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December 6, 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

REDACTED

RECEIVED-FPSC
2017 DEC -6 PM 1:34
COMMISSION
CLERK

Re: Docket No. 20170231-EI

Dear Ms. Stauffer:

I enclose for filing in the above docket Florida Power & Light Company's ("FPL") Request for Confidential Classification of Materials Provided Pursuant to Staff's First Data Request (Nos. 4 and 5). 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 for Confidential Classification.

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

- COM _____
- AFD 1 ex B _____
- APA _____
- ECO _____
- ENG _____
- GCL _____
- IDM _____
- CLK _____

Sincerely,

Kevin I.C. Donaldson
for Kevin I.C. Donaldson

Enclosure

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

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Florida Power & Light Company's
Petition for Approval to Transfer the Martin-
Riviera Lateral Pipeline to Florida Southeast
Connection and Implement Associated Rate
Adjustments

Docket No: 20170231-EI

Date: December 6, 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 DATA REQUESTS (NOS. 4 AND 5)**

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 Data Requests (Nos. 4 and 5) ("Confidential Discovery Response"). In support of its Request, FPL states as follows:

1. On November 16, 2017, Staff served its Data Requests (Nos. 1-6) on FPL. FPL's responses to Staff's First Data Requests (Nos. 4 and 5) contain information of a confidential nature within the meaning of Section 366.093(3), Florida Statutes.

2. FPL served its responses to Staff's First Data Requests (Nos. 1-6) on December 6, 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 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 Sam Forrest 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 descriptions 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,

Kevin I.C. Donaldson, Esq.
Senior Attorney
Florida Power & Light Company
700 Universe Boulevard
Juno Beach, FL 33408
Telephone: (561) 304-5170
Facsimile: (561) 691-7135

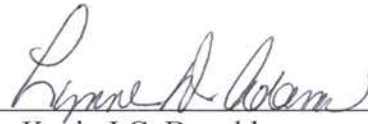
By: 
for

Kevin I.C. Donaldson
Fla. Bar No. 833401

CERTIFICATE OF SERVICE
Docket No. 20170231-EI

I HEREBY CERTIFY that a true and correct copy of the foregoing has been furnished by electronic mail on this 6th day of December, 2017 to the following:

Suzanne Brownless, Esquire
Division of Legal Services
Florida Public Service Commission
2540 Shumard Oak Blvd.
Tallahassee, Florida 32399-0850
sbrownle@psc.state.fl.us

By: 
for Kevin I.C. Donaldson
Florida Bar No. 833401

* 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 B

REDACTED

CONFIDENTIAL

Florida Power & Light Company
Docket No. 20170231-EI
Staff's First Data Request
Request No. 4
Page 1 of 1

1 QUESTION:
2 Referring specifically to row 13, please identify the Net Customer (Savings) / Costs for the year
3 2041 (which is the final year in the 24 year term).

4 RESPONSE:
5 Row 13 refers to the foregone Operating Expenses of divesting the pipeline. For the calendar
6 year 2041, the Operating Expenses total \$2.6 MM on a nominal basis and \$0.5 MM on a present
7 value basis.

8 The Net Customer (Savings) / Costs are reflected in row 23. For the calendar year 2041, the Net
9 Customer Costs total [REDACTED] on a nominal basis and [REDACTED] on a present value basis.

1 Florida Power & Light Company
 2 Deck # 10, 20170219-01
 3 Staff's Final Rate Request
 4 Request No. 5
 5 Attachment No. 1
 6 Tab 1 of 1

Annualized Summary of CPVRR Analysis for Martin-Riviera Gas Lateral Transfer

	Normal Total	2019 CPVRR	2020 CPVRR	2021	2022	2023	2024	2025	2026	2027	2028	2029	2030	2031	2032	2033	2034	2035	2036	2037	2038	2039	2040	2041	2042	2043	2044	2045	2046	2047	2048	2049	2050	2051	2052	2053	2054	2055	2056	2057						
(dollars in millions)				0.98	0.83	0.88	0.80	0.75	0.89	0.85	0.90	0.58	0.52	0.48	0.45	0.42	0.38	0.36	0.33	0.31	0.29	0.27	0.25	0.23	0.22	0.20	0.18	0.17	0.16	0.16	0.14	0.14	0.13	0.12	0.11	0.10	0.10	0.08	0.08	0.08	0.07	0.07	0.06	0.06		
Operating Expenses	\$ (86.7)	\$ (25.1)	\$ (22.7)	\$ (6.0)	\$ (1.2)	\$ (1.4)	\$ (1.3)	\$ (1.4)	\$ (1.3)	\$ (1.2)	\$ (1.4)	\$ (1.5)	\$ (1.6)	\$ (1.6)	\$ (1.7)	\$ (1.6)	\$ (1.6)	\$ (1.6)	\$ (1.6)	\$ (1.6)	\$ (1.6)	\$ (1.6)	\$ (1.6)	\$ (1.6)	\$ (1.6)	\$ (1.6)	\$ (1.6)	\$ (1.6)	\$ (1.6)	\$ (1.6)	\$ (1.6)	\$ (1.6)	\$ (1.6)	\$ (1.6)	\$ (1.6)	\$ (1.6)	\$ (1.6)	\$ (1.6)	\$ (1.6)	\$ (1.6)	\$ (1.6)	\$ (1.6)	\$ (1.6)	\$ (1.6)	\$ (1.6)	
Property Tax	95.0	31.4	33.0	11.5	11.0	11.0	11.0	11.0	11.0	11.0	11.0	11.0	11.0	11.0	11.0	11.0	11.0	11.0	11.0	11.0	11.0	11.0	11.0	11.0	11.0	11.0	11.0	11.0	11.0	11.0	11.0	11.0	11.0	11.0	11.0	11.0	11.0	11.0	11.0	11.0	11.0	11.0	11.0	11.0	11.0	
Depreciation	(168.6)	(63.4)	(64.1)	(2.7)	(5.3)	(5.3)	(5.3)	(5.3)	(5.3)	(5.3)	(5.3)	(5.3)	(5.3)	(5.3)	(5.3)	(5.3)	(5.3)	(5.3)	(5.3)	(5.3)	(5.3)	(5.3)	(5.3)	(5.3)	(5.3)	(5.3)	(5.3)	(5.3)	(5.3)	(5.3)	(5.3)	(5.3)	(5.3)	(5.3)	(5.3)	(5.3)	(5.3)	(5.3)	(5.3)	(5.3)	(5.3)	(5.3)	(5.3)	(5.3)	(5.3)	(5.3)
Inland Expense	(43.8)	(22.8)	(22.8)	(1.6)	(1.7)	(1.6)	(1.6)	(1.6)	(1.6)	(1.6)	(1.6)	(1.6)	(1.6)	(1.6)	(1.6)	(1.6)	(1.6)	(1.6)	(1.6)	(1.6)	(1.6)	(1.6)	(1.6)	(1.6)	(1.6)	(1.6)	(1.6)	(1.6)	(1.6)	(1.6)	(1.6)	(1.6)	(1.6)	(1.6)	(1.6)	(1.6)	(1.6)	(1.6)	(1.6)	(1.6)	(1.6)	(1.6)	(1.6)	(1.6)	(1.6)	(1.6)
Income Tax	(92.8)	(42.3)	(42.8)	(3.0)	(5.1)	(4.6)	(4.8)	(4.5)	(4.7)	(4.1)	(3.8)	(3.7)	(3.5)	(3.3)	(3.1)	(3.0)	(2.8)	(2.6)	(2.4)	(2.2)	(2.1)	(2.0)	(1.8)	(1.7)	(1.6)	(1.5)	(1.4)	(1.3)	(1.2)	(1.1)	(1.0)	(0.9)	(0.7)	(0.6)	(0.5)	(0.4)	(0.4)	(0.4)	(0.4)	(0.4)	(0.4)	(0.4)	(0.4)	(0.4)	(0.4)	
Other Tax Expenses	(131.8)	(67.3)	(67.8)	(4.8)	(8.3)	(7.7)	(7.9)	(7.6)	(7.8)	(7.2)	(6.9)	(6.7)	(6.5)	(6.3)	(6.1)	(6.0)	(5.8)	(5.6)	(5.4)	(5.2)	(5.1)	(5.0)	(4.8)	(4.7)	(4.6)	(4.5)	(4.4)	(4.3)	(4.2)	(4.1)	(4.0)	(3.9)	(3.8)	(3.7)	(3.6)	(3.5)	(3.4)	(3.3)	(3.2)	(3.1)	(3.0)	(2.9)	(2.8)	(2.7)	(2.6)	
Reduction in FPL Revenue Requirements	(252.1)	(147.1)	(147.8)																																											
Tax Payment to FPL	649.2	238.8	249.9																																											
Net Customer (Savings) / Costs	\$ (66.7)	\$ (77.3)	\$ (23.8)																																											

1) Taxes may not sum due to rounding. Where applicable.
 2) Discount Factor is based on weighted average cost of capital of 13.7% discussed in July 1, 2018.
 3) Interest Expense assumes rate of 6.50%.
 4) Assumes other tax rates as applicable.
 5) Further details are available in the CPVRR Analysis Report.

EXHIBIT C

JUSTIFICATION TABLE

EXHIBIT C

COMPANY: Florida Power & Light Company
TITLE: List of Confidential Documents
DOCKET NO: 20170231-EI
DOCKET TITLE: Petition for Approval to Transfer the Martin-Riviera Lateral Pipeline to Florida Southeast Connection and Implement Associated Rate Adjustments
DATE: December 6, 2017

Discovery Set	Request No.	No. of Pages	Conf. Y/N	Line / Column	Florida Statute 366.093(3) Subsection	Declarant
Staff's First Set of Data Request	4	1	Y	Line 9a, 9b	(d), (e)	Sam Forrest
	5 Attachment 1	1	Y Y	Cols. I-AV, Lns. 22, 24-26 Line 33A	(d), (e)	

EXHIBIT D

DECLARATIONS

EXHIBIT D

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Florida Power & Light Company's
Petition for Approval to Transfer the Martin-
Riviera Lateral Pipeline to Florida Southeast
Connection and Implement Associated Rate
Adjustments

Docket No: 20170231-EI

STATE OF FLORIDA)
)
COUNTY OF PALM BEACH)

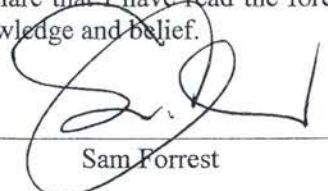
WRITTEN DECLARATION OF SAM FORREST

1. My name is Sam Forrest. I am currently employed by Florida Power & Light Company ("FPL") as Vice President of the Energy Marketing and Trading ("EMT") Business Unit. I have personal knowledge of the matters stated in this written declaration.

2. I have reviewed the documents and information included in Exhibit A to FPL's Request for Confidential Classification filed this date, for which I am listed as the declarant on Exhibit C. The documents that I have reviewed and which are asserted by FPL to be proprietary confidential business information contain or constitute contractual data. Disclosure of this information would impair the efforts of FPL or its affiliates to contract for goods or services on favorable terms. In addition, this information relates to competitive interests, the disclosure of which would impair the competitive business of FPL, its affiliates or its vendors. Specifically, the documents contain information regarding negotiated transportation demand charges. The disclosure of this proprietary confidential business information would disadvantage the transportation provider, Florida Southeast Connection, in their negotiations with third parties. 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, 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.



Sam Forrest

Date: 12/1/17