



Jessica A. Cano  
Principal Attorney  
Florida Power & Light Company  
700 Universe Boulevard  
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(561) 304-5226  
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**REDACTED**

March 2, 2015

**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

RECEIVED-FPSC  
15 MAR -2 PM 1:57  
COMMISSION  
CLERK

Re: Docket No. 150009-EI; Nuclear Cost Recovery Clause

Dear Ms. Stauffer:

Enclosed for filing on behalf of Florida Power & Light Company ("FPL") is a Request for Confidential Classification of Exhibit SDS-1, including Exhibits A through D. Seven copies of FPL's request, excluding Exhibit A, are included.

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  
Fla. Bar No. 0037372

COM	_____
AFD	1
APA	1
ECO	1
ENG	1
GCL	1
IDM	2 + CD
TEL	_____
CLK	_____

Enclosures  
cc: Counsel for Parties of Record (w/out enc.)

**BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION**

In re: Nuclear Cost                    )  
Recovery Clause                    )

Docket No. 150009-EI  
Filed: March 2, 2015

**FLORIDA POWER & LIGHT COMPANY'S REQUEST  
FOR CONFIDENTIAL CLASSIFICATION OF EXHIBIT SDS-1**

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 Exhibit SDS-1 to the pre-filed testimony of FPL witness Steven D. Scroggs. In support of its request, FPL states:

1. FPL is filing contemporaneously with this request the petition, testimony and exhibits in support of its Nuclear Power Plant Cost Recovery True-Up for the Year ending December 2014. Certain portions of Exhibit SDS-1 contain confidential contract payment amounts. Pursuant to Rule 25-22.006(3)(a), Florida Administrative Code, FPL is filing this Request for Confidential Classification.

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 Martin Cox 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. 150009-EI**

I HEREBY CERTIFY that a true and correct copy of FPL's Request for Confidential Classification of Exhibit SDS-1 (without exhibits)\* was served by hand delivery\*\* or U.S. Mail this 2nd day of March, 2015 to the following:

Keino Young, Esq.\*\*  
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*Attorneys for City of Miami*

By:   
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 A**

**CONFIDENTIAL**

**FILED UNDER SEPARATE COVER**

**EXHIBIT B**

**REDACTED COPIES**



**Turkey Point 6&7  
Pre-Construction Costs and Carrying Costs  
True-up Filing: Contracts Executed**

[Section 9(c)]

Schedule-T-7A

FLORIDA PUBLIC SERVICE COMMISSION

COMPANY: Florida Power & Light Company

DOCKET NO.: 150009-EI

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: 12/31/2014  
Witness: Steven D. Scroggs

CONFIDENTIAL CONFIDENTIAL CONFIDENTIAL CONFIDENTIAL

(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 Expended as of Prior Year End (2013)	expended in Current Year (2014)	Estimate of Final Contract Amount	Name of Contractor (and Affiliation if any)	Method of Selection and Document ID	Work Description
1	2000062412	Open - CO#6	02/2012 - 12/2012	02/2012 - 06/2015					AMEC E&I	SSJ	PTN 6&7 RFI Response Review
2	2000115705	Open - CO#1	10/2013 - 08/2016	10/2013 - 02/2016					AMEC E&I	SSJ	PTN 6&7 RFI Response Review/FSAR 2.5.4
3	4500681284	Open - CO#4	08/2011 - 12/2012	08/2011 - 06/2014					Alkins North American	SSJ	PTN 6&7 Expert Scientific Analysis
4	4500395492	Open - CO#57	11/2007 - 12/2011	11/2007 - 02/2016					Bechtel Power Co.	Comp Bid/SSJ/ PDS	PTN 6&7 Engineering Services to support Preparation of COLA and SCA, and Response to Post-Submittal RAIs
5	2000102617	Open - CO#1	07/2013 - 07/2013	07/2013 - 01/2014					Blue Lagoon/Sofitel	SSJ	PTN 6&7 Hearing; Provide Lodging and Meals
6	2000060695	Open - CO#2	02/2012 - 12/2012	02/2012 - 05/2015					Burns & McDonnell	Comp Bid/SSJ	PTN 6&7 Preliminary Design of the Radial Collector Well System
7	4500443122	Open - CO #5	08/2008 - 08/2010	06/2008 - 06/2015					Eco-Metrics, Inc.	SSJ	PTN 6&7 Environmental Consulting Services
8	4500518167	Open - CO#11	07/2009 - 12/2009	07/2009 - 05/2015					Environmental Consulting and Technology Inc.	SSJ/PDS	PTN 6&7 Post SCA Submittal Support
9	4500430034	Open - CO#2	06/2008 - 07/2011	06/2008 - 12/2014					EPRI	SSJ	Advanced Nuclear Technology; Near term deployment of Advanced Light Water Reactors
10	4500492222	Closed - CO#2	03/2009 - 12/2009	03/2009 - 06/2013					Experis Finance(formerly Jefferson Wells)	SSJ	New Nuclear Audit
11	4500518160	Open - CO#11	07/2009 - 12/2009	07/2009 - 04/2015					Golder & Associates, Inc.	SSJ/PDS	PTN 6&7 Post SCA Submittal Support
12	4500425707	Open - CO#8	05/2008 - 08/2008	05/2008 - 08/2015					HDR Engineering, Inc.	Comp Bid/SSJ	Conceptual Engineering of Cooling Water Supply and Discharge
13	2000123867	Open - CO#1	12/2013 - 12/2014	12/2013 - 06/2015					Layne Christensen Company	Comp Bid	PTN 6&7 DIW-1 Injection Test
14	4500652043	Closed - CO#3	03/2011 - 03/2012	03/2011 - 08/2013					Layne Christensen Company	Comp Bid/SSJ	PTN 6&7 Exploratory/UIC Well Installation
15	4500645896	Open - CO#3	02/2011 - 03/2012	02/2011 - 12/2014					McCallum Turner	SSJ	PTN 6&7 COLA Site Selection RAI Support
16	4500517152	Open - CO#7	10/2009 - 12/2010	10/2009 - 06/2015					McNabb Hydrogeologic Consulting, Inc.	SSJ/PDS	PTN 6&7 Post SCA Submittal and UIC Licensing Support
17	4500536449	Closed - CO#4	10/2009 - 12/2011	10/2009 - 06/2013					McNabb Hydrogeologic Consulting, Inc.	Comp Bid/Single Source	PTN 6&7 UIC Subject Matter Expert
18	2000102364	Open - CO#9	05/2013 - 12/2014	05/2013 - 06/2015					Paul C. Rizzo Associates, Inc.	SSJ	PTN 6&7 Field Investigation and FSAR 2.5 Revision
19	2000053246	Open	11/2011 - 06/2014	11/2011 - 06/2015					Power Engineers, Inc.	SSJ	PTN 6&7 Prelim Analysis for Miami River Crossing and Davis/Miami Line
20	4500527549	Open - CO#5	08/2009 - 12/2009	07/2009 - 04/2015					TetraTechGeo (formerly GeoTrans, Inc.)	SSJ	PTN 6&7 APT Review and Collector Well Modeling Support
21	2000140558	Closed - CO#2	06/2014 - 12/2014	06/2014 - 12/2014					HDR Engineering, Inc.	Comp Bid	PTN 6&7 Develop Submittals for USACE Section 408 Authorization
22	4500404639	Open - CO#8	01/2008 - 12/2011	01/2008 - 02/2016					Weslinghouse Electric Co	SSJ/ PDS	PTN 6&7 Engineering Services to Support Preparation of COLA and Response to Post-Submittal RAIs

Turkey Point 6&7  
Pre-Construction Costs and Carrying Costs  
True-up Filing: Contracts Executed Details

Schedule T-7B

[Section (B)(c)]

FLORIDA PUBLIC SERVICE COMMISSION  
COMPANY: Florida Power & Light Company  
DOCKET NO.: 150009-EI

EXPLANATION: Provide additional details of contracts executed in excess of \$1 million including, the nature and scope of the work, the nature of any affiliation with selected vendor, the method of vendor selection, brief description of vendor selection process, and current status of the contract.

For the Year Ended 12/31/2014

Witness: Steven D. Scroggs

Line No.

Line No.	Contract No.	Major Task or Tasks Associated With:	Vendor Identity:	Vendor Affiliation (specify 'direct' or 'indirect'):	Number of Vendors Solicited:	Number of Bids Received:	Brief Description of Selection Process:	Dollar Value:	Contract Status:	Term Begin:	Term End:	Nature and Scope of Work:
2	4500396492	COLA and SCA Preparation and Support	Bechtel Power Corporation	Direct	Two	Two	Initial contract competitively bid. Change Orders 1-11 issued as Single Source. Designated as Predetermined Source January 2009 through July 2013. Subsequent change orders justified as Single Source.		Open - CO#57	11/06/07	08/01/15	Engineering Services to support preparation of COLA and SCA, including post-submittal support for RAI
3	4500518167	PTN 6&7 Post SCA Submittal Support	Environmental Consulting and Technology Inc.	Direct	SSJ/PDS	NA	ECT can build off of their Phase I analysis and project specific experience to complete the transmission corridor environmental licensing with a minimum of mobilization time or bringing project staff up to speed with prior work.		Open - CO#11	07/15/09	Open	PTN 6&7 Post SCA Submittal Support
4	4500430034	Conducts research, development and demonstration (RD&D) relating to the generation, delivery and use of electricity for the benefit of the public.	EPRI	Direct	SSJ	NA	EPRI is non-profit origination with the unique capability to fulfill the needs of this Contract.		Open - CO#2	08/10/03	Open	Advanced Nuclear Technology; Near term deployment of Advanced Light Water Reactors
5	4500518160	PTN 6&7 Post SCA Submittal Support	Golder & Associates, Inc.	Direct	SSJ/PDS	NA	Golder & Associates, Inc. has performed a significant amount of related Phase I tasks and can build off of their Phase I work and project specific experience to complete the environmental licensing with a minimum of mobilization time or bringing project staff up to speed with prior work.		Open - CO#11	09/29/09	04/30/15	Conceptual Engineering of Cooling Water Supply and Discharge
6	4500425707	Conceptual engineering of cooling water supply & disposal.	HDR Engineering, Inc.	Direct	Comp Bid/SSJ	Three	Initial contract competitively bid. Subsequent change orders were issued as Single Source and notes relative experience as the basis for award.		Open - CO#8	05/19/08	Open	Conceptual Engineering of Cooling Water Supply and Discharge
7	4500552043	Installation of exploratory underground injection control well & associated monitoring.	Layne Christensen Company	Direct	Comp Bid/SSJ	Three	Initial contract competitively bid. Subsequent change orders were issued as Single Source and notes relative experience as the basis for award.		Closed - CO#3	03/03/11	08/31/13	PTN 6&7 Exploratory/UIC Well Installation
8	4500536449	PTN 6&7 UIC Subject Matter Expert	McNabb Hydrogeologic Consulting, Inc.	Direct	Comp Bid/SSJ	Three	Initial contract competitively bid. Subsequent change orders were issued as Single Source and notes relative experience as the basis for award.		Closed - CO#4	12/30/11	12/31/12	PTN 6&7 Post SCA Submittal and UIC Licensing Support
9	2000102364	FSAR & NRC RAI Geotechnical Support.	Paul C. Rizzo Associates, Inc.	Direct	SSJ	NA	Rizzo Associates recent interaction with the NRC and their familiarity with Florida geology, would reduce familiarization and development time to prepare the analysis and FSAR revision.		Open - CO#9	04/30/13	12/31/14	PTN 6&7 Field Investigation and FSAR 2.5 Revision
10	4500404639	Support of COL application during NRC review & updating of 10CFR part 21 notification.	Westinghouse Electric Co	Direct	SSJ/PDS	NA	Initial contract award was based on the designation as Predetermined Source. Subsequent change orders were issued as Single Source and notes relative experience as the basis for award.		Open - CO#8	01/31/08	08/31/15	PTN 6&7 Engineering Services to Support Preparation of COLA and Response to Post-Submittal RAs

A

# **EXHIBIT C**

## **JUSTIFICATION TABLE**

**Exhibit C**

**Company:** Florida Power and Light Company  
**Title:** List of Confidential Documents Included in FPL's March 2, 2015 True-Up Filing  
**Docket No.:** 150009-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	2014 Schedule T-7A Pre-Construction Costs and Carrying Costs, New Nuclear (Exhibit SDS-1)	1	Y	Page 24 Lines 1-22 Columns E-H	(d), (e)	Martin Cox
2	2014 Schedule T-7B Pre-Construction Costs and Carrying Costs, New Nuclear (Exhibit SDS-1)	1	Y	Page 25 Lines 2-10 Column A	(d), (e)	Martin Cox

**EXHIBIT D**

**AFFIDAVIT**



BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Nuclear Cost )  
Recovery Clause )

DOCKET NO. 150009-EI

STATE OF FLORIDA )  
 )  
PALM BEACH COUNTY )

AFFIDAVIT OF MARTIN COX

BEFORE ME, the undersigned authority, personally appeared Martin Cox who, being first duly sworn, deposes and says:

1. My name is Martin Cox. I am currently employed by Florida Power & Light Company ("FPL") as Senior Nuclear Cost Analyst, Nuclear Project Controls PTN 6&7. 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 of Exhibit SDS-1, for which I am identified on Exhibit C as the affiant. The documents 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.

3. Consistent with the provisions of the Florida Administrative Code, such documents 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.

*Martin Cox*  
\_\_\_\_\_  
Martin Cox

SWORN TO AND SUBSCRIBED before me this 26<sup>th</sup> day of February 2015, by Martin Cox, who is personally known to me or who has produced FL DL# (type of identification) as identification and who did take an oath. C200-362-58-084-0

*Heather P. Meligonis*  
\_\_\_\_\_  
Notary Public, State of Florida

My Commission Expires: 2/6/17

