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Principal Attorney  
Florida Power & Light Company  
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August 4, 2014

**VIA HAND DELIVERY**

Carlotta Stauffer, Director  
Division of Commission Clerk  
Florida Public Service Commission  
2540 Shumard Oak Blvd.  
Tallahassee, FL 32399-0850

RECEIVED-FPSC  
14 AUG - 4 AM 8:39  
COMMISSION  
CLERK

Re: Docket No. 140009-EI; Nuclear Power Plant Cost Recovery Clause

**REDACTED**

Dear Ms. Stauffer:

Enclosed for filing on behalf of Florida Power & Light Company ("FPL") is a Request for Confidential Classification of Revised NFR Schedule T-7A. Seven copies of FPL's request, including Exhibits B, C, and D are included. Also included is one copy of Exhibit A.

Exhibit A consists of the confidential documents, and all 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 consists of FPL's justification table supporting its Request for Confidential Classification. Exhibit D contains an 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 only in Microsoft Word format.

Please contact me if there are any questions regarding this filing.

Sincerely,

Jessica A. Cano

- COM \_\_\_\_\_
- AFD 1 Enclosures
- APA 1 cc: Parties of Record (w/out enc.)
- ECO 1
- ENG 1
- GCL 1 Florida Power & Light Company
- IDM 2+cd 700 Universe Boulevard, Juno Beach, FL 33408
- TEL \_\_\_\_\_
- CLK \_\_\_\_\_

**BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION**

In re: Nuclear Cost                    )  
Recovery Clause                        )

Docket No. 140009-EI  
Filed: August 4, 2014

**FLORIDA POWER & LIGHT COMPANY'S REQUEST FOR  
CONFIDENTIAL CLASSIFICATION OF REVISED SCHEDULE T-7A**

Pursuant to Section 366.093, Florida Statutes, and Rule 25-22.006, Florida Administrative Code, Florida Power & Light Company ("FPL") requests confidential classification of portions of Revised 2013 Schedule T-7A, Turkey Point 6 & 7, which was filed with FPL's errata on July 7, 2014. In support of its request, FPL states:

1. On July 7, 2014, FPL filed certain errata, including a revised page of its Nuclear Filing Requirement ("NFR") 2013 Schedule T-7A for Turkey Point 6 & 7. This page was filed with a Notice of Intent to Request Confidential Classification. Pursuant to Rule 25-22.006(3)(a)1, FPL is required to file a Request for Confidential Classification for the confidential information within 21 days. FPL notes that this request is one week out of time due to an inadvertent oversight, but asks that this request be considered on its merits. To FPL's knowledge, the information that is the subject of this request has not been publicly disclosed within the last week.

2. The following exhibits are included with and made a part of this request:

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

b. Exhibit B consists of a copy of the confidential pages on which all information that FPL asserts is entitled to confidential treatment has been redacted.

c. Exhibit C is a table containing an identification of the information highlighted in Exhibit A, together with references to the specific statutory basis or bases

for the claim of confidentiality and to the affidavit in support of the requested classification.

d. Exhibit D includes the affidavit of Steven Scroggs in support of this request.

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. Section 366.093(3), Florida Statutes, defines confidential information as information that is intended to be and is treated by the company as private in that disclosure of the information would cause harm to the company's business operations or its customers, and has not been disclosed publicly. 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(3)(2), 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 information provided by FPL contains contractual data, the public disclosure of which would violate nondisclosure provisions of FPL's contracts with certain vendors and impair FPL's ability to contract for goods or services on favorable terms in the future. Such information is protected by Section 366.093(3)(d), Florida Statutes. This information is also competitively sensitive, and its disclosure could impair the competitive business of FPL or its vendors. Such information is protected by Section 366.093(3)(e), Florida Statutes.



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 the information is no longer necessary for the Commission to conduct its business. *See* § 366.093(4), Fla. Stat.

**WHEREFORE**, FPL respectfully requests confidential classification of the material described herein.

Respectfully submitted,

Jessica A. Cano  
Principal Attorney  
Florida Power & Light Company  
700 Universe Boulevard  
Juno Beach, FL 33408  
Telephone: (561) 304-5226  
Facsimile: (561) 691-7135

By: Jessica Cano  
Jessica A. Cano  
Fla. Bar No. 0037372

**CERTIFICATE OF SERVICE  
DOCKET NO. 140009-EI**

I HEREBY CERTIFY that a true and correct copy of FPL's Request for Confidential Classification of Revised Schedule T-7A (without exhibits)\* was served by hand delivery\*\* or U.S. Mail this 4<sup>th</sup> day of August, 2014 to the following:

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By: *Jessica Cano*  
Jessica A. Cano  
Fla. 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 B

Turkey Point S&T  
Pre-Construction Costs and Carrying Costs on Construction Cost Balance  
True-up Filing: Contracts Executed

Schedule 7-7A

[Redacted] (B)(4)

FLORIDA PUBLIC SERVICE COMMISSION  
COMPANY: Florida Power & Light Company  
DOCKET NO.: 140008-EL

EXPLANATION: For all executed contracts exceeding \$250,000, (including change orders), provide the contract number or identifier, status, original and current contract terms, original amount, amount expended as of the end of the prior year, amount expended in the current year, estimated final contract amount, name of contractor and affiliations if any, method of selection including identification of justification documents, and description of work.

For the Year Ended: 12/31/2013  
Witness: Steven D. Saraggs

(A)	(B)	(C)	(D)	(E)	(F)	(G)	(H)	(I)	(J)	(K)	
Line No.	Contract No.	Status of Contract	Original Term of Contract	Current Term of Contract	Original Amount	Actual amount expended as of Prior Year End (2012)	Actual amount expended in Current Year (2013)	Estimate of Final Contract Amount	Name of Contractor (and Affiliation if any)	Method of Selection and Document ID	Work Description
1	2000063412	Open - COB4	02/2012 - 12/2012	02/2012 - 06/2015					AMEC ESI	SSJ	PTN 667 RFI Response Review
2	2000116705	Open	10/2013 - 08/2015	10/2013 - 02/2015					AMEC ESI	SSJ	PTN 667 RFI Response Review/PSAR 2.5.4
3	4500681284	Open - COB4	06/2011 - 12/2012	06/2011 - 06/2014					Aikins North American	SSJ	PTN 667 Expert Scientific Analysis
4	4200354302	Open - COB4	11/2007 - 12/2011	11/2007 - 02/2015					Bechtel Power Co.	Comp Bid/SSJ/PDS	PTN 667 Engineering Services to support Preparation of COLA and SCA and Response to Post-Submittal RAIs
5	2000102917	Open - COB1	07/2013 - 07/2013	07/2013 - 01/2014					Blue Lagoon/Solitel	SSJ	PTN 667 Meeting; Provide Logging and Maps
6	2000363958	Open - COB2	02/2012 - 12/2012	02/2012 - 05/2014					Burns & McDonnell	Comp Bid/SSJ	PTN 667 Preliminary Design of the Radial Collector Well System
7	4500443122	Open - COB4	05/2008 - 08/2010	05/2008 - 03/2015					Eco-Metrics, Inc.	SSJ	PTN 667 Environmental Consulting Services
8	4500519157	Open - COB11	07/2009 - 12/2009	07/2009 - 02/2014					Environmental Consulting and	SSJ/PDS	PTN 667 Post SCA Submittal Support
9	4500450034	Open - COB1	06/2008 - 07/2011	06/2008 - 06/2014					EPRI	SSJ	Advanced Nuclear Technology; Near term employment of Advanced Light Water Reactors
10	4500462222	Closed - COB2	03/2009 - 12/2009	03/2009 - 05/2013					Enpro's Finance (formerly Jefferson Wells)	SSJ	New Nuclear Plant
11	4500518160	Open - COB10	07/2009 - 12/2009	07/2009 - 11/2013					Galcer & Associates, Inc.	SSJ/PDS	PTN 667 Post SCA Submittal Support
12	4500425707	Open - COB9	05/2008 - 08/2008	05/2008 - 06/2014					HDR Engineering, Inc.	Comp Bid/SSJ	Conceptual Engineering of Cooling Water Supply and Discharge
13	2000123867	Open	12/2013 - 12/2014	12/2013 - 06/2015					Layne Christensen Company	Comp Bid	PTN 667 DW-1 Injection Test
14	4500642043	Closed - COB3	03/2011 - 03/2012	03/2011 - 08/2013					Layne Christensen Company	Comp Bid/SSJ	PTN 667 Exploratory/UC Well Installation
15	4500648006	Open - COB3	02/2011 - 03/2012	02/2011 - 12/2014					McCallum Turner	SSJ	PTN 667 COLA Site Selection RAJ Support
16	4500617162	Open - COB7	10/2009 - 12/2010	10/2009 - 06/2014					McNabb Hydrogeologic Consulting, Inc.	SSJ/PDS	PTN 667 Post SCA Submittal and UIC Licensing Support
17	4500536448	Closed - COB4	10/2008 - 12/2011	10/2008 - 06/2013					McNabb Hydrogeologic Consulting, Inc.	Comp Bid/Single Source	PTN 667 UIC Subject Matter Expert
18	2000182304	Open - COB5	05/2013 - 12/2014	05/2013 - 06/2016					Paul C. Rizzo Associates, Inc.	SSJ	PTN 667 Field Investigation and FSAR 2.5 Revision
19	2000053248	Open	11/2011 - 06/2014	11/2011 - 06/2014					Power Engineers, Inc.	SSJ	PTN 667 Prelim Analysis for Miami River Crossing and Devil's Jami Line
20	4500527548	Open - COB5	08/2009 - 12/2009	07/2009 - 04/2014					Tetra Tech-Geo (formerly GeoTrans, Inc.)	SSJ	PTN 667 APT Review and Collector Well Modeling Support
21	2000068250	Closed	11/2012 - 12/2013	11/2012 - 06/2013					University of Miami	SSJ	PTN 667 Expert Witness Support
22	4500404620	Open - COB8	01/2008 - 12/2011	01/2008 - 02/2016					Worthington Electric Co	SSJ/PDS	PTN 667 Engineering Services to Support Preparation of COLA and Response to Post-Submittal RAIs

1 (A) As per response to FPSC DR 29 the amount on Line 17, Column E should be changed from [redacted] to [redacted]. This change does not result in a change to revenue requirements.



**Exhibit C**

**Company:** Florida Power and Light Company  
**Title:** List of Confidential Documents Included in FPL's July 7, 2014 Errata Filing  
**Docket No.:** 140009-EI

<b>Document</b>	<b>Description</b>	<b>No. of Pages</b>	<b>Conf. Y/N</b>	<b>Line No./Col. No.</b>	<b>Florida Statute 366.093 (3) Subsection</b>	<b>Affiant</b>
1	Revised 2013 Schedule T-7A Pre-Construction Costs and Carrying Costs On Construction Cost Balance, Turkey Point 6 & 7 (Exhibit SDS-1)	1	Y	Columns A-D and Line 1	(d), (e)	Steven D. Scroggs

# **EXHIBIT D**

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Nuclear Power Plant Cost )  
Recovery Clause )

DOCKET NO. 140009-EI

STATE OF FLORIDA )  
LEON COUNTY )

AFFIDAVIT OF STEVEN D. SCROGGS

BEFORE ME, the undersigned authority, personally appeared Steven D. Scroggs who, being first duly sworn, deposes and says:

1. My name is Steven D. Scroggs. I am currently employed by Florida Power & Light Company ("FPL") as Senior Director, Project Development. I have personal knowledge of the matters stated in this affidavit.

2. I have reviewed Exhibit C and the documents that are included in FPL's Request for Confidential Classification concerning Revised 2013 Schedule T-7A, Turkey Point 6 & 7, for which I am identified on Exhibit C as the affiant. The documents and materials that I have reviewed contain proprietary confidential business information, including information concerning bids or contractual data. Disclosure of this information would violate FPL's contracts with its vendors, work to the detriment of FPL's competitive interests, impair the competitive interests of its vendors and/or impair FPL's efforts to enter into contracts on commercially favorable terms. To the best of my knowledge, FPL has maintained the confidentiality of these documents and materials.

3. Consistent with the provisions of the Florida Administrative Code, such materials should remain confidential for a period of not less than 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. Affiant says nothing further.

*Steven D. Scroggs*  
\_\_\_\_\_  
Steven D. Scroggs

SWORN TO AND SUBSCRIBED before me this 3 day of August 2014, by Steven D. Scroggs, who is personally known to me or who has produced \_\_\_\_\_ (type of identification) as identification and who did take an oath.

*Annette L. Givens*  
\_\_\_\_\_  
Notary Public, State of Florida

My Commission Expires:

