



**William P. Cox**  
**Senior Attorney**  
**Florida Power & Light Company**  
**700 Universe Boulevard**  
**Juno Beach, FL 33408-0420**  
**(561) 304-5662**  
**(561) 691-7135 (Facsimile)**

January 5, 2018

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COMMISSION  
CLERK

**-VIA HAND DELIVERY-**

Ms. Carlotta Stauffer, Commission Clerk  
Office of the General Counsel  
Florida Public Service Commission  
2540 Shumard Oak Blvd.  
Tallahassee, FL 32399-0850

**REDACTED**

**RE: Docket No. 20170025-EI**

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 Request for Production of Documents (No. 16). The request includes Exhibits A, B (two copies), C, and D.

Exhibit A consists of the confidential documents, and all the information that FPL asserts is entitled to confidential treatment has been highlighted. Exhibit B is an edited version of Exhibit A, in which the information FPL asserts is confidential has been redacted. Exhibit C is a justification table in support of FPL's Request for Confidential Classification. Exhibit D contains one declaration in support of FPL's request.

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

Sincerely,  
  
William P. Cox

Enclosure

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

COM \_\_\_  
AFD \_\_\_  
APA \_\_\_  
ECO \_\_\_  
ENG Exh B  
GCL \_\_\_  
IDM \_\_\_  
CLK \_\_\_

**BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION**

In re: Petition for determination of need for  
Dania Beach Clean Energy Center Unit 7, by  
Florida Power & Light Company.

Docket No: 20170225-EI

Date: January 5, 2018

**FLORIDA POWER & LIGHT COMPANY'S REQUEST  
FOR CONFIDENTIAL CLASSIFICATION OF INFORMATION  
PROVIDED IN RESPONSE TO STAFF OF THE FLORIDA PUBLIC SERVICE  
COMMISSION'S THIRD REQUEST FOR PRODUCTION OF DOCUMENTS (NO. 16)**

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 Request for Production (No. 16) ("Confidential Discovery Response"). In support of its Request, FPL states as follows:

1. On December 21, 2017, Staff served its Third Set of Request for Production (Nos. 16-18) on FPL. FPL's responses to Staff's Third Request for Production (No. 16) 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 Request for Production (Nos. 16-18) on January 5, 2018. 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 Richard Hathaway 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.

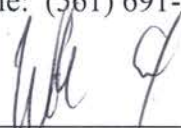
5. As the descriptions included in Exhibit C and the declaration included in Exhibit D indicate, the Confidential Discovery Responses provided by FPL contains information concerning information relating to competitive interests. This information is protected by Section 366.093(3)(e), Fla. Stat.

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,

William P. Cox, Esq.  
Senior Attorney  
Florida Power & Light Company  
700 Universe Boulevard  
Juno Beach, FL 33408  
Telephone: (561) 304-5662  
Facsimile: (561) 691-7135

By:   
\_\_\_\_\_  
William P. Cox  
Fla. Bar No. 0093531

**CERTIFICATE OF SERVICE**  
**Docket No. 20170225-EI**


**I HEREBY CERTIFY** that a true and correct copy of the foregoing has been furnished by electronic mail on this 5th day of January, 2018 to the following:

Charles Murphy, Esq.  
Stephanie Cuello, Esq.  
Division of Legal Services  
Florida Public Service Commission  
2540 Shumard Oak Blvd.  
Tallahassee, Florida 32399-0850  
cmurphy@psc.state.fl.us  
scuello@psc.state.fl.us

Julie Kaplan, Esq.  
Diana Csank, Esq.  
Sierra Club  
50 F Street NW, 8<sup>th</sup> Floor  
Washington, DC 20001  
Julie.kaplan@sierraclub.org  
Diana.csank@sierraclub.org

Patricia Christensen, Esq.  
Office of Public Counsel  
The Florida Legislature  
111 West Madison Street, Room 812  
Tallahassee, Florida 32399  
christensen.patty@leg.state.fl.us

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

  
William P. Cox  
Florida Bar No. 0093531

\* The exhibits to this Request are not included with the service copies, but copies of Exhibits B, C, and D are available upon request.

# **EXHIBIT B**

**REDACTED**

371 372 373 374 375 376 377 378 379 380 381 382 383 384 385 386 387 388 389 390 391 392 393 394 395 396 397 398 399 400 401 402 403 404 405 406 407 408 409 410 411 412 413 414 415 416 417 418 419 420 421 422 423 424 425 426 427 428 429 430 431 432 433 434 435 436 437 438 439 440 441 442 443 444 445 446 447 448 449 450 451 452 453 454 455 456 457 458 459 460 461 462 463 464 465 466 467 468 469 470 471 472 473 474 475 476 477 478 479 480 481 482 483 484 485 486 487 488 489 490 491 492 493 494 495 496 497 498 499 500 501 502 503 504 505 506 507 508 509 510 511 512 513 514 515 516 517 518 519 520 521 522 523 524 525 526 527 528 529 530 531 532 533 534 535 536 537 538 539 540 541 542 543 544 545 546 547 548 549 550 551 552 553 554 555 556 557 558 559 560 561 562 563 564 565 566 567 568 569 570 571 572 573 574 575 576 577 578 579 580 581 582 583 584 585 586 587 588 589 590 591 592 593 594 595 596 597 598 599 600 601 602 603 604 605 606 607 608 609 610 611 612 613 614 615 616 617 618 619 620 621 622 623 624 625 626 627 628 629 630 631 632 633 634 635 636 637 638 639 640 641 642 643 644 645 646 647 648 649 650 651 652 653 654 655 656 657 658 659 660 661 662 663 664 665 666 667 668 669 670 671 672 673 674 675 676 677 678 679 680 681 682 683 684 685 686 687 688 689 690 691 692 693 694 695 696 697 698 699 700 701 702 703 704 705 706 707 708 709 710 711 712 713 714 715 716 717 718 719 720 721 722 723 724 725 726 727 728 729 730 731 732 733 734 735 736 737 738 739 740 741 742 743 744 745 746 747 748 749 750 751 752 753 754 755 756 757 758 759 760 761 762 763 764 765 766 767 768 769 770 771 772 773 774 775 776 777 778 779 780 781 782 783 784 785 786 787 788 789 790 791 792 793 794 795 796 797 798 799 800 801 802 803 804 805 806 807 808 809 810 811 812 813 814 815 816 817 818 819 820 821 822 823 824 825 826 827 828 829 830 831 832 833 834 835 836 837 838 839 840 841 842 843 844 845 846 847 848 849 850 851 852 853 854 855 856 857 858 859 860 861 862 863 864 865 866 867 868 869 870 871 872 873 874 875 876 877 878 879 880 881 882 883 884 885 886 887 888 889 890 891 892 893 894 895 896 897 898 899 900 901 902 903 904 905 906 907 908 909 910 911 912 913 914 915 916 917 918 919 920 921 922 923 924 925 926 927 928 929 930 931 932 933 934 935 936 937 938 939 940 941 942 943 944 945 946 947 948 949 950 951 952 953 954 955 956 957 958 959 960 961 962 963 964 965 966 967 968 969 970 971 972 973 974 975 976 977 978 979 980 981 982 983 984 985 986 987 988 989 990 991 992 993 994 995 996 997 998 999 1000

Project		Miami FL			Miami FL			Miami FL			Miami FL			Miami FL		
System Type		RoofTop			RoofTop			RoofTop			RoofTop			RoofTop		
COD		2018			2019			2020			2021			2022		
DC Size (KW)		317.5	405	675	317.5	405	675	317.5	405	675	317.5	405	675	317.5	405	675
AC Size (KW)		290	300	500	290	300	500	290	300	500	290	300	500	290	300	500
Module Size (Watts)		330	330	330	335	335	335	365	365	365	370	330	330	390	390	390
Interconnection Voltage		480V	480V	480V	480V	480V	480V	480V	480V	480V	480V	480V	480V	480V	480V	480V
Modules		\$	\$/Watt	\$	\$	\$/Watt	\$	\$	\$/Watt	\$	\$	\$/Watt	\$	\$	\$/Watt	\$
Engineering/PCS new																
Connection to Bldg Electrical System																
E&C Contingency																
Subtotal																
Re-roof (See note 1)																
Decommissioning cost (15% of Cost)																
Development Fee (10% of Cost)																
Management Fee 3%																
Freight cost (See note 2)																
Total for one site																
MW to build in year		50		50	50		50		50		50		50		50	
Total \$ for each year																
Staging area for all sites (See note 2)																
Total \$ for each year																
Annual Roof Lease (per site) (See note 3)																

Note 1 - The re-roofing cost assumes 50% of the roofs will require refurbishment to last 30 years prior to installation of the solar array.  
 Note 2 - Assumes that material will be delivered to a central staging yard. The freight cost is to deliver all material from the staging yard to the project.  
 Note 3 - Assumed roof lease rate does not escalate over the life of project.

PROJECTS SUMMARY	TOTAL PROJECT COST (\$)	TOTAL PROJECT COST (\$/MW AC)
TOTAL for SUMMARY		

	A	B	C	D	E	F	G	H	I
1	<b>Privileged and Confidential</b>			DBCEC 004034		<b>CONFIDENTIAL</b>			
2	<b>Attorney-Client Communication/Attorney-Client Work Product</b>								
3	<b>Prepared at the Direction of Legal Counsel</b>								
4				<b>Working</b>	<b>Working</b>	<b>Working</b>	<b>Working</b>	<b>Working</b>	
5				9/25/2017	9/25/2017	9/25/2017	9/25/2017	9/25/2017	
6				FPL	FPL	FPL	FPL	FPL	
7				Dade/Broward BESS, 100 MW, 4Hr., 2018 COD	Dade/Broward BESS, 100 MW, 4Hr., 2019 COD	Dade/Broward BESS, 100 MW, 4Hr., 2020 COD	Dade/Broward BESS, 100 MW, 4Hr., 2021 COD	Dade/Broward BESS, 55 MW, 4Hr., 2022 COD	
8	Batteries & Shipping								
9	BOP								
10	Construction Contingency								
11	Transmission and Interconnect								
12	<b>Total E&amp;C</b>								
13									
14									
15		<b>Year COD</b>		<b>2018</b>	<b>2019</b>	<b>2020</b>	<b>2021</b>	<b>2022</b>	<b>Total</b>
16		<b>Capacity (Note 1)</b>		100 MW	200 MW	200 MW	200 MW	55 MW	755 MW
17		<b>Cost for Year</b>							
18									
19	Note 1 - Capacity is the net capacity AC								
20	Note 2 - Costs are \$USD in the year of COD								



**CONFIDENTIAL**

1 **From:** Scrima, Vincent  
 2 **Sent:** Tuesday, January 02, 2018 10:36 AM  
 3 **To:** Hathaway, Richard  
 4 **Subject:** FW: Attorney Client Privileged - Analysis Inputs

5 Vincent Scrima (Jimmy)  
 6 Sr. Director Construction  
 7 561-304-5319



9 **From:** Scrima, Vincent  
 10 **Sent:** Wednesday, September 27, 2017 11:11 AM  
 11 **To:** Hathaway, Richard; Cox, Will P.  
 12 **Cc:** Sim, Steve R; Del.Sol, Kristine; Burkett, Jeffrey; Whitley, Andrew  
 13 **Subject:** RE: Attorney Client Privileged - Analysis Inputs

14 Below is the updated Universal Solar input per our discussion this morning. Please call if there are any further questions.

		Proxy Land (Average Non Miami Dade Pricing)	
		2022 Current Model	
15	<b>General</b>		
16	In-service date	1/1/2022	
17	MWac Size	74.5	
18	Technology/description	SOLAR PV	
19	Fixed / Tracker	FIXED	A
20	DC/AC Ratio		
21	DC	113.24	A
22	Module Cost (\$/Wdc)		A
23	Total Module Cost		A
24	Capital cost \$millions		A
25	Modules		A
26	BOS		A
27	Sw Yd (low side Inc GSU)		A
28	Sw Yd (High side GSU to cut in)		A
29	Gentie		A
30	Contingency		A
31	E&C Total (calculated)		A

CONFIDENTIAL

1	Rezoning (Legal)	[REDACTED]	A
2	Development		A
3	Environmental Mitigation		A
4	Power Delivery Total (Remote Panels and cut in)		A
5	Land (PV)		A
6	Land (ROW)		A
7	<b>Total Cost (calculated)</b>		A
8	<b>Total Cost (\$/Kwac)</b>	\$ 1,090	

9 Vincent Scrima (Jimmy)  
 10 Sr. Director Construction  
 11 561-304-5319



13 **From:** Hathaway, Richard  
 14 **Sent:** Wednesday, September 27, 2017 11:07 AM  
 15 **To:** Cox, Will P.  
 16 **Cc:** Sim, Steve R; Del.Sol, Kristine; Scrima, Vincent; Burkett, Jeffrey; Whitley, Andrew  
 17 **Subject:** Attorney Client Privileged - Analysis Inputs

18 Privileged and Confidential  
 19 Attorney-Client Communication/Attorney Client Work Product  
 20 Prepared at the Direction of Legal Counsel

21 Attached are the inputs requested for DG solar and battery storage in Dade and Broward counties. Because of  
 22 the sheer number of projects, we have priced them as partial deployment over years and are not assuming  
 23 they could all be built simultaneously in 2022. We have estimated 3 sizes of DG solar projects and they are  
 24 deployed as shown on the sheet. We have 100 MW battery storage projects being built over time with the  
 25 final one in 2022 being 55 MW. I reviewed the schedule for the BESS projects and the 100 MW system takes  
 26 approximately 8 months to erect.

27 We have included an assumed interconnection cost and land cost for the battery storage. For the DG solar,  
 28 there is a roof lease cost being provided.

29 Let me know if you have questions.

# **EXHIBIT C**

## **JUSTIFICATION TABLE**

**EXHIBIT C**

**COMPANY:** Florida Power & Light Company  
**TITLE:** List of Confidential Documents  
**DOCKET NO:** 20170225-EI  
**DOCKET TITLE:** Petition for Determination of Need for Dania Beach Clean Energy Center Unit No. 7  
**DATE:** January 5, 2018

Discovery Set	Item No.	Conf. Y/N	Bates Number	Line / Column	Florida Statute 366.093(3) Subsection	Declarant
Staff's Third Request for Production of Documents No. 16	600MW DG Solar D-B Inputs 9-27-17 (Attachment)	Y	DBCEC 004033	Cols. D-I, Lns. 12-16, 18-23, 25-26, 28-29, 31  Cols. K-P, Lns. 12-16, 18-23, 25-26, 28-29, 31  Cols. R-W, Lns. 12-16, 18-23, 25-26, 28-29, 31  Cols. Y-AD, Lns. 12-16, 18-23, 25-26, 28-29, 31  Cols. AF-AK, Lns. 12-16, 18-23, 25-26, 28-29, 31  Cols. D, F, Ln. 49	(e)	Richard Hathaway
	Dade Broward BESS Inputs 9-27-17 (Attachment)	Y	DBCEC 004034	Cols. D-H, Lns. 8-12  Cols. D-I, Ln. 17	(e)	
	Universal Solar Input (Attachment)	Y  Y	DBCEC 004035  DBCEC 004036	Lns. 22a, 24a, 25a, 27a, 28a, 29a, 30a, 31a, 32a, 33a  Lns. 1a, 2a, 3a, 4a, 5a, 6a, 7a	(e)	

# **EXHIBIT D**

# **DECLARATIONS**

EXHIBIT D

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Florida Power & Light Company's  
Petition for Determination of Need for Dania  
Beach Clean Energy Center Unit No. 7

Docket No: 20170225-EI

STATE OF FLORIDA                    )  
  )  
COUNTY OF PALM BEACH            )

WRITTEN DECLARATION OF  
RICHARD HATHAWAY

1. My name is Richard Hathaway. I am currently employed by Florida Power & Light Company ("FPL") as an Engineering and Construction Sr. Project Director. 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 filed this date, 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 or constitute information relating to competitive interests. Disclosure of this information would impair the efforts of FPL or its affiliates to contract for goods or services on favorable terms. In addition, this information relates to competitive interests, the disclosure of which would impair the competitive business of FPL, its affiliates or its vendors. Specifically, the documents contain information regarding costs and locations for potential new transmission facilities in FPL's service territory and proprietary operational cost information based on specific vendor service contracts. The disclosure of this proprietary confidential business information would harm FPL and its customers by prematurely revealing the associated cost and locational aspects of these potential additional facilities and options before any decision has been made regarding them. 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, 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.

  
Richard Hathaway

Date: JANUARY 4, 2018