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March 21, 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

RECEIVED-FPSC  
2018 MAR 21 AM 11:06  
COMMISSION  
CLERK

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

**REDACTED**

Dear Ms. Stauffer:

I enclose for filing in the above docket Florida Power & Light Company's ("FPL") Second Request for Extension Confidential Classification of Materials Provided Pursuant to Audit No. 14-027-4-3. The request includes Second Revised Exhibits A, B (two copies), C and D.

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

Please contact me if you have 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 Second Request for Extension of Confidential Classification)

COM  
AET  
APA Exh. B  
ECO  
ENG  
GCL  
IDM  
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**BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION**

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

Docket No: 20180001-EI  
Date: March 21, 2018

**FLORIDA POWER & LIGHT COMPANY'S SECOND REQUEST  
FOR EXTENSION OF CONFIDENTIAL CLASSIFICATION OF  
MATERIALS PROVIDED PURSUANT TO AUDIT NO. 14-027-4-3**

Pursuant to Section 366.093, Florida Statutes ("Section 366.093"), and Rule 25-22.006, Florida Administrative Code, Florida Power & Light Company ("FPL") hereby submits its Second Request for Extension of Confidential Classification of Information Provided Pursuant to Audit No. 14-027-4-3 ("Confidential Information"). In support of this request, FPL states as follows:

1. On May 21, 2014 FPL filed a Request for Confidential Classification of the Confidential Information, which included Exhibits A, B, C and D ("May 21, 2014 Request"). By Order No. PSC-14-0483-CFO-EI, dated September 11, 2014 ("Order 0483"), the Commission granted FPL's May 21, 2014 Request. FPL adopts and incorporates by reference the May 21, 2014 Request and Order 0483.

2. On January 28, 2016, FPL filed a First Request for Extension of Confidential Classification of the Confidential Information, which included First Revised Exhibit A, First Revised Exhibit B, First Revised Exhibit C and First Revised Exhibit D ("January 28, 2016 Request"). By Order No. PSC-16-0400-CFO-EI dated September 20, 2016 ("Order 0400"), the Commission granted FPL's January 28, 2016 Request. FPL adopts and incorporates by reference the January 28, 2016 Request and Order 0400.

3. The period of confidential treatment granted by Order 0400 will soon expire. The Confidential Information that was the subject of FPL's January 28, 2016 Request and Order

0400 warrants continued treatment as proprietary and confidential business information within the meaning of Section 366.093(3). Accordingly, FPL hereby submits its First Request for Extension of Confidential Classification.

4. Included herewith are Second Revised Exhibit A, Second Revised Exhibit B, together with Second Revised Exhibit C to reduce the number of pages for which confidential treatment is sought.

5. Second Revised Exhibits A and B consist of highlighted and redacted copies of the specific working papers where FPL has determined that a portion of the information previously designated as confidential requires continued confidential treatment. Where entire pages of a working paper are confidential, FPL has included only identifying cover pages in Second Revised Exhibit B.

6. Second Revised Exhibit C is a table that identifies the specific pages, lines or columns that remain confidential. The table also references the specific statutory basis for confidentiality and the affiants who support the requested classification.

7. Second Revised Exhibit D contains the affidavits of Gerard J. Yupp and Craig Arcari in support of this request.

8. 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.

9. As more fully described in the affidavits included in Second Revised Exhibit D, certain documents provided by FPL contain information pertaining to security measures, systems or procedures. This information is protected by Section 366.093(3)(c), Fla. Stat.

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

11. Last, certain information in these documents and materials concern FPL's competitive interests, and would place FPL at a disadvantage when coupled with the other information that is publicly available. This information is protected by Section 366.093(3)(e), Fla. Stat.

12. 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 thirty-six (36) 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.

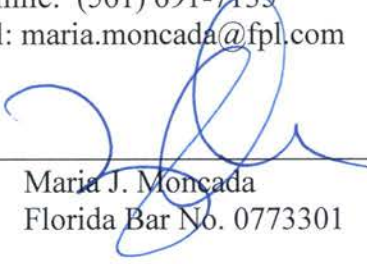
**WHEREFORE**, for the above and foregoing reasons, as more fully set forth in the supporting materials and affidavits included herewith, Florida Power & Light Company

respectfully requests that its Second Request for Extension of Confidential Classification be granted.

Respectfully submitted,

John T. Butler  
Assistant General Counsel - Regulatory  
Maria J. Moncada  
Principal Attorney  
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Email: maria.moncada@fpl.com

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



Maria J. Moncada  
Florida Bar No. 0773301

**CERTIFICATE OF SERVICE**  
**Docket No. 20180001-EI**

I HEREBY CERTIFY that a true and correct copy of the foregoing First Request for Extension of Confidential Classification\* has been furnished by electronic service on this 21st day of March 2018 to the following:

Suzanne Brownless, Esq.  
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Users Group**



Maria J. Moncada

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

**EXHIBIT A**

**CONFIDENTIAL**

**FILED UNDER SEPARATE  
COVER**



# **EXHIBIT B**

**REDACTED COPIES**

JMP  
4/14

Security Sample

Title Security Sample

*Confidential*

Time	Fisc Account	I Account	Account	T Final	IM/F	Final Resp	Source	Int Final	WBS	Document	Vendor	Vendor Tt	Customer	Customer	Sender/Hc	Amount		
1	2013012	9524220	Misc Nucl	5750000	OUTSIDE	Base	PTN	Nucle	Regulated (524B)	MI	YY	FPL	Accrual	Postings		\$ 2,138,937	PTN Security Services Accrual for weeks ending in 12/13 includes non-labor bonus and insurance. Allocation % is based on staffing as noted on documentation.	
2	2013012	9524220	Misc Nucl	5750000	OUTSIDE	Base	PSL	Nucle	Regulated (524B)	MI	YY	FPL	Accrual	Postings		\$ 1,485,474	PSL Security Services Accrual for weeks ending in 12/13 includes non-labor bonus and insurance. Allocation % is based on staffing as noted on documentation.	
							A		B								C	
3	2013005	9549075	Misc Othe	5400100	MATERIAL	Productio		NERC/CIP		WE		Goods rec	3E+09	GE ENERGY CONTROL SOLUTIONS INC		\$	Software update for operating system which was out dated and not compatible with the security solution provided by GE, required to meet NERC CIP Compliance. GE provides the Distributed Control System (DCS) for the gas turbines at site and the security solution to protect this DCS. Invoice represents 40% of total per PO 2000097455 Total invoice is \$580,515.80 Allocation based on 60%	
																	wp 42-3/3 44-3/3 ✓	
4	2013005	9549075	Misc Othe	5400100	MATERIAL	Productio		NERC/CIP		WE		Goods rec	3E+09	GENERAL ELECTRIC INTERNATIONAL INC		\$	Software update related to the Human Machine Interface (HMI) portion of the upgrade related to DCS as described above. Invoice represents 30% of total per PO 2000098396 Total invoice is \$405,240 Allocation based on 50%	
																	wp 42-3/3 44-3/3 ✓	
5	2013002	9524220	Misc Nucl	5620000	LICENSES	Base	PTN	Nucle	NRC Part : (524B)	MI	ZM	Site AP In	49233	U S NUCLEAR REGULATORY COMMISSION		\$ 319,964	Turkey Point Plants Force on Force amount on invoice detail Fiscal Year ending 9/30/13 Quarter -9/23/12 - 12/29/12 See section of NRC fees on 53-2	
6	2013012	9524220	Misc Nucl	5750000	OUTSIDE	Base	PSL	Nucle	Regulated (524B)	MI	XF	NAMS	Invoices			\$ 302,244	PSL Nuclear Security Charges Overall allocation to base/capacity based on staffing number week ending 9/29/13 This amount included the invoice twice, however, it was verified that the amount was removed by searching in the file of all charges. Also the tax is shown in a separate item on the file of all charges.	
																	Wp 44-3/1 ✓	
7	2013003	9524220	Misc Nucl	5750000	OUTSIDE	Base	PSL	Nucle	Regulated (524B)	MI	XF	NAMS	Inv	259032	G4S REGULATED SECURITY SOLUTIONS IN		\$ 209,832	PSL Nuclear Security Charges Agreed to detail of invoice Overall allocation to base/capacity based on staffing number week ending 1/6/13

**CONFIDENTIAL**

SOURCE Page 1, Page 9

*[Handwritten signature]*

JHP 4/14

Time	Fisc Account	I Account	Account	T Final	IM/F Final	Resp Source	Int Final	WBS Document	Document	Vendor	Vendor T	Customer	Customer	Sender/Hc	Amount	
8	2013012	9524220	Misc Nucl	5750000	OUTSIDE ! Base	PSL Nucle	Regulated (524B)	Mi XF	NAMS Inv	259032	G4S	REGULATED SECURITY SOLUTIONS IN	\$	204,571	PSL Nuclear Security Charges Agreed to detail of invoice Overall allocation to base/capacity based on staffing number week ending 11/17/13	
9	2013008	9524220	Misc Nucl	5750000	OUTSIDE ! Base	PSL Nucle	Regulated (524B)	Mi XF	NAMS Inv	259032	G4S	REGULATED SECURITY SOLUTIONS IN	\$	203,498	PSL Nuclear Security Charges Overall allocation to base/capacity based on staffing number week ending 7/7/13	
10	2013008	9549075	Misc Othe	5750700	OUTSIDE ! Productio	NERC/CIP	WE		Goods rec	257420	QUALIFIED SYSTEMS CONTRACTING INC	\$	3	Electronic and physical security modifications to comply with the NERC - CIP standards which require minimum measures for CCA PO 2000107170 (Upgrade Security System)		
10a																
11	2013005	9524220	Misc Nucl	5750000	OUTSIDE ! Base	PTN Nucle	Regulated (524B)	Mi XF	NAMS Inv	259032	G4S	REGULATED SECURITY SOLUTIONS IN	\$	171,666	PTN Nuclear Security Charges Overall allocation to base/capacity based on staffing number week ending 4/28/13	
12	2013007	9524220	Misc Nucl	5750700	OUTSIDE ! Base	PSL Nucle	Force on i (524B)	Mi XF	NAMS Invoices		Sargent&Lundy llc		\$	167,200	PSL Safenet Security Project Installation of intrusion detection system for intake canal crossing bridge Contract \$209,000 - 11/12 - 11/13 A credit for \$83,600 was recorded in the same month to reflect the correct amount (verified in file of all clause chgs)	
													\$	83,600		
13	2013006	9524220	Misc Nucl	5750000	OUTSIDE ! Base	PSL Nucle	Regulated (524B)	Mi XF	NAMS Inv	259032	G4S	REGULATED SECURITY SOLUTIONS IN	\$	167,135	PSL Nuclear Security Charges Overall allocation to base/capacity based on staffing number week ending 5/26/13	
14	2013004	9524220	Misc Nucl	5750000	OUTSIDE ! Base	PTN Nucle	Regulated (524B)	Mi XF	NAMS Invoices				\$	138,566	PTN Nuclear Security Charges Overall allocation to base/capacity based on staffing number week ending 2/13/13	
15	2013005	9524220	Misc Nucl	5750000	OUTSIDE ! Base	PTN Nucle	Regulated (524B)	Mi XF	NAMS Invoices				\$	109,484	PTN Nuclear Security Charges Overall allocation to base/capacity based on staffing number week ending 3/31/13 Tax for this is shown in a separate item in the clause file.	
16	2013001	9524220	Misc Nucl	5750000	OUTSIDE ! Base	PTN Nucle	Regulated (524B)	Mi XF	NAMS Invoices				\$	96,920	PTN Nuclear Security Charges Overall allocation to base/capacity based on staffing number week ending 12/2/12 Tax for this is shown in a separate item in the clause file.	
17	2013007	9549075	Misc Othe	5750450	OUTSIDE ! Productio	NERC/CIP	WE		Goods rec	3E+09	BURNS & MCDONNELL ENGINEERING	\$	9	Project Management and Engineering		

A B

C D

CONFIDENTIAL

JHP

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4/14

Time: Fisc Account: | Account: | Account Account T Final IM/F Final Resp Source Int Final WBS Documen Documen Vendor Vendor Te Customer Customer Sender/Hk Amount

17a

C

Services required to meet the compliance requirements related to NERC - CIP which require minimum measures for CCA PO 200099039

A B

18 2013009 9549075 Misc Othe 5750450 OUTSIDE: Productio █████ NERC/CIP █████ WE Goods rec 3E+09 BURNS & MCDONNELL ENGINEERING

D

\$ █████ 5 Project Management and Engineering Services required to meet the compliance requirements related to NERC - CIP which require minimum measures for CCA PO 200099039

18a

19 2013010 9524220 Misc Nucl 5620000 LICENSES Base PSL Nucl NRC Part: (5248) Mi. ZM Site AP In 49233 U S NUCLEAR REGULATORY COMMISSION

\$ 63,655 Part 171 Annual Fees Homeland Security portion is 5.8% - SL Fiscal year 10/13 - 9/14 quarter period - 10/13 - 12/13

20 2013001 9524220 Misc Nucl 5750700 OUTSIDE: Base PTN Nucl Part 73 Cy (5248) Mi. XF NAMS Inv 3E+09 ZACHRY NUCLEAR ENGINEERING INC

\$ 45,900 PO 2286748 Engineering support for the security data diode installations at Turkey Point

21 2013007 9506075 Misc Steal 5750700 OUTSIDE: Projects Instrumer NERC CIP NERC CIP WE Goods rec 51302 SELAH GROUP INC

\$ █████ 5 Consulting services per PO 2000092262 Represents 50% of Invoice The other 50% was allocated to account 549075, security related also Appears reasonable.  
wp 44-3/2 ✓

22 2013009 9408175 Tax Orth TI 8956000 Payroll Ta Base JB Nuclear ST Payroll (5248) Misc Nuc Power Exps-Cap Clause

\$ 6,905 Payroll tax for nuclear payroll base Agreed to payroll base and recalculated Payroll base from screen shot of payroll st report for this SAP account

23 2013007 9506075 Misc Steal 5750000 OUTSIDE: Productio Manatee: NERC 130 PMT 1&2 WE Goods rec 246785 ASSOCIATED CONSTRUCTION AND DEVEL

\$ █████ Specific doors required to meet the standards for the physical security spaces per PO 2000096612 Services required to meet the compliance requirements related to NERC - CIP which require minimum measures for CCA

23a

\$ 7,012,109 Total Sample  
\$ 40,277,571 TOTAL SECURITY  
17.41% Sampled

CONFIDENTIAL

5  
4

44-3 p 3

JHP 4/14  
PBC  
9/14/0

Title Sample Explanations

FPSC CLAUSES AUDITS  
ADEQUATE SUPPORTING DOCUMENTATION  
Audit Request #9, Item #21

Cash Vouchers

1. Vendors invoice: [REDACTED] A
2. DWA and / or purchase order: 2000092262
3. Contract with vendor,
4. Time sheets, etc. for contract labor.
5. Explain how items on invoice relate to clause i.e., how are they used to support clause activity. The North American Electric Reliability Company (NERC) Critical Infrastructure Protection (CIP) standards require minimum security measures to be maintained at all times for Critical Cyber Assets (CCA). The NERC CIP program requires that Responsible Entities (RE) be audited to ensure they meet the compliance requirements of the NERC CIP standards. [REDACTED] B provided project management and project engineering support under the attached purchase order to Power Generation Division (PGD) at FPL in conducting a program self-assessment and development of Reliability Standards Audit Worksheets (RSAW) in preparation for a CIP audit by the regional entity, the Florida Reliability Coordinating Council (FRCC) as the Regional Entity under NERC responsible for the region in which FPL operates.
- 5.1 [REDACTED] provided project management and project engineering support under the attached purchase order to Power Generation Division (PGD) at FPL in conducting a program self-assessment and development of Reliability Standards Audit Worksheets (RSAW) in preparation for a CIP audit by the regional entity, the Florida Reliability Coordinating Council (FRCC) as the Regional Entity under NERC responsible for the region in which FPL operates.
6. If invoice is allocated between or among programs, indicate allocation percentage and rationale for allocation.
7. If it is advertising, provide the ads.

44-3 ✓

CONFIDENTIAL

Florida Power & Light Co.  
Capacity Cost Recovery Clause  
Dkt.# 140001-EI, ACN 14-027-4-3  
TYE 2013

CONFIDENTIAL

# 21  
JHP  
PEC  
4/14

Title Sample Item #21

A

1  
2  
3  
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5  
6



Vendor Number: 51302

INVOICE	
DATE	INVOICE #
7/31/13	134333-7

CONFIDENTIAL

B

7

BILL TO	CONTACT	SHIP TO
Florida Power & Light CO Attn: Accounts Payable P.O. Box 029950 Miami, Florida 33102	Next Energy Inc [Redacted] PGD NERC CIP Compliance Manager 700 Universe Blvd Juno Beach, Florida 33408	

P. O. No.  
2000092262

TERMS  
Net 45

PROJECT  
FPL PGD NERC/CIP SUPPORT

8  
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Item	Description	AMOUNT
	PGD NERC/CIP SUPPORT	E
	Payments Received To Date	[Redacted]
	Other Invoices in Process	[Redacted]
	C	
1.	July 1, 2013 to July 31, 2013 Time and Material [Redacted] attached approved Time and Expense documents - [Redacted]	D
2.	July 1, 2013 to July 31, 2013 Time and Material [Redacted] attached approved Time and Expense documents - [Redacted]	[Redacted]
	Balance Due This Invoice	[Redacted]
TOTAL INVOICED TO DATE		[Redacted]

I agree to allocation of weekly time reports 45% FERC split

50% alloc

Company Rep. - Date  
OK to Pay

ENTERED BY: [Redacted] DATE: [Redacted]  
PHONE #: [Redacted] COMPANY CODE: 1600

AUTHORIZED BY: [Redacted]

SAP DOCUMENT # 5201072023

GL/IO # 5750700, 6020001160

Get CONFIDENTIAL CAPACITY AUDIT REQUEST NO. 9, Follow Up 1

Florida Power & Light Co.  
Capacity Cost Recovery Clause  
Dkt.# 140001-EI, ACN 14-027-4-3  
TYE 2013

HP 4/1  
PBC

A  
1 [Redacted]

B

C

Title Sample item 3+4.  
D Allocation.

D

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I

PO 2000097455 (Non-AGP)  
Invoice 40% Milestone

2 \$  
3 \$  
4 2451,888 x 40% =

[Redacted]

Total PO  
[Redacted]

G00000115288  
6020001681

Capital  
Recovery

\$ [Redacted]  
\$ [Redacted]  
\$ [Redacted]  
(A+B)

PO 2000098396  
Total PO

[Redacted]  
(C)

20%  
80%

Invoice  
20% Milestone  
[Redacted]

- 5 (443) 30% Order placement - [Redacted]
- 6 10% Completion of Kickoff Meeting - [Redacted]
- 7 40% Shipment of Hardware - [Redacted]
- 8 10% Mobilization to Site for installation - [Redacted]
- 9 10% Upon Startup: not to exceed thirty (30) days from demobilization - [Redacted]

CONFIDENTIAL

10	PO 2000097455 (Non-AGP)	G00000115288	\$ [Redacted]	\$ [Redacted]
11	PO 2000098396 (AGP)	G00000115288	\$ [Redacted]	\$ [Redacted]
12	PO 2000097455 (Non-AGP)	6020001681	\$ [Redacted]	\$ [Redacted]
13	PO 2000098396 (AGP)	6020001681	\$ [Redacted]	\$ [Redacted]
14	PO 2000097455 (Non-AGP)	G00000115288	\$ [Redacted]	\$ [Redacted]
15	PO 2000097455 (Non-AGP)	6020001681	\$ [Redacted]	\$ [Redacted]
16	PO 2000098396 (AGP)	G00000115288	\$ [Redacted]	\$ [Redacted]
17	PO 2000098396 (AGP)	6020001681	\$ [Redacted]	\$ [Redacted]

Enter  
Milestone  
Here  
|||

40%

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\$ [Redacted]

Non-AGP

CONFIDENTIAL

Pili  
Still need how P.O.s were allocated. No specific allocation is made.  
but a specific PO review is made.  
see up 44-3 for further explanation.

HP  
PBC

44-3  
0

Title sample 3+4.

4/14/14  
JHP 4/14  
PBC

FPSC CLAUSES AUDITS  
ADEQUATE SUPPORTING DOCUMENTATION  
Audit Request #9, Item #4, #3

Cash Vouchers

- 1. Vendors invoice: [REDACTED] A
- 2. DWA and / or purchase order: 2000098396
- 3. Contract with vendor,
- 4. Time sheets, etc. for contract labor.
- 5. Explain how items on invoice relate to clause i.e., how are they used to support clause activity. [REDACTED] B provides our Distributed Control System (DCS) for the gas turbines at the site and the security solution to protect this DCS. To establish NERC-CIP compliance under Version 5 of the Standards of our control system a Software upgrade was required. Our operating system was out dated and was not compatible with the security solution provided by [REDACTED] C required to meet NERC CIP compliance. [REDACTED] D International was contracted to provide the Human Machine Interface (HMI) portion of the upgrade as described in the scope of the purchase order.
- 5.1
- 5.2
- 5.3
- 6. If invoice is allocated between or among programs, indicate allocation percentage and rationale for allocation.
- 7. If it is advertising, provide the ads.

CONFIDENTIAL

7.1 [REDACTED] E

(A) For the utility, the PO is reviewed in detail by the applicable Engineer in charge, who determines the items that meet the scope for the NERC CIP standards, and the items that don't are put in capital (Base).

No specific % is applied, but rather an item by item review is prepared. No further work



A B C

IA7AQT2013A12 Capacity Monthly Worksheet Capacity Schedule Worksheet A12 (U)

Month Selected  
Jan-13  
CAPACITY

Title A-12 wcht

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55  
56  
57  
58  
59  
60  
61  
62

A-12 WORKSHEET		Jan-13 CAPACITY	WP Ref	Feb-13 CAPACITY
CEDAR	Prior Month's Estimate			
	Prior Month's Actual			
	Adjustment			
	Current Month's Estimate			
ICL	Prior Month's Estimate			
	Prior Month's Actual			
	Adjustment			
	Current Month's Estimate			
PBC	Prior Month's Estimate			
	Prior Month's Actual			
	Adjustment			
	Current Month's Estimate			
BN SOC	Prior Month's Estimate			
	Prior Month's Actual			
	Adjustment			
	Current Month's Estimate			
BN NEG	Prior Month's Estimate			
	Prior Month's Actual			
	Adjustment			
	Current Month's Estimate			
BS SOC	Prior Month's Estimate			
	Prior Month's Actual			
	Adjustment			
	Current Month's Estimate			
BS NEG	Prior Month's Estimate			
	Prior Month's Actual			
	Adjustment			
	Current Month's Estimate			
SWAPC	Prior Month's Estimate			
	Prior Month's Actual			
	Adjustment			
	Current Month's Estimate			
SJRPP	Prior Month's Estimate			
	Prior Month's Actual			
	Adjustment			
	Current Month's Estimate			
Total Estim				
QF Estim				
		\$0.00		
to page 1		SJRPP		to page 1
TO PAGE 2				TO PAGE 2
TO EB				
prior month True Up				
Current month Estimate				

① 46-3/1 ✓  
46-3/1-1 ✓  
46-3/1-2

A

② 46-3/2 ✓  
46-3/2-1 ✓  
46-3/2-2

B

selected Indiantown + Broward  
N to trace to contract  
print terms.

Sum A, B, C, D, E

\$ 25,205,917  
P1

③ 46-3/3 ✓  
46-3/3-1 ✓  
46-3/3-2

C

④ 46-3/4 ✓  
46-3/4-1 ✓  
46-3/4-2

D

⑤ 46-3/5 ✓  
46-3/5-1 ✓  
46-3/5-2

E

not QF

CONFIDENTIAL

we decided to agree  
Indiantown + Broward N prints  
to the contract since  
in the last two audits  
Cedar Bay was selected.

QF

src:

46-3 P1

Title Bullings stmnt  
 Qualifying Facility Monthly Billing Statement

JHP  
 PBC  
 4/14

Facility Name: BROWARD RESOURCE RECOVERY SOUTH  
 Region: SOUTHEAST  
 Billing Month: January, 2013

	A	B	C
Number of hours in Month:	744		
Number of peak hours in Month:	248		
Energy Received, All Hours:	35,149.623 MWH	10,785.623 MWH (AA)	2,520.000 MWH (91)
Energy Received, All Peak Hours:	██████████ MWH	██████████ MWH (AA)	██████████ MWH (91)
1 Sales (Wheeled):	██████████ MWH		
2 Net Energy Received, All Hours:	██████████ MWH		
3 Maximum Hourly Energy:	██████████ MWH	at 01/18/13:15	
4 Committed Capacity:	██████████ MW	('91)	
5 Monthly Billing Capacity Factor:	██████████ %	('91)	
6 Monthly Peak Capacity Factor:	██████████ %	('91)	
7 Annual Capacity Factor:	██████████ %	('91)	
8 Annual Peak Capacity Factor:	██████████ %	('91)	
9 Billing Capacity Factor:	██████████ %	('91)	
10 Unit Energy Cost:	██████████ \$/MWH	('91)	

	(As Available)	(91)	Total
Monthly Energy Payment:	\$213,984.11	+	\$49,868.10 = \$263,852.21
Monthly Capacity Payment:		\$100,975.00	\$100,975.00 46-3 p2

Execution Date/Time: 01/31/13 at 15:14:08

CONFIDENTIAL

JAW East  
 P18  
 132

Florida Power & Light Co.  
 Capacity Cost Recovery Clause  
 Dkt.# 140001-EL, ACN 14-027-4-3  
 TYE 2013

Title Billing Stmt.

JHP 4/14  
 RBC  
 4/14

Qualifying Facility Monthly Billing Statement

Facility Name: BROWARD RESOURCE RECOVERY SOUTH  
 Region: SOUTHEAST  
 Billing Month: February, 2013

Number of hours in Month:	672		
Number of peak hours in Month:	224	A	B
Energy Received, All Hours:	31,083,381 MWH	7,744,228 MWH (AA)	2,268,000 MWH (91)
1 Energy Received, All Peak Hours:	██████████ MWH	██████████ MWH (AA)	██████████ MWH (91)
2 Sales (Wheeled):	██████████ MWH		
3 Net Energy Received, All Hours:	██████████ MWH		
4 Maximum Hourly Energy:	██████████ MWH	at 02/02/13:08	
5 Committed Capacity:	██████████ MW (91)		
6 Monthly Billing Capacity Factor:	██████████ % (91)		
7 Monthly Peak Capacity Factor:	██████████ % (91)		
8 Annual Capacity Factor:	██████████ % (91)		
9 Annual Peak Capacity Factor:	██████████ % (91)		
10 Billing Capacity Factor:	██████████ % (91)		
11 Unit Energy Cost:	██████████ \$/MWH (91)		

CONFIDENTIAL

	(As Available)	(91)	Total
Monthly Energy Payment:	\$146,419.72	\$43,171.36	\$189,591.08
Monthly Capacity Payment:		\$100,975.00	\$100,975.00

Capacity Cr 463 p 2

Execution Date/Time: 02/28/13 at 14:58:24

46-3  
 4-2

2/28/13  
 Feb  
 P311  
 Cost

# **EXHIBIT C**

## **JUSTIFICATION TABLE**

**SECOND REVISED EXHIBIT C**

**COMPANY:** Florida Power & Light Company  
**TITLE:** FPL, Capacity Cost Recovery Clause  
**AUDIT CONTROL NO:** 14-027-4-3  
**DOCKET NO:** 20180001-EI  
**DATE:** March 20, 2018

Bold denotes revision to reduce the amount of confidential classification previously requested or a new affiant

Workpaper No.	Description	No. of Pages	Conf Y/N	Column No./Line No.	Florida Statute 366.093 (3) Subsection	Affiant
7-2	Analytical Review Explanation	1	N			
7-2/1	Analytical Review Documentation	1	N			
41-1/1	WCEC Factors	1	N			
41-1/1-1	WCEC Factors	1				
42-2	Schedule A-6 Back Up	1	N			
42-2/1	Oasis Report	8	N			
42-2/1-1	Recalculation of Oasis Rpt price	1	N			
42-2/1-2	Third Party Transmission	1	N			
42-2/1-2/1	Reservation Detail	1	N			
<b>42-2/2</b>	<b>Additional Sales</b>	<b>1</b>	<b>N</b>			
<b>42-2/2-1</b>	<b>Invoice</b>	<b>1</b>	<b>N</b>			
<b>42-2/2-2</b>	<b>Purchase Statement</b>	<b>2</b>	<b>N</b>			
<b>42-2/2-2/1</b>	<b>Deal Documentation</b>	<b>1</b>	<b>Y</b>			
42-3	Schedule A 6 Back Up	1	N			
42-3/1	Oasis Report	18	N			
42-3/1-1	Recalculation of Oasis Rpt price	1	N			
<b>42-3/1-1/1</b>	<b>Deal Documentation</b>	<b>2</b>	<b>N</b>			
<b>42-3/2</b>	<b>Transmission Sales</b>	<b>1</b>	<b>N</b>			
<b>42-3/2-1</b>	<b>Invoice</b>	<b>1</b>	<b>N</b>			
<b>42-3/2-2</b>	<b>Purchase Statement</b>	<b>2</b>	<b>N</b>			
<b>42-3/2-2/1</b>	<b>Deal Documentation</b>	<b>1</b>	<b>N</b>			
42-3/3	Transmission Billed	1	N			
44-3	Sample	3	Y	Pg. 1, Cols. A, B, C, Lns. 3, 4  Pg. 2, Cols. A, B, Lns. 10, 17 Col. C, Ln. 10a Col. D, Lns. 10, 17  Pg. 3, Cols. A, B, Line 18 Col. C, Lns. 17a, 18a, 23a Col. D, Lns. 18, 21, 23	(c), (d), (e)	<b>C. Arcari</b>
44-3/1	Sample item	1	N			
44-3/2	Sample item	2	Y	Pg. 1, Lns 1A, 5.1B  Pg. 2, Col. A Col. B, Line 7 Col. C. Lns. 10, 11, 13, 14	(c), (d), (e)	<b>C. Arcari</b>

Workpaper No.	Description	No. of Pages	Conf Y/N	Column No./Line No.	Florida Statute 366.093 (3) Subsection	Affiant
				Col. D, Lns. 10, 13, 18, 19 Col. E, Lns. 8-10, 12, 15-17 Col. F, Line 21 Col. G, Line 20		
44-3/2-1	Sample item	1	N			
44-3/3	Sample item	1	Y	Col. A, Line 1 Cols. B-C, Lns. 2-4 Col. D, Lns. 5, 7, 10-17 Col. E, Lns. 6, 8, 11, 13, 15, 17 Col. F, Lns. 2-4 Col. G, Lns. 9, 14 Cols. H-I, Lns. 2-4	(c), (d), (e)	C. Arcari
44-3/3-1	Sample item	1	Y	Lns 1A, 5.1B, 5.2C, 5.3D, 7.1E	(c), (d), (e)	C. Arcari
45-2	Transmission Charges	1	N			
45-2/1	January Estimate	1	N			
45-2/1-1	Invoice	1	N			
45-2/1-1/1	Invoice Total	1	N			
45-2/1-2	Invoice	1	N			
45-2/1-2/1	Transmission Resales	1	N			
45-2/1-2/1-1	Transmission Resales	1	N			
45-2/2	December Actual/Estimate	2	N			
45-2/3	October Actual	1	N			
45-2/3-1	Invoice	1	N			
45-2/3-2	October Estimate	1	N			
45-2/3-3	Resales	1	N			
45-2/4	November Actual	1	N			
45-2/4-1	Invoice	1	N			
45-2/4-2	November Estimate	1	N			
45-2/4-3	November Resales	1	N			
45-2/5	Transmission True Up	1	N			
45-2/5-1	Transmission Estimate	1	N			
45-2/5-2	Invoice	1	N			
45-3	Transmission by Other Explanations	2	N			
46-2	A-12 Worksheet	1	N			
46-2/1	Invoice	1	N			
46-2/1-1	SJRPP Billing	1	N			
46-2/2	Purchased Power Accrual	1	N			
46-2/3	Invoice	1	N			
46-2/3-1	SJRPP Billing	1	N			
46-2/4	Purchased Power Accrual	1	N			
46-2/5	Invoice	1	N			
46-2/5-1	SJRPP Billing	1	N			
46-2/6	Purchased Power Accrual	1	N			

Workpaper No.	Description	No. of Pages	Conf Y/N	Column No./Line No.	Florida Statute 366.093 (3) Subsection	Affiant
46-3	A-12 Worksheet	1	Y	Cols. A & C, Lns. 1-52, 55-57, 58, 59, 60-62 Col. B, Lns. 4, 53-54	(d), (e)	G. Yupp
46-3/1	Billing Statement	1	N			
46-3/1-1	Billing Statement	1	N			
46-3/1-2	Billing Statement	1	N			
46-3/2	Billing Statement	1	N			
46-3/2-1	Billing Statement	1	N			
46-3/2-2	Billing Statement	1	N			
46-3/2-3	Contract Excerpt	1	N			
46-3/2-3/1	Contract Excerpt	2	N			
46-3/2-3/2	Contract Excerpt	1	N			
46-3/3	Billing Statement	1	N			
46-3/3-1	Billing Statement	1	N			
46-3/3-2	Billing Statement	1	N			
46-3/3-3	Contract Excerpt	1	N			
46-3/3-3/1	Contract Excerpt	1	N			
46-3/4	Billing Statement	1	Y	Col. A, Lns. 1-11 Cols. B-C, Line 1	(e)	G. Yupp
46-3/4-1	Billing Statement	1	N			
46-3/4-2	Billing Statement	1	Y	Col. A, Lns. 1-11 Cols. B-C, Line 1	(e)	G. Yupp
46-3/5	Billing Statement	1	N			
46-3/5-1	Billing Statement	1	N			
46-3/5-2	Billing Statement	1	N			
46-4	Purchased Power Estimate	1	N			
46-4/1	Invoice	1	N			
46-4/1-1	Deal Summary	1	N			
46-4/1-2	Purchase Statement	3	N			
46-4/2	CAPA	1	N			
46-4/3	Contract Pymt Calculation	3	N			
46-5	Purchased Power Estimate	1	N			
46-5/1	Invoice	1	N			
46-5/1-1	CAA	1	N			
46-5/1-2	Purchase Statement	3	N			
46-5/2	CAPA	1	N			
46-5/3	Contract Pymt Calculation	3	N			
46-6	ADA Calculation	1	N			
48-2	Suspension Payment Schedule	1	N			
53-1	NRC Fees	1	N			
53-2	NRC Fees	1	N			
53-2/1	NRC Fees Explanations	1	N			

**FIRST REVISED**

**EXHIBIT D**

**DECLARATION**



**SECOND REVISED 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 CRAIG W. ARCARI**

1. My name is Craig W. Arcari. I am currently employed by Florida Power & Light Company ("FPL") as Vice President of Power Generation, FPL Operations. I have personal knowledge of the matters stated in this declaration.

2. I have reviewed the documents referenced and incorporated in FPL's Second Request for Extension of Confidential Classification of Information Obtained in Connection with Audit No. 14-027-4-3 for which I am identified as the declarant. The documents or materials that I have reviewed and which are asserted by FPL to be proprietary confidential business information contain or constitute information concerning services provided for compliance with North American Electric Reliability Corporation Critical Infrastructure Protection requirements and amounts paid to vendors for those services. This information involves FPL's security measures. Additionally, the documents contain information relating to competitive interests, the disclosure of which would impair the competitive business of the provider of the information. Some documents also contain or constitute bids or other contractual data, the disclosure of which would impair FPL's efforts to contract for goods or services on favorable terms in the future. To the best of my knowledge, FPL has maintained the confidentiality of these documents and materials.

3. Nothing has occurred since the issuance of Order No. PSC-16-0400-CFO-EI to render the information stale or public, such that continued confidential treatment would not be appropriate. Therefore, the information 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.

  
\_\_\_\_\_  
Craig W. Arcari

Date: March 9, 2018

**SECOND REVISED 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

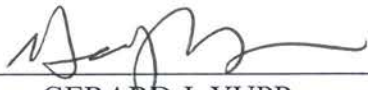
**DECLARATION OF GERARD J. YUPP**

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 written declaration.

2. I have reviewed the documents referenced and incorporated in FPL's Second Request for Extension of Confidential Classification of Information Obtained in Connection with Audit No. 14-027-4-3 for which I am identified as the declarant. The documents or materials that I have reviewed and which are asserted by FPL to be proprietary confidential business information contain or constitute contractual data such as pricing and other terms, payment records, and vendor and supplier rates, the disclosure of which would impair the efforts of FPL to contract for capacity and energy on favorable terms for the benefit of its customers and would impair the competitive interests of FPL and its vendors. Certain information in these documents and materials would also place FPL at a disadvantage when coupled with other information that is publicly available. To the best of my knowledge, FPL has maintained the confidentiality of these documents and materials.

3. Nothing has occurred since the issuance of Order No. PSC-16-0400-CFO-EI to render the information stale or public, such that continued confidential treatment would not be appropriate. Therefore, the information 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.

  
\_\_\_\_\_  
GERARD J. YUPP

Date: 3/9/18