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March 1, 2019

**VIA HAND DELIVERY**

Mr. Adam Teitzman  
Division of the Commission Clerk and Administrative Services  
Florida Public Service Commission  
2540 Shumard Oak Blvd.  
Tallahassee, FL 32399-0850

RECEIVED-FPSC  
2019 MAR -1 AM 10:31  
COMMISSION  
CLERK

Re: Docket No. 20190001-EI **REDACTED**

Dear Mr. Teitzman:

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 the request.

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

Sincerely,

Maria J. Moncada

COM \_\_\_\_\_  
AFD 1  
APA \_\_\_\_\_  
ECO \_\_\_\_\_  
ENG \_\_\_\_\_  
GCL \_\_\_\_\_  
IDM \_\_\_\_\_  
CLK \_\_\_\_\_

Enclosure

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

**BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION**

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

Docket No. 20190001-EI

Filed: March 1, 2019

**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 1, 2019, 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.

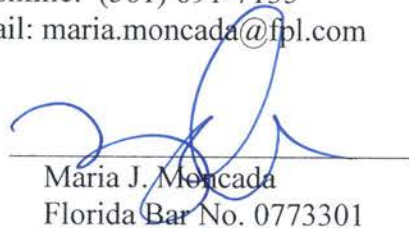
**WHEREFORE**, for the above and foregoing reasons, as more fully set forth in the supporting materials, Florida Power & Light Company respectfully requests that its Request for

Confidential Classification be granted.

Respectfully submitted.

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By:



Maria J. Moncada  
Florida Bar No. 0773301



**CERTIFICATE OF SERVICE**  
**Docket 20190001-EI**

I **HEREBY CERTIFY** that a true and correct copy of the foregoing\* has been furnished by electronic service this 1st day of March 2019 to the following:

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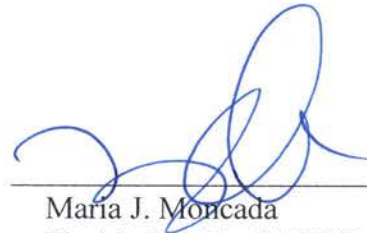
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Users Group**

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.

**EXHIBIT A**

**CONFIDENTIAL**

**FILED UNDER SEPARATE COVER**

# **EXHIBIT B**

## **REDACTED COPIES**



	A	B	C	D	E	F	G	H	I	J	K
1	ASSET OPTIMIZATION DETAIL										
2	Actual for the Period of: January 2018 through December 2018										
3											
4	(1)	(2)	(3)	(4)	(5)	(6)	(7)	(8)	(9)	(10)	(10)
5		Natural Gas	Natural Gas	Natural Gas	Natural Gas	Delivered	Natural Gas	Natural Gas	Electric Transmission	NOX	Total
6		Delivered City-Gate	Production Area	Capacity Release	Option	Natural Gas	Storage	AMA	Capacity Release	Emissions	Asset Optimization
7		Sales	Sales	Firm Transport	Premiums	Savings	Optimization	Gains	Firm Transmission	Sales	Gains
8	Month	(\$)	(\$)	(\$)	(\$)	(\$)	(\$)	(\$)	(\$)	(\$)	(\$)
10	January										6,917,445
11	February										1,599,802
12	March										1,674,495
13	April										1,005,623
14	May										1,464,993
15	June										1,362,678
16	July										1,310,817
17	August										1,114,406
18	September										1,335,598
19	October										1,191,781
20	November										1,614,537
21	December										1,406,134
22											
23											
24											
25											
26											
27											
28											
29											
30											
31											
32											
33											
34	Total	5,752,546	959,088	1,870,966	8,120,859	0	3,307,897	1,966,933	0	0	21,998,309

Florida Power & Light Company  
 Schedule A12 - Capacity Costs: Payments to Non-cogenerators  
 Page 2 of 2

For the Month of Dec-18

Contract	Counterparty	Identification	Contract Start Date	Contract End Date
1	JEA - SJRPP	Other Entity	April, 1982	January 4, 2018
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
4	Exelon Generation Company, LLC	Other Entity	May, 2018	September 30, 2018
5	Orlando Utilities Commission OP-CAP	Other Entity	December 17, 2018	December 31, 2020

2018 Capacity in MW

Contract	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec
1	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
4	-	-	-	-	200	200	200	200	200	-	-	-
5	-	-	-	-	-	-	-	-	-	-	-	-
Total	485	110	110	110	310	310	310	310	310	110	110	118
												228

2018 Capacity in Dollars

	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec
Total	901,301	(6,606,934)	1,442,911	1,195,029	1,410,102	1,029,989	1,530,800	1,530,800	1,486,549	1,220,762	1,230,800	1,822,519

Year-to-date Short Term Capacity Payments 8,194,628 <sup>(1)</sup>

	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												
4												
5												

	1	2	3	4	5
1					
2					
3					
4					
5					

(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.

# **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:** 20190001-EI  
**DATE:** March 1, 2019

<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  Y	Pg. 1  Pg. 2, Line 1, Cols. A, B, L Line 2, Cols. A-L Line 4, Cols. E-I Line 6, Cols. A-J Line 7, Col. B	(d), (e)	G. Yupp
GJY-1	Asset Optimization Detail	4	N  Y  N	Pgs. 1-2  Pg. 3, Cols. B-J, Lns. 10, 12, 14, 16, 18, 20, 22, 24, 26, 28, 30, 32  Pg. 4	(e)	G. Yupp

# **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: 20190001-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 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. Disclosure also 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 / 25 / 19