Bryan S. Anderson
Senior Attorney
Florida Power & Light Company
700 Universe Boulevard
Juno Beach, FL 33408-0420
(561) 304-5253
(561) 691-7135 (Facsimile)
E-mail: bryan.anderson@fpl.com

September 19, 2008

-VIA HAND DELIVERY -

Ms. Ann Cole
Commission Clerk
Florida Public Service Commission
2540 Shumard Oak Blvd.
Tallahassee, FL 32399-0850

Re: Docket No. 080009-EI

Dear Ms. Cole:

I am enclosing for filing in the above docket the original and seven (7) copies of Florida Power & Light Company's Request for Confidential Classification of Information Provided Pursuant to Office of Public Council's Exhibit 45, together with a diskette containing the electronic version of same. The enclosed diskette is HD density, the operating system is Windows XP, and the word processing software is Word. Pursuant to Rule 25-22.006, F.A.C., I am also enclosing one highlighted and two redacted copies of the confidential documents that are the subject of this request.

If there are any questions regarding this transmittal, please contact me at 561-304-5253.

Sincerely,

Bryan S. Anderson

COM ____
ECR ____
GCL 1+CD
OPC ____
RCP ____
SSC ____
SGA ____
ADM ____
CLK 1

Enclosure
cc: Counsel for parties of record (w/encl.)

BEFORE THE
FLORIDA PUBLIC SERVICE COMMISSION

In re: Nuclear Power Plant Cost Recovery Clause	))	DOCKET NO. 080009-EI
		FILED: September 19, 2008

REQUEST FOR CONFIDENTIAL CLASSIFICATION OF INFORMATION PROVIDED PURSUANT TO OFFICE OF PUBLIC COUNCIL'S EXHIBIT 45

Pursuant to Section 366.093, Florida Statutes, and Rule 25-22.006, Florida Administrative Code, Florida Power & Light Company ("FPL") requests confidential classification of certain information provided in Office of Public Council's Exhibit 45 submitted at the hearing held September 11 and 12, 2008 ("Exhibit 45"). In support of its Request, FPL states as follows:

1. Exhibit 45 contains confidential and sensitive cost figures regarding FPL's nuclear projects, including contractual cost information. Public disclosure of this information would impair FPL's competitive business interest. This Request is intended to request confidential classification of the confidential portions of Exhibit 45 consistent with Rule 25-22.006(3)(a).

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

a. Composite Exhibit A consists of copies of the Working Papers, on which all information that FPL asserts is entitled to confidential treatment has been highlighted. Composite Exhibit A is submitted separately in a sealed folder marked "CONFIDENTIAL."

b. Composite Exhibit B consists of an edited version of Exhibit A on which all information FPL asserts is entitled to confidential treatment has been redacted.

c. Exhibit C is a table containing a line-by-line and page-by-page identification of the information for which confidential classification is sought, and, with regard to each document or portions thereof, references to the specific statutory basis or bases for the claim of confidentiality and to the affidavits in support of the requested classification.

d. Exhibit D is comprised of the affidavit of William P. Labbe, Jr.

3. FPL seeks confidential protection for the information highlighted in Exhibit A. The highlighted information is proprietary confidential business information within the meaning of Section 366.093(3). The information is intended to be, and has been, treated by FPL as confidential.

4. Pursuant to Section 366.093, the information highlighted in Exhibit A is entitled to confidential treatment and is exempt from the disclosure provisions of the public records law. Thus, once the Commission determines that the information in question is proprietary confidential business information, the Commission is not required to engage in any further analysis or review, such as weighing the harm of disclosure against the public interest in access to the information.

5. The statutory bases for FPL's assertion of confidentiality with regard to each document or portion thereof are set forth in Exhibit C under the column titled "FLORIDA STATUTE 366.093(3)." The letters in that column refer to the subsection(s) of Section 366.093(3) that provide justification for FPL's request. Further support for FPL's request for confidential classification of the referenced information is provided through the affidavits that are included as Exhibit D to this Request.

6. Upon a finding by the Commission that the information highlighted in Exhibit A, and referenced in Exhibit C, is proprietary confidential business information, the information

should not be declassified for a period of at least eighteen (18) months and should be returned to FPL as soon as the information is no longer necessary for the Commission to conduct its business. *See* § 366.093(4).

WHEREFORE, for the foregoing reasons, Florida Power & Light Company respectfully requests that this Request be granted.

Respectfully submitted,

R. Wade Litchfield, Esq.
Associate General Counsel
Bryan S. Anderson, Esq.
Senior Attorney
Law Department
Florida Power & Light Company
700 Universe Blvd.
Juno Beach, Florida 33408-0420
Telephone: 561-304-5253
Fax: 561-691-7135

By: _____
Bryan S. Anderson
Authorized House Counsel No.219511

CERTIFICATE OF SERVICE
Docket No. 080009-EI

I HEREBY CERTIFY that a true and correct copy of the foregoing Request for Confidential Classification of Of Information Provided Pursuant To Office of Public Council's Exhibit 45(*) has been furnished by hand delivery (**) or U.S. Mail on this 19th day of September 2008, to the following:

Lisa Bennett, Esquire**
Keino Young, Esquire
Jennifer Brubaker, Esquire
Division of Legal Services
Florida Public Service Commission
2540 Shumard Oak Blvd.
Tallahassee, Florida 32399-0850

Joseph A. McGlothlin, Esquire
Steve Burgess, Esquire
J. R. Kelly, Esquire
Office of Public Counsel
c/o The Florida Legislature
111 West Madison Street, Room 812
Tallahassee, Florida 32399

J. Michael Walls, Esquire
Diane M. Tripplet, Esquire
Carlton Fields Law Firm
P.O. Box 3239
Tampa, Florida 33601-3239

John T. Burnett, Esquire
Progress Energy Service Company, LLC
P.O. Box 14042
St. Petersburg, Florida 33733-4042

John W. McWhirter, Jr., Esquire
McWhirter, Reeves Law Firm
Attorneys for FIPUG
P.O. Box 3350
Tampa, FL 33601-3350

Michael B. Twomey, Esquire
Attorney for AARP
Post Office Box 5256
Tallahassee, FL 32314-5256

James W. Brew, Esq.
Brickfield, Burchette, Ritts & Stone, P.C.
1025 Thomas Jefferson St., N.W.
Eighth Floor, West Tower
Washington, DC 20007-5201

Mr. Paul Lewis, Jr.
106 E. College Ave., Suite 800
Tallahassee, FL 32301-7740

By: _____
Bryan S. Anderson

* The exhibits to this Request are not included with the service copies, but copies of Exhibits B, C and D are available upon request.

EXHIBIT A

CONFIDENTIAL

FILED UNDER SEPARATE COVER

EXHIBIT B

REDACTED

Jack Hoffman
07/08/2008 08:06 AM

To: William P. Labbe Jr/NAESCO@NAESCO, Clyde Newson/Juno/Nuclear/FplNuc@FPLNUC
cc:
Subject: CAR delta to uprate explanation

fyi

Jack Hoffman
Engineering Manager - St. Lucie Power Uprate
Office: 772-467-7493
Cell: 772-201-0540

----- Forwarded by Jack Hoffman/Psl/Nuclear/FplNuc on 07/08/2008 08:03 AM -----

Kenneth Palmer
Sent by: Kenneth Palmer
06/04/2007 01:42 PM

To: Yuan Kao/Psl/Nuclear/FplNuc@FplNuc
cc: John Manso/Ptn/Nuclear/FplNuc@FplNuc, Jack Hoffman/Psl/Nuclear/FplNuc@FplNuc
Subject: CAR delta to uprate explanation

Yuan,

Attached you will find the PRB level 1 document that I used for the briefing during the PRB meeting.

The cost for the Siemens package is [redacted] which agrees closely with the uprate estimate of [redacted] when you adjust for the following.
The CAR has the following extra items
[redacted]
[redacted] which assumed major moves for the generator and HP due to installing the new LPs.
This number is now [redacted] due to Siemens claim that the moves are minor.

Total delta is [redacted]

[redacted] Close enough?

ATTACHED CAN - 7/8/08

PRB level 1- LP Turbine Conceptual Cost Estimat

Ken

St. Lucie Plant LP Turbine Modification Conceptual Cost Estimate Summary

Option 1 Repair Rotors and Replace Stationary Blades with Like-for-Like.

As soon as possible but no later than just prior to SL 2-19 repair the existing 2 spare rotors by removing the cracked blades and the blades adjacent to the cracks in the rotor discs. Remove the disc cracks by grinding, if possible, and replace all removed blades with new like-for-like blades. Rotor discs may need to be replaced if the disc cracking is found to be severe when the rotating blades are removed. Due to the high probability of disc replacement discs may need to be ordered no later than 2008. Due to the high probability of stationary blade cracking being discovered during SL2-19 spare stationary blades should be ordered no later than 2008.
During SL2-19 replace the stationary blades and the rotors with the repaired components.
Post SL2-19 repair the removed components for installation in SL1-24.

Cost Estimate for Option 1-Repair Spare Rotor Discs and Replace Stationary Blades with Like-for-Like Components.

For SL2-19 (Occurs in the fall of 2010)
Ship 2 rotors to Charlotte NC. (2008)
[redacted]
Purchase partial rows of spare blades for rows L-0, L-1 and L-2 for both ends of two rotors. (2008)
[redacted]
Purchase full rows of like-for-like blades for rows L-0, L-1 and L-2 for both ends of two rotors. (2008)
[redacted]
Purchase spare discs for two rotors (6 discs per rotor). (2008)
[redacted]
Purchase 2 sets of like-for-like stationary blades for installation during SL2-19. (2008)
(Stationary blades have been replaced in Unit 1 during SL1-20).
[redacted]
Remove cracked blades from generator end and governor end discs and remove additional blades as required to address rotor disc rim cracking for two rotors. (Must be prepared to remove all blades on these blade rows.) (2008)
[redacted]
Glass bead the rotor disc rim steeples. (2008)
[redacted]
Inspect disc steeples for cracks. (2008)
[redacted]
Remove cracks by grinding. (2008)
[redacted]
Evaluate steeples for continued service. (2008)
[redacted]
Remove discs for repair if disc rim cracks exceed acceptance criteria. (2009)
[redacted] (Contingency)

Repair discs by machining disc rim to remove steeples, build up machined area with filler metal and machine discs to final configuration to accept new blades. (ID of disc my need weld repair if found to not meet acceptance criteria.). (2009)

[redacted] (Contingency)

Install repaired discs on rotor. (2010)

[redacted] (Contingency)

Install new blades and shrouds on disc. (2010)

[redacted]

High speed balance 2 rotor assemblies. (2010)

[redacted]

Ship 2 completed rotors to PSL. (2010)

[redacted]

Installation in SL2-19

[redacted]

[redacted]

Repeat above steps during 2010 and 2011 for SL1-24.

[redacted]

Repeat above steps during 2012 for the remaining 2 rotors to be used as spares.

[redacted]

[redacted]

Support Organizations

[redacted]

Option 2 Refurbish Rotors and Replace Stationary Blades with Like-for-Like.
Prior to SL 2-19 refurbish the existing 2 spare rotors with new discs and blades. This work would need to start as early as 2008. Due to the high probability of stationary blade cracking being discovered during SL2-19 spare stationary blades should be ordered as early as 2008. During SL 2-19 install the like-for-like blade rings and install the refurbished rotors. Remove the rotors from Unit 2, refurbish prior to SL 1-24 (one year interval) and install in Unit 1 during SL 1-24. With only one year between SL 2-19 and SL 1-24 the scheduling of the repair work would be critical.

Cost estimate for Option 2-Replace Spare Rotor Discs and Replace Stationary Blades with Like-for-Like Components.

For SL2-19 (Occurs in the fall of 2010)
Ship 2 rotors to Charlotte NC. (2008)
[redacted]
Purchase full rows of like-for-like blades for rows L-0, L-1 and L-2 for both ends of two rotors. (2008)
[redacted]
Purchase new discs for two rotors and machine discs to final configuration to accept new blades. (6 discs per rotor). (2008)
[redacted]
Purchase 2 sets of like-for-like stationary blades for installation during SL2-19. (2009) (Stationary blades have been replaced in Unit 1 during SL1-20).
[redacted]
Remove 6 discs per rotor for replacement. (2009)
[redacted]
Install 6 new discs on each rotor. (2010)
[redacted]
Install new blades and shrouds on discs. (2010)
[redacted]
High speed balance 2 rotor assemblies. (2010)
[redacted]
Ship 2 completed rotors to PSL. (2010)
[redacted]
Installation in SL2-19
[redacted]

Repeat above steps during 2010 and 2011 for SL1-24.
[redacted]

Repeat above steps during 2012 for the remaining 2 rotors to be used as spares.
[redacted]

[redacted]

Support Organizations

[redacted]

Option 3 Siemens 45" (High efficiency LP) HELP Blades

Prior to SL 2-19 refurbish the existing 2 low-pressure rotors with new HELP discs and blades. Prior to SL 2-19 procure four sets of HELP stationary blade rings, two sets for Unit 2 and two sets for Unit 1. During SL 2-19 install two sets of HELP blade rings and the refurbished HELP rotors. Remove the rotors from Unit 2, refurbish prior to SL 1-24 (one year interval) and install in Unit 1 during SL 1-24 with the second two sets of HELP blade rings. Refurbish the rotors removed from Unit 1 with HELP discs and blades and maintain as spares.

Cost estimate for Option 3-Replace Spare Rotor Discs and Replace Stationary Blades with HELP Components.

For SL2-19 (Occurs in the fall of 2010)
Ship 2 rotors to Charlotte NC. (2008)
[redacted]
Purchase new HELP blades for rows L-0, L-1 and L-2 for both ends of two rotors. (2008)
[redacted]
Purchase new HELP discs for two rotors (6 discs per rotor). (2008)
[redacted]
Purchase 4 sets of HELP stationary blades for installation during SL2-19 and during SL1-24. (2009) (Stationary blades replaced in Unit 1 during SL1-20 are not compatible with HELP design).
[redacted]
Remove 6 discs per rotor for replacement. (2009)
[redacted]
Install 6 new discs on each rotor. (2010)
[redacted]
Install new blades and shrouds on discs. (2010)
[redacted]
High speed balance rotor assembly. (2010)
[redacted]
Ship 2 completed rotors to PSL. (2010)
[redacted]
Installation in SL2-19 (includes modifications to exhaust flow guides)
[redacted]

Repeat above steps during 2010 and 2011 for SL1-24.
[redacted]

Repeat above steps during 2012 for the remaining 2 rotors to be used as spares.
[redacted]

[redacted]

Support Organizations

[redacted]

BOP Modifications to support 1% power increase

[redacted]

Assume Thermal Performance Test is not required

0.0M

[redacted]

Option 4 Complete Low Pressure Turbine Retrofit by Siemens or another vendor

Prior to SL 2-19 and SL 1-24 purchase 2 low-pressure turbines for each St. Lucie Unit. During SL 2-19 and SL 1-24 install the new turbines. These turbines would replace the existing Westinghouse low-pressure turbine rotors, jackshafts and both inner cylinders including the stationary blades. The design retains the existing low-pressure turbine frames, outer cylinder covers and inlet piping.

Cost estimate for Option 4-Replace Spare Rotors and Replace Stationary Blades with complete Retrofit Package (Includes new inner cylinders).

Develop bid specification for Retrofit Package. (Early 2007)

[redacted]

Issue RFP for Retrofit Package. (Early 2007)

[redacted] (includes legal review)

Hold pre-bid meeting, receive bids, evaluate bids and award contract for Retrofit Package to be installed during SL2-19 and SL1-24. (Late 2007)

[redacted]

Design review for Retrofit Package and Balance of Plant modifications. (Late 2007)

[redacted]

Issue design changes to BOP for SL2-18. (Early 2008)

[redacted]

Issue design changes to BOP for SL1-23. (Early 2009)

[redacted]

Implement design changes to BOP during SL2-18, if required. (Early 2009)

[redacted]

Implement design changes to BOP during SL1-23, if required. (Early 2010)

[redacted]

Manufacture Retrofit Package for Unit 2. (2008, 2009 and 2010) Requires 18-24 months.

[redacted]

Manufacture Retrofit Package for Unit 1. (2009, 2010 and 2011) Requires 18-24 months.

[redacted]

Ship Unit 2 Retrofit Package for Unit 2 (2010)

[redacted]

Ship Unit Retrofit Package for Unit 2 (2011)

[redacted]

Installation in SL2-19 (includes modifications to exhaust flow guides)

[redacted]
Installation in SL1-24 (includes modifications to exhaust flow guides)
[redacted]

Total Vendor Contract cost for this option for both units with 0 spare rotors
[redacted]

Total NON-Vendor Contract cost for this option for both units with 0 spare rotors and no Thermal Performance Test
[redacted]

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PAGE

Jack Hoffman
07/08/2008 08:06 AM

To: William P. Labbe Jr/NAESCO@NAESCO, Clyde Newson/Juno/Nuclear/FplNuc@FPLNUC
cc:
Subject: CAR delta to uprate explanation

fyi

Jack Hoffman
Engineering Manager - St. Lucie Power Uprate
Office: 772-467-7493
Cell: 772-201-0540

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To: Yuan Kao/Psl/Nuclear/FplNuc@FplNuc
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Yuan,

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[redacted] which assumed major moves for the generator and HP due to installing the new LPs.
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Total delta is [redacted]

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ATTACHED CAN - 7/8/08

PRB level 1- LP Turbine Conceptual Cost Estimat

Ken

St. Lucie Plant LP Turbine Modification Conceptual Cost Estimate Summary

Option 1 Repair Rotors and Replace Stationary Blades with Like-for-Like.

As soon as possible but no later than just prior to SL 2-19 repair the existing 2 spare rotors by removing the cracked blades and the blades adjacent to the cracks in the rotor discs. Remove the disc cracks by grinding, if possible, and replace all removed blades with new like-for-like blades. Rotor discs may need to be replaced if the disc cracking is found to be severe when the rotating blades are removed. Due to the high probability of disc replacement discs may need to be ordered no later than 2008. Due to the high probability of stationary blade cracking being discovered during SL2-19 spare stationary blades should be ordered no later than 2008.

During SL2-19 replace the stationary blades and the rotors with the repaired components.

Post SL2-19 repair the removed components for installation in SL1-24.

Cost Estimate for Option 1-Repair Spare Rotor Discs and Replace Stationary Blades with Like-for-Like Components.

For SL2-19 (Occurs in the fall of 2010)

Ship 2 rotors to Charlotte NC. (2008)

[redacted]

Purchase partial rows of spare blades for rows L-0, L-1 and L-2 for both ends of two rotors. (2008)

[redacted]

Purchase full rows of like-for-like blades for rows L-0, L-1 and L-2 for both ends of two rotors. (2008)

[redacted]

Purchase spare discs for two rotors (6 discs per rotor). (2008)

[redacted]

Purchase 2 sets of like-for-like stationary blades for installation during SL2-19. (2008)

(Stationary blades have been replaced in Unit 1 during SL1-20).

[redacted]

Remove cracked blades from generator end and governor end discs and remove additional blades as required to address rotor disc rim cracking for two rotors. (Must be prepared to remove all blades on these blade rows.) (2008)

[redacted]

Glass bead the rotor disc rim steeples. (2008)

[redacted]

Inspect disc steeples for cracks. (2008)

[redacted]

Remove cracks by grinding. (2008)

[redacted]

Evaluate steeples for continued service. (2008)

[redacted]

Remove discs for repair if disc rim cracks exceed acceptance criteria. (2009)

[redacted] (Contingency)

Repair discs by machining disc rim to remove steeples, build up machined area with filler metal and machine discs to final configuration to accept new blades. (ID of disc my need weld repair if found to not meet acceptance criteria.). (2009)
[redacted] (Contingency)
Install repaired discs on rotor. (2010)
[redacted] (Contingency)
Install new blades and shrouds on disc. (2010)
[redacted]
High speed balance 2 rotor assemblies. (2010)
[redacted]
Ship 2 completed rotors to PSL. (2010)
[redacted]
Installation in SL2-19
[redacted]

[redacted]

Repeat above steps during 2010 and 2011 for SL1-24.
[redacted]

Repeat above steps during 2012 for the remaining 2 rotors to be used as spares.
[redacted]

[redacted]

Support Organizations

[redacted]

Option 2 Refurbish Rotors and Replace Stationary Blades with Like-for-Like.
Prior to SL 2-19 refurbish the existing 2 spare rotors with new discs and blades. This work would need to start as early as 2008. Due to the high probability of stationary blade cracking being discovered during SL2-19 spare stationary blades should be ordered as early as 2008. During SL 2-19 install the like-for-like blade rings and install the refurbished rotors. Remove the rotors from Unit 2, refurbish prior to SL 1-24 (one year interval) and install in Unit 1 during SL 1-24. With only one year between SL 2-19 and SL 1-24 the scheduling of the repair work would be critical.

Cost estimate for Option 2-Replace Spare Rotor Discs and Replace Stationary Blades with Like-for-Like Components.

For SL2-19 (Occurs in the fall of 2010)
Ship 2 rotors to Charlotte NC. (2008)
[redacted]
Purchase full rows of like-for-like blades for rows L-0, L-1 and L-2 for both ends of two rotors. (2008)
[redacted]
Purchase new discs for two rotors and machine discs to final configuration to accept new blades. (6 discs per rotor). (2008)
[redacted]
Purchase 2 sets of like-for-like stationary blades for installation during SL2-19. (2009)
(Stationary blades have been replaced in Unit 1 during SL1-20).
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Remove 6 discs per rotor for replacement. (2009)
[redacted]
Install 6 new discs on each rotor. (2010)
[redacted]
Install new blades and shrouds on discs. (2010)
[redacted]
High speed balance 2 rotor assemblies. (2010)
[redacted]
Ship 2 completed rotors to PSL. (2010)
[redacted]
Installation in SL2-19
[redacted]

Repeat above steps during 2010 and 2011 for SL1-24.
[redacted]

Repeat above steps during 2012 for the remaining 2 rotors to be used as spares.
[redacted]

[redacted]

Support Organizations

[redacted]

Option 3 Siemens 45" (High efficiency LP) HELP Blades

Prior to SL 2-19 refurbish the existing 2 low-pressure rotors with new HELP discs and blades. Prior to SL 2-19 procure four sets of HELP stationary blade rings, two sets for Unit 2 and two sets for Unit 1. During SL 2-19 install two sets of HELP blade rings and the refurbished HELP rotors. Remove the rotors from Unit 2, refurbish prior to SL 1-24 (one year interval) and install in Unit 1 during SL 1-24 with the second two sets of HELP blade rings. Refurbish the rotors removed from Unit 1 with HELP discs and blades and maintain as spares.

Cost estimate for Option 3-Replace Spare Rotor Discs and Replace Stationary Blades with HELP Components.

For SL2-19 (Occurs in the fall of 2010)
Ship 2 rotors to Charlotte NC. (2008)
[redacted]
Purchase new HELP blades for rows L-0, L-1 and L-2 for both ends of two rotors. (2008)
[redacted]
Purchase new HELP discs for two rotors (6 discs per rotor). (2008)
[redacted]
Purchase 4 sets of HELP stationary blades for installation during SL2-19 and during SL1-24. (2009) (Stationary blades replaced in Unit 1 during SL1-20 are not compatible with HELP design).
[redacted]
Remove 6 discs per rotor for replacement. (2009)
[redacted]
Install 6 new discs on each rotor. (2010)
[redacted]
Install new blades and shrouds on discs. (2010)
[redacted]
High speed balance rotor assembly. (2010)
[redacted]
Ship 2 completed rotors to PSL. (2010)
[redacted]
Installation in SL2-19 (includes modifications to exhaust flow guides)
[redacted]

Repeat above steps during 2010 and 2011 for SL1-24.
[redacted]

Repeat above steps during 2012 for the remaining 2 rotors to be used as spares.
[redacted]

[redacted]

Support Organizations

[redacted]

BOP Modifications to support 1% power increase

[redacted]

Assume Thermal Performance Test is not required

0.0M

[redacted]

Option 4 Complete Low Pressure Turbine Retrofit by Siemens or another vendor

Prior to SL 2-19 and SL 1-24 purchase 2 low-pressure turbines for each St. Lucie Unit. During SL 2-19 and SL 1-24 install the new turbines. These turbines would replace the existing Westinghouse low-pressure turbine rotors, jackshafts and both inner cylinders including the stationary blades. The design retains the existing low-pressure turbine frames, outer cylinder covers and inlet piping.

Cost estimate for Option 4-Replace Spare Rotors and Replace Stationary Blades with complete Retrofit Package (Includes new inner cylinders).

Develop bid specification for Retrofit Package. (Early 2007)

[redacted]

Issue RFP for Retrofit Package. (Early 2007)

[redacted] (includes legal review)

Hold pre-bid meeting, receive bids, evaluate bids and award contract for Retrofit Package to be installed during SL2-19 and SL1-24. (Late 2007)

[redacted]

Design review for Retrofit Package and Balance of Plant modifications. (Late 2007)

[redacted]

Issue design changes to BOP for SL2-18. (Early 2008)

[redacted]

Issue design changes to BOP for SL1-23. (Early 2009)

[redacted]

Implement design changes to BOP during SL2-18, if required. (Early 2009)

[redacted]

Implement design changes to BOP during SL1-23, if required. (Early 2010)

[redacted]

Manufacture Retrofit Package for Unit 2. (2008, 2009 and 2010) Requires 18-24 months.

[redacted]

Manufacture Retrofit Package for Unit 1. (2009, 2010 and 2011) Requires 18-24 months.

[redacted]

Ship Unit 2 Retrofit Package for Unit 2 (2010)

[redacted]

Ship Unit Retrofit Package for Unit 2 (2011)

[redacted]

Installation in SL2-19 (includes modifications to exhaust flow guides)

[redacted]

Installation in SL1-24 (includes modifications to exhaust flow guides)

[redacted]

Total Vendor Contract cost for this option for both units with 0 spare rotors

[redacted]

Total NON-Vendor Contract cost for this option for both units with 0 spare rotors and no Thermal Performance Test

[redacted]

EXHIBIT C

Exhibit C
Company: FLORIDA POWER AND LIGHT COMPANY
Title: List of Confidential Workpapers
Office of Public Council, Exhibit #45 – EPU Project
DOCKET NO. 080009 EI

Item	Description	No. of Pages	Conf Y/N	Line No. Col. No	Florida Statue 366.093 (3) Subsection	Affiant
1	St. Lucie Plant LP Turbine Modification Conceptual Cost Estimate Summary	9	Y	Page 1 lines 2, 5-10, Page 2 lines 13, 16, 19, 21, 24, 28, 30, 32, 34, 36, 38, Page 3 lines 4, 6, 8, 10, 12, 14, 15, 17, 19, 20-22, 23-25, Page 4 lines 10, 13, 16, 19, 21, 23, 25, 27, 29, 31, 32, 34, 36, Page 5 lines 1-3, 5-7, Page 6 lines 10, 12, 14, 18, 20, 22, 24, 26, 28, 30-31, 33, 35, Page 7 lines 1-3, 5-6, 8, 11-12, Page 8 lines 7, 9, 12, 14, 16, 18, 20, 22, 25, 28, 30, 32, Page 9 lines 1, 3, 5-7, 10-12.	(d), (e)	William P. Labbe, Jr.

EXHIBIT D

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Nuclear Power Plant Cost Recovery)
Clause –Office of Public Council Deposition of William P. Labbe, Jr.) DOCKET NO. 080009

STATE OF FLORIDA)
) **AFFIDAVIT OF WILLIAM P. LABBE, Jr.**
PALM BEACH COUNTY)

BEFORE ME, the undersigned authority, personally appeared William P. Labbe, Jr. who, being first duly sworn, deposes and says:

1. My name is William P. Labbe, Jr. I am currently employed by Florida Power & Light Company ("FPL") as the Project Director for the Nuclear Power Uprate Projects. I have personal knowledge of the matters stated in this affidavit.

2. I have reviewed Exhibit C and the document that is included in FPL's Request for Confidential Classification of Information Obtained in Connection with the Office of Public Council Deposition of William P. Labbe, Jr., for which I am identified on Exhibit C as the affiant. The document that I have reviewed is a Turbine Conceptual Cost Estimate Summary, which is asserted by FPL to be proprietary confidential business information. Disclosure of this information would violate FPL's contract with its vendors, work to the detriment of FPL's competitive interests, and/or impair FPL's efforts to enter into contracts on commercially favorable terms. To the best of my knowledge, FPL has maintained the confidentiality of this document.

3. Consistent with the provisions of the Florida Administrative Code, such materials should remain confidential for a period of not less than 18 months. In addition, they should be returned to FPL as soon as the information is no longer necessary for the Commission to conduct its business so that FPL can continue to maintain the confidentiality of these documents.

4. Affiant says nothing further.

William P. Labbe, Jr.

SWORN TO AND SUBSCRIBED before me this 17th day of September 2008, by William P. Labbe, Jr. who is personally known to me or who has produced _____ (type of identification) as identification and who did take an oath.

NOTARY PUBLIC-STATE OF FLORIDA
Susan Schlosberg
Commission # DD711057
Expires: SEP. 04, 2011
BONDED THRU ATLANTIC BONDING CO., INC.

Notary Public, State of Florida

My Commission Expires:

STATE OF FLORIDA

OFFICE OF COMMISSION CLERK
ANN COLE
COMMISSION CLERK
(850) 413-6770

Public Service Commission

ACKNOWLEDGEMENT

DATE: September 19, 2008

TO: **Bryan S. Anderson, Esquire/FPL**

FROM: **Marguerite H. McLean, Office of Commission Clerk**

RE: **Acknowledgement of Receipt of Confidential Filing**

This will acknowledge receipt of a CONFIDENTIAL DOCUMENT filed in Docket Number 080009-EI (DN 08861-08) **or, if filed in an undocketed matter, concerning** OPC's Hearing Exhibit No. 45 submitted at hearing held 9/11-12/08, **and filed on behalf of** FPL. **The document will be maintained in locked storage.**

If you have any questions regarding this document, please contact Marguerite McLean, Deputy Clerk, at (850) 413-6770.