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February 23, 2017

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
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COMMISSION
CLERK

Re: Docket No. 170001-EI

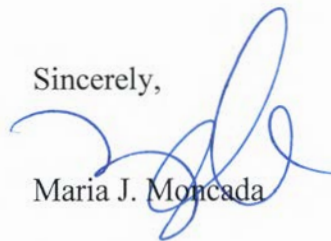
Dear Ms. Stauffer:

I enclose for filing in the above docket Florida Power & Light Company's ("FPL's") Request for Confidential Classification of Information Provided in Response to Staff's First Set of Interrogatories (No. 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 FPL's request.

Please contact me if you 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 Request for Confidential Classification)

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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: 170001-EI

Date: February 23, 2017

**FLORIDA POWER & LIGHT COMPANY'S REQUEST
FOR CONFIDENTIAL CLASSIFICATION OF INFORMATION
PROVIDED IN RESPONSE TO STAFF OF THE FLORIDA PUBLIC
SERVICE COMMISSION'S FIRST SET OF INTERROGATORIES (No. 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 certain information provided in response to the Staff of the Florida Public Service Commission's ("Staff") First Set of Interrogatories (No. 1) ("Confidential Discovery Response"). In support of its Request, FPL states as follows:

1. On January 24, 2017, Staff served its First Set of Interrogatories (Nos. 1-7) on FPL. FPL's Response to Staff's First Set of Interrogatories (No. 1) contains information of a confidential nature within the meaning of Section 366.093(3), Florida Statutes.

2. FPL served its responses to Staff's First Set of Interrogatories (Nos. 1-7) on February 23, 2017. This request is being filed contemporaneously with the service of the responses to Staff's discovery in order to request confidential classification of the Confidential Discovery Responses consistent with Rule 25-22.006, Florida Administrative Code.

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

a. Exhibit A consists of a copy of the Confidential Discovery Response on which all information that FPL asserts is entitled to confidential treatment is highlighted.

b. Exhibit B consists of an edited version of the Confidential Discovery Response on which all information that FPL asserts is entitled to confidential treatment is redacted.

c. Exhibit C is a table containing a page-and-line identification of the information highlighted in Exhibit A and a brief description of the Confidential Information. Exhibit C also references the specific statutory bases for the claim of confidentiality and identifies the declarant who supports the requested classification.

d. Exhibit D is the declaration of Gerard J. Yupp in support of this Request.

4. 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, and its confidentiality has been maintained. Pursuant to Section 366.093, such information is entitled to confidential treatment and is exempt from the disclosure provisions of the public records law. Thus, once the Commission determined 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.

5. As the description included in Exhibit C and the declaration included in Exhibit D indicate, the Confidential Discovery Responses provided by FPL contains information concerning bids or other contractual data, the disclosure of which would impair the efforts of FPL to contract for goods and services on favorable terms. This information is protected by Section 366.093(3)(d), Fla. Stat.

6. Additionally, this information relates to the competitive interests of FPL and its vendors, the disclosure of which would impair their competitive interests. This information is protected by Section 366.093(3)(e), Fla. Stat.

7. 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 eighteen (18) 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 materials and declaration included herewith, Florida Power & Light Company respectfully requests that its Request for Confidential Classification be granted.

Respectfully submitted,

John T. Butler
Assistant General Counsel - Regulatory
Maria J. Moncada
Senior Attorney
Florida Power & Light Company
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Juno Beach, FL 33408
Telephone: (561) 304-5795
Facsimile: (561) 691-7135
Email: maria.moncada@fpl.com

By: _____


Maria J. Moncada
Florida Bar No. 0773301

CERTIFICATE OF SERVICE

Docket No. 170001-EI

I HEREBY CERTIFY that a true and correct copy of the foregoing Request for Confidential Classification has been furnished by electronic service this 23rd day of February 2017 to the following:

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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.

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EXHIBIT A

CONFIDENTIAL

**FILED UNDER SEPARATE
COVER**

EXHIBIT B

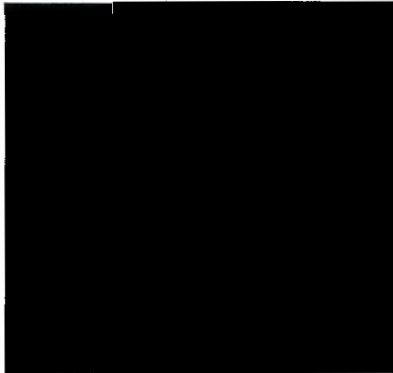
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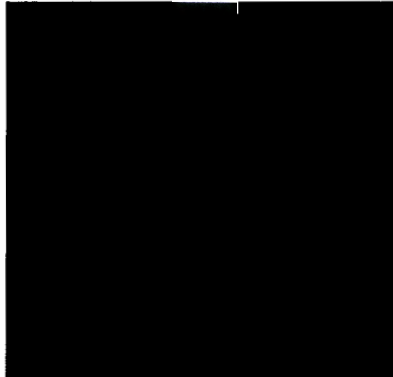
February 17, 2016 Due Date

Plant Scherer February 2016 Spot Solicitation

Q2 2016 Proposals

	<u>Offers</u>	<u>btu/lb</u>	<u>Total tons</u> <u>March-Q2</u>	<u>Delivered</u> <u>\$/mmbtu</u> <u>w/o SO2</u>
1		8,800	400,000	2.306
2		8,600	400,000	2.311
3		8,850	400,000	2.313
4		8,400	400,000	2.320
5		8,800	300,000	2.332
6		8,400	400,000	2.338
7		8,850	400,000	2.234
8		8,350	200,000	2.345
9		8,400	400,000	2.402
10		9,400	400,000	2.620

Q3 2016 Proposals

	<u>Offers</u>	<u>btu/lb</u>	<u>Total tons</u> <u>Q3</u>	<u>Delivered</u> <u>\$/mmbtu</u> <u>w/o SO2</u>
11		8,800	300,000	2.306
12		8,600	300,000	2.311
13		8,850	300,000	2.313
14		8,400	300,000	2.327
15		8,800	300,000	2.332
16		8,400	300,000	2.338
17		8,850	300,000	2.340
18		8,350	150,000	2.345
19		8,400	300,000	2.402
20		9,400	300,000	2.620

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April 8, 2016 Due Date

Plant Scherer May-Dec 2016 Spot

	<u>Offers</u>	<u>btu/lb</u>	<u>Total tons</u>	Delivered \$/mmbtu <u>w/o SO2</u>
21	[REDACTED]	8,900	1,000,000	2.257
22	[REDACTED]	8,400	1,000,000	2.292
23	[REDACTED]	8,400	800,000	2.293

Plant Scherer 2017

	<u>Offers</u>	<u>btu/lb</u>	<u>Total tons</u>	Delivered \$/mmbtu <u>w/o SO2</u>
24	[REDACTED]	8,400	5,000,000	2.336
25	[REDACTED]	8,500	5,000,000	2.340
26	[REDACTED]	8,900	6,000,000	2.341
27	[REDACTED]	8,850	3,000,000	2.360
28	[REDACTED]	8,800	8,000,000	2.366
29	[REDACTED]	8,400	2,000,000	2.276
30	[REDACTED]	8,400	3,000,000	2.397

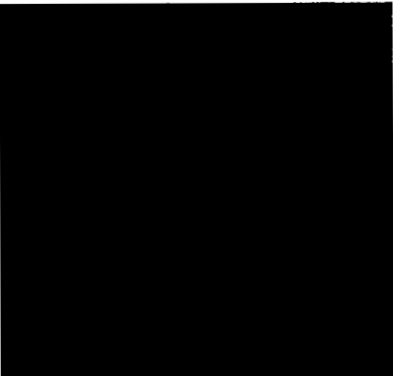
May 17, 2016 Due Date

Plant Scherer Jul-Sept 2016 Spot

	<u>Offers</u>	<u>btu/lb</u>	<u>Total tons</u> <u>per Q</u>	Delivered \$/mmbtu <u>w/o SO2</u>
31	[REDACTED]	8,400	250,000	2.230
32	[REDACTED]	8,800	600,000	2.237
33	[REDACTED]	8,800	50,000	2.246
34	[REDACTED]	8,900	600,000	2.251
35	[REDACTED]	8,400	600,000	2.267
36	[REDACTED]	8,800	100,000	2.267
37	[REDACTED]	8,850	150,000	2.270
38	[REDACTED]	8,600	600,000	2.279
39	[REDACTED]	8,800	600,000	2.282
40	[REDACTED]	8,350	125,000	2.309
41	[REDACTED]	8,400	150,000	2.343


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Plant Scherer Oct-Dec 2016 Spot

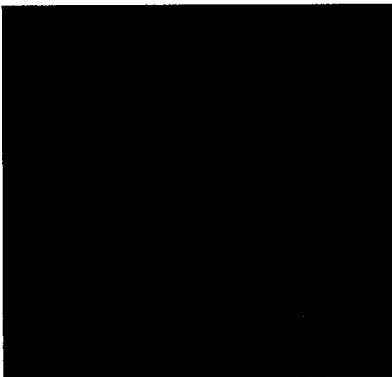
	<u>Offers</u>	<u>btu/lb</u>	<u>Total tons per Q</u>	<u>Delivered \$/mmbtu w/o SO2</u>
42		8,400	250,000	2.230
43		8,800	50,000	2.246
44		8,900	300,000	2.251
45		8,400	300,000	2.267
46		8,800	100,000	2.267
47		8,850	150,000	2.270
48		8,600	300,000	2.279
49		8,800	300,000	2.282
50		8,350	125,000	2.309
51		8,400	150,000	2.343

August 18, 2016 Due Date

Plant Scherer Sept-Dec 2016 Spot


	<u>Offers</u>	<u>btu/lb</u>	<u>Total tons per M</u>	<u>Delivered \$/mmbtu w/o SO2</u>
52		8,400	200,000	2.253
53		8,600	200,000	2.272
54		8,400	200,000	2.291
55		8,900	200,000	2.319
56		8,800	200,000	2.342
57		8,400	125,000	2.390
58		8,850	125,000	2.450

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Plant Scherer 2017

	<u>Offers</u>	<u>btu/lb</u>	<u>Total tons per M</u>	<u>Delivered \$/mmbtu w/o SO2</u>
59		8,400	350,000	2.336
60		8,350	125,000	2.340
61		8,400	350,000	2.351
62		8,400	125,000	2.352
63		8,600	350,000	2.359
64		8,900	350,000	2.370
65		8,600	41,666	2.384
66		8,800	350,000	2.403
67		8,850	83,000	2.429
68		8,400	83,000	2.464


November 17, 2016 Due Date

Plant Scherer Q1 2017 Spot

	<u>Offers</u>	<u>btu/lb</u>	<u>Total tons per M</u>	<u>Delivered \$/mmbtu w/o SO2</u>
69		8,350	150,000	2.356
70		8,400	199,998	2.377
71		8,400	1,050,000	2.384
72		8,800	225,000	2.403
73		8,900	900,000	2.406
74		8,400	1,050,000	2.408
75		8,850	450,000	2.414
76		8,800	1,050,000	2.458

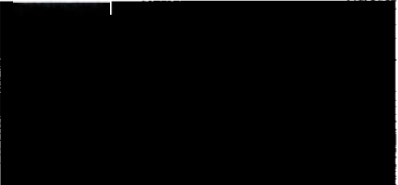
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Plant Scherer Q2 2017 Spot

	<u>Offers</u>	<u>btu/lb</u>	<u>Total tons per M</u>	<u>Delivered \$/mmbtu w/o SO2</u>
77		8,350	150,000	2.356
78		8,400	199,998	2.377
79		8,400	750,000	2.384
80		8,800	225,000	2.403
81		8,850	450,000	2.405
82		8,900	900,000	2.406
83		8,400	1,050,000	2.408
84		8,800	90,000	2.434
85		8,800	750,000	2.358

November 2016 (telephone solicitation)

Plant Scherer Dec 2016 Spot

	<u>Offers</u>	<u>btu/lb</u>	<u>Total tons per M</u>	<u>Delivered \$/mmbtu w/o SO2</u>
86		8,400	150,000	2.335
87		8,400	75,000	2.362
88		8,600	150,000	2.369
89		8,850	150,000	2.374
90		8,850	75,000	2.454

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November 17, 2016 Due Date

GPC PRB Scherer LT Proposals and NPV from November 2016 Solicitation (Original Bids)

	<u>Suppliers</u>	<u>Year</u>	<u>btu/lb</u>	Total Tons <u>Offered</u>	delivered \$/mmbtu <u>without SO2</u>
1		2017	8,900	3,000,000	2.400
2		2018	8,900	6,000,000	2.503
3		2019	8,900	6,000,000	2.595
		2020	8,900	6,000,000	2.689

	<u>Suppliers</u>	<u>Year</u>	<u>btu/lb</u>	Total Tons <u>Offered</u>	delivered \$/mmbtu <u>without SO2</u>
4		2017	8,900	3,000,000	2.400
5		2018	8,900	6,000,000	2.503
6		2019	8,900	6,000,000	2.595
	Market Review Option	2020	8,900	6,000,000	2.689

	<u>Suppliers</u>	<u>Year</u>	<u>btu/lb</u>	Total Tons <u>Offered</u>	delivered \$/mmbtu <u>without SO2</u>
7		2017	8,400	1,000,000	2.383
8		2018	8,400	2,000,000	2.483
9		2019	8,400	3,000,000	2.594
		2020	8,400	3,000,000	2.684

	<u>Suppliers</u>	<u>Year</u>	<u>btu/lb</u>	Total Tons <u>Offered</u>	delivered \$/mmbtu <u>without SO2</u>
10		2017	8,400	1,000,000	2.383
11		2018	8,400	2,000,000	2.483
12		2019	8,400	3,000,000	2.594
	Market Review	2020	8,400	3,000,000	2.684

	<u>Suppliers</u>	<u>Year</u>	<u>btu/lb</u>	Total Tons <u>Offered</u>	delivered \$/mmbtu <u>without SO2</u>
13		2017	8,400	3,000,000	2.398
14		2018	8,400	6,000,000	2.495
		2019	8,400	6,000,000	2.583
		2020	8,400	6,000,000	2.683

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	<u>Suppliers</u>	<u>Year</u>	<u>btu/lb</u>	<u>Total Tons Offered</u>	<u>delivered \$/mmbtu without SO2</u>
15		2017	8,850	500,000	2.443
16		2018	8,850	1,000,000	2.502
17		2019	8,850	1,000,000	2.589
		2020	8,850	1,000,000	2.686

	<u>Suppliers</u>	<u>Year</u>	<u>btu/lb</u>	<u>Total Tons Offered</u>	<u>delivered \$/mmbtu without SO2</u>
18		2017	9,350	250,000	2.256
19		2018	9,350		
20		2019	9,350		
		2020	9,350		

	<u>Suppliers</u>	<u>Year</u>	<u>btu/lb</u>	<u>Total Tons Offered</u>	<u>delivered \$/mmbtu without SO2</u>
21		2017	8,400	500,000	2.415
22		2018	8,400	1,000,000	2.483
23		2019	8,400	1,000,000	2.584
		2020	8,400	1,000,000	2.681

	<u>Suppliers</u>	<u>Year</u>	<u>btu/lb</u>	<u>Total Tons Offered</u>	<u>delivered \$/mmbtu without SO2</u>
24		2017	8,800	3,000,000	2.457
25		2018	8,800	6,000,000	2.537
26		2019	8,800	6,000,000	2.619
	reopener	2020	8,800	6,000,000	

	<u>Suppliers</u>	<u>Year</u>	<u>btu/lb</u>	<u>Total Tons Offered</u>	<u>delivered \$/mmbtu without SO2</u>
27		2017	8,600	3,000,000	2.406
28		2018	8,600	6,000,000	2.472
29		2019	8,600	6,000,000	2.571
	reopener	2020	8,600	6,000,000	

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	<u>Suppliers</u>	<u>Year</u>	<u>btu/lb</u>	Total Tons <u>Offered</u>	delivered \$/mmbtu <u>without SO2</u>
30	[REDACTED]	2017	8,400	3,000,000	2.383
31	[REDACTED]	2018	8,400	6,000,000	2.483
32	[REDACTED]	2019	8,400	6,000,000	2.568
	reopener	2020	8,400	6,000,000	

	<u>Suppliers</u>	<u>Year</u>	<u>btu/lb</u>	Total Tons <u>Offered</u>	delivered \$/mmbtu <u>without SO2</u>
33	[REDACTED]	2017	8,350	0	
34	[REDACTED]	2018	8,350	3,000,000	2.440
35	[REDACTED]	2019	8,350	3,000,000	2.526
		2020	8,350	3,000,000	2.613

	<u>Suppliers</u>	<u>Year</u>	<u>btu/lb</u>	Total Tons <u>Offered</u>	delivered \$/mmbtu <u>without SO2</u>
36	[REDACTED]	2017	8,600	500,000	2.406
37	[REDACTED]	2018	8,600	500,000	2.503
38	[REDACTED]	2019	8,600	500,000	2.602
		2020	8,600	500,000	2.702

EXHIBIT C

JUSTIFICATION TABLE

EXHIBIT C

COMPANY: Florida Power & Light Company
TITLE: List of Confidential Documents
DOCKET NO.: 170001-EI
DOCKET TITLE: Fuel and Purchased Power Cost Recovery Clause with Generating Performance Incentive Factor
SUBJECT: FPL's Responses to Staff's 1st Set of Interrogatories No. 1
DATE: February 23, 2017

Staff's 1st Interrog. (No. 1)	Pg Nos.	Description	Line No./ Col. No.	Florida Statute 366.093(3) Subsection	Declarant
Attachment 1	1 through 8	Requests for Proposal bids for coal received by FPL	Pg. 1, Col. A, Lns. 1-20 Pg. 2, Col. A, Lns. 21-41 Pg. 3, Col. A, Lns. 42-58 Pg. 4, Col. A, Lns. 59-76 Pg. 5, Col. A, Lns. 77-90 Pg. 6, Col. A, Lns. 1-14 Pg. 7, Col. A, Lns. 15-29 Pg. 8, Col. A, Lns. 30-38	(d), (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: 170001-EI

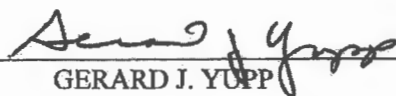
DECLARATION OF GERARD J. YUPP

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 declaration.

2. I have reviewed the documents and information included in Exhibit A to FPL's Request for Confidential Classification. The documents and materials in Exhibit A which are asserted by FPL to be proprietary confidential business concern bids and other contractual data, as well as competitive interests of FPL's suppliers, the public disclosure of which would impair the efforts of FPL to contract for goods or services on favorable terms. Specifically, the documents contain information regarding bids received from FPL's coal suppliers, including proposed volumes, quality, pricing, and delivery methods. Disclosure of this information 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 these documents and materials.

3. Consistent with the provisions of the Florida Administrative Code, such materials should remain confidential for a period of eighteen (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. 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: 2/23/17