



Florida Power & Light Company, P.O. Box 14000, Juno Beach, FL 33408-0420  
Law Department

Jessica Cano  
Principal Attorney  
Florida Power & Light Company  
700 Universe Boulevard  
Juno Beach, FL 33408-0420  
(561) 304-5226  
(561) 691-7135 (Facsimile)

June 4, 2014

**VIA HAND DELIVERY**

Ms. Carlotta S. Stauffer  
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

**REDACTED**

RECEIVED FPSC  
14 JUN -4 AM 11:17  
COMMISSION CLERK

Re: Docket No. 140000; FPL's 2014 Ten Year Power Plant Site Plan

Dear Ms. Cole:

Enclosed for filing on behalf of Florida Power & Light Company ("FPL") is a Request for Confidential Classification of its response to Staff's First Set of Data Requests, Question No. 34. 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

COM \_\_\_\_\_  
AFD \_\_\_\_\_  
APA \_\_\_\_\_  
ECO \_\_\_\_\_  
ENG 6 + CD  
GCL 1  
IDM \_\_\_\_\_  
TEL \_\_\_\_\_  
CLK \_\_\_\_\_

Enclosures  
cc: Charles Murphy

**BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION**

In re: Florida Power & Light Company's )  
2013 Ten Year Power Plant Site Plan )

Docket No. 130000  
Filed: June 4, 2014

**FLORIDA POWER & LIGHT COMPANY'S  
REQUEST FOR CONFIDENTIAL CLASSIFICATION  
OF RESPONSE TO STAFF'S FIRST SET OF DATA REQUESTS, NO. 34**

Pursuant to Section 366.093, Florida Statutes, and Rule 25-22.006, Florida Administrative Code, Florida Power & Light Company ("FPL") requests confidential classification of a portion of its response to Staff's First Set of Data Requests, Question No. 34. In support of its request, FPL states:

1. On May 15, 2014, FPL filed a Notice of Intent to Request Confidential Classification of FPL's response. 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 FPL's response to Data Request No. 34.

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

a. Exhibit A consists of a copy of the confidential document on which all information that FPL asserts is entitled to confidential treatment has been highlighted.

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

c. Exhibit C is a table containing an identification of the information highlighted in Exhibit A, together with references to the specific statutory basis or bases for the claim of confidentiality and to the affidavit in support of the requested classification.

d. Exhibit D includes the affidavits of John Hampp 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. Section 366.093, Florida Statutes, defines confidential information as information that is intended to be and is treated by the company as private in that disclosure of the information would cause harm to the company's business operations or its customers, and has not been disclosed publicly. The confidential information is intended to be and has been treated by FPL as private, its confidentiality has been maintained, and its disclosure would cause harm to FPL and its customers. 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, the information provided by FPL contains competitively sensitive data, the public disclosure of which would violate nondisclosure provisions of FPL's contract with Georgia Power Company. Disclosure of this information could impair the competitive business of the provider of the information. 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**, FPL respectfully requests confidential classification of the material described herein.

Respectfully submitted,

Jessica A. Cano  
Principal Attorney  
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. 140000-EI**

I HEREBY CERTIFY that a true and correct copy of FPL's Request for Confidential Classification\* was served by hand delivery this 4th day of June, 2014 to the following:

Charles Murphey, Esq.  
Division of Legal Services  
Florida Public Service Commission  
2540 Shumard Oak Blvd.  
Tallahassee, Florida 32399-0850

By: Jessica Cano  
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.

**EXHIBIT A**

**CONFIDENTIAL**

**FILED UNDER SEPARATE COVER**

**EXHIBIT B**

**REDACTED**

**REDACTED COPIES**

A B C D E F G H I

Estimated Unit Cost of EPA's New and Proposed Rules								
Unit	Unit Type	Fuel Type	Net Summer Capacity (MW)	Estimated Cost of New or Proposed EPA Rules Impacts (2014 \$ millions)				
				MATS	CSAPR/CAIR	CWIS	CCR	Total*
							Non-Hazardous Waste	
Cape Canaveral 3	CC	NG, ULSD	1210	N/A	0	16-255	N/A	16-255
Fort Myers Gas Turbines 1-12	GT	DFO	552	N/A	0	N/A	N/A	0
Fort Myers 2	CC	NG	1366	N/A	0	17-220	N/A	17-220
Fort Myers CT's	GT	NG, ULSD	296	N/A	0	N/A	N/A	0
Lauderdale 4	CC	NG	438	N/A	0	7-59	N/A	7-59
Lauderdale 5	CC	NG	438	N/A	0	7-59	N/A	7-59
Lauderdale Gas Turbines 1-12	GT	NG, DFO	342	N/A	0	N/A	N/A	0
Lauderdale Gas Turbines 13-24	GT	NG, DFO	342	N/A	0	N/A	N/A	0
Port Everglades Gas Turbines 1-12	GT	NG, DFO	342	N/A	0	N/A	N/A	0
Port Everglades 5	CC	NG, ULSD	1219	N/A	0	18-255	N/A	18-255
Riviera 5	CC	NG, ULSD	1219	N/A	0	14-205	N/A	14-205
Sanford 4	CC	NG	950	N/A	0	0.5	N/A	0.5
Sanford 5	CC	NG, DFO	950	N/A	0	0.5	N/A	0.5
Turkey Point 1	ST	NG, RFO	378	N/A	0	N/A	N/A	0
Turkey Point 3	PWR	NUC	811	N/A	N/A	N/A	N/A	0
Turkey Point 4	PWR	NUC	821	N/A	N/A	N/A	N/A	0
Turkey Point 5	CC	NG, ULSD	1070	N/A	0	N/A	N/A	0
Manatee 1	ST	NG, RFO	767	N/A	0	0.03	N/A	0
Manatee 2	ST	NG, RFO	767	N/A	0	0.03	N/A	0
Manatee 3	CC	NG	943	N/A	0	0.03	N/A	0.03
Martin 1	ST	NG, RFO	802	52.1	0	0.02	N/A	55.8
Martin 2	ST	NG, RFO	802	52.1	0	0.02	N/A	55.8
Martin 3	CC	NG, RFO	431	N/A	0	0.02	N/A	0.02
Martin 4	CC	NG	431	N/A	0	0.02	N/A	0.02
Martin 8	CC	NG, ULSD	1079	N/A	0	0.02	N/A	0.02
Martin SOLAR	ST	SUN	75***	N/A	N/A	0.02	N/A	0.02
St. Lucie 1	PWR	NUC	981	N/A	N/A	17-221	N/A	17-221
St. Lucie 2	PWR	NUC	840**	N/A	N/A	17-221	N/A	17-221
Putnam 1	CC	NG, DFO	229	N/A	0	0	N/A	0
Putnam 2	CC	NG, DFO	229	N/A	0	0	N/A	0
West County Energy Center 1	CC	NG, ULSD	1219	N/A	0	N/A	N/A	0
West County Energy Center 2	CC	NG, ULSD	1219	N/A	0	N/A	N/A	0
West County Energy Center 3	CC	NG, ULSD	1219	N/A	0	N/A	N/A	0
SJRPP 1	ST	BIT	125**	2.4	0	0.1	Estimate Not Available from operator	3.5
SJRPP 2	ST	BIT	125**	2.4	0	0.1	Estimate Not Available from operator	3.5
Scherer 4	ST	SUB						
Space Coast Solar Energy	PV	SUN	10	N/A	N/A	N/A	N/A	N/A
Desoto Solar Energy	PV	SUN	25	N/A	N/A	N/A	N/A	N/A

Unit Type: ST = Steam Turbine, GT = Gas Turbine, CC = Combined Cycle, PV = Photovoltaic  
 Fuel Type: NG = Natural Gas, DFO = Distillate Fuel Oil, RFO = Residual Fuel Oil, ULSD = Ultra-Low Sulfur Distillate, BIT = Bituminous Coal, SUB = Sub-Bituminous Coal,  
 SUN = Solar (PV & thermal), NUC = Nuclear  
 Notes: \* Total includes anticipated total project capital expenses for installation  
 \*\* FPL Ownership Share only  
 \*\*\* Unit capability also included in Martin Unit 8 Net Summer Capability



A B C D E F G H I

Estimated Unit Cost of EPA's New and Proposed Rules								
Unit	Unit Type	Fuel Type	Net Summer Capacity (MW)	Estimated Cost of New or Proposed EPA Rules Impacts (2014 \$ millions)				
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West County Energy Center 2	CC	NG, ULSD	1219	N/A	0	N/A	N/A	0
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Unit Type: ST = Steam Turbine, GT = Gas Turbine, CC = Combined Cycle, PV = Photovoltaic  
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 SUN = Solar (PV & thermal), NUC = Nuclear  
 Notes: \* Total includes anticipated total project capital expenses for installation  
 \*\* FPL Ownership Share only  
 \*\*\* Unit capability also included in Martin Unit 8 Net Summer Capability

# **EXHIBIT C**

## **JUSTIFICATION TABLE**

**EXHIBIT C**

**COMPANY:** Florida Power & Light Company  
**TITLE:** List of Confidential Documents  
**DOCKET:** 2014 Ten Year Site Plan

<b>Document</b>	<b>Description</b>	<b>No. of Pages</b>	<b>Conf. Y/N</b>	<b>Line No./Col. No.</b>	<b>Florida Statute 366.093(3)</b>	<b>Affiant</b>
Response to Staff's 1 <sup>st</sup> DR, Question 34	Estimated Unit Cost of EPA's New and Proposed Rules	1	Y	Line 1, Col. D-I	(e)	John Hampp

**EXHIBIT D**

**AFFIDAVIT**

**BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION**

In re: Florida Power & Light Company's )  
2014 Ten Year Power Plant Site Plan )

DOCKET NO. 140000

STATE OF FLORIDA )  
 )  
PALM BEACH COUNTY )

**AFFIDAVIT OF JOHN HAMPP**

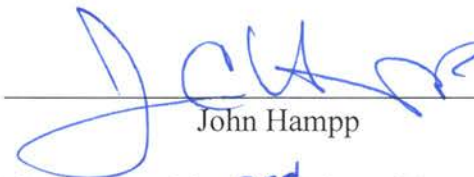
**BEFORE ME**, the undersigned authority, personally appeared John Hampp who, being first duly sworn, deposes and says:

1. My name is John Hampp. I am currently employed by Florida Power & Light Company ("FPL") as Environmental Services Manager. I have personal knowledge of the matters stated in this affidavit.

2. I have reviewed Exhibit C and the document that is included with FPL's Request for Confidential Classification of Response to Data Request No. 34, for which I am identified on Exhibit C as the affiant. The document that I have reviewed contains proprietary confidential business information related to Scherer Unit 4 which FPL is obligated by contract with Georgia Power Company not to disclose publicly. Disclosure of this information would impair the competitive interests of the provider of this information. To the best of my knowledge, FPL has maintained the confidentiality of this information.

3. 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 this document.

4. Affiant says nothing further.

  
\_\_\_\_\_  
John Hampp

**SWORN TO AND SUBSCRIBED** before me this 3<sup>rd</sup> day of June, 2014, by John Hampp, 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:

