



Kenneth M. Rubin  
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July 11, 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

**Re: Docket No. 20170123-EI**

Dear Ms. Stauffer:

**REDACTED**

RECEIVED-FPSC  
2017 JUL 11 PM 3:35  
COMMISSION  
CLERK

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 First Request for Production of Documents (Nos. 1 & 11). 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 contains the declarations in support of FPL's request.

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

Sincerely,

Kenneth M. Rubin

Enclosure

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

**BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION**

Petition for Approval of Arrangement to Mitigate Unfavorable Impact of St. Johns River Power Park, by Florida Power and Light Company

Docket No: 20170123-EI

Date: July 11, 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 FIRST  
REQUEST FOR PRODUCTION OF DOCUMENTS (NOS. 1 AND 11)**

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") First Request for Production of Documents (Nos. 1 and 11) ("Confidential Discovery Response"). In support of its Request, FPL states as follows:

1. On June 21, 2017, Staff served its First Request for Production of Documents (Nos. 1-11) on FPL. FPL's Response to Staff's First Request for Production of Documents (Nos. 1 and 11) contain information of a confidential nature within the meaning of Section 366.093(3), Florida Statutes.

2. FPL served its responses to Staff's First Request for Production of Documents (Nos. 1-11) on July 11, 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 contains the declarations of Scott Bores and Sam Forrest 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 has determined that the information in question is proprietary confidential business information, the Commission is not required to engage in any further analysis or review such as weighing the harm of disclosure against the public interest in access to the information.

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 concerning bids or other contractual data, the disclosure of which would impair the efforts of FPL or its vendors to contract for goods or services on favorable terms. This information is protected by Section 366.093(3)(d), Fla. Stat.

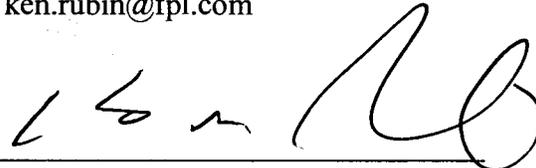
6. In addition, certain documents contain information relating to the competitive interests of FPL and its vendors, the disclosure of which would impair their competitive interests. This information is protected by Section 366.093(3)(e), Fla. Stat.

7. 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,

Kenneth M. Rubin  
Senior Counsel  
Florida Power & Light Company  
700 Universe Boulevard  
Juno Beach, FL 33408  
Telephone: (561) 691-2512  
Facsimile: (561) 691-7135  
Email: ken.rubin@fpl.com

By:   
Kenneth M. Rubin  
Florida Bar No. 349038

**CERTIFICATE OF SERVICE**

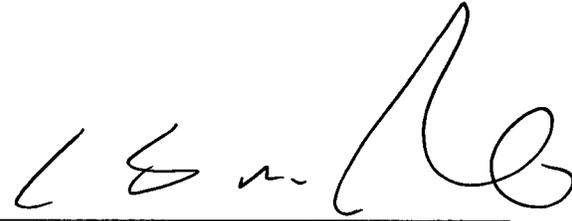
**Docket No. 20170123-EI**

I HEREBY CERTIFY that a true and correct copy of the foregoing has been furnished  
by electronic service on this 11<sup>th</sup> day of July 2017 to the following:

Danijela Janjic, Esq.  
Kyesha Mapp, Esq.  
Margo DuVal, Esq.  
Division of Legal Services  
Office of General Counsel  
2540 Shumard Oak Blvd.  
Tallahassee, Florida 32399-0850  
djanjic@psc.state.fl.us  
kmapp@psc.state.fl.us  
mduval@psc.state.fl.us  
**Florida Public Service Commission**

J. R. Kelly, Esq.  
Stephanie Morse, Esq.  
c/o The Florida Legislature  
111 West Madison Street, Room 812  
Tallahassee, Florida 32399  
kelly.jr@leg.state.fl.us  
morse.stephanie@leg.state.fl.us  
**Office of Public Counsel**

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



Kenneth M. Rubin

**EXHIBIT A**

**CONFIDENTIAL**

**FILED UNDER SEPARATE COVER**

# **EXHIBIT B**

## **REDACTED COPIES**

SJRPP 000867

Commodity Cost - Gas (\$/mmbtu) <sup>1,2</sup>												
Year	January	February	March	April	May	June	July	August	September	October	November	December
2012	\$3.03	\$2.66	\$2.38	\$2.19	\$2.14	\$2.49	\$2.90	\$3.07	\$2.71	\$3.11	\$3.55	\$3.66
2013	\$3.36	\$3.27	\$3.58	\$4.08	\$4.18	\$4.14	\$3.74	\$3.48	\$3.60	\$3.55	\$3.55	\$3.96
2014	\$4.45	\$5.70	\$4.88	\$4.63	\$4.74	\$4.60	\$4.32	\$3.84	\$3.95	\$3.93	\$3.80	\$4.07
2015	\$3.11	\$2.85	\$2.85	\$2.55	\$2.59	\$2.78	\$2.77	\$2.84	\$2.62	\$2.46	\$2.02	\$2.08
2016	\$2.32	\$2.13	\$1.69	\$1.86	\$1.94	\$2.09	\$2.89	\$2.69	\$2.84	\$2.92	\$2.65	\$3.26

Transportation Costs Gas (\$/mmbtu)												
Year	January	February	March	April	May	June	July	August	September	October	November	December
2012	\$0.080	\$0.070	\$0.064	\$0.087	\$0.086	\$0.097	\$0.114	\$0.123	\$0.106	\$0.091	\$0.100	\$0.102
2013	\$0.094	\$0.093	\$0.103	\$0.141	\$0.151	\$0.152	\$0.139	\$0.131	\$0.133	\$0.097	\$0.096	\$0.106
2014	\$0.120	\$0.148	\$0.131	\$0.126	\$0.131	\$0.127	\$0.118	\$0.105	\$0.105	\$0.115	\$0.105	\$0.113
2015	\$0.089	\$0.082	\$0.083	\$0.103	\$0.104	\$0.112	\$0.112	\$0.117	\$0.108	\$0.090	\$0.075	\$0.079
2016	\$0.083	\$0.078	\$0.068	\$0.071	\$0.072	\$0.078	\$0.103	\$0.100	\$0.102	\$0.089	\$0.078	\$0.093

Delivered Gas												
Year	January	February	March	April	May	June	July	August	September	October	November	December
2012	\$3.11	\$2.73	\$2.44	\$2.28	\$2.23	\$2.59	\$3.01	\$3.19	\$2.82	\$3.20	\$3.65	\$3.76
2013	\$3.46	\$3.36	\$3.68	\$4.22	\$4.33	\$4.29	\$3.88	\$3.62	\$3.73	\$3.65	\$3.65	\$4.07
2014	\$4.57	\$5.84	\$5.01	\$4.75	\$4.87	\$4.73	\$4.44	\$3.94	\$4.05	\$4.04	\$3.91	\$4.18
2015	\$3.19	\$2.93	\$2.93	\$2.66	\$2.70	\$2.89	\$2.88	\$2.96	\$2.72	\$2.55	\$2.10	\$2.16
2016	\$2.40	\$2.21	\$1.76	\$1.93	\$2.01	\$2.17	\$2.99	\$2.79	\$2.94	\$3.01	\$2.73	\$3.35

Notes:

- 1 - Commodity Cost includes basis
- 2 - Commodity Cost is a function of the natural gas mmbtu purchased at various upstream locations.
- 3 - Transportation includes a weighted average loss factor for FGT and Gulfstream
- 4- Calculation: Sum of Commodity and Transportation Costs

SJRPP 000868

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	<b>Commodity Cost - Scherer 4 (\$/ton)</b>												
<b>Year</b>	<b>January</b>	<b>February</b>	<b>March</b>	<b>April</b>	<b>May</b>	<b>June</b>	<b>July</b>	<b>August</b>	<b>September</b>	<b>October</b>	<b>November</b>	<b>December</b>	
<b>2012</b>													
<b>2013</b>													
<b>2014</b>													
<b>2015</b>													
<b>2016</b>													

	<b>Transportation Cost - Scherer 4 (\$/ton)</b>												
<b>Year</b>	<b>January</b>	<b>February</b>	<b>March</b>	<b>April</b>	<b>May</b>	<b>June</b>	<b>July</b>	<b>August</b>	<b>September</b>	<b>October</b>	<b>November</b>	<b>December</b>	
<b>2012</b>													
<b>2013</b>													
<b>2014</b>													
<b>2015</b>													
<b>2016</b>													

	<b>Delivered Cost - Scherer 4 (\$/ton)</b>												
<b>Year</b>	<b>January</b>	<b>February</b>	<b>March</b>	<b>April</b>	<b>May</b>	<b>June</b>	<b>July</b>	<b>August</b>	<b>September</b>	<b>October</b>	<b>November</b>	<b>December</b>	
<b>2012</b>	\$38.92	\$40.20	\$40.81	\$41.31	\$41.06	\$41.06	\$40.52	\$39.70	\$40.45	\$39.78	\$39.94	\$39.59	
<b>2013</b>	\$40.05	\$40.33	\$40.22	\$40.83	\$41.42	\$40.16	\$40.93	\$40.53	\$40.91	\$41.93	\$42.34	\$42.35	
<b>2014</b>	\$42.17	\$41.93	\$42.13	\$43.00	\$43.90	\$44.16	\$43.69	\$44.43	\$44.39	\$42.97	\$43.24	\$42.55	
<b>2015</b>	\$41.92	\$39.31	\$38.31	\$38.66	\$38.23	\$37.95	\$38.67	\$39.25	\$39.29	\$38.41	\$38.45	\$38.51	
<b>2016</b>	\$39.67	\$39.56	\$39.10	\$39.17	\$38.87	\$38.84	\$38.25	\$38.47	\$38.35	\$37.50	\$37.85	\$0.00	

Notes:  
Source - FPSC Form 423

SJRPP 000869

	A	B	C	D	E	F	G	H	I	J	K	L	M
1	<b>Commodity Cost - SJRPP - Rail (\$/ton)</b>												
2	<b>Year</b>	<b>January</b>	<b>February</b>	<b>March</b>	<b>April</b>	<b>May</b>	<b>June</b>	<b>July</b>	<b>August</b>	<b>September</b>	<b>October</b>	<b>November</b>	<b>December</b>
3	2012												
4	2013												
5	2014												
6	2015												
7	2016												
8													
9	<b>Transportation Cost - SJRPP - Rail (\$/ton)</b>												
10	<b>Year</b>	<b>January</b>	<b>February</b>	<b>March</b>	<b>April</b>	<b>May</b>	<b>June</b>	<b>July</b>	<b>August</b>	<b>September</b>	<b>October</b>	<b>November</b>	<b>December</b>
11	2012												
12	2013												
13	2014												
14	2015												
15	2016												
16													
17	<b>Delivered Cost - SJRPP - Rail (\$/ton)</b>												
18	<b>Year</b>	<b>January</b>	<b>February</b>	<b>March</b>	<b>April</b>	<b>May</b>	<b>June</b>	<b>July</b>	<b>AUGUST</b>	<b>September</b>	<b>October</b>	<b>November</b>	<b>December</b>
19	2012	\$75.05	\$76.06	\$77.23	\$77.23	\$77.45	\$76.28	\$77.25	\$77.23	\$77.23	\$77.23	\$77.37	\$77.44
20	2013	\$78.84	\$78.78	\$78.77	\$78.98	\$78.90	\$78.60	\$78.77	\$78.77	\$78.77	\$78.77	\$78.77	\$78.77
21	2014	\$79.65	\$79.76	\$79.76	\$79.76	\$79.83	\$78.82	\$79.06	\$78.45	\$78.78	\$79.76	\$79.76	\$79.76
22	2015	\$75.79	\$88.00	\$88.00	\$88.50	\$88.50	\$88.50	\$88.50	\$88.50	\$88.50	\$88.50	\$88.50	\$88.50
23	2016	\$90.07	\$90.07	\$90.07	\$90.07	\$90.07	\$90.07	\$90.07	\$90.07	\$90.07	\$90.07	\$90.07	\$90.07

Notes:

Source - FPSC Form 423

SJRPP 000870

	A	B	C	D	E	F	G	H	I	J	K	L	M
1	[REDACTED]												
2	[REDACTED]												
3	Year	January	February	March	April	May	June	July	August	September	October	November	December
4	2012	[REDACTED]											
5	2013	[REDACTED]											
6	2014	[REDACTED]											
7	2015	[REDACTED]											
8	2016	[REDACTED]											
9	[REDACTED]												

- 10 Notes:
- 11 Source - FPSC Form 423
- 12 FPL purchases Vessel Delivered coal at an all in delivered price

SJRPP 000867

Commodity Cost - Gas (\$/mmbtu) <sup>1,2</sup>												
Year	January	February	March	April	May	June	July	August	September	October	November	December
2012	\$3.03	\$2.66	\$2.38	\$2.19	\$2.14	\$2.49	\$2.90	\$3.07	\$2.71	\$3.11	\$3.55	\$3.66
2013	\$3.36	\$3.27	\$3.58	\$4.08	\$4.18	\$4.14	\$3.74	\$3.48	\$3.60	\$3.55	\$3.55	\$3.96
2014	\$4.45	\$5.70	\$4.88	\$4.63	\$4.74	\$4.60	\$4.32	\$3.84	\$3.95	\$3.93	\$3.80	\$4.07
2015	\$3.11	\$2.85	\$2.85	\$2.55	\$2.59	\$2.78	\$2.77	\$2.84	\$2.62	\$2.46	\$2.02	\$2.08
2016	\$2.32	\$2.13	\$1.69	\$1.86	\$1.94	\$2.09	\$2.89	\$2.69	\$2.84	\$2.92	\$2.65	\$3.26

Transportation Cost - Gas (\$/mmbtu) <sup>3</sup>												
Year	January	February	March	April	May	June	July	August	September	October	November	December
2012	\$0.080	\$0.070	\$0.064	\$0.087	\$0.086	\$0.097	\$0.114	\$0.123	\$0.106	\$0.091	\$0.100	\$0.102
2013	\$0.094	\$0.093	\$0.103	\$0.141	\$0.151	\$0.152	\$0.139	\$0.131	\$0.133	\$0.097	\$0.096	\$0.106
2014	\$0.120	\$0.148	\$0.131	\$0.126	\$0.131	\$0.127	\$0.118	\$0.105	\$0.105	\$0.115	\$0.105	\$0.113
2015	\$0.089	\$0.082	\$0.083	\$0.103	\$0.104	\$0.112	\$0.112	\$0.117	\$0.108	\$0.090	\$0.075	\$0.079
2016	\$0.083	\$0.078	\$0.068	\$0.071	\$0.072	\$0.078	\$0.103	\$0.100	\$0.102	\$0.089	\$0.078	\$0.093

Delivered Cost - Gas (\$/mmbtu) <sup>4</sup>												
Year	January	February	March	April	May	June	July	August	September	October	November	December
2012	\$3.11	\$2.73	\$2.44	\$2.28	\$2.23	\$2.59	\$3.01	\$3.19	\$2.82	\$3.20	\$3.65	\$3.76
2013	\$3.46	\$3.36	\$3.68	\$4.22	\$4.33	\$4.29	\$3.88	\$3.62	\$3.73	\$3.65	\$3.65	\$4.07
2014	\$4.57	\$5.84	\$5.01	\$4.75	\$4.87	\$4.73	\$4.44	\$3.94	\$4.05	\$4.04	\$3.91	\$4.18
2015	\$3.19	\$2.93	\$2.93	\$2.66	\$2.70	\$2.89	\$2.88	\$2.96	\$2.72	\$2.55	\$2.10	\$2.16
2016	\$2.40	\$2.21	\$1.76	\$1.93	\$2.01	\$2.17	\$2.99	\$2.79	\$2.94	\$3.01	\$2.73	\$3.35

Notes:

- 1 - Commodity Cost includes basis
- 2 - Commodity Cost is a function of the natural gas mmbtu purchased at various upstream locations.
- 3 - Transportation includes a weighted average loss factor for FGT and Gulfstream
- 4- Calculation: Sum of Commodity and Transportation Costs

SJRPP 000868

	A	B	C	D	E	F	G	H	I	J	K	L	M
1	<b>Commodity Cost - Scherer 4 (\$/ton)</b>												
2	<b>Year</b>	<b>January</b>	<b>February</b>	<b>March</b>	<b>April</b>	<b>May</b>	<b>June</b>	<b>July</b>	<b>August</b>	<b>September</b>	<b>October</b>	<b>November</b>	<b>December</b>
3	<b>2012</b>												
4	<b>2013</b>												
5	<b>2014</b>												
6	<b>2015</b>												
7	<b>2016</b>												

	<b>Transportation Cost - Scherer 4 (\$/ton)</b>												
	<b>Year</b>	<b>January</b>	<b>February</b>	<b>March</b>	<b>April</b>	<b>May</b>	<b>June</b>	<b>July</b>	<b>August</b>	<b>September</b>	<b>October</b>	<b>November</b>	<b>December</b>
11	<b>2012</b>												
12	<b>2013</b>												
13	<b>2014</b>												
14	<b>2015</b>												
15	<b>2016</b>												

	<b>Delivered Cost - Scherer 4 (\$/ton)</b>												
	<b>Year</b>	<b>January</b>	<b>February</b>	<b>March</b>	<b>April</b>	<b>May</b>	<b>June</b>	<b>July</b>	<b>August</b>	<b>September</b>	<b>October</b>	<b>November</b>	<b>December</b>
19	<b>2012</b>	\$38.92	\$40.20	\$40.81	\$41.31	\$41.06	\$41.06	\$40.52	\$39.70	\$40.45	\$39.78	\$39.94	\$39.59
20	<b>2013</b>	\$40.05	\$40.33	\$40.22	\$40.83	\$41.42	\$40.16	\$40.93	\$40.53	\$40.91	\$41.93	\$42.34	\$42.35
21	<b>2014</b>	\$42.17	\$41.93	\$42.13	\$43.00	\$43.90	\$44.16	\$43.69	\$44.43	\$44.39	\$42.97	\$43.24	\$42.55
22	<b>2015</b>	\$41.92	\$39.31	\$38.31	\$38.66	\$38.23	\$37.95	\$38.67	\$39.25	\$39.29	\$38.41	\$38.45	\$38.51
23	<b>2016</b>	\$39.67	\$39.56	\$39.10	\$39.17	\$38.87	\$38.84	\$38.25	\$38.47	\$38.35	\$37.50	\$37.85	\$0.00

Notes:

Source - FPSC Form 423

SJRPP 000869

	A	B	C	D	E	F	G	H	I	J	K	L	M
1	<b>Commodity Cost - SJRPP - Rail (\$/ton)</b>												
2	Year	January	February	March	April	May	June	July	August	September	October	November	December
3	2012												
4	2013												
5	2014												
6	2015												
7	2016												

	<b>Transportation Cost - SJRPP - Rail (\$/ton)</b>												
Year	January	February	March	April	May	June	July	August	September	October	November	December	
2012													
2013													
2014													
2015													
2016													

	<b>Delivered Cost - SJRPP - Rail (\$/ton)</b>												
Year	January	February	March	April	May	June	July	August	September	October	November	December	
2012	\$75.05	\$76.06	\$77.23	\$77.23	\$77.45	\$76.28	\$77.25	\$77.23	\$77.23	\$77.23	\$77.37	\$77.44	
2013	\$78.84	\$78.78	\$78.77	\$78.98	\$78.90	\$78.60	\$78.77	\$78.77	\$78.77	\$78.77	\$78.77	\$78.77	
2014	\$79.65	\$79.76	\$79.76	\$79.76	\$79.83	\$78.82	\$79.06	\$78.45	\$78.78	\$79.76	\$79.76	\$79.76	
2015	\$75.79	\$88.00	\$88.00	\$88.50	\$88.50	\$88.50	\$88.50	\$88.50	\$88.50	\$88.50	\$88.50	\$88.50	
2016	\$90.07	\$90.07	\$90.07	\$90.07	\$90.07	\$90.07	\$90.07	\$90.07	\$90.07	\$90.07	\$90.07	\$90.07	

Notes:

Source - FPSC Form 423

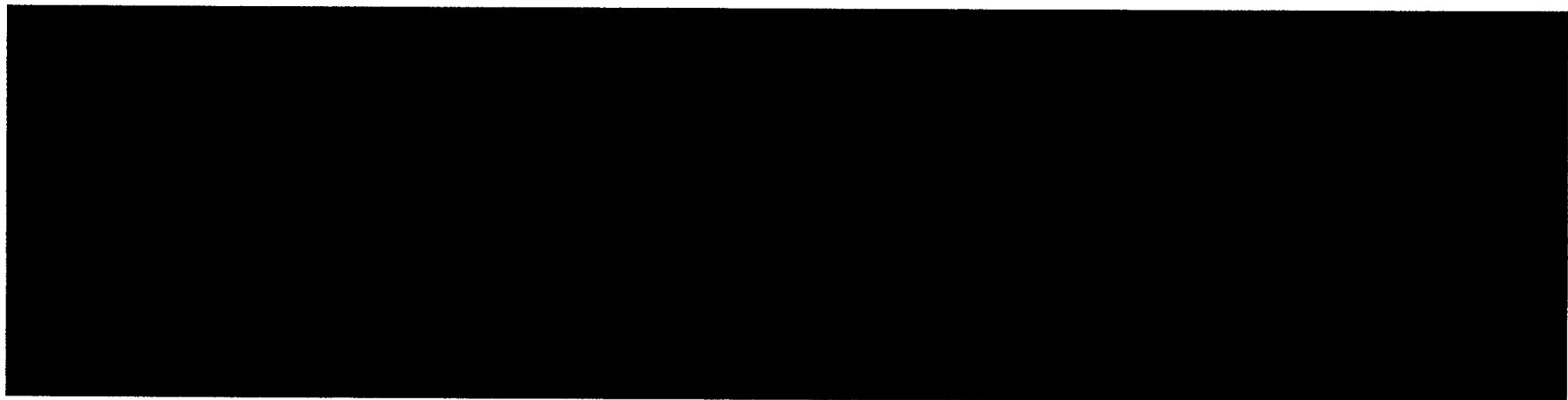
SJRPP 000870

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Delivered Cost - SJRPP - Vessel (\$/ton)												
Year	January	February	March	April	May	June	July	August	September	October	November	December
2012												
2013												
2014												
2015												
2016												

10 Notes:  
11 Source - FPSC Form 423  
12 FPL purchases Vessel Delivered coal at an all in delivered price





45	2016		50.8%
46	2017		72.3%
47	2018		60.3%
48	2019		52.4%
49	2020		45.4%
50	2021		38.8%
51	2022	EIA Solar Growth	9.9%
52	2023	Rate Projections	3.8%
53	2024		4.4%
54	2025		5.0%
55	2026		5.2%
56	2027		5.4%
57	2028		5.4%
58	2029		5.4%
59	2030		5.6%
60	2031		5.3%
61	2032		5.0%
62	2033		4.7%
63	2034		4.5%
64	2035		4.3%
65	2036		4.2%
66	2037		4.0%
67	2038		3.9%
68	2039		3.7%
69	2040		3.6%

I J K L M N O

**FPL SERVICE TERRITORY**

Commercial	Total	Total SP Impact Including Losses	Total SP Impact Including Losses Compared with Last Year	FPL's assumed share of the state based on Residential Commercial		
3	7					
5	9					
8	15					
14	24					
17	32	10.8	-0.1			
21	45	15.2	0.1	2015	50%	27%
25	61	20.9	-1.7	2016	50%	27%
34	96	33.2	4.5	2017	50%	27%
46	144	50.3	13.1	2018	50%	27%
57	208	72.8	24.0	2019	50%	27%
73	292	103.1	37.2	2020	50%	27%
93	396	140.9	57.8	2021	50%	27%
97	430	152.8	52.4	2022	50%	27%
102	448	158.9	41.1	2023	50%	27%
109	471	166.8	31.5	2024	50%	27%
120	500	176.9	31.2			
131	531	188.2	31.4			
144	565	200.7	32.3			
157	601	214.2	33.8			
172	639	228.6	35.9			
187	681	244.2	38.5			
203	722					
219	764					
235	806					
251	848					
268	891					
285	934					
302	977					
319	1,020					
336	1,063					
353	1,107					

<p>Losses for 2015</p> <p>4.5%</p>	<p>0.4%</p>
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<p>Annual Growth</p> <p>40.8%</p> <p>79.4%</p> <p>60.7%</p> <p>23.6%</p> <p>25.9%</p>	<p>23.0%</p> <p>74.8%</p> <p>58.2%</p> <p>33.7%</p> <p>40.2%</p>
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20.3%	36.5%
35.7%	57.1%
32.4%	50.3%
25.1%	43.7%
27.6%	40.5%
27.0%	35.8%
4.3%	8.6%
5.5%	4.2%
7.3%	5.1%
9.4%	6.0%
9.6%	6.2%
9.6%	6.4%
9.4%	6.4%
9.1%	6.4%
8.8%	6.4%
8.4%	6.1%
7.9%	5.8%
7.4%	5.5%
7.0%	5.2%
6.6%	5.0%
6.2%	4.8%
5.9%	4.6%
5.6%	4.4%
5.4%	4.2%
5.1%	4.1%

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2014 data

Total

36%

37%

38%

39%

41%

41%

42%

42%

42%

42%

Actual Data for year ending 12/31/2015

**CONFIDENTIAL**

From FPSC net metering reports

**SJRPP 000865**

	MW (ac)	MWh	LF
Florida	101.835	49588.459	5.6%
FPL	39.951	19922.479	5.7%
FPL Share	39.2%	40.2%	

	MW (dc)
Florida	119.81
FPL	47.00
FPL Share	39.2%

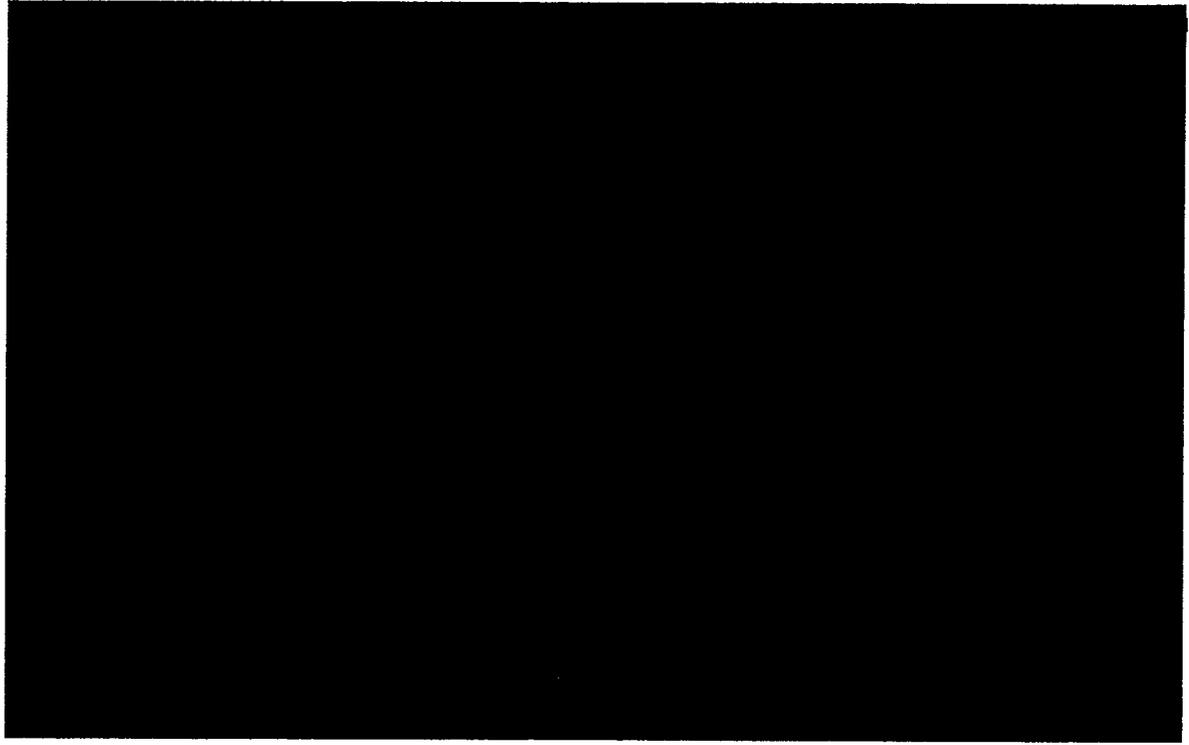
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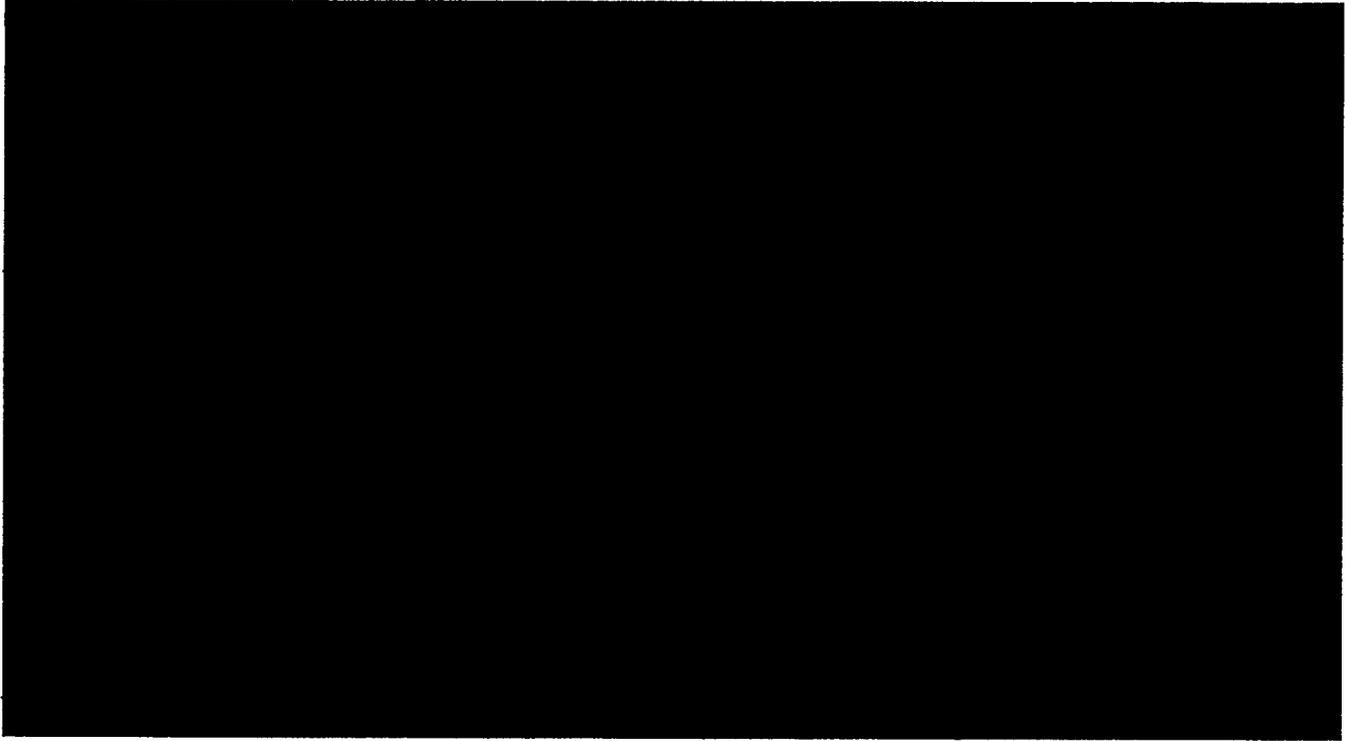
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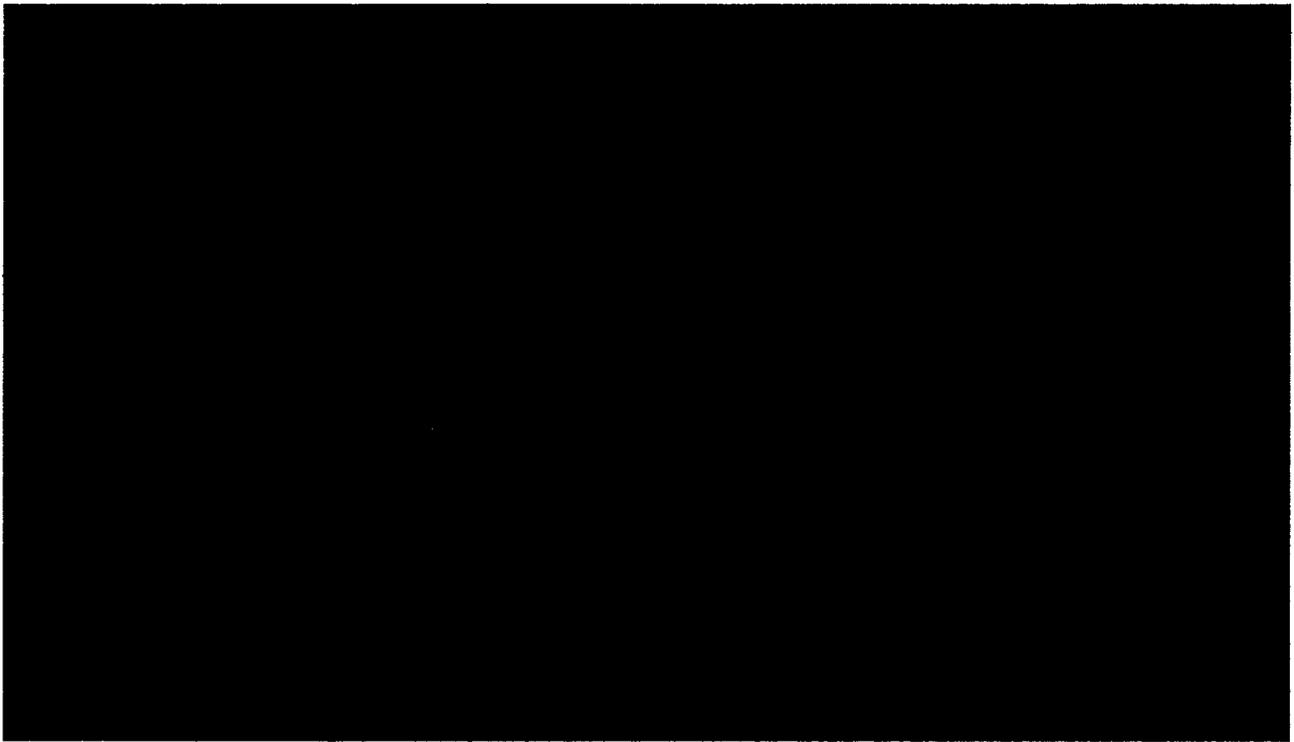
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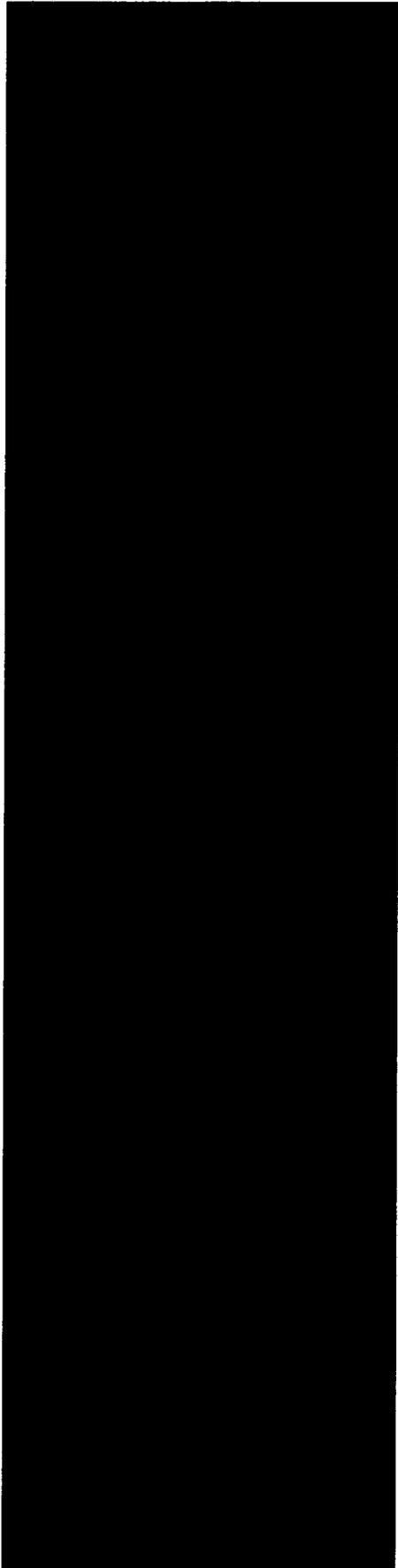


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45	2016		50.8%
46	2017		72.3%
47	2018		60.3%
48	2019		52.4%
49	2020		45.4%
50	2021		38.8%
51	2022	EIA Solar Growth	9.9%
52	2023	Rate Projections	3.8%
53	2024		4.4%
54	2025		5.0%
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64	2035		4.3%
65	2036		4.2%
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68	2039		3.7%
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I J K L M N O

**FPL SERVICE TERRITORY**

Commercial	Total	Total SP Impact Including Losses	Total SP Impact Including Losses Compared with Last Year	FPL's assumed share of the state based on		
					Residential	Commercial
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5	9					
8	15					
14	24					
17	32	10.8	-0.1			
21	45	15.2	0.1	2015	50%	27%
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251	848					
268	891					
285	934					
302	977					
319	1,020					
336	1,063					
353	1,107					

<p>es for 2015</p> <p>4.5%      0.4%</p>
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<p>Annual Growth</p> <p>40.8%      23.0%</p> <p>79.4%      74.8%</p> <p>60.7%      58.2%</p> <p>23.6%      33.7%</p> <p>25.9%      40.2%</p>
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20.3%	36.5%
35.7%	57.1%
32.4%	50.3%
25.1%	43.7%
27.6%	40.5%
27.0%	35.8%
4.3%	8.6%
5.5%	4.2%
7.3%	5.1%
9.4%	6.0%
9.6%	6.2%
9.6%	6.4%
9.4%	6.4%
9.1%	6.4%
8.8%	6.4%
8.4%	6.1%
7.9%	5.8%
7.4%	5.5%
7.0%	5.2%
6.6%	5.0%
6.2%	4.8%
5.9%	4.6%
5.6%	4.4%
5.4%	4.2%
5.1%	4.1%

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2014 data

Total

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Actual Data for year ending 12/31/2015  
From FPSC net metering reports

**CONFIDENTIAL**

**SJRPP 000865**

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	MW (dc)
Florida	119.81
FPL	47.00
FPL Share	39.2%

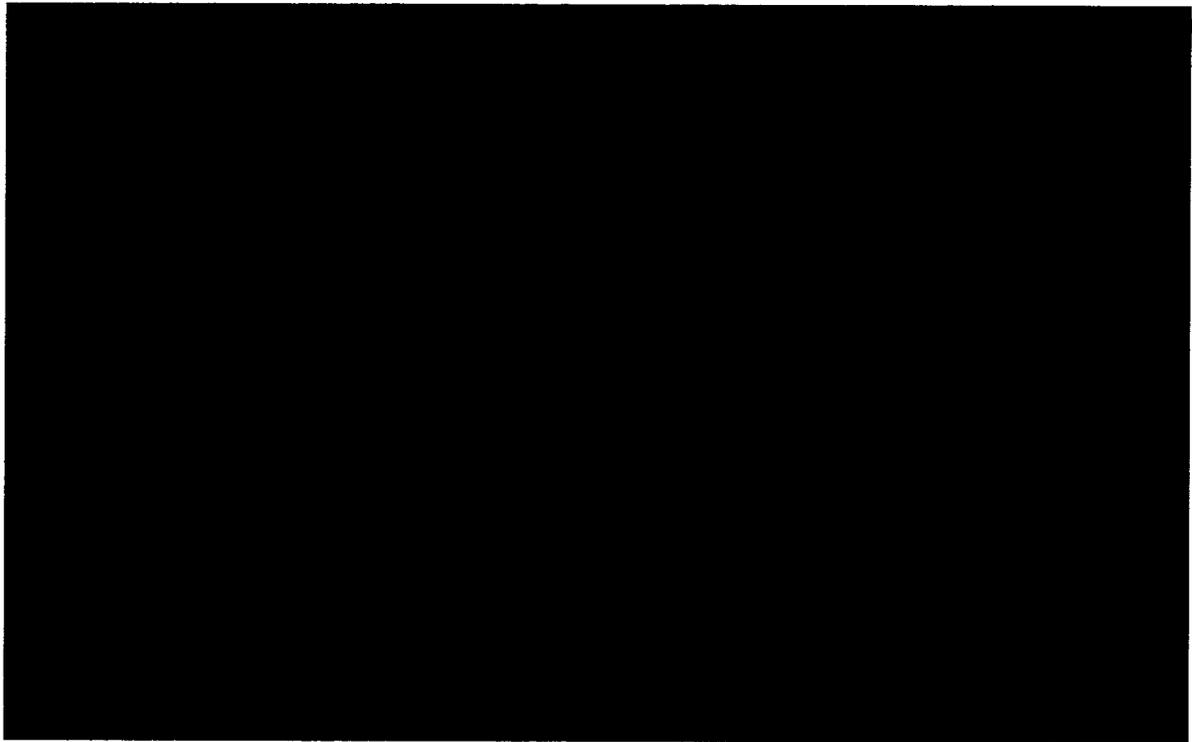
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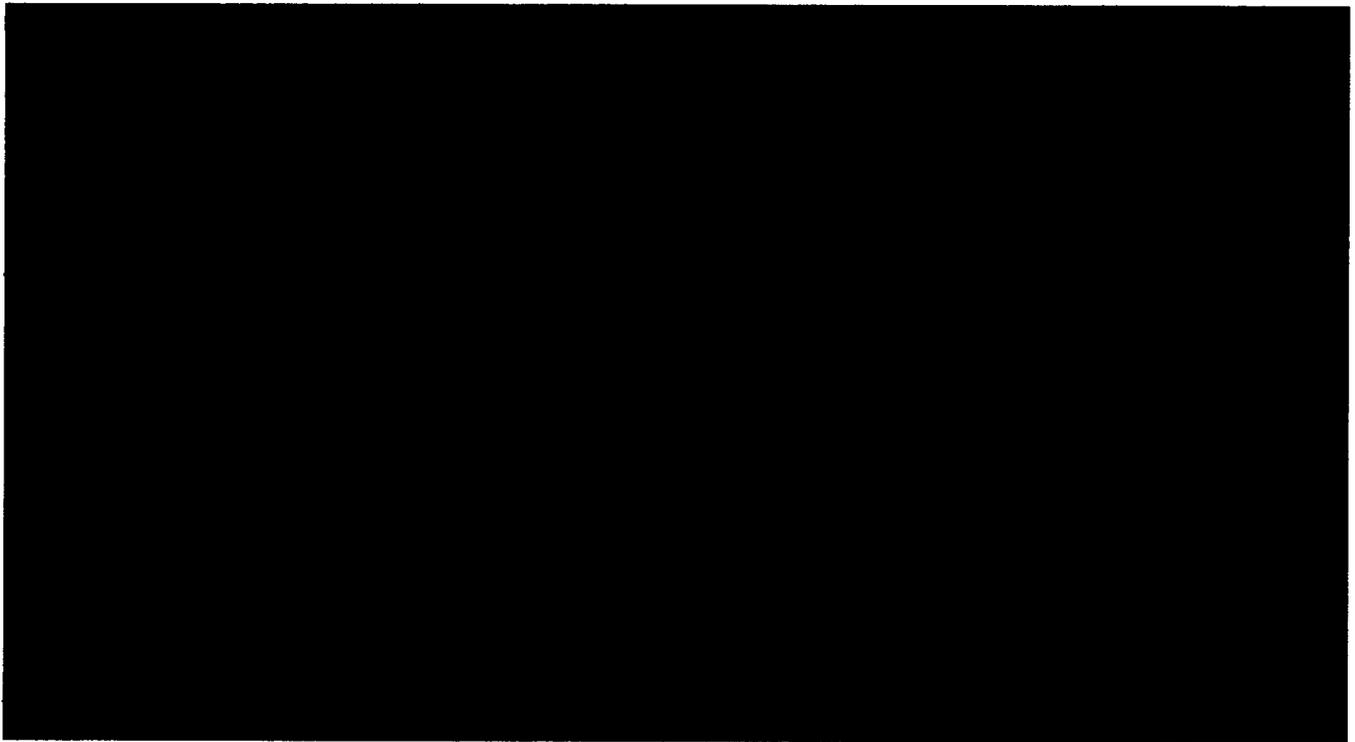
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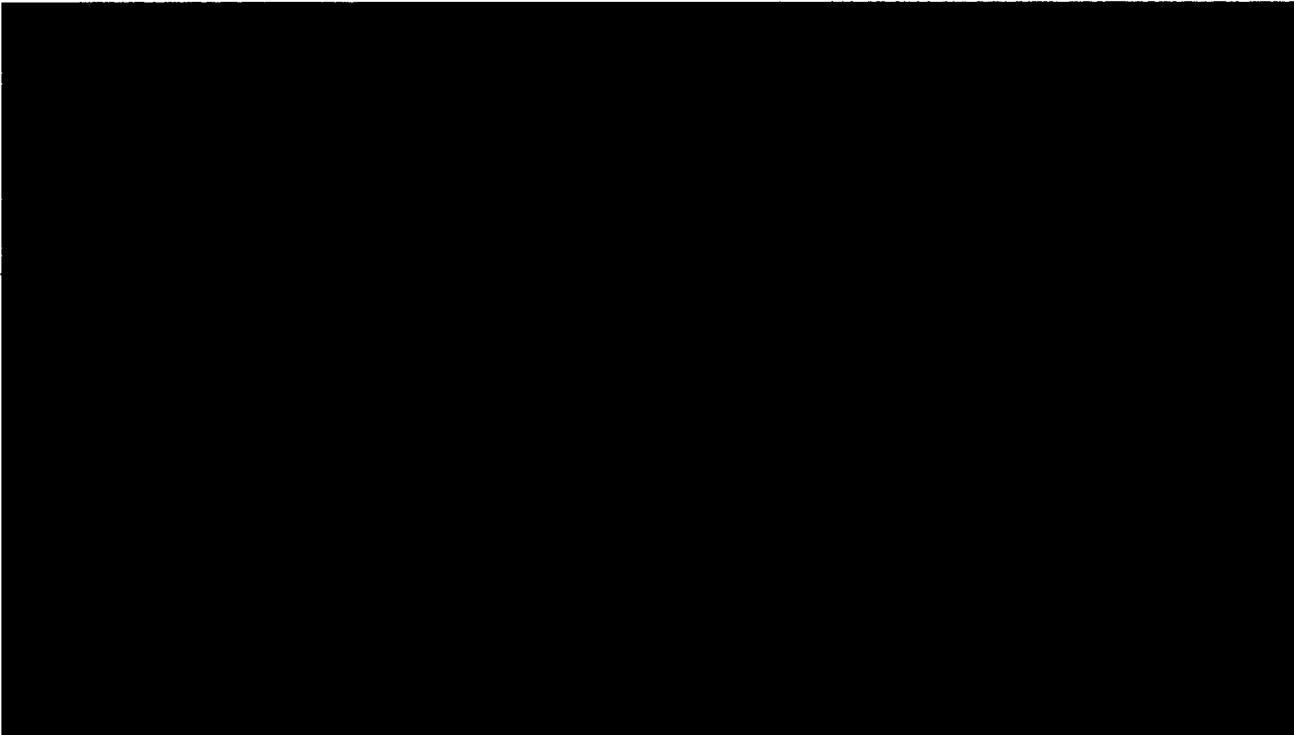
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# **EXHIBIT C**

## **JUSTIFICATION TABLE**

**EXHIBIT C**

**COMPANY:** Florida Power & Light Company  
**TITLE:** List of Confidential Documents  
**DOCKET NO:** 20170123-EI  
**DOCKET TITLE:** Petition for approval of arrangement to mitigate unfavorable impact of St. Johns River Power Park, by Florida Power & Light Company.  
**DATE:** July 11, 2017

Discovery Set	POD No.	Conf. Y/N	Bates Number	Line / Column	Florida Statute 366.093(3) Subsection	Declarant
Staff's First Set of PODs	1	Y	SJRPP 000863	All	(d)	Scott Bores
		Y	SJRPP 000864	Cols B, C & D Col E Lines 5 - 25	(d)	Scott Bores
		N	SJRPP 000865	N/A	N/A	N/A
		Y	SJRPP 000866	All	(d)	Scott Bores
Staff's First Set of PODs	11	N	SJRPP 000867	N/A	N/A	N/A
		Y	SJRPP 000868	Cols B – M Lines 3 – 7 & 11 – 15	(e)	Sam Forrest
		Y	SJRPP 000869	Cols B – M Lines 3 – 7 & 11 – 15	(e)	Sam Forrest
		Y	SJRPP 000870	Cols B – M Lines 4 - 8	(e)	Sam Forrest

# **EXHIBIT D**

# **DECLARATIONS**

**EXHIBIT D**

**BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION**

In re: Florida Power & Light Company's  
Petition for Approval of Arrangement To  
Mitigate Unfavorable Impact of St. Johns  
River Power Park

Docket No: 170123-EI

STATE OF FLORIDA            )  
  )  
COUNTY OF PALM BEACH    )

**DECLARATION OF SAM FORREST**

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.

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 coal procurement activities. The disclosure of this information would impair FPL's ability to competitively procure coal 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: 7/10/17

**EXHIBIT D**

**BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION**

In re: Florida Power & Light Company's  
Petition for Approval of Arrangement To  
Mitigate Unfavorable Impact of St. Johns  
River Power Park

Docket No: 170123-EI

STATE OF FLORIDA )

)

**DECLARATION OF SCOTT BORES**

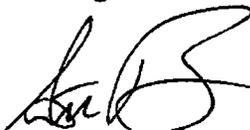
COUNTY OF PALM BEACH )

1. My name is Scott Bores. I am currently employed by Florida Power & Light Company ("FPL") as Senior Director of Financial Planning and Analysis. I have personal knowledge of the matters stated in this written declaration.

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 contain contractual data. Disclosure of this information would impair the efforts of FPL to procure this information from this vendor in the future. Further, this is a non-public forecast used for our planning purposes and disclosing this information would adversely affect the vendor's ability to further market this product. To the best of my knowledge, FPL has maintained the confidentiality of these documents and materials.

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.



SCOTT BORES

Date: \_\_\_\_\_

7/11/2017