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July 2, 2014

VIA HAND DELIVERY

Ms. Carlotta Stauffer
Commission Clerk
Florida Public Service Commission
Betty Easley Conference Center
2540 Shumard Oak Boulevard, Room 110
Tallahassee, FL 32399-0850

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COMMISSION
CLERK

Re: Docket No. 130199-EI

REDACTED

Dear Ms. Stauffer:

Enclosed for filing in the above docket on behalf of Florida Power & Light Company ("FPL") is FPL's Request for Confidential Classification of Response to Staff's Second Set of Interrogatories No. 74. Seven copies of FPL's request, including Exhibits C and D, are included. Also included are one copy of Exhibit A and two copies of Exhibit B.

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 one affidavit in support of FPL's Request for Confidential Classification. Also included in this filing is a compact disc containing FPL's Request for Confidential Classification and Exhibit C in Microsoft Word format.

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

Sincerely,

Jessica Cano

Jessica A. Cano
Fla. Bar No. 0037372

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Enclosures
cc: Counsel for Parties of Record

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Petition for Approval of Numeric
Conservation Goals

Docket No: 130199-EI
Date: July 2, 2014

**FLORIDA POWER AND LIGHT COMPANY'S REQUEST FOR
CONFIDENTIAL CLASSIFICATION OF RESPONSE
TO STAFF'S SECOND SET OF INTERROGATORIES, NO. 74**

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 included in its response to the Staff of the Florida Public Service Commission's ("Staff's") Second Set of Interrogatories No. 74. In support of its request, FPL states as follows:

1. On June 11, 2014, FPL filed a Notice of Intent to Request Confidential Classification of its response to Staff's Second Set of Interrogatories, No. 74. Pursuant to Rule 25-22.006(3)(a), Florida Administrative Code, FPL has 21 days from the date of the Notice of Intent to file a formal request for confidential classification. Accordingly, FPL is filing this Request for Confidential Classification to maintain continued confidential handling of the information contained in the discovery response provided to Staff with the Notice of Intent.

2. The following exhibits are included with, and made part of this request:
- a. Exhibit A consists of a copy of the confidential material, on which all information that FPL asserts is entitled to confidential treatment under Florida law 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 under Florida law has been redacted.

- c. Exhibit C is a table containing an identification of the information for which confidential treatment is sought and references to the specific statutory basis or bases for the claim of confidentiality, and to the affidavits in support of the requested classification.
- d. Exhibit D consists of the affidavit of Gerrard J. Yupp.

3. 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 in that the disclosure of the information would cause harm to customers or FPL's business operations, and its confidentiality has been maintained. Pursuant to Section 366.093, such information is entitled to confidential treatment and it is 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 the affidavit included in Exhibit D indicates, the document included in Exhibits A and B, and identified in Exhibit C, contains fuel price forecast data FPL obtained from third parties which FPL is obligated by contract to maintain as confidential. Disclosure of this information would violate the nondisclosure provisions of FPL's contracts with certain vendors and impair the efforts of FPL to contract for goods or services on favorable terms. Such information is protected pursuant to Section 366.093(3)(d), F.S. In addition, this information relates to competitive interests, the disclosure of which would impair the competitive business of the vendors providing the information. Such information is protected pursuant to Section 366.093(3)(e), F.S.

5. Upon a finding by the Commission that the information highlighted in Exhibit A, and referenced in Exhibit C, 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 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 affidavit included herewith, Florida Power & Light Company respectfully requests that its Request for Confidential Classification be granted.

Respectfully submitted this day of July 2, 2014.

Jessica A. Cano
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700 Universe Boulevard
Juno Beach, Florida 33408-0420
Telephone: (561) 304-5226
Facsimile: (561) 691-7135

By: Jessica Cano
Jessica Cano
Florida Bar No. 0037372

**CERTIFICATE OF SERVICE
DOCKET NO. 130199-EI**

I HEREBY CERTIFY that a true and correct copy of FPL's Request for Confidential Classification of Response to Staff's Second Set of Interrogatories, No. 74* was served by hand delivery** or U.S. mail this 2nd day of July, 2014 to the following:

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Qualified Representative for the NAACP

By: Jessica Cano
Jessica Cano
Florida Bar No. 0037372

* 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

CONFIDENTIAL

	A	B	C	D	E	F	G	H	I	J	K	L	M	N	O
	DELIVERED FUEL PRICE FORECAST (nominal)														
	2014 Goals Proceeding				2009 Goals Proceeding				2012 Rate Case						
	Natural Gas (\$/MMBtu)	Oil (\$/MMBtu)	Coal (\$/MMBtu)	Coal (\$/MMBtu)	Natural Gas (\$/MMBtu)	Oil (\$/MMBtu)	Coal (\$/MMBtu)	Coal (\$/MMBtu)	Natural Gas (\$/MMBtu)	Oil (\$/MMBtu)	Coal (\$/MMBtu)	Coal (\$/MMBtu)	Natural Gas (\$/MMBtu)	Oil (\$/MMBtu)	Coal (\$/MMBtu)
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DELIVERED FUEL PRICE FORECAST (nominal)											
2014 Goals Proceeding				2009 Goals Proceeding				2012 Rate Case			
Natural Gas (\$/MMBtu)	Oil (\$/MMBtu)	Coal (\$/MMBtu)	Coal (\$/MMBtu)	Natural Gas (\$/MMBtu)	Oil (\$/MMBtu)	Coal (\$/MMBtu)	Coal (\$/MMBtu)	Natural Gas (\$/MMBtu)	Oil (\$/MMBtu)	Coal (\$/MMBtu)	Coal (\$/MMBtu)
ZONE 3 FGT FIRM	PORT EVERGLADES 1%	SCHERER 4	SJRPP	ZONE 3 FGT FIRM	PORT EVERGLADES 1%	SCHERER 4	SJRPP	ZONE 3 FGT FIRM	PORT EVERGLADES 1%	SCHERER 4	SJRPP
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EXHIBIT C

JUSTIFICATION TABLE

EXHIBIT C

COMPANY: Florida Power & Light Company

TITLE: List of Confidential Documents

DOCKET TITLE: Petition for approval of Numeric Conservation Goals

DOCKET NO.: 130199-EI

DATE: July 2, 2014

Description	Conf. Y/N	Line/Column	366.093(3) F.S.	Affiant
Staff's Second Set of Interrogatories No. 74	Y	Cols G - J, Lines 8 - 12 Cols L - O, Lines 11 - 12 Cols B - O, Lines 13 - 40	(d) (e)	G. J. Yupp

EXHIBIT D

AFFIDAVIT

EXHIBIT D

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Petition for Approval of Numeric Conservation Goals

Docket No. 130199-EI

STATE OF FLORIDA)
PALM BEACH COUNTY)

AFFIDAVIT OF GERARD J. YUPP

BEFORE ME, the undersigned authority, personally appeared Gerard J. Yupp who, being first duly sworn, deposes and says:

1. My name is Gerard J. Yupp. I am currently employed by FPL as Sr. Director of Wholesale Operations in the Energy Marketing and Trading Division. My business address is 700 Universe Boulevard, Juno Beach, Florida, 33408. I have personal knowledge of the matters stated in this affidavit.

2. I have reviewed the document that is included in Exhibit A to FPL's Request for Confidential Classification of Response to Staff's Second Set of Interrogatories, No. 74, for which I am listed as the affiant on Exhibit C. This document, which is asserted by FPL to contain proprietary and confidential business information, contains or constitutes competitively sensitive information that FPL is obligated by contract to maintain as confidential. The disclosure of this information could impair the competitive business of the provider of the information. To the best of my knowledge, FPL has maintained the confidentiality of these documents.

3. The information should remain confidential for a period of at least eighteen (18) months. This document 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 the information.

4. Affiant says nothing further.

Handwritten signature of Gerard J. Yupp over a horizontal line, with the printed name Gerard J. Yupp below it.

SWORN TO AND SUBSCRIBED before me this 26 day of June, 2014, by Gerard J. Yupp, who is personally known to me or who has produced (type of identification) as identification and who did take an oath.

Handwritten signature of Maritza Miranda-Wise over a horizontal line, with the printed name Notary Public, State of Florida below it.

My Commission Expires

