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July 6, 2012

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

claim of confidentiality
 notice of intent
 request for confidentiality
 filed by OPC

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RECEIVED-FPSC
12 JUL -6 PM 2:45
COMMISSION
CLERK

Re: Docket No. 120009-EI; Nuclear Power Plant Cost Recovery Clause

Dear Ms. Cole:

Enclosed for filing on behalf of Florida Power & Light Company ("FPL") is a Request for Confidential Classification of Exhibit WRJ(FPL)-3 to the testimony of William R. Jacobs, Jr. Seven copies of FPL's request, including Exhibits B, C, and D are included. Also included is one copy of Exhibit A.

Exhibit A consists of the confidential document, and all information that FPL asserts is entitled to confidential treatment has been highlighted. Exhibit B is an edited version of Exhibit A, in which the information FPL asserts is confidential has been redacted. Exhibit C consists of FPL's justification table supporting its Request for Confidential Classification. Exhibit D contains one affidavit in support of FPL's Request for Confidential Classification. Also included in this filing is a compact disc containing FPL's Request for Confidential Classification and Exhibit C only in Microsoft Word format.

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

Sincerely,

Jessica Cano

Jessica A. Cano

ECO
ENG
IDM
AFD +CD
COM
APA
ECR
GCL
RAD
SRC
ADM
OPC
CLK Florida Power & Light Company

Enclosures
cc: Parties of Record (w/out enc.)

DOCUMENT NUMBER-DATE

04510 JUL -6 2

FPSC-COMMISSION CLERK

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Nuclear Power Plant)
Cost Recovery Clause _____)

Docket No. 120009-EI
Filed: July 6, 2012

**FLORIDA POWER & LIGHT COMPANY'S
REQUEST FOR CONFIDENTIAL CLASSIFICATION
OF EXHIBIT WRJ(FPL)-3 TO THE TESTIMONY OF WILLIAM JACOBS**

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 included in Exhibit WRJ(FPL)-3 to the testimony of the Office of Public Counsel's witness William Jacobs. In support of its request, FPL states as follows:

1. On June 19, 2012, FPL filed a Notice of Intent to Request Confidential Classification of William Jacobs's and Brian Smith's testimony and exhibits. Pursuant to Rule 25-22.006(3)(a), Florida Administrative Code, FPL has 21 days from the date of the Notice of Intent to file a formal request for confidential classification. Accordingly, FPL is filing this Request for Confidential Classification to maintain continued confidential handling of the information contained in Exhibit WRJ(FPL)-3 to the testimony of William Jacobs. FPL has determined that there is no confidential information in the testimony and other exhibits of OPC's witnesses.

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

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

b. Exhibit B consists of a copy of the confidential exhibit, on which all information that is entitled to confidential treatment has been redacted.

c. Exhibit C is a table containing the specific line and page references to the confidential information, and references to the specific statutory basis or bases for the claim of confidentiality and to the affidavit in support of the requested confidential classification.

d. Exhibit D includes the affidavit of Bruce Beisler in support of this request.

3. FPL submits that the highlighted information in Exhibit A is proprietary confidential business information within the meaning of Section 366.093(3), Florida Statutes. This information is intended to be and is treated by FPL as private in that the disclosure of the information would cause harm to customers or FPL's business operations, and its confidentiality has been maintained. Pursuant to Section 366.093, such information is entitled to confidential treatment and it 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 included in Exhibit D indicates, some of information in Exhibit WRJ(FPL)-3 is proprietary, confidential business information. This information is competitively sensitive information which, if disclosed, could impair FPL's competitive interests and impair FPL's ability to contract for goods or services on favorable terms in the future. Specifically, it could influence future bids received for certain scopes of work in a manner that would be detrimental to FPL and its customers. Such information is protected by Section 366.093(3)(e), Florida Statutes.

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

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

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

Respectfully submitted,

Jessica A. Cano
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Florida Power & Light Company
700 Universe Boulevard
Juno Beach, FL 33408
Telephone: (561) 304-5226
Facsimile: (561) 691-7135

By: Jessica Cano
Jessica A. Cano
Fla. Bar No. 0037372

**CERTIFICATE OF SERVICE
DOCKET NO. 120009-EI**

I HEREBY CERTIFY that a true and correct copy of FPL's Request for Confidential Classification of Exhibit WRJ(FPL)-3 (without exhibits*) was served by hand delivery** or U.S. Mail this 6th day of July, 2012 to the following:

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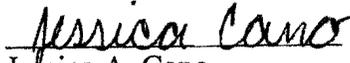
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By:


Jessica A. Cano
Fla. Bar No. 0037372

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

REDACTED

EXHIBIT B

COM _____
APA _____
ECR _____
GCL _____
RAD _____
SRC _____
ADM _____
OPC _____
CLK _____

DOCUMENT NUMBER-DATE

04510 JUL-6 2

FPSC-COMMISSION CLERK

CONFIDENTIAL

**FPL EPU PROJECT - TURKEY POINT NUCLEAR PLANT
 ESTIMATE AT COMPLETION**

COMPARATIVE DATA

Quantities

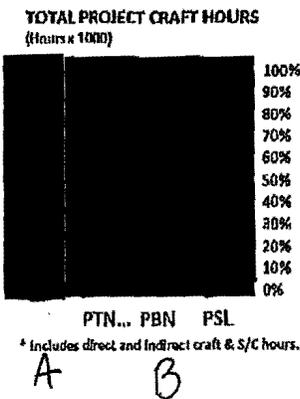
For quantitative and comparative purposes, the chart at the right demonstrates the differences between PTN and St Lucie (PSL). Excluded are demolition, remove and replace quantities.

QUANTITY COMPARISON

COMMODITY	UOM	PSL	PTN	MULTIPLE
1 LARGE PIPE	LF	2,146	16,210	7.6
2 SMALL PIPE	LF	3,095	9,103	2.9
3 PIPE SUPPORTS	EA	565	2,736	4.8
4 LARGE VALVES	EA	22	559	25.4
5 SMALL VALVES	EA	499	1,683	3.4
6 TUBING	LF	1,600	9,453	5.9
7 TRAY	LF	-	2,679	-
8 CONDUIT	LF	15,918	37,632	2.4
9 CABLE	LF	110,710	266,443	2.4

Total Project Craft Hours

Project craft hours for direct and indirect labor total [REDACTED] including support to Siemens, which is roughly 2.6 times Point Beach and 3.1 times PSL project hours. This is driven by over three times the quantities and approximately 28% higher unit rates.



The major craft hour scope differences between PTN and Point Beach and St Lucie are:

- Condenser
- CREVs
- Turbine Digital Controls
- MSR Replacement
- EHC Upgrade
- Normal Containment Cooling



C

The PTN Craft Ramp (shown at the top of the next page) is a gradual build up of staff to support the start of the outage based on processing approximately 50 to 75 craft per week. Also shown is the ramp down after the outage prior to the start of 4R27.

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EXHIBIT C

Exhibit C
Florida Power and Light Company
Exhibit WRJ(FPL)-3 to the Testimony of William R. Jacobs, Jr.
Docket No. 120009-EI

Document	No. of Pages	Conf. Y/N	Line No./Col. No.	Florida Statute 386.093 (3) Subsection	Affiant
Exhibit WRJ(FPL)-3, Comparison of PTN EPU to PSL EPU scope of work	2	N Y	Page 1 Page 2, Line 1 and Columns A-C	(e)	Bruce Beisler

EXHIBIT D

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Nuclear Power Plant Cost)
Recovery Clause)

DOCKET NO. 120009-EI

STATE OF FLORIDA)
)
PALM BEACH COUNTY)

AFFIDAVIT OF BRUCE BEISLER

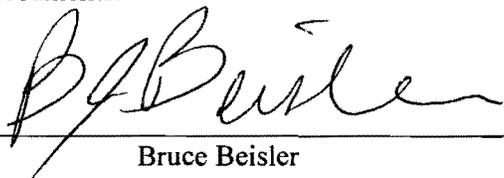
BEFORE ME, the undersigned authority, personally appeared Bruce Beisler who, being first duly sworn, deposes and says:

1. My name is Bruce Beisler. I am currently employed by Florida Power & Light Company ("FPL") as Project Manager - Nuclear. I have personal knowledge of the matters stated in this affidavit.

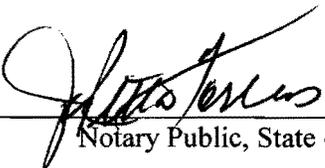
2. I have reviewed Exhibit C and the document that is included as Exhibit A to FPL's Request for Confidential Classification of Exhibit WRJ(FPL)-3, for which I am identified on Exhibit C as the affiant. The document that I have reviewed contains competitively sensitive information that would work to the detriment of FPL's competitive interests and impair FPL's efforts to enter into contracts on commercially favorable terms. Specifically, this information could influence future bids to perform certain scopes of work in a manner detrimental to FPL's and FPL's customers' interests. 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.


Bruce Beisler

SWORN TO AND SUBSCRIBED before me this 5th day of July 2012, by Bruce Beisler, 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

My Commission Expires:

