OF INTERROGATORIES (No. 24)**

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 the Staff of the Florida Public Service Commission's ("Staff") Third Set of Interrogatories (No. 24) ("Confidential Discovery Response"). In support of its Request, FPL states as follows:

1. On May 15, 2017, Staff served its Third Set of Interrogatories (Nos. 11-25) on FPL. FPL's Response to Staff's Third Set of Interrogatories (No. 24) contains information of a confidential nature within the meaning of Section 366.093(3), Florida Statutes.

2. FPL served its responses to Staff's Third Set of Interrogatories (Nos. 11-25) on June 14, 2017. This request is being filed contemporaneously with the service of the responses to Staff's discovery in order to request confidential classification of the Confidential Discovery Responses consistent with Rule 25-22.006, Florida Administrative Code.

3. The following exhibits are made a part of this request:

a. Exhibit A consists of a copy of the Confidential Discovery Response on which all information that FPL asserts is entitled to confidential treatment is highlighted.

b. Exhibit B consists of an edited version of the Confidential Discovery Response on which all information that FPL asserts is entitled to confidential treatment is redacted.

c. Exhibit C is a table containing a page-and-line identification of the information highlighted in Exhibit A and a brief description of the Confidential Information. Exhibit C also references the specific statutory bases for the claim of confidentiality and identifies the declarant who supports the requested classification.

d. Exhibit D is the declaration of William Brannen in support of this Request.

4. FPL submits that the highlighted information in Exhibit A is proprietary confidential business information within the meaning of Section 366.093(3), Florida Statutes. This information is intended to be and is treated by FPL as private, and its confidentiality has been maintained. Pursuant to Section 366.093, such information is entitled to confidential treatment and is exempt from the disclosure provisions of the public records law. Thus, once the Commission determined that the information in question is proprietary confidential business information, the Commission is not required to engage in any further analysis or review such as weighing the harm of disclosure against the public interest in access to the information.

5. As the descriptions included in Exhibit C and the declaration included in Exhibit D indicate, the Confidential Discovery Responses provided by FPL contains information relating to the competitive interests of FPL and its vendors, the disclosure of which would impair their competitive interests. 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 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 materials and declaration 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@fpl.com

By: _____


Maria J. Moncada
Florida Bar No. 773301

CERTIFICATE OF SERVICE

Docket No. 170001-EI

I HEREBY CERTIFY that a true and correct copy of FPL's Request for Confidential Classification* has been furnished by electronic service this 14th day of June 2017 to the following:

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

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

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

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

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

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

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
law@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

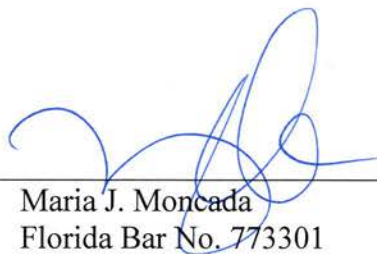
J. R. Kelly, Esq.
Patricia Christensen, Esq.
Charles Rehwinkel, Esq.
Office of Public Counsel
c/o The Florida Legislature
111 West Madison Street, Room 812
Tallahassee, Florida 32399
kelly.jr@leg.state.fl.us
christensen.patty@leg.state.fl.us
rehwinkel.charles@leg.state.fl.us

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: _____



Maria J. Moncada
Florida Bar No. 773301

* The exhibits to this Request are not included with the service copies. Exhibit B was served with FPL's Response to Staff's Third Set of Interrogatories, No. 24. Copies of Exhibits C and D are available upon request.

EXHIBIT A

CONFIDENTIAL

FILED UNDER SEPARATE COVER

EXHIBIT B

REDACTED COPIES

QUESTION:

Please refer to the testimony of Witness Brannen page 3, Lines 4 to 9. Please explain if “components” includes: Solar energy collectors, photovoltaic modules, inverters, Power conditioning and storage devices that store or use solar energy, wiring, structural supports and other components used as integral parts of the systems. If not, please explain what is included in the term.

- a. For each 2017- 2018 solar project please explain and provide the cost of all components included in the calculation used towards the \$1750 kWac cost cap.
b. List all transmission & distribution costs associated with these systems.

RESPONSE:

Yes. The term “components” does include solar energy collectors, photovoltaic modules, inverters, Power conditioning and storage devices that store or use solar energy, wiring, structural supports, and other components used as integral parts of the systems.

		A	B			C	D		
		2017 Solar	Estimated Cost (\$MM)	\$/kW			2018 Solar	Estimated Cost (\$MM)	\$/kW
1	PV Array ⁽¹⁾	█	█	█	PV Array ⁽¹⁾	█	█	█	█
	Transmission Interconnect and Integration ⁽²⁾	\$30	\$102		Transmission Interconnect and Integration ⁽²⁾	\$34	\$115		
	Land	\$12	\$42		Land	\$18	\$59		
	AFUDC	\$16	\$54		AFUDC	\$18	\$59		
2	Total	█	█	█	Total	█	█	█	█

⁽¹⁾ PV array includes: Panels, Racking & Posts, Collection Cables, EPC Contractor, and Development & Project Management Expenses.

⁽²⁾ Transmission Interconnect & Integration includes: Generator Step-up Transformers and Substation materials and contractor scope.

- b. Please refer to FPL's response to Staff's Third Set of Interrogatories, No. 24(a) for the transmission and distribution costs associated with these systems.

EXHIBIT C

JUSTIFICATION TABLE

EXHIBIT C

COMPANY: Florida Power & Light Company
TITLE: List of Confidential Documents
DOCKET NO.: 170001-EI
DOCKET TITLE: Fuel and Purchased Power Cost Recovery Clause with Generating Performance Incentive Factor
SUBJECT: FPL's Responses to Staff's 3rd Set of Interrogatories No. 24
DATE: June 14, 2017

Staff's 3rd Interrog.	Pg Nos.	Description	Line No./ Col. No.	Florida Statute 366.093(3) Subsection	Declarant
Int. No. 24	1 of 1	Solar Project Cost Components - PV Array	Cols. A-D, Lns. 1-2	(e)	W. Brannen

EXHIBIT D

DECLARATION

EXHIBIT D

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Fuel and Purchase Power Cost Recovery
Clause with Generating Performance Incentive
Factor

Docket No: 170001-EI

DECLARATION OF WILLIAM F. BRANNEN

1. My name is William F. Brannen. I am currently employed by NextEra Energy Resources, LLC ("NEER") as a Senior Director for Project Engineering and Due Diligence. I have personal knowledge of the matters stated in this declaration.

2. I have reviewed the documents and information included in Exhibit A to Florida Power & Light Company's ("FPL") Request for Confidential Classification. I have reviewed the documents and information included in Exhibit A to FPL's Request for Confidential Classification of Materials Provided in Response to Staff Interrogatory No. 24, for which I am listed as the declarant on Exhibit C. The documents that I have reviewed and which are asserted by FPL to be proprietary confidential business information contain information relating to competitive interests. Specifically, the documents contain data related to negotiated vendor costs for photovoltaic solar installations. The public disclosure of such information would impair FPL's ability to obtain competitive pricing for such goods and services in the future, to the detriment of customers. 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 not less than 36 months. In addition, they 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.


WILLIAM F. BRANNEN

Date: June 13, 2017