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March 2, 2018

**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

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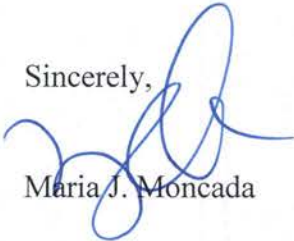
**Re: Docket No. 20180001-EI**

Dear Ms. Stauffer:

I enclose for filing in the above docket Florida Power & Light Company's ("FPL's") Request for Confidential Classification of certain information provided in exhibits to the prepared direct testimony of FPL witnesses Renae B. Deaton (RBD-2) and Gerard J. Yupp (GJY-1). 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 the declaration in support of 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 copy
- APA
- ECO 6459642
- ENG
- GCL
- IDM
- CLK

**BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION**

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

Docket No. 20180001-EI

Filed: March 2, 2018

**FLORIDA POWER AND LIGHT COMPANY'S  
REQUEST FOR CONFIDENTIAL CLASSIFICATION  
OF CERTAIN PORTIONS OF EXHIBITS RBD-2 AND GJY-1**

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 provided in exhibits to the prepared direct testimony of FPL witnesses Renae B. Deaton (RBD-2) and Gerard J. Yupp (GJY-1) ("Confidential Information") in this proceeding. In support of this Request, FPL states:

1. On March 2, 2018, FPL filed the testimony of FPL witnesses Renae B. Deaton and Gerard J. Yupp. Exhibits RBD-2 and GJY-1 to the testimony contains confidential information. Pursuant to Rule 25-22.006, F.A.C., FPL files this Request for Confidential Classification.

2. The following exhibits are included with this Request:

a. Exhibit A consists of a copy of the confidential material on which all of the information that FPL asserts is entitled to confidential treatment has been highlighted.

b. Exhibit B consists of a copy of the confidential material on which all information that FPL asserts is entitled to confidential treatment has been redacted. A copy of the redacted Exhibits is also included in the copy of the prepared testimony of FPL witnesses Renae B. Deaton and Gerard J. Yupp.

c. Exhibit C is a table that identifies by column and line the information for which confidential treatment is sought and references the specific statutory bases for the claim of confidentiality and the declarant who supports the requested classification.

d. Exhibit D is the declaration of Gerard J. Yupp in support of this request.

3. The Confidential Information is intended to be and has been treated by FPL as private, its confidentiality has been maintained, and its disclosure would cause harm to FPL and its customers. 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. As more fully described in the declaration in Exhibit D, the documents provided by FPL contain information concerning contractual data, the disclosure of which would impair the efforts of FPL or its affiliates to contract for goods or services on favorable terms. This information is protected by Section 366.093(3)(d), Fla. Stat.

5. Additionally, the information relates to competitive interests, the disclosure of which would impair the competitive businesses of FPL or its vendors. This information is protected by Section 366.093(3)(e), Fla. Stat.

6. Upon a finding by the Commission that the Confidential Information is proprietary confidential business information, the information should not be declassified for a period of at least eighteen (18) months and should be returned to FPL as soon as the information is no longer necessary for the Commission to conduct its business. *See* § 399.093(4), Fla. Stat.

**WHEREFORE**, for the above and foregoing reasons, as more fully set forth in the supporting materials and declaration included herewith, Florida Power & Light Company

respectfully requests that its Request for Confidential Classification be granted.

Respectfully submitted.

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By: 

\_\_\_\_\_  
Maria J. Moncada  
Florida Bar No. 0773301

**CERTIFICATE OF SERVICE**  
**Docket 20180001-EI**

**I HEREBY CERTIFY** that a true and correct copy of the foregoing\* has been furnished

by electronic service this 2nd day of March 2018 to the following persons:

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Users Group**

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



Maria J. Moncada  
Florida Bar No. 0773301

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

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**EXHIBIT A**

**CONFIDENTIAL**

**FILED UNDER SEPARATE COVER**

**REDACTED**

**EXHIBIT B**

**REDACTED COPIES**



For the Month of Dec-17

Contract	Counterparty	Identification	Contract Start Date	Contract End Date
1	JEA - SJRPP	Other Entity	April, 1982	September 30, 2021
2	Solid Waste Authority - 40 MW	Other Entity	January, 2012	March 31, 2032
3	Solid Waste Authority - 70 MW	Other Entity	July, 2015	May 31, 2034

2017 Capacity in MW

Contract	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec
1	375	375	375	375	375	375	375	375	375	375	375	375
2	40	40	40	40	40	40	40	40	40	40	40	40
3	70	70	70	70	70	70	70	70	70	70	70	70
Total	485	485	485	485	485	485	485	485	485	485	485	485

2017 Capacity in Dollars

	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec
Total	5,766,501	6,108,331	7,331,333	6,885,779	7,218,840	5,809,218	6,018,687	5,728,777	6,303,387	5,270,026	4,872,922	4,672,896

Year-to-date Short Term Capacity Payments	71,966,698 <sup>(1)</sup>
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	A	B	C	D	E	F	G	H	I	J	K	L
Contract	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec
1												
2												
3												
<b>True ups</b>												
1	(359,124)	67,968	121,713	22,827	416,058	(608,260)	(317,941)	(382,365)	(152,217)	(190,351)	(396,126)	(307,985)
2												
3												

(1) Total capacity costs do not include payments for the Solid Waste Authority - 70 MW unit. Capacity costs for this unit were recovered through the Energy Conservation Cost Recovery Clause in 2014, consistent with Commission Order No. PSC-11-0293-FOF-EU issued in Docket No. 110018-EU on July 6, 2011.

	A	B	C	D	E	F	G	H	I
1	<b>ASSET OPTIMIZATION DETAIL</b>								
2	<b>Actual for the Period of: January 2017 through December 2017</b>								
3									
4	(1)	(2)	(3)	(4)	(5)	(6)	(7)	(8)	(9)
5		Natural Gas	Natural Gas	Natural Gas	Natural Gas	Natural Gas	Natural Gas	NOX	Total
6		Delivered City-Gate	Production Area	Capacity Release	Option	Storage	AMA	Emissions	Asset Optimization
7		Sales	Sales	Firm Transport	Premiums	Optimization	Gains	Sales	Gains
8	Month	(\$)	(\$)	(\$)	(\$)	(\$)	(\$)	(\$)	(\$)
9	January								1,032,914
10	February								1,168,100
11	March								1,120,311
12	April								1,121,805
13	May								1,975,986
14	June								1,656,384
15	July								1,744,266
16	August								2,069,815
17	September								1,851,678
18	October								1,220,333
19	November								1,417,614
20	December								2,383,603
21									
22									
23									
24									
25									
26									
27									
28									
29									
30									
31									
32									
33									
34	<b>Total</b>	<b>3,538,237</b>	<b>602,559</b>	<b>3,217,971</b>	<b>8,945,075</b>	<b>861,359</b>	<b>1,478,429</b>	<b>119,180</b>	<b>18,762,809</b>

# **EXHIBIT C**

## **JUSTIFICATION TABLE**

**EXHIBIT C**

**COMPANY:** Florida Power & Light Company  
**TITLE:** List of Confidential Exhibits  
**DOCKET TITLE:** Fuel and Purchased Power Cost Recovery Clause with Generating Performance Incentive Factor  
**DOCKET NO:** 20180001-EI  
**DATE:** March 2, 2018

<b>Exhibit No.</b>	<b>Description</b>	<b>Pages</b>	<b>Conf Y/N</b>	<b>Column No./Line No.</b>	<b>Florida Statute 366.093 (3) Subsection</b>	<b>Declarant</b>
RBD-2	Schedule A12 - Capacity Costs	2	N	Pg. 1	(d), (e)	G. Yupp
			Y	Pg. 2, Cols. A-L, Lns. 2-3		
GJY-1	Asset Optimization Detail	4	N	Pgs. 1-2	(e)	G. Yupp
			Y	Pg. 3, Cols. B-H, Lns. 10, 12, 14, 16, 18, 20, 22, 24, 26, 28, 30, 32		
			N	Pg. 4		

**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: 20180001-EI

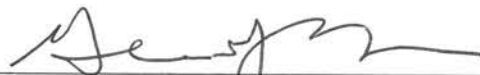
**DECLARATION OF GERARD J. YUPP**

1. My name is Gerard J. Yupp. I am currently employed by Florida Power & Light Company ("FPL") as Senior Director of Wholesale Operations in the Energy Marketing and Trading Division. I have personal knowledge of the matters stated in this declaration.

2. I have reviewed the exhibits to FPL's Request for Confidential Classification of Information included in the testimony of FPL witness Renae B. Deaton (Exhibit RBD-2) and the testimony of FPL witness Gerard J. Yupp (Exhibit GJY-1). The documents and materials which are asserted by FPL to be proprietary confidential business information contain or constitute contractual data, the disclosure of which would impair the efforts of FPL to contract for goods or services on favorable terms. Specifically, the documents contain information related to the pricing for short-term capacity purchases, the disclosure of which would impair FPL's ability to contract for capacity on favorable terms for the benefit of its customers. The information provided by FPL also contains information related to the competitive interests of suppliers from whom FPL purchases capacity, the disclosure of which would impair the competitive businesses of the provider of the information. Additionally, the documents contain financial details related to FPL's asset optimization activities for natural gas and electric transmission. The disclosure of this information would impair FPL's ability to execute transactions for natural gas commodity sales, natural gas storage, natural gas transportation, and electricity transmission 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. 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.



GERARD J. YUPP

Date: 2/22/18