



Jessica Cano
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Florida Power & Light Company
700 Universe Boulevard
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June 27, 2008

VIA HAND DELIVERY

Ms. Ann Cole
Division of the Commission Clerk and
Administrative Services
Florida Public Service Commission
Betty Easley Conference Center
2540 Shumard Oak Boulevard, Room 110
Tallahassee, FL 32399-0850

RECEIVED-FPSC
08 JUN 27 PM 4:52
COMMISSION
CLERK

Re: **PSC Consolidated Docket Nos. 080203-EI, 080245-EI, and 080246-EI**

Dear Ms. Cole:

Enclosed find an original and seven (7) copies of FPL's Request for Confidential Classification of FPL's Late Filed Hearing Exhibit No. 100 (which exhibit was requested to be filed during Heather C. Stubblefield's testimony at the hearing on June 23, 2008). The original includes Exhibits A, B, C, and D. The seven (7) copies include Exhibit B only. Also included with this filing is a computer diskette containing FPL's Request for Confidential Classification and Exhibit C, in Word format.

Exhibit A consists of certain documents on which all information that FPL asserts is entitled to confidential treatment has been highlighted. Exhibit A is submitted for filing in a separate, sealed folder marked "EXHIBIT A - CONFIDENTIAL"

Exhibit B consists of an edited version of Exhibit A, in which the information FPL asserts is confidential has been redacted, and the non-confidential documents that are part of FPL's Late Filed Hearing Exhibit No. 100. Exhibit C consists of FPL's justification for its Request for Confidential Classification. Exhibit D consists of a copy of the affidavit in support of FPL's Request. The original affidavit will be hand-delivered to you on Monday, June 30th.

Please do not hesitate to contact me should you or your staff have any questions regarding this filing.

1 + Diskette

Sincerely,

Jessica A. Cano
Jessica A. Cano

JAC:alc
Enclosures

cc: Martha Brown (w/enc.)

1 conf records

DOCUMENT NUMBER-DATE

05623 JUN 27 08

FPSC-COMMISSION CLERK

**BEFORE THE
FLORIDA PUBLIC SERVICE COMMISSION**

In re: Florida Power & Light Company's)	Docket No. 080203-EI
Petition to Determine Need for West County)	
Energy Center Unit 3 Electrical Power Plant)	
)	
In re: Florida Power & Light Company's)	Docket No. 080245-EI
Petition to Determine Need for Conversion of)	
Riviera Plant)	
)	
In re: Florida Power & Light Company's)	Docket No. 080246-EI
Petition to Determine Need for Conversion of)	
Cape Canaveral Plant)	Filed: June 27, 2008
)	

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

COMES NOW, BEFORE THIS COMMISSION, Florida Power & Light Company ("FPL"), by and through undersigned counsel, and pursuant to Rule 25-22.006, Florida Administrative Code, and Section 366.093, Florida Statutes, hereby requests confidential classification of FPL's Late Filed Hearing Exhibit No. 100. In support of its request, FPL states as follows:

1. The confidential information is contained in Attachment No. 1 of the Late Filed Hearing Exhibit No. 100 which was requested to be filed during the hearing on June 23, 2008.
2. The following exhibits are included herewith and made a part hereof:
 - a. Exhibit A consists of the document for which FPL seeks confidential treatment, whether in whole or in part. All information in Exhibit A that FPL asserts is entitled to confidential treatment has been highlighted. Exhibit A is submitted separately in a sealed folder marked "CONFIDENTIAL."

b. Exhibit B consists of an edited version of the document for which FPL seeks confidential treatment, and the non-confidential documents that are part of FPL's Late Filed Hearing Exhibit No. 100. All information for which FPL requests confidential treatment has been redacted in Exhibit B.

c. Exhibit C is a table containing a column-by-column and row-by-row identification of the information for which confidential treatment is sought, reference to the specific statutory basis for the claim of confidentiality, and the name of the affiant who supports the requested confidential classification. Exhibit C is sometimes referred to hereinafter as the "Justification Table."

d. Exhibit D is the affidavit of Heather C. Stubblefield in support of this request.

3. FPL submits that the highlighted information in Exhibit A is proprietary, confidential business information within the meaning of Section 366.093(3), Florida Statutes. To the best of FPL's knowledge, the highlighted information has not been publicly disclosed. Pursuant to Section 366.093, Florida Statutes, such information is entitled to confidential treatment and is exempt from the disclosure provisions of the public records law. Thus, once the Commission determines that the information in question is proprietary, confidential business information, the Commission is not required to engage in any further analysis or review such as weighing the harm of disclosure against the public interest in access to the information.


4. As the affidavit of Heather C. Stubblefield indicates, the confidential information consists of proprietary, confidential business information of FPL. If publicly disclosed, this information would harm the efforts of FPL to contract for goods or services on favorable terms. This information is protected by Section 366.093(3)(e), Florida Statutes.

5. Upon a finding by the Commission that the material in Exhibit A for which FPL seeks confidential treatment is proprietary, confidential business information within the meaning of Section 366.093(3), pursuant to Section 366.093(4), such materials 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.

WHEREFORE, for the above and foregoing reasons, as more fully set forth in the supporting materials and affidavit included herewith, Florida Power & Light Company respectfully requests that its request for confidential classification be granted.

Respectfully submitted this 27th day of June, 2008.

R. Wade Litchfield, Vice President
and Associate General Counsel
Bryan S. Anderson
Stephen L. Huntoon
Jessica A. Cano
Attorneys for Florida Power & Light Company
700 Universe Boulevard
Juno Beach, Florida 33408-0420

By: 

Jessica A. Cano
Florida Bar No. 0037372

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of Florida Power & Light Company's Request for Confidential Classification has been hand-delivered this 27th day of June, 2008, to the following:

Martha Brown, Esquire
Senior Attorney
Florida Public Service Commission
Gerald L. Gunter Building
2540 Shumard Oak Boulevard
Tallahassee, Florida 32399-0850

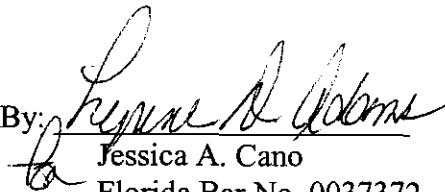
By: 
Jessica A. Cano
Florida Bar No. 0037372

EXHIBIT B

DOCUMENT NUMBER-DATE
05623 JUN 27 8
FPSC-COMMISSION CLERK

Q.

Late Filed Hearing Exhibit No. 100 - Natural gas analysis.

A.

FPL's analysis of the long-term supply of natural gas, based on data received from The PIRA Energy Group, a reputable energy consulting firm, and the Energy Information Administration (EIA), shows that sufficient long-term supplies of natural gas will be available to meet the requirements of WCEC 3 and the Conversion of Canaveral and Riviera plants. Attached is the confidential North American natural gas data provided by The PIRA Energy Group and publicly available information from the Energy Information Administration website (www.eia.doe.gov; Forecasts & Analysis; Annual Energy Outlook 2008; Reference Case; Table 13 Natural gas Supply, Disposition, and Prices). The data from The PIRA Energy Group is currently used in FPL's internal analyses to determine both the availability and sources of natural gas supply for FPL's existing and future units.

DOCUMENT NUMBER-DATE

05623 JUN 27 08

FPSC-COMMISSION CLERK

ENERGY INFORMATION ADMINISTRATION: ANNUAL ENERGY OUTLOOK 2008 WITH PROJECTIONS TO 2030 (REVISED EARLY RELEASE)

Report #00070001-0103(2008)
Release Date: March 2008 (Revised)
Previous Release Date: December 2007
Next Release Date: December 2008
Full report available June 23, 2008

Table 13. Natural Gas Supply, Disposition, and Prices
(trillion cubic feet, unless otherwise noted)

	2005	2006	2007	2008	2009	2010	2011	2012	2013	2014	2015	2016	2017	2018	2019	2020	2021	2022	2023	2024	2025	2026	2027	2028	2029	2030	2006-2030	
Production																												
Dry Gas Production 1/	18.07	18.51	19.00	19.18	19.28	19.29	19.26	19.40	19.41	19.39	19.52	19.64	19.62	18.53	19.41	19.67	19.98	19.98	19.79	19.72	18.60	19.70	19.66	19.59	19.48	19.43	0.2%	
Supplemental Natural Gas 2/	0.06	0.06	0.06	0.06	0.06	0.06	0.06	0.06	0.06	0.06	0.06	0.06	0.06	0.06	0.06	0.06	0.06	0.06	0.06	0.06	0.06	0.06	0.06	0.06	0.06	0.06	0.1%	
Net Imports	3.81	3.46	3.80	3.85	3.05	3.85	4.01	4.02	5.83	3.92	4.03	4.08	4.04	3.87	3.60	3.55	3.27	3.21	3.28	3.27	3.19	3.20	3.23	3.18	3.18	3.18	-0.4%	
Pipeline 3/	3.05	2.94	3.08	2.95	2.85	2.64	2.56	2.41	2.22	2.07	1.91	1.80	1.87	1.56	1.45	1.18	1.00	0.90	0.82	0.78	0.68	0.62	0.53	0.46	0.38	0.33	-8.7%	
Liquefied Natural Gas	0.57	0.52	0.74	0.90	0.99	1.20	1.44	1.61	1.61	1.85	2.12	2.28	2.37	2.41	2.45	2.37	2.27	2.31	2.46	2.49	2.60	2.57	2.66	2.77	2.80	2.84	7.3%	
Total Supply	21.75	22.03	22.86	23.09	23.29	23.20	23.33	23.49	23.50	23.38	23.61	23.79	23.73	23.67	23.37	23.28	23.29	23.25	23.14	23.08	22.94	22.95	22.93	22.89	22.73	22.68	0.1%	
Consumption by Sector																												
Residential	4.83	4.37	4.73	4.83	4.89	4.81	4.85	4.91	4.84	4.97	5.01	5.05	5.07	5.09	5.11	5.15	5.16	5.18	5.19	5.20	5.19	5.19	5.19	5.20	5.18	5.17	0.7%	
Commercial	3.00	2.83	3.02	3.05	2.95	2.96	3.01	3.06	3.11	3.15	3.20	3.24	3.27	3.30	3.33	3.37	3.41	3.44	3.47	3.50	3.53	3.56	3.59	3.61	3.64	3.67	1.1%	
Industrial 4/	6.50	6.48	6.80	6.84	6.90	6.95	7.03	7.04	7.03	7.02	7.00	6.97	6.95	6.94	6.92	6.93	6.88	6.98	6.96	6.97	6.96	6.96	6.95	6.93	6.90	6.87	0.2%	
Natural Gas-to-Liquids Heat and Power 5/	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	--	
Natural Gas-to-Liquids Production 6/	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	--	
Electric Power 7/	5.87	6.24	6.78	6.83	6.77	6.70	6.84	6.87	6.42	6.41	6.58	6.66	6.58	6.37	6.15	5.92	5.77	5.67	5.52	5.41	5.30	5.26	5.22	5.17	5.04	4.99	-0.9%	
Transportation 8/	0.01	0.02	0.02	0.03	0.03	0.03	0.04	0.04	0.05	0.05	0.08	0.08	0.06	0.06	0.07	0.07	0.07	0.07	0.08	0.08	0.08	0.08	0.08	0.08	0.08	0.09	6.2%	
Pipeline Fuel	0.58	0.58	0.61	0.60	0.62	0.62	0.63	0.63	0.63	0.64	0.64	0.64	0.64	0.64	0.64	0.64	0.64	0.64	0.64	0.64	0.64	0.64	0.64	0.64	0.64	0.64	0.64	0.8%
Lease and Plant Fuel 9/	1.11	1.14	1.15	1.13	1.16	1.18	1.18	1.18	1.18	1.18	1.18	1.20	1.20	1.19	1.19	1.22	1.25	1.25	1.24	1.24	1.24	1.24	1.24	1.24	1.24	1.23	0.3%	
Total	22.01	21.66	22.90	23.12	23.31	23.25	23.37	23.54	23.35	23.42	23.86	23.83	23.76	23.81	23.42	23.33	23.34	23.30	23.18	23.10	22.99	23.00	22.97	22.93	22.78	22.72	0.2%	
Discrepancy 8/	-0.26	0.37	-0.04	-0.03	-0.02	-0.05	-0.05	-0.05	-0.05	-0.05	-0.05	-0.05	-0.05	-0.04	-0.05	-0.05	-0.05	-0.04	-0.05	-0.04	-0.04	-0.04	-0.04	-0.05	-0.05	-0.05	--	
Natural Gas Prices																												
(2008 dollars per million Btu)																												
Henry Hub Spot Price	8.93	6.73	6.78	7.23	7.35	6.90	6.88	6.37	6.16	5.99	5.87	5.82	5.89	5.97	6.05	5.95	5.82	5.95	6.08	6.25	6.38	6.56	6.61	6.86	7.06	7.22	0.3%	
Average Lower 48 Wellhead Price 10/	7.82	6.24	6.03	6.39	6.58	6.16	5.85	5.67	5.49	5.32	5.21	5.17	5.24	5.31	5.38	5.29	5.17	5.29	5.41	5.56	5.69	5.84	5.86	6.12	6.30	6.45	0.1%	
(2008 dollars per thousand cubic feet)																												
Average Lower 48 Wellhead Price 11/	7.85	6.42	6.21	6.58	6.75	6.33	6.02	5.84	5.64	5.48	5.36	5.32	5.39	5.46	5.54	5.44	5.32	5.44	5.57	5.72	5.86	6.01	6.06	6.30	6.48	6.63	0.1%	
Delivered Prices																												
Residential	13.23	13.60	12.99	13.64	13.63	12.52	12.22	12.02	11.81	11.84	11.54	11.51	11.82	11.73	11.82	11.74	11.83	11.76	11.83	12.11	12.29	12.50	12.80	12.87	13.10	13.30	-0.2%	
Commercial	11.86	11.85	11.06	11.41	11.49	10.91	10.62	10.44	10.22	10.06	9.97	9.95	10.06	10.17	10.27	10.20	10.10	10.26	10.42	10.81	10.78	10.99	11.08	11.36	11.58	11.78	0.0%	
Industrial 4/	8.62	7.89	7.25	7.65	7.83	7.43	7.10	6.89	6.65	6.46	6.33	6.28	6.35	6.42	6.48	6.40	6.27	6.39	6.50	6.64	6.76	6.91	6.95	7.19	7.36	7.50	-0.2%	
Electric Power 7/	6.67	7.07	7.09	7.45	7.51	7.16	6.84	6.67	6.42	6.23	6.10	6.05	6.10	6.15	6.21	6.11	5.97	6.09	6.18	6.31	6.44	6.56	6.62	6.85	6.99	7.13	0.0%	
Transportation 8/	14.97	14.71	13.86	14.24	14.45	14.01	13.65	13.40	13.11	12.68	12.71	12.61	12.83	12.64	12.68	12.52	12.33	12.40	12.46	12.58	12.65	12.77	12.78	12.97	13.10	13.22	-0.4%	
Average 12/	10.22	9.49	9.01	9.34	9.45	8.97	8.67	8.48	8.29	8.12	8.00	7.97	8.06	8.16	8.27	8.22	8.11	8.26	8.40	8.57	8.73	8.91	8.99	9.25	9.45	9.63	0.1%	

1/ Marketed production (wet) minus extraction losses
2/ Synthetic natural gas, propane air, coke oven gas, refinery gas, biomass gas, air injected for Btu stabilization, and manufactured gas commingled and distributed w natural gas.
3/ Includes any natural gas regasified in the Bahamas and transported via pipeline to Florida, as well as gas from Canada and Mexico
4/ Includes energy for combined heat and power plants, except those whose primary business is to sell electricity, or electricity and heat, to the publ
5/ Includes any natural gas used in the process of converting natural gas to liquid fuel that is not actually converted
6/ Includes any natural gas converted into liquid fuel
7/ Includes consumption of energy by electricity-only and combined heat and power plants whose primary business is to sell electricity, or electricity and heat, to public. Includes small power producers and exempt wholesale generation
8/ Compressed natural gas used as vehicle fuel
9/ Represents natural gas used in well, field, and lease operations, and in natural gas processing plant machines
10/ Balancing item. Natural gas lost as a result of converting flow data measured at varying temperatures and pressures to a standard temperature and pressure and t merger of different data reporting systems which vary in scope, format, definition, and respondent type. In addition, 2005 and 2006 values include net storage injectio
11/ Represents lower 48 onshore and offshore supplies
12/ Compressed natural gas used as a vehicle fuel. Price includes estimated motor vehicle fuel taxes and estimated dispensing costs or charge
13/ Weighted average prices. Weights used are the sectoral consumption values excluding lease, plant, and pipeline fu
-- = Not applicable.
Note: Totals may not equal sum of components due to independent rounding. Data for 2005 and 2006 are model results and may differ slightly from official EIA data repo
Sources: 2005 supply values; and lease, plant, and pipeline fuel consumption: Energy Information Administration (EIA), Natural Gas Annual 2005, DOE/EIA-0131(20 (Washington, DC, November 2006). 2006 supply values; and lease, plant, and pipeline fuel consumption; and wellhead price: EIA, Natural Gas Monthly, DOE/EIA-0136(2007/ (Washington, DC, April 2007). Other 2005 and 2006 consumption based on: EIA, Annual Energy Review 2006, DOE/EIA-0394(2006) (Washington, DC, June 2007). 2/ wellhead price: Minerals Management Service and EIA, Natural Gas Annual 2005, DOE/EIA-0131(2005) (Washington, DC, November 2006). 2005 residential and commarc delivered prices: EIA, Natural Gas Annual 2005, DOE/EIA-0131(2005) (Washington, DC, November 2006). 2006 residential and commercial delivered prices: EIA, Natu Gas Monthly, DOE/EIA-0136 (2007/04) (Washington, DC, April 2007). 2005 and 2006 electric power prices: EIA, Electric Power Monthly, DOE/EIA-0226, May 2006 throu April 2007, Table 4.11.A. 2005 and 2006 industrial delivered prices are estimated based on: EIA, Manufacturing Energy Consumption Survey 1994 and Industrial wellhead prices from the Natural Gas Annual 2005, DOE/EIA-0131(2005) (Washington, DC, November 2006) and the Natural Gas Monthly, DOE/EIA-0136(2007/ (Washington, DC, April 2007). 2005 transportation sector delivered prices are based on: EIA, Natural Gas Annual 2005, DOE/EIA-0131(2005) (Washington, DC, November 20 and estimated state taxes, federal taxes, and dispensing costs or charges. 2006 transportation sector delivered prices are model results. Projections: EIA, AEO20 National Energy Modeling System run aeo2008.d0362081

EXHIBIT C

DOCUMENT NUMBER-DATE

05623 JUN 27 8

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EXHIBIT C

COMPANY: Florida Power & Light Company
TITLE: Petition to determine need for West County Energy Center Unit 3 electrical power plant, petition for determination of need for conversion of Cape Canaveral Plant in Brevard County, petition for determination of need for conversion of Riviera Plant in Palm Beach County, by Florida Power & Light Company
DOCKET NO. Consolidated Docket Nos. 080203-EI, 080245-EI, and 080246-EI

Description	No. of Pages	Conf. Y/N	Line No./Col. No.	Florida Statute 366.093(3) Subsection	Affiant
The PIRA Energy Group, North American natural gas supply & demand balance	1	Y	rows B to L, lines 10 to 49	(e)	Heather C. Stubblefield

EXHIBIT D

DOCUMENT NUMBER-DATE

05623 JUN 27 8

FPSC-COMMISSION CLERK

EXHIBIT D

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

STATE OF FLORIDA)
) AFFIDAVIT OF HEATHER C. STUBBLEFIELD
PALM BEACH COUNTY)

BEFORE ME, the undersigned authority, personally appeared Heather C. Stubblefield who, being first duly sworn, deposes and says:

1. My name is Heather C. Stubblefield. I am currently employed by Florida Power & Light Company (FPL) as Manager of Project Development. My business address is 700 Universe Boulevard, Juno Beach, FL 33408. I have personal knowledge of the matters stated in this affidavit.

2. With respect to Exhibit C, I have reviewed the documents that are included in Exhibit A to FPL's Request for Confidential Classification. Documents or materials that I have reviewed and which are asserted by FPL to be proprietary confidential business information contain or constitute contractual vendor data, such as forecasted demand and supply for natural gas, the disclosure of which would impair the competitive business of the provider of the information. To the best of my knowledge, FPL has maintained the confidentiality of these documents and materials.

3. This proprietary confidential business information will continue to be competitively sensitive beyond an 18-month period, for at least 36 months. Therefore, this information should remain confidential for a period of not less than 36 months. In addition, the documents 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.

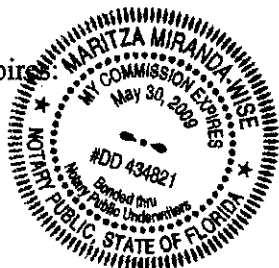
4. Affiant says nothing further.

Heather C. Stubblefield
Heather C. Stubblefield

SWORN TO AND SUBSCRIBED before me this 26th day of June 2008, by Heather C. Stubblefield, who is personally known to me or who has produced personally known (type of identification) as identification and who did take an oath.

Maria Miranda Wise
Notary Public, State of Florida

My Commission Expires:



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COMMISSIONERS:
MATTHEW M. CARTER II, CHAIRMAN
LISA POLAK EDGAR
KATRINA J. MCMURRIAN
NANCY ARGENZIANO
NATHAN A. SKOP

STATE OF FLORIDA



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

Public Service Commission

ACKNOWLEDGEMENT

DATE: June 27, 2008

TO: Jessica A. Cano, 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 080203-EI; 080245-EI; 080246-EI (DN 05624-08) or, if filed in an undocketed matter, concerning Attachment No. 1 of late filed Hearing Exhibit No. 100, 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.