D- 1

#### Steel Hector & Davis

Tallahassee Florida

Jonathan E. Sigstrom (904) 222 - 2300

December 21, 1995

BY HAND DELIVERY

Ms. Blanca S. Bayó, Director Division of Records and Reporting Florida Public Service Commission 4075 Esplanade Way, Room 110 Tallahassee, FL 32399-0850

RE: DOCKET NO. 950001-EI

FILE COPY

Dear Ms. Bayó:

Florida Power & Light Company ("FPL") provides the following documents for filing in this docket:

20 copies of FPL's Notice Of Filing Corrected Request For Confidential Classification Regarding A Schedules For The Month Of September, 1995;

20 copies of FPL's Corrected Request For Confidential Classification Regarding A Schedules For The Month Of September, 1995, including Exhibit "A" - Redacted Schedules A4, A6, A6a and A9, and Exhibit "B" - Affidavit of Rene Silva; and

1 copy of Schedules A4, A6, A6a and A9 for the month of September in which the information for which confidential classification has been sought is highlighted. This copy is marked "Confidential" and is being submitted in a sealed envelope, also marked "Confidential."

Jon

Respectfully submitted,

RECEIVED & FILED

FPSC BUILLAU OF RECORDS

TAL/13891 Enclosures

cc: All Parties of Record

#### BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

IN RE: Fuel and Purchased Fower Cost Recovery Clause and Generating Performance Incentive Factor DOCKET NO. 950001-EI

FILED: December 21, 1995

### FLORIDA POWER & LIGHT COMPANY'S NOTICE OF FILING CORRECTED REQUEST FOR CONFIDENTIAL CLASSIFICATION REGARDING A SCHEDULES FOR THE MONTH OF SEPTEMBER, 1995

Florida Power & Light Company ("FPL") gives notice of filing a corrected request for confidential classification regarding A Schedules for the Month of September, 1995. These corrections apply to FPL's Request for Confidential Classification filed November 13, 1995.

Therefore, the corrections narrow the information for which FPL seeks confidential classification. The attached Corrected Request for Confidential Classification indicates the corrections by overstrike for deleted material and underscoring for added material. The Corrected Request includes copies of the September A Schedules highlighted and redacted, as provided in Rule 25-22.006(4), to reflect FPL's corrections.

Respectfully submitted,

STEEL HECTOR & DAVIS
215 South Monroe Street
Suite 601
Tallahassee, Florida 32301
Attorneys for Florida Power
& Light Company

ву:

Jonathan STEECHOENT NUMBER-DATE

12879 DEC 21 8

FPSC-RECORDS/REPORTING

#### CERTIFICATE OF SERVICE DOCKET NO. 950001-EI

I HEREBY CERTIFY that a true and correct copy of Florida Power & Light Company's Notice of Filing Corrected Request for Confidential Classification Regarding A Schedules for the Month of September, and Request for Confidential Classification have been furnished by Hand Delivery,\*\* or U.S. Mail this 21st day of December, 1995, to the following:

Vicki D. Johnson, Esq.\*\* Division of Legal Services FPSC 2540 Shumard Oak Blvd. Rm.370 Tallahassee, FL 32399-0850

Joseph A. McGlothlin, Esq. Vicki Gordon Kaufman, Esq. McWhirter, Reeves, McGlothlin, Davidson, Rief & Bakas, P.A. 117 South Gadsden Street Tallahassee, FL 32301

G. Edison Holland, Esq. Jeffrey A. Stone, Esq. Beggs and Lane P. O. Box 12950 Pensacola, FL 32576

Floyd R. Self, Esq.
Messer, Vickers, Caparello,
Madsen, Lewis, Goldman &
Metz, P.A.
P. O. Box 1876
Tallahassee, FL 32302-1876

Richard A. Zambo, P.A. 598 S.W. Hidden River Ave. Palm City, FL 34990

Peter J.P. Brickfield, Esq. James Brew, Esq. Brickfield, Burchette & Ritts 1025 Thomas Jefferson St.N.W. Eighth Floor, West Tower Washington, D.C. 20007

John W. McWhirter, Jr., Esq. McWhirter, Reeves, McGlothlin, Davidson, Rief & Bakas, P.A. Post Office Box 3350
Tampa, Florida 33601-3350

John Roger Howe, Esq. Office of Public Counsel 111 West Madison Street Room 812 Tallahassee, FL 32399

Lee L. Willis, Esq.
James D. Beasley, Esq.
Macfarlane Ausley Ferguson
& McMullen
P. O. Box 391
Tallahassee, FL 32302

James A. McGee, Esq. Florida Power Corporation P. O. Box 14042 St. Petersburg, FL 33733

Prentice P. Pruitt, Esq.\*\* Legal Services FPSC 2540 Shumard Oak Boulevard Tallahassee, FL 32399-0850

Richard J. Salem, Esq. Marian B. Rush, Esq. Salem, Saxon & Nielsen 101 East Kennedy Blvd. Suite 3200 One Barnett Plaza Post Office Box 3399 Tampa, Florida 33601

Stephen R. Yurek Dahlen, Berg & Co. 2150 Dain Bosworth Plaza 60 South Sixth Street Minneapolis, MN 55402

Jonathan Sigstrom

#### BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

IN RE: Fuel and Purchased Power Cost Recovery Clause and Generating Performance Incentive Factor DOCKET NO. 950001-EI

FILED: DECEMBER 21, 1995

### CORRECTED REQUEST FOR CONFIDENTIAL CLASSIFICATION REGARDING A SCHEDULES FOR THE MONTH OF SEPTEMBER, 1995

Pursuant to Commission Rule 25-22.006(4), Florida Power & Light Company ("FPL") requests confidential classification of certain information contained in Schedules A4, A6, A6a and A9 filed for the month of September, 1995 (the "A Schedules") required to be filed in this docket pursuant to Minimum Filing Requirements set forth in Commission Directive dated April 24, 1980, and as revised by Commission Memorandum issued by the Division of Electric and Gas dated December 13, 1994. The referenced A Schedules are the subject of FPL's Notice of Intent to Request Confidential Classification filed October 20, 1995.

## Highlighted Copy of Schedules A4, A6, A6a and A9 Filed Herewith

Pursuant to Rule 25-22.006(4)(a), Exhibit "A" attached to this Request consists of one copy of A Schedules A4, A6, A6a and A9. The specific information asserted to be confidential has been highlighted in Exhibit "A."

## 20 Redacted Copies of Schedules A4, A6, A6a and A9 Filed Herewith

Pursuant to Rule 25-22.006(4)(a), FPL is filing herewith 20 edited copies of A Schedules A4, A6, A6a and A9 on which the

specific information asserted to be confidential has been blocked out by the use of an opaque marker or other masking device.

# General Statement of FPL's Concerns Regarding Competitive Harm from Publication of Information in A Schedules

The information FPL seeks to classify as confidential concerns transactions in the wholesale power market and information concerning FPL's fuel costs for each of FPL's generating plants/units. The information sought to be protected here is only the highly detailed information — information at the level of the individual customer, unit, plant or supplier. FPL does not here seek confidentiality for aggregations of this information. FPL's concern regarding the disclosure of information in A Schedules stems from FPL's competitors' ability to obtain and use price and cost information to undercut FPL's wholesale prices, out-bid FPL for energy sources and reduce the benefit to FPL of buying rather than generating power. See Affidavit of Rene Silva ¶13 (Attached as Exhibit "B").

From the portions of the A4, A6 and A6a schedules sought to be protected, FPL's competitors can determine and use the names of FPL's customers and suppliers correlated with the amounts purchased or sold, the price and the cost of wholesale transactions. Moreover, FPL's competitors can determine the economics of FPL's generating facilities and thereby undercut FPL's pricing or out bid FPL for energy sources. Suppliers of economy energy could use the information in the A9 Schedule to determine the point at which it

is more economical for FPL to purchase rather than generate power and price their service nearer this margin. Thus, this information could also be used to reduce the savings FPL realizes from purchasing rather than generating power. Affidavit of Rene Silva II. 14,15.

competition exists now in the wholesale power market. For example, FPL recently lost a long term contract with the City of New Smyrna Beach for the sale of wholesale power. New Smyrna Beach has replaced FPL with Enron Power Marketing. A spokesman for New Smyrna Beach is reported as stating "the prices were better" and "the fuel charges from Enron are lower" as justification for canceling the contract with FPL. Additionally, FPL anticipates increasing competition in other aspects of its business especially the retail market with respect to commercial and industrial customers. Affidavit of Rene Silva ¶11.

Information from the A Schedules is also appearing in publications widely available to FPL's competitors. For example, a recent edition of Power Markets Week, published by McGraw-Hill reported detailed information on FPL's wholesale power transactions for the month of July, reporting the names of customers, total amounts purchased, average price and total price. This same story reported extensive information regarding FPL's power purchases for the same period. This information is found in the sections of the A Schedules sought to be protected here and, to FPL's knowledge,

nowhere else. FPL knows of no source similar to the A Schedules from which FPL can derive similar information with regard to its competitors such as Enron Power Marketing. Affidavit of Rene Silva ¶ 11.

The competitive harm worked by the disclosure of this information is visited directly and, in most cases totally, upon FPL's customers. Virtually all of the "profit" realized from wholesale power sales and "savings" from wholesale purchases is passed directly through to the customer as reduced fuel cost. Because competition exists now and will continue to increase, FPL must eliminate disclosure of information that could be used by its competitors to put FPL at a competitive disadvantage and harm both FPL and its customers. Affidavit of Rene Silva ¶ 16.

# Page and Line Identification of Confidential Information and Justification in Support of Confidential Classification

Pursuant to Rule 25-22.006(4)(a) and (c), FPL hereby identifies the pages and lines at which confidential material is found in the subject A Schedules correlated with the specific justification proffered in support of the classification of such material.

<sup>100%</sup> of the profit and savings from OS transactions is passed through to the customers. In Schedule C and X transactions, 80% of the profit or savings is passed to the customers and 20% is retained as profit by FPL. Affidavit of Rene Silva ¶ 16.

### Identification of Confidential Material in Schedule A4.

FPL identifies the following information in Schedule A4 for which FPL requests confidential classification:

Schedule A4 September 1995, Page 1, Lines 1-28, Columns (1) As Burned Fuel Cost, (m) Fuel Cost per KWH, and (n) Cost of Fuel \$/Unit; Schedule A4 September 1995, Page 2, Lines 1-25, Columns (1) As Burned Fuel Cost, (m) Fuel Cost per KWH, and (n) Cost of Fuel \$/Unit; Schedule A4 September 1995, Page 3, Lines 1-16, 1-6 and 11-16, Columns (1) As Burned Fuel Cost, (m) Fuel Cost per KWH, and (n) Cost of Fuel \$/Unit.

Schedule A4 Total Period, Page 1, Lines 1-28, Columns (1) As Burned Fuel Cost, (m) Fuel Cost per KWH, and (n) Cost of Fuel \$/Unit; Schedule A4 September 1995, Total Period, Page 2, Lines 1-25, Columns (1) As Burned Fuel Cost, (m) Fuel Cost per KWH, and (n) Cost of Fuel \$/Unit; Schedule A4 September 1995, Total Period, Page 3, Lines 1-16, and 11-16, Columns (1) As Burned Fuel Cost, (m) Fuel Cost per KWH, and (n) Cost of Fuel \$/Unit.

## Correlation and Justification of Confidential Classification of Material Identified in Schedule A4.

The information identified as confidential by FPL in Schedule A4 is intended to be and is treated by FPL as private in that the disclosure of the information could cause harm to FPL's business operations and has not been disclosed. See Fla. Stat. \$ 366.093(3). See also F.A.C. \$ 25-22.006(4)(c) & (d). The information relates to FPL's competitive interests and disclosure would impair FPL's competitive business. See Fla. Stat. \$ 366.093(3)(e). Additionally, the information concerns bids or other contractual data the disclosure of which would impair FPL's efforts to contract for goods or services on favorable terms. See Fla. Stat. \$ 366.093(3)(d). Information on FPL's fuel costs on a

per plant or unit basis is available only to FPL's senior management, personnel involved in the fuel transactions and personnel involved in the use and preparation of the A Schedules. FPL has strictly limited access to this confidential material and has instituted strict controls to insure that the information remains private. Affidavit of Rene Silva ¶12.

The information identified as confidential in Schedule A4 consists of fuel cost data for each plant or unit operated by FPL. The publication of this information at the level of the plant or unit is harmful to FPL's competitive interest because it gives FPL's competitors the advantage of determining and predicting FPL's generating efficiencies and marginal costs with extreme precision. This extreme precision allows potential competitors an unfair advantage in pricing their own service and in making decisions as to whether to target FPL's customers. Additionally, this information permits suppliers of energy to predict the point at which it is more economical for FPL to purchase rather than generate power and therefore price closer to FPL's break even point, thereby reducing the benefit of purchasing rather than generating power. Affidavit of Rene Silva ¶¶ 14,15.

Schedule A4 September 1995, Page 1, Lines 1-28, Page 2, Lines 1-25, Page 3, Lines 1-16, 1-6 and 11-16, Column (1) As Burned Fuel Cost.

Column (1) states the total cost of the fuel burned in each of FPL's generating plants/units for the relevant period. The unit

cost of fuel, column (n) is an algebraic function of columns (l) and (i). In other words, given columns (l) and (i), a competitor could determine FPL's cost of fuel for each of FPL's generating plants.

By revealing fuel cost information for each of FPL's generating plants, Schedule A4 permits FPL's competitors in the wholesale power market to learn the price at which FPL can economically sell power and thus undercut FPL's prices. The significance of the per plant figures is that these figures would permit the competitor to more accurately estimate FPL's pricing. This is so because of FPL's well known policy of economic dispatch. Barring unusual circumstances, FPL dispatches its most economical units first -- initially to satisfy its retail demand and then to sell surplus energy on the wholesale market. With knowledge of FPL's dispatch and the fuel costs and efficiencies of FPL's remaining generating units available to supply wholesale energy, FPL's competitors are enabled to pinpoint and undercut FPL's pricing. Therefore, the information relates to FPL's competitive interests and disclosure would impair FPL's competitive business. See Fla. Stat. § 366.093(3)(e). Affidavit of Rene Silva 99 14, 15.

Additionally, by disclosing in detail the efficiencies of FPL's generating units and plants, the potential suppliers of power to FPL can more accurately predict the point at which it becomes economical to purchase power rather than generate power. Precise

prediction of this break-even point would permit suppliers to price wholesale power so as to maximize profit and minimize the benefit to FPL of purchasing rather than generating power. Thus, column (1) of Schedule A4 concerns bids or other contractual data the disclosure of which would impair FPL's efforts to contract for goods or services on favorable terms. See Fla. Stat. § 366.093 (3) (d). Affidavit of Rene Silva ¶¶ 14,15.

FPL requests that the information remain confidential for a period of 18 months. See Fla. Stat. § 366.093(4); F.A.C. § 25-22.006(4)(8)(a).

Schedule A4 September 1995, Page 1, Lines 1-28, Page 2, Lines 1-25, Page 3, Lines 1-16, 1-6 and 11-16, Column (m) Fuel Cost per KWH.

Column (m) states the fuel cost per KWH incurred for each of FPL's generating plants/units. By revealing fuel cost information for each of FPL's generating plants, Schedule A4 permits FPL's competitors in the wholesale power market to learn the price at which FPL can economically sell power and thus undercut FPL's prices. The significance of the per plant figures is that these figures would permit the competitor to more accurately estimate FPL's pricing. This is so because of FPL's well known policy of economic dispatch. Barring unusual circumstances, FPL dispatches its most economical units first -- initially to satisfy its retail demand and then to sell surplus energy on the wholesale market. With knowledge of FPL's dispatch and the fuel costs and

efficiencies of FPL's remaining generating units available to supply wholesale energy, FPL's competitors are enabled to pinpoint and undercut FPL's pricing. Therefore, the information relates to FPL's competitive interests and disclosure would impair FPL's competitive business. See Fla. Stat. § 366.093(3)(e). Affidavit of Rene Silva ¶¶ 14,15.

Additionally, by disclosing in detail the efficiencies of FPL's generating units and plants, the potential suppliers of power to FPL can more accurately predict the point at which it becomes economical to purchase power rather than generate power. Precise prediction of this break-even point would permit suppliers to price wholesale power so as to maximize profit and minimize the benefit to FPL of purchasing rather than generating power. Thus, column (m) of Schedule A4 concerns bids or other contractual data the disclosure of which would impair FPL's efforts to contract for goods or services on favorable terms. See Fla. Stat. § 366.093 (3) (d). Affidavit of Rene Silva ¶¶ 14,15.

FPL requests that the information remain confidential for a period of 18 months. See Fla. Stat. § 366.093(4); F.A.C. § 25-22.006(4)(8)(a).

Schedule A4 September 1995, Page 1, Lines 1-28, Page 2, Lines 1-25, Page 3, Lines 1-16, 1-6 and 11-16, Column (n) Cost of Fuel \$/Unit.

Column (n) states the cost of fuel per unit for each of FPL's generating plants/units. By revealing fuel cost information for

each of FPL's generating plants, Schedule A4 permits FPL's competitors in the wholesale power market to learn the price at which FPL can economically sell power and thus undercut FPL's prices. The significance of the per plant figures is that these figures would permit the competitor to more accurately estimate FPL's pricing. This is so because of FPL's well known policy of economic dispatch. Barring unusual circumstances, FPL dispatches its most economical units first -- initially to satisfy its retail demand and then to sell surplus energy on the wholesale market. With knowledge of FPL's dispatch and the fuel costs and efficiencies of FPL's remaining generating units available to supply wholesale energy, FPL's competitors are enabled to pinpoint and undercut FPL's pricing. Therefore, the information relates to FPL's competitive interests and disclosure would impair FPL's competitive business. See Fla. Stat. § 366.093(3)(e). Affidavit of Rene Silva ¶¶ 14,15.

Additionally, by disclosing in detail the efficiencies of FPL's generating units and plants, the potential suppliers of power to FPL can more accurately predict the point at which it becomes economical to purchase power rather than generate power. Precise prediction of this break-even point would permit suppliers to price wholesale power so as to maximize profit and minimize the benefit to FPL of purchasing rather than generating power. Thus, column (n) of Schedule A4 concerns bids or other contractual data the

disclosure of which would impair FPL's efforts to contract for goods or services on favorable terms. See Fla. Stat. § 366.093 (3) (d). Affidavit of Rene Silva ¶¶ 14,15.

FPL requests that the information remain confidential for a period of 18 months. See Fla. Stat. § 366.093(4); F.A.C. § 25-22.006(4)(8)(a).

Schedule A4 Total Period, Page 1, Lines 1-28, Columns (1) As Burned Fuel Cost, (m) Fuel Cost per KWH, and (n) Cost of Fuel \$/Unit; Schedule A4 September 1995, Total Period, Page 2, Lines 1-25, Columns (1) As Burned Fuel Cost, (m) Fuel Cost per KWH, and (n) Cost of Fuel \$/Unit; Schedule A4 September 1995, Total Period, Page 3, Lines 1-16, 1-6 and 11-16, Columns (1) As Burned Fuel Cost, (m) Fuel Cost per KWH, and (n) Cost of Fuel \$/Unit.

The information identified in the total period section of Schedule A4 must be classified as confidential since a competitor could determine the current month's plant/unit fuel cost information by subtracting the prior month's total period figures from the current month's total period figures. The substantive justifications for classifying this information as confidential for each of the identified total period columns (1-n) are the same as for the current month stated above.

FPL requests that the information remain confidential for a period of 18 months. See Fla. Stat. \$ 366.093(4); F.A.C. \$ 25-22.006(4)(8)(a).

### Identification of Confidential Material in Schedule A6.

FPL identifies the following information in Schedule A6 for which FPL requests confidential classification:

Schedule A6 for the Month of September 1995, Lines 9-19, 9-17 and 19, (3) Total KWH Sold, (5) KWH from Own Generation, (6a) Fuel Cost, (6b) Total Cost, (7) Total \$ for Fuel Adj., and (8) Total Cost.

Schedule A6 for the Months of April through September 1995, Lines 3-16, 3-6, 8-13, and 15-16, Columns, (3) Total KWH Sold, (5) KWH from Own Generation, (6a) Fuel Cost, (6b) Total Cost, (7) Total \$ for Fuel Adj., and (8) Total Cost.

## Correlation and Justification of Confidential Classification of Material Identified in Schedule A6.

The information identified as confidential by FPL in Schedule A6 is intended to be and is treated by FPL as private in that the disclosure of the information could cause harm to FPL's business operations and has not been disclosed. See Fla. Stat. § 366.093(3). See also F.A.C. § 25-22.006(4)(c) & (d). The information relates to FPL's competitive interests and disclosure would impair FPL's competitive business. See Fla. Stat. § 366.093(3)(e). The information on FPL's specific, individual wholesale power sales customers is made available only to FPL's senior management, personnel involved in wholesale power transactions and personnel involved in the use and preparation of the A Schedules. FPL has strictly limited access to this confidential material and has instituted strict controls to insure that the information remains private. Affidavit of Rene Silva ¶12.

The information identified as confidential by FPL in Schedule A6 consists of a list of FPL's wholesale power sales customers, sales figures for each such customers and the pricing of the power sold to each customer. Disclosure of this information allows FPL's potential competitors to precisely target FPL's wholesale power customers because Schedule A6 discloses the name of the customer, each customer's energy needs and current pricing for each customer. There is very little else that a competitor needs to target FPL's wholesale power sales customers. Affidavit of Kene Silva ¶¶ 14,15.

FPL requests that the information remain confidential for a period of 18 months. See Fla. Stat. \$ 366.093(4); F.A.C. \$ 25-22.006(4)(8)(a).

# Schedule A6 for the Month of September 1995, Lines 9-19, 9-17 and 19, Column (3) Total KWH Sold.

Column (3) of Schedule A6 discloses the total KWH of wholesale power sold to each of FPL's wholesale power customers. Disclosure of the volume of purchases made by individual customers would permit FPL's competitors to target FPL's customers. This targeting together with pricing information available elsewhere in the A Schedules would permit FPL's competitors to cherry-pick FPL's wholesale power customers. Therefore, the information relates to FPL's competitive interests and disclosure would impair FPL's competitive business. See Fla. Stat. § 366.093(3)(e). Affidavit of Rene Silva ¶¶ 14,15.

FPL requests that the information remain confidential for a period of 18 months. See Fla. Stat. § 366.093(4); F.A.C. § 25-22.006(4)(8)(a).

Schedule A6 for the Month of September 1995, Lines 9-19, 9-17 and 19, Column (5) KWH from Own Generation.

Column (5) of Schedule A6 states the amount of power sold from FPL's own generation as opposed to energy wheeled from other systems. Since FPL does not currently wheel power from other systems for resale on the wholesale market, the numbers in column (5) are the same as the numbers in column (3) and the same justification for confidentiality applies. Therefore, the information relates to FPL's competitive interests and disclosure would impair FPL's competitive business. See Fla. Stat. \$ 366.093(3)(e). Affidavit of Rene Silva ¶¶ 14,15.

Schedule A6 for the Month of September 1995, Lines 9-19, 9-17 and 19, Column (6a) Fuel Cost.

Column (6a) of Schedule A6 states the fuel cost of power sales to each of FPL's wholesale customers aggregated on a monthly basis. Disclosure of the cost of the fuel component of wholesale transactions, Column (6a) provides competitors the means to precisely target the FPL wholesale customers vulnerable to price-cutting. Therefore, the information relates to FPL's competitive interests and disclosure would impair FPL's competitive business.

See Fla. Stat. § 366.093(3)(e). Affidavit of Rene Silva ¶¶ 14,15.

FPL requests that the information remain confidential for a period of 18 months. See Fla. Stat. § 366.093(4); F.A.C. § 25-22.006(4)(8)(a).

# Schedule A6 for the Month of September 1995, Lines 9-19, 9-17 and 19, Columns (6b) Total Cost.

Column (6b) of Schedule A6 shows the total cost of the energy sold to each of FPL's wholesale power customers on a per KWH basis. Disclosure of the total price of FPL's sales to each customer invites FPL's competitors to target FPL's wholesale customers by pricing power to undercut FPL's price. Therefore, the information relates to FPL's competitive interests and disclosure would impair FPL's competitive business. See Fla. Stat. § 366.093(3)(e). Affidavit of Rene Silva ¶¶ 14,15.

FPL requests that the information remain confidential for a period of 18 months. See Fla. Stat. § 366.093(4); F.A.C. § 25-22.006(4)(8)(a).

## Schedule A6 for the Month of September 1995, Lines 9-19, 9-17 and 19, Column (7) Total \$ for Fuel Adj.

Column (7) is simply the product of columns (5) total KWH sold from own generation and (6a) fuel cost. This figure gives the total cost of the fuel component of the price of energy purchased by each of the FPL's wholesale customers. Disclosure of this information would permit FPL's competitors to target FPL's wholesale customers and undercut FPL's pricing of wholesale power. Therefore, the information relates to FPL's competitive interests

and disclosure would impair FPL's competitive business. See Fla. Stat. S 366.093(3)(e). Affidavit of Rene Silva ¶¶ 14, 15.

FPL requests that the information remain confidential for a period of 18 months. See Fla. Stat. \$ 366.093(4); F.A.C. \$ 25-22.006(4)(8)(a).

Schedule A6 for the Month of September 1995, Lines 9-19, 9-17 and 19, Column (8) Total Cost.

Column (8) of Schedule A6 is simply the aggregate total paid by each of FPL's wholesale customers for all purchases from FPL during the month. Providing FPL's competitors with this information permits the competitors to project the pricing necessary to undersell FPL. Therefore, the information relates to FPL's competitive interests and disclosure would impair FPL's competitive business See Fla. Stat. § 366.093(3)(e). Affidavit of Rene Silva ¶¶ 14,15.

FPL requests that the information remain confidential for a period of 18 months. See Fla. Stat. \$ 366.093(4); F.A.C. \$ 25-22.006(4)(8)(a).

Schedule A6 for the Months of April through September 1995, Lines 3-16, 3-6, 8-13, and 15-16, (3) Total KWH Sold, (5) KWH from Own Generation, (6a) Fuel Cost, (6b) Total Cost, (7) Total \$ for Fuel Adj., and (8) Total Cost.

The information identified in the April through September 1995 section of Schedule A6 must be classified as confidential since a competitor could determine the current month's plant/unit fuel cost

information by subtracting the prior month's total period figures from the current month's total period figures. The substantive justifications for classifying this information as confidential for each of the identified April through September columns (1, 3, 6a, 6b, 7 and 8) are the same as for the corresponding columns in Schedule A6 for the current month stated above.

FPL requests that the information remain confidential for a period of 18 months. See Fla. Stat. \$ 366.093(4); F.A.C. \$ 25-22.006(4)(8)(a).

### Identification of Confidential Material in Schedule A6a.

FPL identifies the following information in Schedule A6a, Gain on Economy Energy Sales, for which FPL requests confidential classification:

Schedule A6a for the Month of September 1995, Lines 7-20, 7, 9-18, and 20, Columns (3) Total KWH Sold, (4a) Fuel Cost, (4b) Total Cost, (5a) Fuel Cost cents/KWH, (5b) Total Cost cents/KWH, (6) Gain on Economy Energy Sales.

Schedule A6a for the Months of April through September 1995, Lines 2 21, 2, 4-18, and 20-21, Columns (3) Total KWH Sold, (4a) Fuel Cost, (4b) Total Cost, (5a) Fuel Cost cents/KWH, (5b) Total Cost cents/KWH, (6) Gain on Economy Energy Sales.

## Correlation and Justification of Confidential Classification of Material Identified in Schedule A6a.

The information identified as confidential by FPL in Schedule A6a is intended to be and is treated by FPL as private in that the disclosure of the information could cause harm to FPL's business operations and has not been disclosed. See Fla. Stat.

§ 366.093(3). See also F.A.C. § 25-22.006(4)(c) & (d). The information relates to FPL's competitive interests and disclosure would impair FPL's competitive business. See Fig. Stat. § 366.093(3)(e). The information on FPL's specific, individual economy sales customers is made available only to FPL's senior management, personnel involved in wholesale power transactions and personnel involved in the use and preparation of the A Schedules. FPL has strictly limited access to this confidential material and has instituted strict controls to insure that the information remains private. Affidavit of Rene Silva ¶12.

The information identified as confidential by FPL in Schedule A6a consists of total sales figures for each of FPL's economy sales customers and the pricing and fuel costs for the power sold to each customer. The information and significance of the information in Schedule A6a is essentially similar to that in Schedule A6 except the transactions reported in Schedule A6a are made via the Florida Broker system rather than through long-term contracts. The competitive harm from disclosure of the information is the same. Disclosure of this information allows FPL's potential competitors to precisely target FPL's wholesale power customers because Schedule A6a discloses each customer's energy needs and the pricing FPL is able to offer. There is very little else that a competitor needs to target FPL's economy energy customers.

## Schedule A6a for the Month of September 1995, Lines 7 20, Columns (3) Total KWH Sold.

wholesale power sold to each of FPL's economy energy customers. Disclosure of the volume of purchases made by individual customers would permit FPL's competitors to target FPL's customers. This targeting together with pricing information available elsewhere in the A Schedules would permit FPL's competitors to target FPL's wholesale power customers. Therefore, the information relates to FPL's competitive interests and disclosure would impair FPL's competitive business. See Fla. Stat. \$ 366.093(3)(e). Affidavit of Rene Silva FFL 14, 15.

period of 18 months. See Fla. Stat. \$ 366.093(4); F.A.G. \$ 25-22.006(4)(8)(a).

## Schedule A6a for the Month of September 1995, Lines 7-20, 7, 9-18, and 20, Column (4a) Fuel Cost.

column (4a) of Schedule A6a states the fuel cost of power sales to each of FPL's wholesale customers aggregated on a monthly basis. Disclosure of the cost of the fuel component of wholesale transactions, Column (4a) provides competitors the means to precisely target the FPL economy energy customers vulnerable to price-cutting and to undercut FPL's pricing generally. Therefore, the information relates to FPL's competitive interests and

disclosure would impair FPL's competitive business. <u>See</u> Fla. Stat. § 366.093(3)(e). <u>Affidavit of Rene Silva</u> ¶¶ 14,15.

period of 18 months. See Fla. Stat. § 366.093(4); F.A.C. § 25-2.006(4)(8)(a).

Schedule A6a for the Month of September 1995, Lines 7 20, 7, 9-18, and 20, Columns (4b) Total Cost.

Column (4b) of Schedule A6a shows the total cost of the energy sold to each of FPL's wholesale power customers on a per KWH basis. Disclosure of the total price of FPL's sales to each customer invites FPL's competitors to target FPL's wholesale customers by pricing power to undercut FPL's price. Therefore, the information relates to FPL's competitive interests and disclosure would impair FPL's competitive business. See Fla. Stat. § 366.093(3)(e). Affidavit of Rene Silva ¶¶ 14,15.

FPL requests that the information remain confidential for a period of 18 months. See Fla. Stat. § 366.093(4); F.A.C. § 25-22.006(4)(8)(a).

Schedule A6a for the Month of September 1995, Lines 7 20, 7, 9-18, and 20, Column (5a) Fuel Cost cents/KWH.

Column (5a) reports the average total fuel cost of all transactions with each of FPL's economy energy customers on a per KWH basis. Disclosure of this information would permit FPL's competitors to estimate the price at which FPL can economically

the information relates to FPL's competitive interests and disclosure would impair FPL's competitive business. See Fla. Stat. § 366.093(3)(e). Affidavit of Rene Silva ¶¶ 14,15.

FPL requests that the information remain confidential for a period of 18 months. See Fla. Stat. § 366.093(4); F.A.C. § 25-22.006(4)(8)(a).

Schedule A6a for the Month of September 1995, Lines 4-17 7, 9-18, and 20, Column (5b) Total Cost.

Column (5b) reports the average total cost of all transactions with each of FPL's economy energy customers on a per KWH basis-essentially the price of each sale. Disclosure of FPL's pricing for economy energy sales would permit FPL's competitors to undercut FPL's pricing. Therefore the information relates to FPL's competitive interests and disclosure would impair FPL's competitive business. See Fla. Stat. § 366.093(3)(e). Affidavit of Rene Silva TT 14,15.

FPL requests that the information remain confidential for a period of 18 months. See Fla. Stat. \$ 366.093(4); F.A.C. \$ 25-2.006(4)(8)(a).

Schedule A6a for the Month of September 1995, Lines 7-20, 7, 9-18, and 20, Column (6) Gain on Economy Energy Sales.

Column (6) of Schedule A6a reports the gain on economy energy sales made to each of FPL's wholesale power customers. Column (6)

essentially discloses FPL's profit margin on wholesale power transactions. Disclosure of FPL's profit margin permits FPL's competitors to undercut FPL's pricing for wholesale power. Therefore, the information relates to FPL's competitive interests and disclosure would impair FPL's competitive business. See Fla. Stat. S 366.093(3)(e). Affidavit of Rene Silva ¶¶ 14,15.

FPL requests that the information remain confidential for a period of 18 months. See Fla. Stat. \$ 366.093(4); F.A.C. \$ 25-22.006(4)(8)(a).

Schedule A6a for the Months of April through September 1995, Lines 2-21, 2, 4-18, and 20-21, Columns (3) Total KWH Sold, (4a) Fuel Cost, (4b) Total Cost, (5a) Fuel Cost cents/KWH, (5b) Total Cost cents/KWH, (6) Gain on Economy Energy Sales.

The information identified in the April through September 1995 section of Schedule A6a must be classified as confidential since a competitor could determine the current month's plant/unit fuel cost information by subtracting the prior month's total period figures from the current month's total period figures.

The substantive justifications for classifying this information as confidential for each of the identified April through September columns (3,4a,4b,5a,5b and 6) are the same as for the corresponding columns in Schedule A6a for the current month stated above.

FPL requests that the information remain confidential for a period of 18 months. See Fla. Stat. § 366.093(4); F.A.C. § 25-22.006(4)(8)(a).

#### Identification of Confidential Material in Schedule A9.

FPL identifies the following information in Schedule A9 for which FPL requests confidential classification:

Schedule A9 for the Month of September 1995, Lines 6-19, 7-13, 15, 17-19, Columns (4) Trans. Cost, (5) Total \$ for Fuel Adj., (6a) Cost if Generated cents/KWH, (6b) Cost if Generated \$, and (7) Fuel Savings, and Lines 16, 18 & 19, Columns (3) Total KWH Purchased.

Schedule A9 for the Months of April through September 1995, Lines 2-30, 2-13, 15-16, 19-22, and 24-30, Columns (4) Trans. Cost, (5) Total \$ for Fuel Adj., (6a) Cost if Generated cents/KWH, (6b) Cost if Generated \$, and (7) Fuel Savings, and Lines 18-24 19-22, 24, and 26-30, Column (3) Total KWH Purchased.

## Correlation and Justification of Confidential Classification of Material Identified in Schedule A9.

The information identified as confidential by FPL in Schedule A9 is intended to be and is treated by FPL as private in that the disclosure of the information could cause harm to FPL's business operations and has not been disclosed. See Fla. Stat. § 366.093(3). See also F.A.C. § 25-22.006(4)(c) & (d). The information relates to FPL's competitive interests and disclosure would impair FPL's competitive business. See Fla. Stat. § 366.093(3)(e). Additionally, information in Schedule A9 details the terms of FPL's purchases of economy energy with individual suppliers. Therefore, the information concerns bids or other contractual data the disclosure of which would impair FPL's efforts

to contract for goods or services on favorable terms. See Fla. Stat. S 366.093(3)(d). The information on FPL's specific, individual wholesale power sales customers is made available only to FPL's senior management, personnel involved in wholesale power transactions and personnel involved in the use and preparation of the A Schedules. FPL has strictly limited access to this confidential material and has instituted strict controls to insure that the information remains private. Affidavit of Rene Silva TT 12.

The information identified as confidential in Schedule A9 consists of detailed information on economy energy purchases from each of FPL's supplier's for the stated periods including the total volume of the purchases, pricing and fuel savings realized from purchase rather than generation of the power.<sup>2</sup> This information provides FPL's potential competitors with knowledge of the volume purchased from each specific source (column (3)), price (column (4)), and information from which it can be ascertained at what point it becomes economic for FPL to purchase rather than generate power under prevailing market conditions. From the information

The purchases must be broken down into two broad categories, sales made using the Florida Broker System and opportunity sales, for the purpose of this Request. The reason for this distinction is that certain of the information that would otherwise be claimed as confidential for the Florida Broker contracts is currently disseminated to all members of the broker, thus precluding a claim of confidentiality as to column (3) Total KWH Purchased for transactions made using the Broker.

provided in Schedule A9, a competitor could outbid FPL for a potential energy source otherwise available to FPL on advantageous terms and cause FPL to replace the lost energy at a higher price on the market or dispatch otherwise uneconomic generating resources. Similarly, the information provided in Schedule A9 could permit FPL's suppliers of economy energy to price their power toward FPL's margin with greater precision thus minimizing FPL's savings realized from purchasing economy energy. Affidavit of Rene Silva TT 14,15.

Schedule A9 for the Month of September 1995, Lines 6-19 7-13, 15, 17-19, Column (4) Trans. Cost cents/KWH.

column (4) of Schedule A9 reports the total average price of economy energy purchases for each of FPL's suppliers for the month of September on a per KWH basis. By reporting the price FPL paid, FPL's competitors and suppliers can more precisely price their service towards FPL's generating cost, in the case of suppliers, or narrowly outbid FPL for energy sources, in the case of competitors. The information relates to FPL's competitive interests and disclosure would impair FPL's competitive business. See Fla. Stat. § 366.093(3)(e). Additionally, information in Schedule A details the terms of FPL's purchases of economy energy with individual suppliers. Therefore, the information concerns bids or other contractual data the disclosure of which would impair FPL's efforts

to contract for goods or services on favorable terms. See Fla. Stat. S 366.093(3)(d). Affidavit of Rene Silva ¶¶ 14,15.

Schedule A9 for the Month of September 1995, Lines 6-19, 7-13, 15, 17-19, Column (5) Total \$ for Fuel Adj.

Column (5) of Schedule A9 reports the total cost of all of FPL's economy energy purchases from each vendor for the month of September. Column (5) with the total purchased figures in column (3) provides FPL's competitors and suppliers with the price FPL paid each of its suppliers for economy energy. By reporting the price FPL paid, FPL's competitors and suppliers can more precisely price their service towards FPL's margin, in the case of suppliers, or narrowly outbid FPL for energy sources, in the case of The information relates to FPL's competitive competitors. interests and disclosure would impair FPL's competitive business. Additionally, information in See Fla. Stat. § 366.093(3)(e). Schedule A details the terms of FPL's purchases of economy energy with individual suppliers. Therefore, the information concerns bids or other contractual data the disclosure of which would impair FPL's efforts to contract for goods or services on favorable terms. See Fla. Stat. \$ 366.093(3)(d). Affidavit of Rene Silva ¶¶ 14,15.

FPL requests that the information remain confidential for a period of 18 months. See Fla. Stat. § 366.093(4); F.A.C. § 25-22.006(4)(8)(a).

Schedule A9 for the Month of September 1995, Lines 6-19, 7-13, 15, 17-19, Columns (6a) Cost if Generated cents/KWH.

Column (6a) reports the cost of generation that would have been necessary but for the subject purchase from each of FPL's economy energy suppliers on a cents per KWH basis. Publication of this information permits FPL's competitors to predict when FPL will enter the market for wholesale power and outbid FPL for sources. Knowledge of the precise point at which economy energy purchases become economical would also permit potential suppliers to price their energy closer to FPL's margin, thus reducing savings realized from purchasing rather than generating power. The information relates to FPL's competitive interests and disclosure would impair See Fla. Stat. \$ 366.093(3)(e). FPL's competitive business. Additionally, information in Schedule A details the terms of FPL's purchases of economy energy with individual suppliers. Therefore, the information concerns bids or other contractual data the disclosure of which would impair FPL's efforts to contract for goods or services on favorable terms. See Fla. § 366.093(3)(d). Affidavit of Rene Silva ¶ 14,15.

period of 18 months. See Fla. Stat. \$ 366.093(4); F.A.C. \$ 25-22.006(4)(8)(a).

Schedule A9 for the Month of September 1995, Lines 6-19, 7-13, 15, 17-19, Column (6b) Cost if Generated \$.

Column (6b) reports the total cost FPL would incur if it had generated rather than purchased the power purchased from each of FPL's economy energy suppliers. Publication of this information permits FPL's competitors to predict when FPL will enter the market for wholesale power and outbid FPL for sources. Knowledge of the precise point at which economy energy purchases become economical would also permit potential suppliers to price their energy closer to FPL's margin, thus reducing savings realized from purchasing rather than generating power. The information relates to FPL's competitive interests and disclosure would impair FPL's competitive See Fla. Stat. § 366.093(3)(e). Additionally, business. information in Schedule A details the terms of FPL's purchases of economy energy with individual suppliers. Therefore, the information concerns bids or other contractual data the disclosure of which would impair FPL's efforts to contract for goods or services on favorable terms. See Fla. Stat. § 366.093(3)(d). Affidavit of Rene Silva ¶¶ 14,15.

FPL requests that the information remain confidential for a period of 18 months. See Fla. Stat. \$ 366.093(4); F.A.C. \$ 25-22.006(4)(8)(a).

# Schedule A9 for the Month of September 1995, Lines 6-19, 7-13, 15, 17-19, Column (7) Fuel Savings.

Column (7) of Schedule A9 reports the total dollar amount of fuel savings realized from purchasing rather than generating power for each of FPL's economy energy suppliers. Publication of this information permits FPL's competitors to predict when FPL will enter the market for wholesale power and outbid FPL for sources. Knowledge of the precise point at which economy energy purchases become economical would also permit potential suppliers to price their energy closer to FPL's margin, thus reducing savings realized from purchasing rather than generating power. The information relates to FPL's competitive interests and disclosure would impair FPL's competitive business. See Fla. Stat. \$ 366.093(3)(e). Additionally, information in Schedule A details the terms of FPL's purchases of economy energy with individual suppliers. Therefore, the information concerns bids or other contractual data the disclosure of which would impair FPL's efforts to contract for Fla. goods or services on favorable See terms. S 366.093(3)(d). Affidavit of Rene Silva ¶ 14,15.

FPL requests that the information remain confidential for a period of 18 months. See Fla. Stat. \$ 366.093(4); F.A.C. \$ 25-22.006(4)(8)(a).

Schedule A9 for the Month of September 1995, Lines 16, 18 & 19, Column (3) Total KWH Purchased.

Column (3) for the referenced lines reports the total KWH purchased by FPL pursuant to long term contracts rather than opportunity sales under the Florida Broker system. By disclosing FPL's energy needs under contracts, the terms of which are matters of public record, FPL's competitors and suppliers can predict FPL's economy energy demand and more precisely price their service towards FPL's margin, in the case of suppliers, or narrowly outbid FPL for energy sources, in the case of competitors. The information relates to FPL's competitive interests and disclosure would impair FPL's competitive business. See Fla. Stat. § 366.093(3)(e). Additionally, information in Schedule A details the terms of FPL's purchases of economy energy with individual Therefore, the information concerns bids or other contractual data the disclosure of which would impair FPL's efforts to contract for goods or services on favorable terms. See Fla. Stat. § 366.093(3)(d). Affidavit of Rene Silva ¶¶ 14,15.

FPL requests that the information remain confidential for a period of 18 months. See Fla. Stat. \$ 366.093(4); F.A.C. \$ 25-2.006(4)(8)(a).

Schedule A9 for the Months of April through September 1995, Lines 2-36, 2-13, 15-16, 19-22, and 24-30, Columns (4) Trans. Cost, (5) Total \$ for Fuel Adj., (6a) Cost if Generated cents/KWH, (6b) Cost if Generated \$, and (7) Fuel Savings, and Lines 18-24 19-22, 24, and 26-30, Column (3) Total KWH Purchased.

The information identified in the April through September 1995 section of Schedule A9 must be classified as confidential since a competitor could determine the current month's plant/unit fuel cost information by subtracting the prior month's total period figures from the current month's total period figures.

The substantive justifications for classifying this information as confidential for each of the identified April through September columns are the same as for the corresponding columns in Schedule A9 for the current month stated above.

period of 18 months. See Fla. Stat. § 366.093(4); F.A.C. § 25-2.006(4)(8)(a).

DATED this 21st day of December, 1995.

Respectfully submitted,

STEEL HECTOR & DAVIS
215 South Monroe Street
Suite 601
Tallahassee, Florida 32301
Attorneys for Florida Power
& Light Company

By:

Jonathan Sjos from

31

		PT EVERGLADES #1	PT EVERGLADES #1	PT EVERGLADES	PT EVERGLADES #1	PT EVERGLADES #1	PTEVERGLADES #1				2 2 2					190		.,	II MANATES 81 783		166 5 8			State of Sta	S FT MYERS #1 137		#2 367		CAPE CANAVERAL #1 367	Council	PLANTANTI CAPABILITY	NET	19		
125,377 783 156,473 106,393 430 0 321,924 430 331,124 204 90,623 204 97,539 204 97,539 204 27,539 29,538 367 127,181														T	125.377					311,8	10000	300,652		1000					90,696	CHANG	GENERATION	N		(c)	
103 6 49 5 54 6 10 65 2										1		1	1007		446				428		98.0		943	567	47.5		655		654	3	FACTOR	CAPACITY		9	
2 939							The second second	1000		1000	T		98 2		93.4				990		995			The same	99.7		90.7		980	2	FACTOR	AVAILABILITY	EQUIVATENT	(c)	ACTUAL FOR THE PERIOD/MONTH OF
			752		I	686		672		103.0	1		100 7		463		497	123	497		107.8	27.58463	103 9	70.1	68.6		709	aller -	708	3	PACTOR	OUTPUT	M	6	THE PERIO
9,948			2 10,003			6 10353		2 10,480		6,133			7,259		10,433		10,158	10,306	10,582		7,566	SHEET STATES	7,467	9,918			9,957		9,771	- Annual of	SIVE IVE	N	AVERAGE	(E)	O HUNOWIG
	1000	GAS	#6 OIL	Т	T	#6 OIL	GAS	#6 OIL	Т	Т					#6 OIL	GAS	#6 OIL	10 OIL	#6 OIL	GAS	#2 OIL	GAS	#2 OIL	#6 OIL	#6 OIL	GAS	16 OIL	GAS	#6 OIL		1907			(d)	-
131,684	074,127	447 167	197,371	200,000	111167	93,232	325,252	81,993	2,300,370	7 1/0 670	0	2,336,752	0	1,146,166	249,774	1,306,652	250,479	490,750	426,528	2,359,585	0	2,245,044	0	262,079	87,191	1,064,627	136,434	1,012,127	135,550		GEINAN	TRN		Θ	SEPTEMBER IS
BBLS		MCF	6100	no.	MCF	BBLS	MCF	6100	100	uC.	BBLS	MCF	BBLS	MCF	BBLS	MCF	BBLS	8118	881.5	MCF	BBLS	MCF	BBLS	BBLS	BBLS	MCF	BBLS	MCF	BBLS	_					1995
6311		T	Ī	1		6311	1 000			1000	0 000	1 000	0 000	1 000	6 391	1000	6 391	6371	6371	1 000	0,000	1 000	0.000	0000	0.00	1 000	6 336	1000	6.336		CONTRACTOR	ANTES.		ω	
850,000			1	1 745 60	313,367	588,387	202,026	200	(17.47)	2 368 578		2,336,752		1,146,166	1,596,306	1,306,652	1,600,81	3,120,300	2,117,410	2,359,383		2,243,044		1,001,004	222,000	1,064,627	554,446	1,017,177	838,843		COTENED	BCBOKED	1	(2)	
100	N. St. of Street, or other Designation of the least of th				7	7							0																		9	MAL COST	ASSESSED ASSESSED	0	
																															(texas)	NAT TAL	FUEL COST	(m)	Page 1 of 3
				1																											(TREAT)	Tank	do 1500	(n)	

Florids Peare & Light Company
SYSTEM NET GENERATION AND FUEL COST

SCHEDULE V4

Florata Power & Light Company
SYSTEM NET GENERATION AND FU IL COST
ACTUAL FOR THE PERIOD/MONTH OF SEPTEMBER 1995

(4)		(b)	(3)	(4)	101	121	-			_					1
100					DOLLANTEL	N A	AVETVA		TEM	_	TABLI ISAT	MIL	CENTRING EV	MET CORL	0051.08
	2	TSN TEN	NET	FACTOR	FACTOR	FACTOR	HEAT BATE	THIN	BURNED		BITTYA	DURNAD	MUEL COST	OLAN EM	2 2
L'ANTONIO	- 1	Carro	CHANG	2	5	2	(BENTALE)	3411	(cmen)	9	Camanacanaca	1			
	1		171 410	810	991	866	9,729	#6 OIL	264,920	BLLS	6366	1,686,481			
RIVIERA	-	111	415,611					GAS		MCF	1000	14,933			
			1,400		2	879	9957	110 gg		BBLS	6366	1,533,525			
3	14	275	134,379	140	1			GAS		MCF	1000	35,664			
	-		3,214			"	11175	110 9s	44.987	881.5	6 303	283,553			
SANFORD	8.3	137	25,753	34.2	10000	15		GAS		MCF	1 000	154,689			
•	3		13,641	Charles and		T	T	200		BRI S	6 303	1,059,742			
S. C. Taller of Co.		362	106,357	492	1000	60.7	to'o'a	1000		5	188	374,804			y
			35,706	The State of the S	The state of the s			GAS	374,000		100	980.932			
			92,730	DESTRUCTION OF	SELECTION OF STREET			GAS		1	1	min			
5		362	73,013	57.5	991	67.4	10,355	16 OIL	110,004	BBLS	0,000	100000			
										BBI S	6387	995,114			
TURKEY POINT		387	106,562	652	94.6	757	9,301	T	001 100	5	100	993.188			
2			101,387					GAS		. 1					
		:							136.477	BBLS					
=	8.2	367	93,498	03 6	900	104	2000	GAS	928.510	MCF	1 000	928,510			
-	8.2		94,600			1	T	Т	0	8.188					
15 CUTLER		67	0	207	7 100.0	09.4	13,877	Τ.	165 940	ğ		165,940			
6	2 4		11,956				T	Т		2 100					
17	# G	137		417	7 952	65.5	5 11,536	L		000		\$21,220			
	. 6		45,183					GAS	027,170	Me					
O ET LIVERS	1.12	565		0.3	992	2 551	1 15,966	Т	3,123	BBLA	940				
IN THE MILENS		174					7 16,421	1 #2 OIL	322	881.8					
20 I AUDEXDALE								GAS	60,775	MCF					
21				21	956	6 613	3 17,455	5 #2 OIL	393	BBLS					
22	13.24	39							111,756	MCF		111,756	9	i ,	
23	13.24				10 877	38.5	5 19,068		485	881.5	1				
24 EVERGLADES		199	657					GAS	125,499	MCH	1 000		9		STATE OF THE PARTY

•• EXCLUDES CRANKING DIESELS

Page 2 of 3

SCHEDULE AS

Page 3 of 3

9			

(4)		100	101	13	-										-
		Ą	MI	ALDVA	AVAILABILITY BOLIVATENT	NET	AVERAGE		TIL.		L'ART HEYL	ME	Calcant Sv	PUREL COST	
HANTANT		CANABILITY	ODEBATION	FACTOR	PACTOR .	NCTOR	(STUKWE)	THE	(CUNT)	_	CINETILIBRIO	Character	9	(Naxari)	
				(1)	(1)	(0)				1					
MANITUR	0	239	0	823	947	839	8,941	#6 OIL	0	STREE	0.000	0			
			0	200				#2 OIL	0	BBLS	0,000	0			
			147.077				SEC. 11	GAS	1,315,060	MCF	1,000	1,315,060			
		230	0	86.7	966	88.2	8,735	#6 OIL	0	BBLS	0.000	0			
			0					82 OIL	0	BBLS	0 000	0			
			14215		THE STATE OF	No. of Control		GAS	1,347,123	MCF	1 000	1,347,123			
		-			TO SECURITY OF THE PARTY OF THE		9						The state of the s		
TST JOHNS (II)		125	86,977	977	98 9	98.8	9,545	COAL	34,259	TONS	24.232	830,164	1,428,943	1.6429	18
The second second			170		がしては		100	#2 OIL	279	BBLS	3.817	1,623	6,297		122
		2	9		2.67.8	ALC: NO.	9								
	. 2	125	76,714	86.4	893	958	9,5	COAL	30,232	TONS	24 290	734,335	1,260,968	1.5437	12
0	# 2		341			The same		#2 OIL	195	BBLS	5817	3,263	12,686	3.7215	<b>3</b> 4
		W													
11 SCHERER	-	646	398,947	53.0	90.0	93.3	10,030	COAL	233,314	ENO	17.130	4,001,490			
12			339						SBS	BBLX	5.817	3,403			
INDEX POINT	# 3	666	85,444	79	100	80.6	11,679	NUCLEAR	997,928 MMBTU	OLBW	1	997,928			
		666	500,728	101 2		1012		NUCLEAR	5,578,826 MMBTU	UTBN	1	5,578,826			
IS ST LUCIE		839	(10,988)		0.0	00	0	NUCLEAR	o M	O MMBTU		0			
									ı						
16	# 2	714	496,087	923	939	923	11,284	NUCLEAR	5,597,736 MMBTU	NBTU	1	5,597,736			
17															
8														Ī	
19													10000	T	9 1
20 SYSTEM TOTALS		15,475	6,622,271	:			9,739		3,676,692 BBLS	BLS	-	64,491,656	121,738,004	1 8383	ă
21									23,387,586 MCF	CF					1
22 EXCLUDES PARTICIPANTS	1								298,005 TONS	SNO	COAL				1
WALLAL BEGINNER TO THE STATE OF									O TONS		ORIMULSION				1
A CONTRACTOR OF THE PROPERTY O		-	200						12.174.490 MMBTU		NUCLEAR				

# Florida Power & Light Company SYSTEM NET GENERATION AND FUEL COST

771		26	25	24	23	: :		21 PT EVERGLADES	20	19	18		1 2			1	IJ MARTIN	12	MANATEE	5	9		7 LAUDERDALE	6	S FT MYERS		3	2	I CAPE CANAVERAL		THATANT		(0)	
		# 3	# 3	# 2					**	14				. 7	. 2			8.2						# 2		82	8.2				ñ			
	367		367		107	AK.		204		430		1	410		783		783	783	783		391		430	367	137		367		367	9	CAPABILITY	Ä	(6)	
	7 367,183	507,202	1 492,936	283,881	I		246,556	210,063	1.580,876	0	1,830,72	T					511,573	8	1,130,830	1,819,758	0	1,673,399	(127)	802,382	237,306	749,532	316,079	708,955	299,379	Grand	GENERATION	Ą	(6)	
	556		# 5			54.6		492		840	T		97.5		368		27.5	38 1	327	The second second	936		897	465	37.6	A SANSAGA	8 19		57.3	2	PACTOR	CANCILL	9	
	6 88 5		5 887			6 975		2 973		178			954		858		890	920	87.3	2000	979		923	93.6	98.7		- C	1000	959	3	FACTOR	MANAMATER	(6)	
	626		67.5			628		63 6		00.0			98 4		456		482	477	435	The second	103.2	Section 8	101.0	63.5	63.8	OACOND.	687	Total Services	58.9	3	PACTOR	OUTPUT	6	
	6 9,974		5 10,051	1		8 10,374		6 10,621	T	0 1,401			7,280		10,400		10,278	10.536	10,618		7,600		7,544	9,958		Section 1	9,944		9,859	GENTOR	HEAT RATE	NET	(8)	
GAS	10 OIL	GAS	1	T		#6 OIL	GAS	#6 OIL	Т	Т			#2 OIL	Г	#6 OIL	GAS	#6 OIL	110 9s	#6 OIL	GAS	12 OIL	GAS	#2 OIL	#6 OIL	#6 OIL	GAS	#6 OIL	GAS	N6 OIL	1100	NH.		(4)	
5 925 495	557,865	3,233,296	/34,400	-	2 978 725	367,540	2,688,436	339,697	PONCECUI.	11 101 44	0	13,472,804	0	6,948,906	1,029,730	4,785,541	799,189	2,205,008	1.882,276	13,830,339	0	12,623,669	0	1,261,386	393,496	7,577,448	476,679	7,116,426	446,077	ferent	BURNED	N.E.	(1)	
MCF	RIBE	MCE	0000	nni e	MCP	BBLS	MCH	RETRE	200	LCE .	BBLS	MCF	881.5	MCF	BBIS	MCH	881.8	R188	8.186	MCH	BBLS	MC	RE18	RIBB	881.9	MCH	881.5	MCF	BBLS					
1000			1000	851.9	1000	6 362						1 000	0 000	1 000	6 393	1000	0.591	0.300	0.379	1000	0,000	1000	9000	9339	0.330	1 000	6 333	1 000	6332		STIVA	PURIL HEAT	(1)	
5,925,495	T	T	T		2,978,725	2,338,258	Т	T	T	11.393.454		13,472,804		6,948,906	T	T	T	14,007,000	2,000,000	13,030,339		400(1707)	011	1,300,174	1491,000	1,311,948	3,018,990	7,110,420	2,824,719		COMMING	TIES.	(k)	( A C C C C C C C C C C C C C C C C C C
S STREET, STRE					3	8	10		The state of		0					STATE OF															9	CONTRIBE EV	(0)	
																															(hex.no)	MET COST	(m)	
No. of Concession, Name of Street, or other Persons and Street, or other P					١																										CLINETAL	COST OF	(0)	141

Florida Power & Light Company
SYSTEM NET GENERATION AND FIEL COST
ACTUAL FOR THE PERIOD/MONTH OF TOTAL PERIOD

		1											
		i		EQUIVALENT	NALL OF THE PARTY	AVELVA		TRA		MEL HEAT	TBJ	OBCUDE EV	MEL COST
CAPA .		NOW. WENT	PACTOR	*ACTOR	FACTOR	HEAT BATE	TRIA	Garane		BITTYA	CTBCBDB	MET CORL	RAN TEM
0	_	CHANG	2	2	2	GENNUTE	3411	(SLINU)		CENTALEBRA	Character	9	
	272	754.493	659	953	66.5	9,976	#6 OIL	1,169,478	BBLS	6382	7,463,029		
-		86 730			A CONTRACTOR		GAS	928,877	MCF	1 000	928,877		
	275	636 792	794	8 06	649	10,139	#6 OIL	998,594	881.5	6380	6,370,959		
		100 001					GAS	1,120,788	MCF	1 000	1,120,788		
	1	181 482	368	808	64.4	10,921	#6 OIL	310,996	BBLS	6 292	1,956,805		
	1	11.00			100	Special Section Sectio	GAS	633,187	MCF	1,000	633,187		
	3	167 947	122	64.7	848	10,257	#6 OIL	592,348	BBLS	6 295	3,729,058		
	1	188 574			STATE OF THE PARTY OF	STATE OF THE PARTY OF	GAS	1,979,198	MCF	1 000	1,979,198		
		422.676	N	THE STATE OF THE S	10000		GAS	4,501,295	MCF	1,000	4,501,295		
	362	469,371	52.5	933	58 1	10,410	#6 OIL	760,293	881.8	6 293	4,784,758		
	:												
	387	455,045	508	849		9,789	10 9W	677,374	8118	0 380	CKC17C'b		
=		445,848					GAS	4,497,340	MCH	1000	CACTAN'S		
	:									286.7	170 774		
12	367	\$01,065	396			T	16 OIL	141.439	100	0.000	to the		
# 2		\$17,307					GAS	5,213,577	MCF	1000	3,413,311		
2.8	67	0				13,332	#6 OIL	0	BBLS	0 000			
2		64,336					GAS	857,724	MCF	1 000	857,724		
8 6	137	0	0.4				#6 OIL	0	881.5	0000	0		
		209,403					GAS	2,470,723	MCF	1000	2		
1.12	565	13,224					Г	33,723	BBLS	5 826	T		
1-12	364	830					#2 OIL	2,195	881.5	\$ 709			
		38,097					GAS	626.217	MCF	1 000	626,217		
13-24	ž	1,230					#2 OIL	3,621	881.5	5 708	20,667	,	
13-24		53,841					GAS	901,706	MCF	1 000			
1-12	364	308					#2 OIL	994	881.8	5 788			
		\$3,007					GAS	925,417	MCF	1 000	925,417	THE TANK	
		36,471											
		NAT	NET	NET NET CAPACITY  APPAIRLITY GENERACION PACTOR  DAWN DAWN D PR  2772 754,493 63  86,730 784  1371 181,482 34  1362 367,947 37  362 367,947 37  362 469,371 5  367 445,848  445,848  445,848  517,307  67 64,336  687 0 0  29,403  564 13,224  53,641 1320  53,641 1320  53,641 1320	NET NET CAPACITY AVAILABILY AVAILABILY GENERACION PACTOR P	NET NET CAPACITY AVAILABILITY OUTPUT CAPACITATY CAPACITY AVAILABILITY OUTPUT CAPACITATY CAPACITY AVAILABILITY CONTRUT CAPACITY CONTRUT CAPACITY AVAILABILITY CONTRUT CAPACITY AVAILABILITY CONTRUT CAPACITY CAPACIT	NET NET CAPACITY ANALABET NET AVEA.  ANABILITY GENERACION PACTOR	NET VIET CAPACHTY AVAILABILITY OUTPUT NET AVELAGE (NAT) GENERATION PACTOR PACTO	STATES   SANCTIVE   SCANCET   SANCE   SANCE	Net   Capacity   Anti-part   Net   Net   Anti-part   Net   Anti-part   Net   Anti-part   Net   Anti-	RET   CANCITY   CANCITY	NET   CAPACITY   CAP	RELITY   CANACITY   CANACITY

Page 2 of 3

SCHEDULE A

#### SCHEDULE A4

# Florida Power & Light Company SYSTEM NET GENERATION AND FUEL COST ACTUAL FOR THE PERIOD/MONTH OF

TOTAL PERIOD

Page 3 of 3

(a)	(b)	(c)	(d)	(e)	(0)	(g)	(h)	(1)		ω	(k)	0	(m)	(n)
HANTAINT	MET CAPABILITY (MW)	HET	CAPACITY FACTOR (%)	EQUIVALENT AVAILABILITY FACTOR (%)	HET OUTPUT FACTOR (%)	NET HEAT RATE (BTUKWH)	PUEL TYPE	(CMITS) BURNED FUEL		PURE HEAT VALUE (MARTUUMET)	(VEL BURNED (MMSTU)	AS BURNED PUBL COST (S)	PUBL COST PER EVA (A/EVA)	COST OF
РИЛПАМ	1 2	39 0	83 8	95.5	68.4	9,166	#6 OIL	0	BBLS	0 000	0			
0.114.04	11	0		20 III(27)		The Market	#2 OIL	0	BBLS	0.000	0			
	0 1	881,934				No. of the last	GAS	8,083,614	MCF	1.000	8,083,614			
	12 2	39 0	79.0	92.4	81.1	8,929	#6 OIL	0	BBLS	0.000	0			
	12	0	1	2000	門製器		#2 OIL	0	BBLS	0.000	0			
	12	820,326					GAS	7,324,960	MCF	1.000	7,334,960			
ST JOHNS (I)		(A) (8 25 381,526	70.7	724	96.0	9,433	COAL	149,458	TONS	24 084	3,599,590	6,303,720	1.6522	42
ST KORPS (I)	. 1	1,419		THE PROPERTY.	family 1		#2 OIL	2,203	BBLS	5.832	12,847	49,494	3.4892	22
		(A) (II		97.5	96.8	9,356	COAL	196,482	TONS	24 672	4,847,562	8,319,206	1 6056	4
	82	1,002		71.7	- 70	- Ipers	#2 OIL	1,621	BBLS	5 820	9,434	36,363	3.6281	2
SCHERER		(A) (A) (A) (A) (B) (A)		86.9	78.2	10,477	COAL	1,286,157	TONS	17 060	21,942,328			
34 HERER	14	1,02					#2 OIL	1,966	BBLS	5.817	11,436			
TURKEY POINT	-	666 2,491,24		83.5	96.3	11,216	NUCLEAR	27,940,875 M	MBTU		27,940,875			
TORKET POINT		666 2,945,30			99.		NUCLEAR	32,822,596 M	<b>MBTU</b>		32,822,596			
ST LUCIE	-	2,433,23		1	99	11,045	NUCLEAR	26,873,950 M	<b>MBTU</b>		26,873,950			
STLOCIE		714 2,932,38	-	-		-	NUCLEAR	32,881,983 M	27.0		32,881,983		1	
														-
SYSTEM TOTALS	15	475 38,807,84	7			9,951		15,815,988 B	BLS	****	386,176,602	653,366,470	1 683	5
								134,661,162 M	4CF	-			-	+
*** EXCLUDES PARTICIPANTS								1,632,097 T	TONS	COAL			-	-
INCLUDES PARTICIPANTS								0 1	ONS	ORIMULSION			-	-
(I) CALCULATED ON CALENDAR M	ONTH/PERIOD	THE DATA IS FISC.	AL					120,519,404 N	MBTU	NUCLEAR				

(A) FPL SHARE (B) CALCULATED ON GENERATION RECEIVED NET OF LINE LOSSES

# POWER SOLD COMPANY: FLORIDA POWER & LIGHT COMPANY FOR THE MONTH OF SEPTEMBER, 1995

(1)	(2)	(3)	(4)	(5)	(6)		(7)	(8)
SOLD TO	TYPE & SCHEDULE	TOTAL KWH SOLD (000)	KWH WHEELED FROM OTHER SYSTEMS (000)	KWH FROM OWN GENERATION (000)	(a) FUEL COST	(b) TOTAL COST	TOTAL \$ FOR FUEL ADJ. (5) x (6)(a)	TOTAL COST \$ (5) X (6)(b)
ESTIMATED:								
	CAOS	52,721	0	52,721	2.529	3.306	1,333,321	1,743,00
	S	0	0	0	0.000	0.000	0	+05.00
ST. LUCIE RELIABILITY 80% OF GAIN ON ECONOMY SALES		44,164	0	41,164	0.442	0.442	195,204 327,757	195,20-
TOTAL		96,885	0	96,885	1.578	2.001	1,856,282 *	1,938,200
ACTUAL:								
ECONOMY		23,237	0	23,237	(6.315)	3.277	(1,467,521)	761,38
FMPA (SL 1)			0	A				
OUC (SL 1)			0					
SEMINOLE ELECTRIC COOPERATIVE, INC. (UNSCHEDULED	1		0		<b>A</b>			1300
UTILITIES COMMISSION, CITY OF NEW SMYRNA BEACH	ST	A TOTAL	0					
FT. PIERCE UTILITIES AUTHORITY	OS OS	Eller Service	0					- WEST
UTILITY BOARD OF THE CITY OF KEY WEST	OS		o			201518		
CITY OF LAKE WORTH UTILITIES UTILITIES COMMISSION, CITY OF NEW SMYRNA BEACH	os		0					
OGLETHORPE POWER CORPORATION	os		0					and a color
8 TAMPA ELECTRIC COMPANY	os	1,333	0	1,333	3.442	4.174	45,885	55,83
1 FLORIDA KEYS ELECTIC COOPERATIVE	15.5		0	Gregoria			4500	(1,74
PRIOR MONTH'S ADJUSTMENT	OS	(64)	0	(64)	2.450	2.725	(1,568)	(1,7
LI PRIOR MONTH'S ADJUSTMENT "	os	0	0	0	0.000	0.000	15,442	
ECONOMY SUB-TOTAL		23,237	0	23,237	(6.315)	3.277	(1,467,521)	761,3
ST. LUCIE PARTICIPATION SUB-TOTAL		0	0	0	0.000	0.000	(479)	1,435,5
Y SALES EXCLUSIVE OF ECONOMY AND ST. LUCIE PARTICIP	ATION SUB-TOTAL	39,620	0	39,620	2.705	3.623	1,071,743	1,433,3
							1,783,112	
80% OF GAIN ON ECONOMY SALES (SEE SCHED A6)	))	62,857	0	62,857	(0 630)	3.494	1,386,855	2,196,39
6 TOTAL		02,031						
1 CURRENT MONTH			121	(24.028)	(2 208)	1.494	(469,427)	258,19
B DIFFERENCE		(34,028)		(34,028)	(140.0)	74.7	(25.3)	13
29 DIFFERENCE (%)		(35.1)	0.0	(33.1)	(140.0)		,,	
PERIOD TO DATE:		0.1000	525			2 906	18,086,893	20,758.4
ACTUAL.		713,918	0	713,918	4 117	2.129	13,921,284	14,714,5
SZ ESTIMATED		691,202		691,202 22,716	1.703 0.413	0 779	4,165,609	6,043,9
33 DIFFERENCE		22,716	1 1 2 1 2 1 2 1 2 1 2 1 2 1 2 1 2 1 2 1	33	243	36.6	29.9	41
34 DIFFERENCE (%)		33	0.0	33	24.5	50.0		

ONLY TOTAL \$ INCLUDES 80% OF GAIN ON ECONOMY SALES.

<sup>&</sup>quot;NOTE: TRUE-UP OF FUEL COST OF JULY AND AUGUST SALES.

SCHEDULE A6

# POWER SOLD COMPANY: FLORIDA POWER & LIGHT COMPANY FOR THE MONTHS OF APRIL THROUGH SEPTEMBER 1995

(1)	(2)	(3)	(4)	(5)	(6)		(7)	(5)
VIII.			KWH		cents/K	WH		2 1
SOLD TO	TYPE & SCHEDULE	KWH SOLD (000)	WHEELED FROM OTHER SYSTEMS (000)	FROM OWN GENERATION (000)	(a) FUEL COST	(b) TOTAL COST	TOTAL \$ FOR FUEL ADJ. (5) x (5)(a)	TOTAL COST \$ (5) X (6)(b)
ACTUAL:								
ECONOMY		297,792	0	297,792	2.637	3.885	7,651,530	11,570,227
FMPA (SL 1)			0				Tanga and	
OUC (SL 1)			0				THE PROPERTY OF	
SEMINOLE ELECTRIC COOPERATIVE, INC. (UNSCHEDULED)  LITILITIES COMMISSION, CITY OF NEW SMYRNA BEACH	ST		0				******	394,688
FLORIDA POWER CORPORATION	os	11,912	0	11,912	2.681	3,313	319,331	334,000
R FT. PIERCE UTILITIES AUTHORITY	OS		0					
CITY OF HOMESTEAD	OS OS		0					
UTILITY BOARD OF THE CITY OF KEY WEST CITY OF LAKE WORTH UTILITIES	OS	100	0		THE RESERVE TO SERVE THE RESERVE THE RESER		REAL PROPERTY.	
IT UTILITIES COMMISSION, CITY OF NEW SMYRNA BEACH	OS		0					
IS OGLETHORPE POWER CORPORATION	os	5,851	0	5,851	2.601	3.351	152,205	196,059
N TAMPA ELECTRIC COMPANY	OS OS	3,031	Ö				9	
IS CITY OF VERO BEACH IS FLORIDA KEYS ELECTIC COOPERATIVE			0					
		297,792	0	297,792	2 637	3.885	7,851,530	11,570,227
IT ECONOMY SUB-TOTAL		183,299	ŏ	183,299	0.576	0.576	1,056,449	1,056,449
IS ST. LUCIE PARTICIPATION SUB-TOTAL IN SALES EXCLUSIVE OF ECONOMY AND ST. LUCIE PARTICIPATI	ON SUB-TOTAL	232,827	0	232,827	2.665	3.493	6,203,956	8,131,782
The second secon							2,974,958	
20 80% OF GAIN ON ECONOMY SALES (SEE SCHED AND 21 TOTAL		713,918	0	713,918	2.117	2 908	18,086,893	20,758,458

#### GAIN ON ECONOMY ENERGY SALES COMPANY: FLORIDA POWER & LIGHT COMPANY FOR THE MONTH OF SEPTEMBER, 1995

(1)	(2)	(3)	(4)		(5)		(6)
			\$		cents/KV	MH	CANON
SOLD TO	TYPE & SCHEDULE	TOTAL KWH SOLD (000)	(a) FUEL COST	(b) TOTAL COST	(a) FUEL COST	(b) TOTAL COST	GAIN ON ECONOMY ENERGY SALES (4)(b) - (4)(a)
ESTIMATED:							
	С	42,499	1,074,800	1,484,496	2.529	3.493	409,696
80% OF GAIN ON ECONOMY SALES	7.1						x 80
		42 400	1,074,800	1,484,496	2.529	3.493	327,757
TOTAL		42,499	1,014,000	1,000,000			
ACTUAL:							
FLORIDA MUNICIPAL POWER AGENCY	C	1,795				3,663	77,903
FLORIDA POWER CORPORATION	C	10,579	309,618	387,521	2.927	2,003	
FT. PIERCE UTILITIES AUTHORITY	C	97	4				
CITY OF HOMESTEAD	C	393	1000	200	Tall Service		
JACKSONVILLE ELECTRIC AUTHORITY	C	958			WEEK	THE REAL PROPERTY.	
KISSIMMEE UTILITY AUTHORITY	C	1,506					
CITY OF LAKE WORTH UTILITIES	C	16					
UTILITIES COMMISSION, CITY OF NEW SMYRNA BEACH	c	858		THE REAL PROPERTY AND ADDRESS OF THE PERSON ADDRESS OF THE PERSON AND			
ORLANDO UTILITIES COMMISSION	c	230		E00280			
REEDY CREEK IMPROVEMENT DISTRICT	č	338	THE REAL PROPERTY.	720200		CREE	
SEMINOLE ELECTRIC COOPERATIVE, INC.	č	3,932				-	21,72
B SOUTHERN COMPANIES TAMPA ELECTRIC COMPANY	C	2,339	63,009	84,731	2.694	3.623	21,72
CITY OF VERO BEACH	c c c	3			0.000	0.000	- (
PRIOR MONTH ADJUSTMENT (KEY)	С	0	0	(1)	0.000	0.000	2,080,86
22 PRIOR MONTH'S ADJUSTMENT **	С	0	(2,080,862)	0	0.000	0.000	
		******		761,369	(6.315)	3.277	2,228,89
3 SUB-TOTAL		23,237	(1,467,521)	701,309	(0.5.0)		5
al any of the outcomotive states							x 1
14 80% OF GAIN ON ECONOMY SALES		23,237	(1,467,521)	761,369	(6 315)	3.277	1,783,11
S TOTAL							
4 CURRENT MONTH:		(19,262)	(2,542,321)	(723,127)	(8 844)	(0.216)	
L) DIFFERENCE 28 DIFFERENCE (%)		(45.3)	(236.5)	(48.7)	(349.7)	(6.2)	444
						240000	
9 PERIOD TO DATE:		297,792	7,851,530	11,570,227	2 637	3.885	2,974,9
ACTUAL.		304,658	7,552,837	10,206,747	2.479	3.350	2,123,12
21 ESTIMATED		(6,866)	298,693	1,363,480	0.157	0.535	851,82 40
32 DIFFERENCE (%)		(2.3)	4.0	13 4	6.4	16 0	.40

SCHEDULE A6a

# GAIN ON ECONOMY ENERGY SALES COMPANY: FLORIDA POWER & LIGHT COMPANY FOR THE MONTHS OF APRIL THROUGH SEPTEMBER 1995

(1)	(2)	(3)	(4)		(5)		(6)
				onthing of the	cents/k	WH	GAIN ON
SOLD TO	TYPE & SCHEDULE	TOTAL KWH SOLD (000)	(a) FUEL COST	(b) TOTAL COST	(a) FUEL COST	(b) TOTAL COST	ECONOMY ENERGY SALES (4)(b) - (4)(a)
ACTUAL:				10 S			
STORIOS SHIRICIPAL POWER ACENCY	C	5,089				3.598	401,299
FLORIDA MUNICIPAL POWER AGENCY	C	51,003	1,432,534	1,833,833	2.809	3.390	401,200
FLORIDA POWER CORPORATION	C	252	Charles and the same of the sa			CONTRACT OF THE PARTY OF THE PA	10000000
FT. PIERCE UTILITIES AUTHORITY	C	2,197	BIDLETA			NEW SERVICE	
CITY OF GAINESVILLE	C	1,369	WEST COLUMN		HENRY		100000
CITY OF HOMESTEAD	C	4,231				100000	Market
JACKSONVILLE ELECTRIC AUTHORITY	C	2,619		5 / V 10 10 10 10 10 10 10 10 10 10 10 10 10		相當 第	
UTILITY BOARD OF THE CITY OF KEY WEST	č	4,550				(3) (3) (4) (4)	
KISSIMMEE UTILITY AUTHORITY	č	397			THE STATE OF	( 图 )	
CITY OF LAKE WORTH UTILITIES	C	55		SHEETS	menin a	(HEX. 12)	
CITY OF LAKELAND	č	26	75 O				
UTILITIES COMMISSION, CITY OF NEW SMYRNA BEACH	č	4,199	\$40 SHEET	TO POTATE	- 15 15 2 X		
ORLANDO UTILITIES COMMISSION	č	1,477		HIRDING		M. S. L. L.	<b>製造和の変数</b>
REEDY CREEK IMPROVEMENT DISTRICT	c c c c	5,646					200 PM (200 PM
SEMINOLE ELECTRIC COOPERATIVE, INC.	č	205,109					
SOUTHERN COMPANIES	č	378	1000	Machine Se	BETTYE	(858)   F/S/	
CITY OF STARKE	č	21		<b>与全国外局</b>		A STATE OF THE STA	-
CITY OF TALLAHASSE	Č	5,586	163,019	207,860	2.918	3.721	44,841
TAMPA ELECTRIC COMPANY	Č	203	COLUMN TO SERVICE AND ADDRESS OF THE PERSON	<b>CONTROL</b>	(18)(9)	CONTRACT OF THE PARTY OF	
CITY OF VERO BEACH		3,385	OH STORY		4		STATE OF THE PARTY
I CITY OF GAINESVILLE	x	3,363					
NI CUR TOTAL		297,792	7,851,530	11,570,227	2 637	3.885	3,718,697
2 SUB-TOTAL		5400000000					x 8
TO SOO OF CAIN ON ECONOMY SALES						3 885	2,974,958
23 80% OF GAIN ON ECONOMY SALES		297,792	7,851,530	11,570,227	2 637	3 685	6,314,830

#### ECONOMY ENERGY PURCHASES INCLUDING LONG TERM PURCHASES COMPANY FLORIDA POWER & LIGHT COMPANY FOR THE MONTH OF SEPTEMBER, 1995

	(1)	(2)	(3)	(4)	(5)		(6)	(7)
					OFFICE STATES	COST # G	ENERATED	20124
	PURCHASED FROM	SCHEDULE	TOTAL KWH PURCHASED (000)	TRANS COST cents/KWH	TOTAL S FOR FUEL ADJ (3) x (4)	(a) cents/KWH	(b) \$	FUEL SAVING() (6)(b) - (5)
١	ESTIMATED:							
2	FLORIDA SOUTHERN COMPANY	c	139,061 106,151	1.777 2.058	2,471,470 2,161,800	1.946 2.225	2,708,521 2,339,608	235,051 177,808
4	TOTAL		244,232	1.897	4,633,270	2.066	5,046,129	412,859
5	ACTUAL:							
-	CITY OF HOMESTEAD	00000	79,430 758 13,575 7 9,194	1.855	1,473,224	2,050	1,635,250	162,026
11 12	ORLANDO UTILITIES COMMISSION SEMINOLE ELECTRIC COOPERATIVE, INC. CITY OF TALLAHASSEE	CCC	1,698 48,880 890			2077	1,587,975	212,318
15	TAMPA ELECTRIC COMPANY CITY OF VERO BEACH FLORIDA POWER CORPORATION	C C OS C	76,464 914 7,250 200	1.799	1,375,657	1.976	143,250	25,500
19	SOUTHERN COMPANIES MUNICIPAL ELECTRIC AUTHORITY OF GEORGIA OGLETHORPE POWER CORPORATION PRIOR MONTH'S ADJUSTMENT (SEC)	OS OS	(43)	6.351	(2,731)	8.000	(3,440)	(709)

21 FLORIDA ECONOMY/OS PURCHASES SUB-TOTAL	239,003	1 826	4,365,105	2.068	4,941,969	576,864
21 NON-FLORIDA ECONOMY/OS PURCHASES SUB-TOTAL	95,671	2.125	2,032,861	2.728	2,609,628	576,767
23 TOTAL	334 674	1 912	6,397,966	2 256	7,551,597	1,153,631
24 CURRENT MONTH						5557652550
25 DIFFERENCE	90,442	0.015	1,764,696	0.190	2,505,468	740,772
26 DIFFERENCE (%)	37.0	0.8	38.1	9.2	49.7	179.4
27 PERIOD TO DATE:				1272 227	12000000000	
28 ACTUAL	1,623,152	2.014	32,690,818	2 385	38,711,495	6,020,677
11 ESTIMATED	1,372,586	1 909	26,200,008	2.199	30,187,653	3,987,645
30 DIFFERENCE	250,568	0 105	6,490,810	0.186	8,523,842	2,033,032
31 DIFFERENCE (%)	18 3	5.5	24 5	8.4	28 2	51.0

# ECONOMY ENERGY PURCHASES INCLUDING LONG TERM PURCHASES COMPANY: FLORIDA POWER & LIGHT COMPANY FOR THE MONTHS OF APRIL THROUGH SEPTEMBER 1995

(1)	(2)	(3)	(4)	(5)		6)	n
					COST IF G	ENERATED	190
PURCHASED FROM	TYPE & SCHEDULE	TOTAL KWH PURCHASED (000)	TRANS. COST cents/KWH	TOTAL \$ FOR FUEL ADJ. (3) x (4) \$	(a) cents/KWH	(b) 8	SAVINGS (G)(b) - (5)
ACTUAL:							
FLORIDA POWER CORPORATION	C	260,868	1.861	4,855,469	2.085	5,440,238	584,788
FT. PIERCE UTILITIES AUTHORITY	C	5,890	- CALLED				
CITY OF GAINESVILLE	C	51,258			2000		
CITY OF HOMESTEAD	C	175		Possilla A. S. J.	Section 1	TOTAL DEED	THE PERSON NAMED IN
JACKSONVILLE ELECTRIC AUTHORITY	C	50,972				CONTRACTOR OF THE PARTY OF THE	The second
KISSIMMEE UTILITY AUTHORITY	C	76				100000	LOGICAL DE LOGICA DE
CITY OF LAKE WORTH UTILITIES	C	4,191					TO SERVICE SER
UTILITIES COMMISSION, CITY OF NEW SMYRNA BEACH	C	5	5 7 1				
ORLANDO UTILITIES COMMISSION	C	19,543					ESMS.
REEDY CREEK IMPROVEMENT DISTRICT	C	22			THE REAL PROPERTY.		E AUG
SEMINOLE ELECTRIC COOPERATIVE, INC.	C	138,518			ALC: N	43333	175
CITY OF TALLAHASSEE	C	11,972			The second second	400 minor	4 700 51
TAMPA ELECTRIC COMPANY	C	612,540	1.822	11,160,118	2.110	12,926,701	1,766,58
S CITY OF VERO BEACH	C	7,068	40000		The state of the s	986	1000
SEMINOLE ELECTRIC COOPERATIVE, INC.	x	616	HE SOLD	CHILL DAY		Charles on the last of the las	-
7 TAMPA ELECTRIC COMPANY	X	2,825	2.700	76,275	2.950	83,338	7,06
9 FLORIDA POWER CORPORATION	os	8,559	2.451	209,748	2.897	247,970	38,22
	os		CHARLES AND ADDRESS OF THE PARTY OF THE PART	CONTRACT OF THE PARTY OF THE PA			
9 CITY OF HOMESTEAD	os	177.63	THE SECOND	13-8/10	ELESE A		4
CITY OF LAKE WORTH UTILITIES	os		<b>*************************************</b>			Marke III	
/ ORLANDO UTILITIES COMMISSION	os					Company of	-
L CITY OF TALLAHASSEE	os	7,533	6.680	503,190	7.547	568,525	65,33
3 TAMPA ELECTRIC COMPANY	os		4000				100
Y CITY OF VERO BEACH S SOUTHERN COMPANIES	c	12,881	(農, 是)	<b>灣和 3</b>			
6 ENRON POWER MARKETING, INC.	os				SS 944 S 9	<b>EXECUTA:</b>	SAN SAN
	os	<b>以重要证</b>	(MSXX)(E)	(大震) (東京)		<b>医</b> 单位对184	(ENEWA)
7 ENTERGY SERVICE, INC.	os	\$\$\$X\$E	Village			<b>是人也以</b>	5)112011
B LG&E POWER MARTEKING  MUNICIPAL ELECTRIC AUTHORITY OF GEORGIA	os				SYROPE		WEST STATE
30 OGLETHORPE POWER CORPORATION	os						Carrier.
I FLORIDA ECONOMY/OS PURCHASES SUB-TOTAL		1,194,237	1.937	23,126,454	2 212	26,419,331	3,292,87
32 NON-FLORIDA ECONOMY/OS PURCHASES SUB-TOTAL		428,915	2.230	9,564,364	2.866	12,292,164	2,727,00
33 TOTAL		1,623,152	2 014	32,690,618	2 385	38,711,495	6,020,67

#### **AFFIDAVIT**

STATE OF FLORIDA	
COUNTY OF DADE	

BEFORE ME, the undersigned authority, personally appeared Rene Silva, who being first duly swom deposes and says:

- My name is Rene Silva; My business address is Florida Power & Light Company, 9250 West Flagler, Miami, Florida.
- 2) I graduated from the University of Michigan in 1974 with a Bachelor of Science degree in Engineering Science, with a major in Nuclear Engineering. In 1978 I earned a Master of Science Degree in Mechanical Engineering from San Jose State University. In 1985 I earned a Master of Science Degree in Business Administration with a major in Finance, from the University of Miami.
- 3) From 1974 to 1978, I was employed by the General Electric Company, Nuclear Energy Division, where I performed design and engineering analyses related to nuclear fuel assemblies.
- 4) In 1973, I joined FPL as Nuclear Fuel Engineer and was responsible for negotiating contracts for the fabrication of nuclear fuel assemblies for FPL's nuclear generating plants. In 1980, I was named Supervisor of Nuclear Fuel Supply, with the responsibility for the procurement of all materials and services related to nuclear fuel.
- 5) In 1982, I was named Supervisor of Special Projects. In that capacity, I was involved in litigation and settlement negotiations of fuel-related disputes, development of fuel procurement and utilization strategies and strategic evaluations of generation capacity alternatives.
- 6) In 1986, I was named Acting Manager of Fossil Fuels and was responsible for the procurement of fuel oil, natural gas and coal for FPL's generating plants, as well as the operation and maintenance of FPL's fuel oil receiving/storage facilities.
- 7) In 1987, I was named Manager of Fuel Services. In that capacity I directed the development

of fossil fuel price forecasts used in fuel procurement decisions, generation capacity evaluations, regulatory filings and financial planning. I participated in the development of FPL's generation capacity strategies, the evaluation of power supply alternatives, and the investigations regarding the feasibility of alternate fossil fuels for use at FPL's plants.

- 8) In October of 1993, I was named Manager, Forecasting and Regulatory Response, my present position. I am responsible for fossil fuel price forecasts and regulatory filings related to fossil fuel and fossil plants. In addition, I participate in interdisciplinary team efforts to develop and implement strategies to purchase and utilize fuel more economically, now and in the future.
- 9) Pursuant to Commission Rule 25-22.006(4), FPL is requesting confidential classification of certain information contained in schedules A4, A6, A6a and A9 pertaining to the month of September 1995 (the "A Schedules") required to be filed in this docket pursuant to Minimum Filing Requirements set forth in Commission Directive dated April 24, 1980, and as revised by Commission Memorandum issued by the Division of Electric and Gas dated December 13, 1994.
- 10) FPL believes it is at a competitive disadvantage since the disclosure of certain information in the A Schedules provides FPL's competitors with the ability to obtain price and cost information. FPL believes that the disclosure of this information is reasonably likely to impair FPL's ability to contract for goods and services since the information on these schedules allows a competitor to undercut FPL's sales price to a potential customer or to outbid FPL for a potential energy source.
- 11) FPL believes the importance of this information to competitors is demonstrated by the blossoming of publications which provide utility-reported data from the A Schedules. The disclosure of the information sought to be protected herein is creating an industry of publishers ready to serve a developing competitive market. For example, the September 18, 1995 edition of Power Markets Week, published by McGraw-Hill reported detailed information on FPL's wholesale power transactions for the month of July, reporting the names of customers, total amounts purchased, average and total price. This same story reported extensive information regarding FPL's power purchases for the same period. This information is found in the sections of the A Schedules sought to be protected here and, to FPL's knowledge, nowhere else. FPL knows of no other source similar to the A Schedules from which FPL can derive similar information with regard to its competitors. One such competitor is Enron Power Marketing who recently replaced FPL in a long term contract with New Smyrna Beach. The October 23, 1995

edition of Power Markets Week reports a spokesman for New Smyrna Beach as stating "the prices were better" and "the fuel charges from Enron are lower" as justification for canceling the contract with FPL. True and correct copies of these articles are attached to this affidavit as Attachment I.

- 12) The information which FPL seeks to protect from disclosure is data that is being treated by FPL as proprietary confidential business information. Access within the company to this information is restricted. Each of the copies of Schedules A4, A6, A6a and A9 have been marked "CONFIDENTIAL". Employees have been instructed to not make any copies of the schedules. The information on these schedules has not, to the best of my knowledge, been disclosed elsewhere.
- 13) While FPL must protect itself from the competitive disadvantage of the disclosure of this information, FPL is also acutely sensitive to the obligation to maintain public access to information to the extent that such information does not harm competitive interests. For this reason, the information sought to be protected is only highly detailed information -- information at the level of the individual customer, unit, plant or supplier -- that would permit or encourage a competitor to target and undercut FPL's pricing or out-bid FPL for a power source available to FPL on advantageous terms. FPL does not seek protection for cumulations of the detailed, specific information.
- 14) Specifically, FPL is requesting confidential classification of certain information on Schedule A4 System Net Generation and Fuel Cost, Schedule A6 Power Sold, Schedule A6a Gain on Economy Energy Sales, and Schedule A9 Purchase Power. From the portions of the A4, A6 and A6a Schedules sought to be protected, FPL's competitors can determine and use the names of FPL's customers and suppliers correlated with the amounts purchased or sold, the price and the cost of wholesale transactions. Moreover, FPL's competitors can determine the economics of FPL's generating facilities and thereby undercut FPL's pricing or out bid FPL for energy sources. Suppliers of economy energy could use the information in the A9 Schedule to determine the point at which it is more economical for FPL to purchase rather than generate power and price their service nearer this margin. Thus, this information could also be used to reduce the savings FPL realizes from purchasing rather than generating power.
- 15) By revealing fuel cost information for each of FPL's generating plants, Schedule A4 permits

Silva Affidavlt Page 4

FPL's competitors in the wholesale power market to learn the price at which FPL can economically sell power and thus undercut FPL's prices. The significance of the per plant figures is that these figures would permit competitors to more accurately estimate FPL's pricing. This is so because of FPL's well known policy of economic dispatch. Barring unusual circumstances, FPL dispatches its most economical units first — initially to satisfy its retail demand and then to sell surplus energy on the wholesale market. With the knowledge of FPL's dispatch and the fuel costs and efficiencies of FPL's remaining generating units available to supply wholesale energy, FPL's competitors are enabled to pinpoint and undercut FPL's pricing.

16) The competitive harm worked by the disclosure of this information is visited directly and, in most cases totally, upon FPL's customers. Virtually all of the "profit" realized from wholesale power sales and "savings" from wholesale purchases is passed directly through to the customer as reduced fuel cost. (100% of the profit and savings from OS transactions is passed through to the customers. In schedule C and X transactions, 80% of the profit or savings is passed to the customer and 20% is retained as profit by FPL.) Because competition exists now and will continue to increase, FPL must eliminate disclosure of information that could be used by its competitors to put FPL at a competitive disadvantage and harm both FPL and its customers.

I hereby certify that on this <u>9</u> day of <u>November</u>, 1995, before me, on officer duly authorized in the State and County aforesaid to take acknowledgements, personally appeared Rene Silva who is personally known to me, and he acknowledged before me that he executed this certification of signature as his free act and deed who did not take an oath.

> Notary Public State of Fiorida

My Comm Lxp. 5/25/96

No. CG205462

# Dower Wark

Rene Silva Affidavit Attachment 1 Page 1 of 3

October 23, 1995

#### Markets-East, Midwest, South

#### PEPCO OPENING UP SECOND DOOR TO PJM, SEEN GIVING APS 'A RUN FOR ITS MONEY'

Spot market prices for bulk power in the eastern U.S. continued their decline of the last few weeks, with little relief in sight until heating loads pick up, most sources said.

In market developments, several industry sources commented on a noticeable increase in marketing activity taking place on the Washington, D.C.-based Potomac Electric Power (PEPCO) system in recent weeks, opening a longclosed door for power to flow from the southern U.S. into the Mid-Atlantic region.

A more aggressive attitude at PEPCO, armed with a new sales tariff that went into effect this fall, apparently is coming at the expense of Allegheny Power System. Until now, (continued on page 7)

#### PRICES OF SPOT ELECTRICITY WEEK ENDING OCTOBER 20

(per MV/h)

	Range	Index
Western Markets		
CalifOregon border	\$10.00 to \$14.75	\$14.00
Mid-Columbia	\$12.00 to \$14.00	\$13.75
Midway	\$15.00 to \$17.00	\$16.00
Mead	\$14.00 to \$16.50	\$15.00
Four Corners	\$13.00 to \$16.00	\$15.00
Palo Verde	\$13.25 to \$17.00	\$15.00
Northeastern Markets		
NEPOOL	\$18.00 to \$21.00	\$19.50
NYPP	\$18.00 to \$22.00	\$20.25
РЈМ	\$20.00 to \$23.50	\$21.25
Midwestern, Southern	Markets	
ECAR	\$16.00 to \$20.00	\$18.50
SERC	\$14.00 to \$22.00	\$18.75
SPP	\$14.00 to \$18.00	\$16.25

NOTE: Ranges and index prices for on-peak non-firm electricity are based on prices of actual transactions obtained in confidential surveys of buyers and sellers.

The California-Oregon border, Mid-Columbia, Midway, Palo Verde, Mead and Four Corners represent prices for daily prescheduled on-peak non-firm transactions at those points. Prices for NEPOOL, NYPP, PJM, ECAR, PJM, SERC and SPP are for daily non-firm transactions within those market areas.

The index prices are Power Markets Week's assessments of where the bulk of dealmaking occurred. The assessments are based on a variety of statistical measures of the transactions gathered, including averages, medians, modes (most frequently occurring prices), and, where possible, volume-weighted averages.

## ENRON TO REPLACE FP&L AS SUPPLIER FOR FLA. MUNI: 'PRICES WERE BETTER'

Enron Power Marketing has signed an agreement to provide firm power to the Utilities Commission of New Smyrna Leach, which canceled a similar contract with Florida Power & Light, according to Ron Vaden, the municipal utility's supervising engineer of power supply and planning.

Vaden said the muni exercised an option in its four-year power sales contract with FP&L and canceled the agreement on June 1, which means it will cease taking power from FP&L as of June 1 next year, when the new deal with Enron will start.

With the exception of price, which was the motivating factor for the change, the amount of power and schedule for delivery were essentially the same for both contracts.

"We did a four-month contract [with Enron during the summer for 5 MW] to get our feet wet with power marketers," Vaden explained. "We were satisfied. The prices were better." He added, "For a small utility, (power marketers)

(continued on page 3)

# VA. SCC RULING AGAINST SIEMENS SHOWS PROBLEMS FACED BY MERCHANT PLANTS

The Virginia State Corporation Commission, in a ruling that shows the difficulties faced by merchant plant developers, last week rejected Siemens Power Ventures' plan for a 185-MW, gas-fired project in Loudoun County because the commission found no identified need for its capacity and energy.

New York City-based SPV, the non-utility power development unit of Siemens AG, proposed development of the \$70-million plant in June, asserting it would operate the project as a demonstration facility for Siemens's new V84.3A combustion turbine for 18 months, then run it as a merchant plant selling capacity and energy to a variety of buyers in the Mid-Atlantic and Southeast regions (PMW, 26 June, 1).

In the weeks after its announcement, however, the developer downplayed the merchant-plant part of its proposal, and suggested it would operate the project in a demonstration mode for several years.

The SCC's eight-page ruling (Case No. PUE910081) rejected arguments by SPV that the commission has no jurisdiction over the proposed plant since it was not a "public utility" and, alternatively, that the SCC should refrain from asserting its jurisdiction on the grounds that SPV's operation of the plant would not affect the public interest.

The commission said state statutes define an entity like

fornia Cities Consortium, which comprises 11 cities (PMW, 28 Aug. 7). The cities last summer hired New Energy Ventures of Pasadena to develop a purchasing pool that will put together portfolios for both natural gas and electricity in an effort similar to that announced in July by the Association of Bay Area Governments (PMW, 31 July, 6).

NEV intends to have the electricity portfolio ready for consortium members to take advantage of cheaper power if the California Public Utilities Commission approves a restructuring plan that would give the cities direct access to wholesale suppliers.

"If you can't get excited about something like that, you have to be brain dead. It is a window of opportunity...and those of you in the industry, we ask for your help," Boulgarides said. "We want direct access, bilateral contracts, aggregation without limits, no stranded costs, and cost-based wheeling."

Sponsored by NewsData Corporation, the conference explored a wide range of issues pertaining to transmission access and "the new electric marketplace." stemming from FERC's notice of proposed rulemaking on open access.

"There isn't a lot of sympathy for the electric industry in the rest of the country because they've already gone through" the pain of deregulation and layoffs, Hesse said. She dismissed the California PUC's pooleo restructuring proposal as "just another form of monopoly regulation."

Indeed, the new electric marketplace may well become a world of bilateral contracts with no need for a central power pool like poolco, predicted Mike Burke, senior vice president of New Energy Ventures. Nor will there be any need for an independent system operator, as generators hook up with power marketers to sell their power.

Buyers' agents will play a significant role in the new market, and successful power sellers will interface with retail customers and aggregators as well as wholesale brokers, Burke said.

Meanwhile, the breakup of utilities' information monopoly will pose an even greater challenge than structural changes in the industry, he predicted.

The Northwest, surprisingly, has become a leader in the development of a competitive power market because of the Bonneville Power Administration, which has 200 wholesale contracts, most of them due to expire in 2001. "BPA is seeing fierce competition for its 2.5-cent wholesale power," said Walt Pollock, BPA's vice president of marketing, conservation, and production.

In fact, BPA is trading with five times more customers today than five years ago, and the number of transactions and trading partners on the California-Oregon intertie has doubled in the past year with the removal of technical barriers, he said.

# ENRON TO REPLACE FP&L AS SUPPLIER ...begins on page 1

have opened up a competitive market and we are not as much a captured customer as we were."

Under the terms of the agreement, the muni will buy intermediate and peaking power from Enron during eight months of the year, as follows: 10 MW from June through September: 10 MW in December: 25 MW in January and February; and 10 MW in March. "This is a real good advantage for us." Vaden said. "We can step our purchases up and down for our extra residential customers in the winter, and it still follows our load and maintains our reserve margin."

New Smyrna will pay Enron a capacity charge of \$3,990 per MW/month during the periods it is scheduled to receive power, plus an energy or fuel charge for the power it actually accepts. Vaden said that represents a saving of about 15% from what it was paying FP&L, which had a demend charge of \$4,700 per MW/month.

"Not only that," Vaden said, "but the fuel charges from Enron are lower."

Vaden said the city is in the process of negotiating another power sales agreement with Enron, but declined to release any details until the deal is completed.

An FP&L spokesman confirmed the muni had exercised its option to cancel the contract but had no comment on Enron's power sales activities in the state. Enron did not respond to request for a comment.

#### DERIVATIVES

# FERC'S SANTA QUESTIONS IF COMMISSION CAN, SHOULD REGULATE RISK MANAGEMENT

Commissioner Donald Santa hinted last week that he is skeptical the Federal Energy Regulatory Commission could properly regulate derivatives or enforce companies' discipline in participating in price-risk management markets.

Speaking to a Houston conference on integrated gas and electric power marketing. Santa said he has not yet looked at any staff analysis or pleadings opposing the New York Mercantile Exchange's petition for a declaratory order that FERC has no jurisdiction over electricity futures contracts (PMW, 9 Oct. 6).

But beyond the question of the commission's authority under the Federal Power Act is the issue of whether FERC should regulate risk management services when they are offered by marketers, Santa said.

"Obviously, we cannot ignore the financial debacles that have occurred in other sectors of the global economy in connection with reckless speculation in financial derivatives," he asserted, but then cautioned that the commission should define its concerns and assess how much it can do about them.

"Is our concern that some 'snake oil salesman' power marketer will induce a poor defenseless wholesale purchaser to buy a risk-management contract?" Santa queried. "Is it that being a FERC-approved power marketer gives a derivatives seller an air of legitimacy that may facilitate the seduction of unsuspecting customers?"

Even if the concerns are well founded, however, "how much of the market can we reach with our regulation?"

A danger with derivatives is in purchasers crossing the line between hedging and speculation, according to Santa, but he questioned whether regulating marketers will do anything to discipline the buyers of derivatives.

Additionally, he suggested, the Securities & Exchange Commission and the Commodity Futures Trading Commiser, as Houston Lighting & Power, in particular, suffered from outages. HL&P lost the 580-MW, coal-fired Parish Unit 8 and the 770-MW Cedar Bayou Unit 1 in the middle of the week. Texas Utilities Electric was making up most of the difference, but sources said TU was apparently keeping its prices down to make sure it kept the business.

The flow of power to HL&P was adding a few dollars to the price of hourly, non-firm energy, according to one source, and keeping north-to-south transfer facilities heavily loaded.

ERCOT also was beginning to see the effect of fall maintenance schedules, which left fewer options than usual for replacing the units that were down. HL&P, for example, already had its 780-MW Cedar Bayou Unit-3 on a scheduled outage.

An unofficial accounting of recent use of the new HVDC East Tie shows that marketers sent a total of about 52,000 MWh of power out of Texas across the tie between Aug. 11, when the first marketer deal was done, and the end of the month.

Only three marketers made use of the tie: Electric Clearinghouse moved about 26,000 MWh; LG&E Power Marketing, 13,900 MWh; and Enron Power Marketing, 12,400.

Sources reported that marketers had moved nothing across the tie since Sept. 2.

One utility source noted, however, that marketers were making some competitive offers to move power into Texas across the tie this week, as the situation in ERCOT tightened. "We're getting close to the point where it's possible," said one source.

#### HEAT WAVE ALLOWED FLA. IOUS TO TURN THE TABLES: BIG SALES AT HIGH PRICES

The heat wave that blanketed the Southeast U.S. in July allowed Florida's two largest investor-owned utilities, which frequently import energy from the rest of the Southeast in the summer, to sell almost \$8-million worth of power out of state, according to various reports filed with the state Public Service Commission.

During July, temperatures were actually lower in Florida than the rest of the Southeast, where the mercury frequently hit 100 degrees. With some excess generation, Florida Power & Light and Florida Power took advantage of higher prices they could get to the north, selling to players that frequently export power into Florida.

FP&L, the state's largest utility, sold the most economy power to Southern Company, a total of 131,374 MWh at a very attractive average price of \$42.69/MWh, for a total of \$5.6-million. In addition, it made off-system sales to Oglethorpe Power of 28,602 MWh at an average price of \$34.81/MWh for a total of \$995,720.

To put that into perspective, in June, FP&L made no offsystem sales to Oglethorpe and its total economy sales amounted to only 31,469 MWh at an average price of \$28.93/MWh for a total of \$910,451, so its power sales income was nearly eight times higher in July.

During the same period, FP&L spent about the same amount to purchase power as it did in June, \$4.9-million for 246,719 MWh at an average price of \$20.01/MWh. Tampa Electric was its biggest provider.

In July. Florida Power, the state's second-largest utility.

sold roughly three times as much as it did in June—thanks to Oglethorpe and the Southeastern Power Authority. Its total economy and off-system sales in July were 115.347 MWh at an average price of \$20.21/MWh for a total of \$2.3-million. A month earlier, it sold 44.085 MWh at an average price of \$17.66/MWh for a total of \$778.758.

Oglethorpe bought 34,805 MWh at an average price of \$25,49 MWh for a total of \$887,024 from Florida Power in July. SEPA purchased 32,376 MWh but at an average price of only \$14,28/MWh for a total of \$462,302.

During July, Florida Power bought about twice as much as it did in June, 49,050 MWh at an average price of \$30.35/ MWh for a total of \$1.5-million.

TECO, which sold only to utilities within the state, sold more power, 97,783 MWh more than FP&L, but at a lower average price, \$20.24/MWh, for a total of \$4-million. The previous month it sold 133,287 MWh at an average of \$19.45/MWh for a total of \$2.6-million. In July, TECO bought 1.311 MWh at an average of \$39.96/MWh for a total of \$52,383.

### WESTERN PLAYERS SEE MORE COMPETITION ...begins on page 1

the previous week to \$17.25/MWh and at the California-Oregon border, the index fell 50 cents to \$18/MWh. In the Southwest, which saw cooler temperatures and lower humidity, the PMW index fell three dollars to \$19/MWh. Midway in Southern California was the only index point in the West that did not move last week, staying at \$21/MWh.

Most sources said the market should stay less than \$20/ MWh through the end of the month, but one source said he believed prices would be dropping soon because of a "flurry of block offers" for October he has received priced at around \$17/MWh.

"If [the players] thought it would do better, we wouldn't get block offers," he said. "Prices will probably drop."

He alluded to "market influences" including fish protection measures that were neither weather driven or market driven that would affect Northwest utilities including BPA in the near term. But he would not elaborate on how those influences would impact the market.

BPA said it has remained in the market this late into the year mostly because of the good water year that boosted its hydro generation. A BPA source also said the mild Northwest summer added to its surplus.

But a California buyer said BPA was keeping prices down below \$20/MWh in an effort to stay competitive. "It is untypical for Bonneville to be in this time of year and prices to be this low." the source said. "I can't remember the last time they were in the market in September."

He said power marketers were forcing BPA and the region's investor-owned utilities to be more competitive with spot prices BPA is now trying to beat the marketers, who previously bough cheep BPA power and sold it for a higher price, he said.

"BPA doesn't like the middle man coming in," he said.
"They are getting more aggressive and trying to beat out the marketers."

He also pointed out that BPA was losing some of its customers to other suppliers and probably would have excess