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February 14, 2018

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COMMISSION CLERK

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

Re: Docket No. 20170231-EI

Dear Ms. Stauffer:

REDACTED

I enclose for filing in the above docket Florida Power & Light Company's ("FPL") Request for Confidential Classification of Certain Information Contained in REB-1, Exhibit 2, RBD-3 and SAF-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 declarations in support of FPL's Request for Confidential Classification.

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

Sincerely,

Kevin I.C. Donaldson

Enclosure

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

COM _____
AFD 1 redacted B copy
APA _____
ECO _____
ENG _____
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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

Filed: February 14, 2018

**FLORIDA POWER AND LIGHT COMPANY'S
REQUEST FOR CONFIDENTIAL CLASSIFICATION**

Pursuant to Section 366.093, Florida Statutes ("Section 366.093"), and Rule 25-22.006, Florida Administrative Code, Florida Power & Light Company ("FPL") hereby requests confidential classification of certain information provided in Attachments REB-1, Exhibit 2, RBD-3 and SAF-1 filed in this proceeding (referred to herein as the "Confidential Information").

In support of this request, FPL states as follows:

1. On February 14, 2018 FPL filed a Motion for Leave to file an Amended Petition for Approval to Transfer the Martin-Riviera Lateral Pipeline to Florida Southeast Connection and implement associated rate adjustments. As part of the motion, FPL attached the Amended Petition having certain portions of attachments REB-1, Exhibit 2, RBD-3 and SAF-1 which contain confidential information.

2. The following exhibits are included with this Request:

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

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

c. Exhibit C is a table that identifies by column and line the information for which confidential treatment is sought and references the specific statutory bases for the claim of confidentiality. Exhibit C also identifies the declarants who support the requested classification.

d. Exhibit D contains the declarations of William Lavarco and Sam Forrest in support of this request.

3. 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, such materials are entitled to confidential treatment and are 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 described in the declaration in Exhibit D, some of the Confidential Information contains information regarding security measures, systems or procedures. This information is protected by Section 366.093(3)(c), Fla. Stat.

5. Additionally, certain documents concern bids or other contractual data, the disclosure of which would impair the efforts of FPL or its vendors for goods or services on favorable terms. This information is protected by Section 366.093(3)(d), Fla. Stat.

6. Lastly, certain information in these documents concern FPL's competitive interests, the disclosure of which would impair the competitive business of FPL and its vendors. This information is protected by Section 366.093(3)(e), Fla. Stat.

7. Upon a finding by the Commission that the Confidential Information 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* § 399.093(4), Fla.Stat.

WHEREFORE, for the above and foregoing reasons, as more fully set forth in the supporting 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
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Facsimile: (561) 691-7135
Email: Kevin.donaldson@fpl.com

By: _____



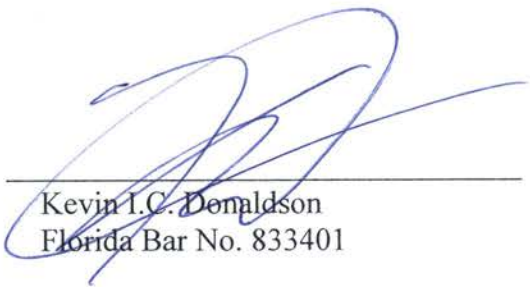
Kevin I.C. Donaldson
Florida Bar No. 833401

CERTIFICATE OF SERVICE
Docket 20170231-EI

I HEREBY CERTIFY that a true and correct copy of the foregoing* has been furnished by electronic service this 14th day of February, 2018 to the following:

Suzanne Brownless, Esq.
Office of General Counsel
Florida Public Service Commission
2540 Shumard Oak Blvd.
Tallahassee, FL 32399-0850
sbrownle@psc.state.fl.us

By: _____


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 A

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FILED UNDER SEPARATE COVER

EXHIBIT B

REDACTED COPIES

A B C D E F G H I J K L M N

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

(dollars in millions) ⁽¹⁾	Nominal Total	40-yr CPVRR	1 2018 ⁽²⁾	2 2019	3 2020	4 2021	5 2022	6 2023	7 2024	8 2025	9 2026	10 2027	11-40 2028-2057
Discount Factor ⁽²⁾			0.99	0.94	0.87	0.81	0.75	0.69	0.64	0.60	0.55	0.51	na
Operating Expenses	\$ (87.3)	\$ (21.9)	\$ (0.4)	\$ (1.3)	\$ (1.4)	\$ (1.3)	\$ (1.4)	\$ (1.3)	\$ (1.5)	\$ (1.4)	\$ (1.5)	\$ (1.8)	\$ (74.0)
Property Tax	(83.8)	(32.1)	(1.0)	(3.0)	(3.0)	(2.9)	(2.9)	(2.9)	(2.8)	(2.8)	(2.7)	(2.7)	(57.1)
Depreciation and Amortization	(159.9)	(64.7)	(1.9)	(5.8)	(5.8)	(5.8)	(5.3)	(5.6)	(5.5)	(5.5)	(5.5)	(5.5)	(107.6)
Interest Expense ⁽³⁾	(47.8)	(24.2)	(1.2)	(3.0)	(2.8)	(2.7)	(2.6)	(2.5)	(2.4)	(2.3)	(2.2)	(2.1)	(24.1)
Income Tax	(48.8)	(24.7)	(1.2)	(3.0)	(2.9)	(2.8)	(2.7)	(2.5)	(2.4)	(2.3)	(2.2)	(2.1)	(24.6)
After-Tax Earnings ⁽⁴⁾	(143.8)	(72.9)	(3.5)	(8.9)	(8.5)	(8.2)	(7.8)	(7.5)	(7.2)	(6.9)	(6.6)	(6.2)	(72.6)
Reduction in FPL Revenue Requirements	(571.4)	(240.5)	(9.2)	(25.0)	(24.4)	(23.7)	(22.6)	(22.4)	(21.8)	(21.2)	(20.7)	(20.4)	(360.0)
Tariff Payment to FSC ⁽⁵⁾	633.5	\$ 236.1											
Net Customer (Savings) / Costs	<u>\$ 62.1</u>	<u>\$ (4.4)</u>											

- 1) Totals may not sum due to rounding. 40-year horizon
- 2) Discount Factor is based on weighted average cost of capital of 7.85% discounted to September 1, 2018
- 3) Interest Expense assumes cost of debt of 5.17%
- 4) Assumes after-tax return on equity of 10.55%
- 5) Tariff rate provided to FPL based on 300,000 MDQ (Dth). The total tariff payment by FPL to FSC in 2018 is [REDACTED]
- 6) Excess deferred taxes for MR-RV Lateral will be amortized immediately upon transfer and will be reflected consistent with all excess deferred taxes in the earnings surveillance report

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1 4. Paragraph 17(b) of the 2016 Stipulation and Settlement Agreement approved by the
2 Commission in Order No. PSC-16-0560-AS-EI ("2016 Settlement Agreement") authorizes FPL
3 to implement a simultaneous change to lower base rates and adjust fuel rates to reflect the
4 projected transportation charges upon a showing that the transfer of the Martin-Riviera lateral
5 natural gas pipeline ("MR-RV Lateral") from FPL to Florida Southeast Connection ("FSC")
6 will result in customer savings on a CPVRR basis.

7 5. The purpose of my amended declaration is to provide the base rate adjustment
8 calculation and the corresponding base rate reductions and the associated fuel recovery factor
9 changes associated with the transfer of the MR-RV Lateral from FPL to FSC. The base rate
10 reduction is accomplished by applying a percentage reduction in the base rates for each rate
11 class. The fuel factor increase is accomplished by adding the MR-RV Lateral Factor to the
12 currently approved fuel factor for March through December 2018.

13 6. As presented in Mr. Barrett's amended declaration, the jurisdictional annualized base
14 revenue requirement of the MR-RV Lateral to be removed from base rates is \$25.2 million. The
15 FSC transportation charge for September through December 2018 to be included in the 2018 fuel
16 factors is [REDACTED]

17 **MR-RV Lateral Base Rate Reduction**

18 7. Attachment RBD-1, page 1 of 1, provides the computation of the allocation of the
19 base revenue reduction and the resulting base rate adjustment factors for each rate class
20 associated with the MR-RV Lateral pipeline transfer. The base revenue requirement of \$25.2
21 million is allocated to the rate classes based on energy, which is the same manner the
22 transportation costs are allocated in the fuel clause. The percent reduction in base revenues for
23 each rate class was then determined by dividing each class's target base revenue reduction by

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1 each class's forecasted retail base revenues from the sales of electricity including unbilled
2 revenues and base revenues recovered through the Conservation clause for the
3 Commercial/Industrial Load Control Program ("CILC") and Commercial/Industrial Demand
4 Reduction Rider ("CDR") credits, and non-clause recoverable credits for the same period.
5 The percent reduction in base revenues for each rate class is shown in Exhibit RBD-1, page 1
6 of 1, column 7.

7 8. The detailed calculations and the resulting charges for each rate schedule are
8 provided in Attachment RBD-2, pages 1-25.

9 **MR-RV Lateral Fuel Recovery Factor Changes**

10 9. Attachment RBD-3, page 1 of 6 provides the calculation of the MR-RV Lateral
11 fuel recovery factor based on projected firm gas transportation charges from the Martin plant to
12 the Riviera Beach plant in the same quantities currently available to FPL through its ownership
13 of the MR-RV Lateral. Projected transportation costs of [REDACTED]^A for the September 1, 2018
14 through December 31, 2018 period as shown in REB-1, divided by projected sales of 36.73
15 million MWh for the same period, adjusted for taxes, results in an MR-RV Lateral fuel recovery
16 factor of 0.020 cents per kWh. When added to the currently approved fuel recovery factor of
17 2.606 cents per kWh, the revised fuel recovery factor for September 1, 2018 through December
18 31, 2018 is 2.626 cents per kWh. The calculation of the resulting fuel factors for each rate class
19 is shown in attachment RBD-3 in pages 2-6.

20 **MR-RV Lateral Rate Changes**

21 10. Attachment RBD-4, pages 1-108, provides the Company's revised tariff sheets in
22 both legislative and proposed formats that reflect the MR-RV Lateral related base and fuel factor

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C

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FLORIDA POWER & LIGHT COMPANY
CALCULATION OF FUEL FACTORS INCLUDING MARTIN-RIVIERA GAS LATERAL TRANSFER

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ESTIMATED FOR THE PERIOD OF: SEPTEMBER 2018 THROUGH DECEMBER 2018			
(1)	(2)	(3)	(4)
Schedule	Dollars	MWH	Cents/KWH
1 Martin-Riviera Gas Lateral Transportation Costs (1)		36,733,215	
2 Revenue Tax Factor			1.00072
3 Martin-Riviera Gas Lateral Fuel Recovery Factor Adjusted for Taxes			
4 Martin-Riviera Gas Lateral Fuel Recovery Factor (Rounded)			0.020
5 Approved FCR Midcourse Correction Factor for March - December 2018 (Rounded)			2.606
6 FCR Factor Including Martin-Riviera Gas Lateral Transfer for September - December 2018 (Rounded)			2.626
(1) Per REB-1			

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Exhibit A

A	B	C	D
	Begin	End	MDQ 300,000 Dth
Primary Term	9/1/2018	8/31/2019	[REDACTED]
	9/1/2019	8/31/2020	
	9/1/2020	8/31/2021	
	9/1/2021	8/31/2022	
	9/1/2022	8/31/2023	
	9/1/2023	8/31/2024	
	9/1/2024	8/31/2025	
	9/1/2025	8/31/2026	
	9/1/2026	8/31/2027	
	9/1/2027	8/31/2028	
	9/1/2028	8/31/2029	
	9/1/2029	8/31/2030	
	9/1/2030	8/31/2031	
	9/1/2031	8/31/2032	
	9/1/2032	8/31/2033	
	9/1/2033	8/31/2034	
	9/1/2034	8/31/2035	
	9/1/2035	8/31/2036	
	9/1/2036	8/31/2037	
	9/1/2037	8/31/2038	
9/1/2038	8/31/2039		
9/1/2039	8/31/2040		
9/1/2040	8/31/2041		
9/1/2041	6/30/2042		
Extension Option #1	7/1/2042	8/31/2042	
	9/1/2042	8/31/2043	
	9/1/2042	8/31/2044	
	9/1/2044	8/31/2045	
	9/1/2045	8/31/2046	
Extension Option #2	9/1/2046	6/30/2047	
	7/1/2047	8/31/2047	
	9/1/2047	8/31/2048	
	9/1/2048	8/31/2049	
	9/1/2049	8/31/2050	
Extension Option #3	9/1/2050	8/31/2051	
	9/1/2051	6/30/2052	
	7/1/2052	8/31/2052	
	9/1/2052	8/31/2053	
	9/1/2053	8/31/2054	
	9/1/2054	8/31/2055	
	9/1/2055	8/31/2056	
9/1/2056	6/30/2057		

**Attachment SAF-1, pages 11-19
are confidential in their entirety.**

A EXHIBIT 1 B C D

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	Begin	End	MDQ 300,000 Dth
Primary Term	7/1/2018	6/30/2019	
	7/1/2019	6/30/2020	
	7/1/2020	6/30/2021	
	7/1/2021	6/30/2022	
	7/1/2022	6/30/2023	
	7/1/2023	6/30/2024	
	7/1/2024	6/30/2025	
	7/1/2025	6/30/2026	
	7/1/2026	6/30/2027	
	7/1/2027	6/30/2028	
	7/1/2028	6/30/2029	
	7/1/2029	6/30/2030	
	7/1/2030	6/30/2031	
	7/1/2031	6/30/2032	
	7/1/2032	6/30/2033	
	7/1/2033	6/30/2034	
	7/1/2034	6/30/2035	
	7/1/2035	6/30/2036	
	7/1/2036	6/30/2037	
	7/1/2037	6/30/2038	
	7/1/2038	6/30/2039	
7/1/2039	6/30/2040		
7/1/2040	6/30/2041		
7/1/2041	6/30/2042		
Extension Option #1	7/1/2042	6/30/2043	
	7/1/2043	6/30/2044	
	7/1/2044	6/30/2045	
	7/1/2045	6/30/2046	
Extension Option #2	7/1/2046	6/30/2047	
	7/1/2047	6/30/2048	
	7/1/2048	6/30/2049	
	7/1/2049	6/30/2050	
Extension Option #3	7/1/2050	6/30/2051	
	7/1/2051	6/30/2052	
	7/1/2052	6/30/2053	
	7/1/2053	6/30/2054	
	7/1/2054	6/30/2055	
	7/1/2055	6/30/2056	
	7/1/2056	6/30/2057	

EXHIBIT C

JUSTIFICATION TABLE

EXHIBIT C

COMPANY: Florida Power & Light Company
TITLE: List of Confidential Exhibits
DOCKET TITLE: Approval to Transfer the Martin-Riviera Lateral Pipeline to Florida Southeast Connection and Implement Associated Rate Adjustments
DOCKET NO.: 20170231-EI
DATE: February 14, 2018

Description	No. of Pages	Conf. Y/N	Line / Column	Florida Statute 366.093(3) Subsection	Declarant
Attachment REB-1 (which is an attachment to Exhibit 1)	1	Y	Cols. D-N, Lns. 14-15, Col. E, Ln. 20	(d), (e)	Sam Forrest
Exhibit 2 (Renae B. Deaton Declaration)	4	N	Pg. 1	(d), (e)	Sam Forrest
		Y	Pg. 2, Ln. 16a		Sam Forrest
		Y	Pg. 3, Ln. 13a		Sam Forrest
		N	Pg. 4		
Attachment RBD-3 (which is an attachment to Exhibit 2)	6	Y	Pg. 1, Col. B, Lns. 6 and 8, Col. D, Lns. 6 and 8	(d), (e)	Sam Forrest
		N	Pgs. 2-6		
Attachment SAF-1 (which is an attachment to Exhibit 3)	67	N	Pgs. 1	(d), (e)	Sam Forrest
		Y	Pg. 2, Col. D, Lns. 5-46		Sam Forrest
		N	Pgs. 3-10		
		Y	Pgs. 11-19	(c)	William Lavarco
		N	Pgs. 20-65		
		Y	Pg. 66, Col. D, Lns. 7-45	(d), (e)	Sam Forrest
		N	Pg. 67		

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

THE DISTRICT OF COLUMBIA)
)
)

WRITTEN DECLARATION OF WILLIAM LAVARCO

1. My name is William Lavarco. I am currently employed by NextEra Energy ("NEE")/ Florida Power & Light ("FPL") as Senior FERC Counsel. 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 portions of Exhibit C. The documents that I have reviewed and which are asserted by NEE/FPL to be confidential information related to security measures, systems, or procedures. Specifically, the documents contain information regarding Critical Energy Infrastructure Information ("CEII"). This information is also filed at the Federal Energy Regulatory Commission ("FERC") and treated as non-public. 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.



William Lavarco

Date: February 8, 2018

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)

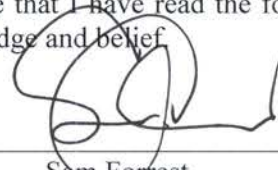
WRITTEN DECLARATION OF SAM FORREST

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 document contains 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: 2/9/18