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May 26, 2020

**-VIA HAND-DELIVERY -**

Adam Teitzman  
Commission Clerk  
Florida Public Service Commission  
2540 Shumard Oak Blvd.  
Tallahassee, FL 32399-0850

**REDACTED**

**Re: Docket No. 20200001-EI**

Dear Mr. Teitzman:

I enclose for filing in the above docket Florida Power & Light Company's ("FPL") Request for Confidential Classification of Materials Provided Pursuant to Audit No. 2020-007-4-2. 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 and Exhibit D are a justification table and declaration in support of FPL's Request.

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

RECEIVED-FPSC  
2020 MAY 26 PM 1:35  
COMMISSION CLERK

Sincerely,

s/ Maria Jose Moncada  
Maria Jose Moncada

COM  
AFD 1 Ex B  
APA  
ECO  
ENG  
GCL  
IDM  
CLK

Enclosure

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

:7973294

**BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION**

In re: Fuel and purchase power cost recovery  
clause with generating performance incentive  
factor

Docket No: 20200001-EI

Date: May 26, 2020

**FLORIDA POWER & LIGHT COMPANY'S  
REQUEST FOR CONFIDENTIAL CLASSIFICATION OF  
MATERIALS PROVIDED PURSUANT TO AUDIT NO. 2020-007-4-2**

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 material provided to the Staff of the Florida Public Service Commission ("Staff") pursuant to Audit Control No. 2020-007-4-2 ("the Audit"). In support of this request, FPL states as follows:

1. During the Audit, FPL provided Staff with various confidential documents. By letter dated May 6, 2020 Staff indicated its intent to retain certain audit work papers. Pursuant to Rule 25-22.006(3)(a), FPL was given 21 days from the date of the letter to file a formal request for confidential classification with respect to the work papers. Accordingly, FPL files this Request for Confidential Classification to maintain continued confidential handling of the confidential work papers.

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

a. Exhibit A consists of a copy the confidential documents, on which all information that is entitled to confidential treatment under Florida law has been highlighted.

b. Exhibit B consists of a copy of the confidential documents, on which all the information that is entitled to confidential treatment under Florida law has been redacted. For the documents that are confidential in their entirety, FPL has included only identifying cover pages in Exhibit B.

c. Exhibit C is a table containing an identification of the information highlighted in Exhibit A by page and line. 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 Gerard J. Yupp 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. 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 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 more fully in the declaration included as Exhibit D, certain documents contain information concerning bids or other contractual data, the disclosure of which would impair the efforts of FPL to contract for goods or services on favorable terms. This information is protected by Section 366.093(3)(d), Fla. Stat.

5. Also, 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.

6. 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**, for the above and foregoing reasons, as more fully set forth in the supporting materials, Florida Power & Light Company respectfully requests that its Request for Confidential Classification be granted.

Respectfully submitted,

Maria Jose Moncada  
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By: s/Maria Jose Moncada  
Maria Jose Moncada  
Florida Bar No. 0773301

**CERTIFICATE OF SERVICE**  
**Docket No. 20200001-EI**

I **HEREBY CERTIFY** that a true and correct copy of the foregoing Request for Confidential Classification\* has been furnished by electronic mail on this 26th day of May 2020 to the following:

Suzanne Brownless  
Division of Legal Services  
**Florida Public Service Commission**  
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Tallahassee, Florida 32399-0850  
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Chemicals, Inc. d/b/a PCS Phosphate -  
White Springs**

By: s/Maria Jose Moncada  
Maria Jose 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.

**EXHIBIT A**

**CONFIDENTIAL**

**FILED UNDER SEPARATE  
COVER**

# **EXHIBIT B**

## **REDACTED COPIES**



*Handwritten initials/signature*

Florida Power & Light Company  
 Schedule A12 - Capacity Costs: Payments to Co-generators  
 Page 2 of 2

*Handwritten: 2.0.19*

For the Month of Sep-19

Contract	Counterparty	Identification	Contract Start Date	Contract End Date
1	JEA - SJRPP	Other Entity	April, 1982	January 4, 2018
2	Solid Waste Authority - 40 MW	Other Entity	January, 2012	March 31, 2032
3	Solid Waste Authority - 70 MW	Other Entity	July, 2015	May 31, 2034
4	Orlando Utilities Commission OP-CAP	Other Entity	December 17, 2018	December 31, 2020

2019 Capacity in MW

Contract	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec
1												
2	40	40	40	40	40	40	40	40	40			
3	70	70	70	70	70	70	70	70	70			
4	70	70	70	70	100	100	100	100	100			
Total	180	180	180	180	210	210	210	210	210	-	-	-

2019 Capacity in Dollars

	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec
Total	1,910,160	1,907,899	1,910,150	1,910,150	2,180,125	2,243,700	2,243,700	2,241,689	2,243,700	0	0	0

Year-to-date Short Term Capacity Payments	18,791,260
---	------------

(1) Total capacity costs do not include payments for the Solid Waste Authority - 70 MW unit. Capacity costs for this unit were recovered through the Energy Conservation Cost Recovery Clause in 2014, consistent with Commission Order No. PSC-11-0293-FOF-EU issued in Docket No. 110018-EU on July 6, 2011.

**CONFIDENTIAL**

	A	B	C	D	E	F	G	H	I			
Contract	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec
1												
2 1										file		
3 2												
4 3												
True ups												
1 4												
2 5												
3 6												
4 7												

**PBC**

SOURCE DR #11

Florida Power and Light  
 Capacity Cost Recovery Clause  
 DKT #20200001-EL, ACN 2020-007-4-2  
 TYE 12/17/2019

**REDACTED VERSION OF CONFIDENTIAL DOCUMENTS**

**Capacity Audit Workpaper Number 46.3**

**[Page 1]**

**Power Purchased**

**REDACTED VERSION OF CONFIDENTIAL DOCUMENTS**

**Capacity Audit Workpaper Number 46.4**

**[Page 1]**

**Power Purchased**

**REDACTED VERSION OF CONFIDENTIAL DOCUMENTS**

**Capacity Audit Workpaper Number 46.5**

**[Page 1]**

**Power Purchased**

YN  
4/20/20

### Florida Power & Light Company

Billing Statement  
For Purchased Power From  
Wheelabrator South Broward  
For Transaction Period:  
September 1, 2019 through September 30, 2019

GENERATION A	B	AMOUNT
[REDACTED]	1	[REDACTED]
[REDACTED]	2	[REDACTED]
ENERGY PAYMENT	3	46.8 [REDACTED]
VARIABLE O&M - PER FPSC ORDER DATED JANUARY 01, 2018	4	[REDACTED]
Monthly Capacity Payment	5	46.7 [REDACTED] 46.6
CUSTOMER CHARGE	6	[REDACTED]
Total Due		\$325,688.10

Execution Date/Time : 10/09/19 at 11:27:50

Invoice ID: 3568



CONFIDENTIAL

SOURCE DR #11

46.7

7/2  
4/2020

# Qualifying Facility Monthly Billing Statement

**Facility Name:** BROWARD RESOURCE RECOVERY SOUTH  
**Region:** Southeast  
**Billing Month:** September, 2019  
**Number of Hours in Month:** 720  
**Number of Peak Hours in Month:** 0  
**Committed Capacity:** 41.9 3.500 MW  
**Energy Received, All Hours:** 1 [REDACTED]  
     MWH      MWH (AA)      MWH ('91)  
**Energy Received, All Peak Hours:** [REDACTED]  
     MWH      MWH (AA)      MWH ('91)  
**Sales (Wheeled):** 2 [REDACTED]  
**Net Energy Received, All Hours:** 3 [REDACTED]  
**Maximum Hourly Energy:** 4 [REDACTED]  
**Committed Capacity:** 5 [REDACTED]  
**Monthly Billing Capacity Factor:** 6 [REDACTED]  
**Monthly Peak Capacity Factor:** 7 [REDACTED]  
**Annual Capacity Factor:** 8 [REDACTED]  
**Annual Peak Capacity Factor:** 9 [REDACTED]  
**Billing Capacity Factor:** 10 [REDACTED]  
**Unit Energy Cost:** 11 [REDACTED]  
**Monthly Energy Payment:**

(As Available)	( '91 )	Total
\$159,930.6	\$50,484.86 =	\$210,415.53
7+		

**Monthly Capacity Payment:**

46.9 \$116,165.00 = \$116,165.00 46.7

CONFIDENTIAL



Execution Date/Time: 10/09/19 at 11:27:50

Invoice ID: 3568

SOURCE DR #11

46.8

70  
4/20/20

Broward South

**APPENDIX D**  
**CAPACITY PRICING**  
**CAPACITY PAYMENT RATE SCHEDULE**

<b>MONTHLY CAPACITY YEAR</b>	<b>BCP PAYMENT A \$/KW/MONTH</b>
1993	
1994	
1995	
1996	
1997	
1998	
1999	
2000	
2001	
2002	
2003	
2004	
2005	
2006	
2007	
2008	
2009	
2010	
2011	
2012	
2013	
2014	
2015	
2016	
2017	
2018	
2019	
2020	
2021	
2022	
2023	
2024	
2025	
2026	

B

6-9

CONFIDENTIAL

PBC

D-1

46.9

SOURCE DR #11  
SOURCE: AS REFERENCED

# **EXHIBIT C**

## **JUSTIFICATION TABLE**



**EXHIBIT C**

**COMPANY:** Florida Power & Light Company  
**TITLE:** List of Confidential Workpapers  
**AUDIT:** FPL, Capacity Audit  
**AUDIT CONTROL NO:** 2020-007-4-2  
**DOCKET NO:** 20200001-EI  
**DATE:** May 26, 2020

Workpaper No.	Description	No. of Pages	Conf Y/N	Column No./Line No.	Florida Statute 366.093 (3) Subsection	Declarant
45.2	Transmission Revenues	1	N			
45.3	Transmission Revenues	1	N			
45.4	Transmission Revenues	1	N			
45.5	Transmission Revenues	1	N			
45.6	Transmission Revenues	1	N			
45.7	Transmission Revenues	1	N			
45.8	Transmission Revenues	1	N			
45.9	Transmission Revenues	1	N			
46.1	Power Purchased	1	N			
46.2	Power Purchased	1	Y	Lns. 1 and 3, Cols. A – I Line 2, Cols. A – C Line 4, Cols. B, C, E and H Lns. 5 – 7, Cols. A and C	(d), (e)	G. Yupp
46.3	Power Purchased	1	Y	ALL	(d)	G. Yupp
46.4	Power Purchased	1	Y	ALL	(d)	G. Yupp
46.5	Power Purchased	1	Y	ALL	(d)	G. Yupp
46.6	Power Purchased	1	N			
46.7	Power Purchased	1	Y	Col. A Col. B, Lns. 1 – 6	(d), (e)	G. Yupp
46.8	Power Purchased	1	Y	Lns. 1 – 11	(d), (e)	G. Yupp
46.9	Power Purchased	1	Y	Cols. A and B	(d)	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. 20200001-EI

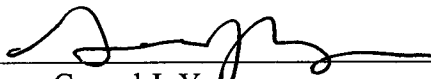
**DECLARATION OF GERARD J. YUPP**

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 business unit. I have personal knowledge of the matters stated in this declaration.

2. I have reviewed Exhibit C and the documents that are included in Exhibit A to FPL's Request for Confidential Classification of Information Obtained in Connection with Audit No. 2020-007-4-2 for which I am designated as the declarant. The documents or materials that I have reviewed and which are asserted by FPL to be proprietary confidential business information contain or constitute data such as pricing and other terms, payment records, and vendor and supplier rates. The disclosure of this information would impair the efforts of FPL to contract for energy and capacity-related goods or services on favorable terms for the benefit of its customers and would impair the competitive interests of FPL and its vendors. Certain information in these documents and materials would also place FPL at a 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 least 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: 5/15/20