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REDACTED

March 6, 2015

VIA HAND DELIVERY

Ms. Carlotta S. Stauffer
Commission Clerk
Florida Public Service Commission
2540 Shumard Oak Blvd.
Tallahassee, FL 32399-0850

RECEIVED-FPSC
15 MAR -6 PM 1:03
COMMISSION
CLERK

Re: In re: Florida Power & Light Company's Petition for Approval of Arrangement To Mitigate Impact of Unfavorable Cedar Bay Power Purchase Obligation

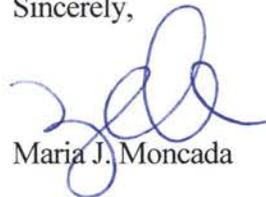
Dear Ms. Stauffer:

Enclosed for filing on behalf of Florida Power & Light Company ("FPL") are an original and seven (7) copies of FPL's Request for Confidential Classification. The original includes Exhibits A through D. The seven copies do not include copies of the exhibits.

Exhibit A contains the confidential information that is the subject of FPL's Request for Confidential Classification. Exhibit A consists of the confidential documents and all the 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 is a justification table in support of FPL's Request for Confidential Classification. Exhibit D contains two affidavits 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, in Microsoft Word format.

Please contact me should you or your Staff have any questions regarding this filing.

Sincerely,


Maria J. Moncada

COM _____
AFD _____
APA _____
ECO 2
ENG 3^{rcd} + Redacted
GCL 2
IDM _____
TEL _____
CLK _____

Enclosures

cc: parties of record, (Request for Confidential Classification w/o exhibits)

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Florida Power & Light Company's
Petition for Approval of Arrangement To
Mitigate Impact of Unfavorable Cedar Bay
Power Purchase Obligation

Docket No: 15 _____-EI

Date: March 6, 2015

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

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 contained in the prepared testimony of FPL witness Tom L. Hartman (TLH-2) and David Herr (DH-3) in this proceeding. In support of its Request, FPL states as follows:

1. On March 6, 2015, FPL filed the testimony of FPL witnesses Tom Hartman and David Herr in support of FPL's Petition for Approval of Arrangement To Mitigate Impact of Unfavorable Cedar Bay Power Purchase Obligation. Exhibit TLH-2 to the testimony of Tom Hartman and Exhibit DH-3 to the testimony of David Herr contain confidential information. Pursuant to Rule 25-22.006 FPL files this Request for Confidential Classification.

2. The following exhibits are included with this Request:

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

b. Exhibit B consists of pages identifying the title of the exhibits and noting that the contents are confidential. Because FPL seeks confidential classification of the exhibits in their entirety, no purpose would be served by reproducing a full redacted version.

c. Exhibit C is a table that identifies the specific statutory bases for the claim of confidentiality and to the affiants who support the requested classification.

d. Exhibit D is comprised of the affidavits of Tom Hartman and David Herr in support of this Request for Confidential Classification.

3. FPL submits that the highlighted information in Exhibit A is proprietary confidential business information within the meaning of Section 366.093(3), F.S. This information is intended to be and is treated by FPL as private, and its confidentiality has been maintained. Pursuant to Section 366.093, such information is entitled to confidential treatment and is exempt from the disclosure provisions of the public records law. Thus, once the Commission determined 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 hard of disclosure against the public interest in access to the information.

4. As the affidavits included as Exhibit D indicate, some of the information provided by FPL contains information concerning contractual data, the disclosure of which would impair the efforts of FPL or its affiliates to contract for goods or services on favorable terms. Such information is protected by Section 366.093(3)(d), F.S. Other information includes proprietary information concerning the competitive interest of FPL or third parties, the disclosure of which would impair the competitive business of the provider of the information. Such information is protected by Section 366.093(3)(e).

5. Exhibit TLH-2 contains information related to the specific negotiated terms between FPL and CBAS Holdings, LLC for the Cedar Bay Transaction, the disclosure of which would impair FPL's ability or position to attain favorable transactions for the benefit of its customers in the future. Likewise, disclosure would impair CBAS Holdings, LLC's ability to negotiate terms with third parties indirectly affected by the Cedar Bay Transaction. Such information is protected by Sections 366.093(3)(d) and (e), F.S.

6. Exhibit DH-3 contains information is related to the competitive interests of Duff & Phelps, Inc., an independent valuation consultant. Exhibit DH-3 consists of a highly detailed valuation assessment prepared by Duff & Phelps, which, if disclosed, would reveal the proprietary methodology that Duff & Phelps employs in performing valuations. Such public disclosure would impair the competitive businesses of Duff & Phelps.

7. Upon a finding by the Commission that the Confidential Information is proprietary confidential business information within Section 366.093(3), such information should not be declassified for 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. § 366.093(4), Fla. Stat.

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

Respectfully submitted,

R. Wade Litchfield, Esq.
Vice President and General Counsel
John T. Butler, Esq.
Assistant General Counsel – Regulatory
Maria J. Moncada
Principal Attorney
Florida Power & Light Company
700 Universe Boulevard
Juno Beach, FL 33408
Telephone: (561) 304-5639
Facsimile: (561) 691-7135

By: _____

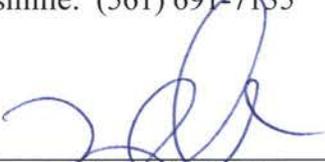

Maria J. Moncada
Fla. Bar No. 0773301

EXHIBIT B

REDACTED COPIES

Documents included in Exhibit TLH-2 are confidential in their entirety.

Documents included in Exhibit DH-3 are confidential in their entirety.

EXHIBIT C

JUSTIFICATION TABLE

EXHIBIT C

COMPANY: Florida Power & Light Company
TITLE: Request for Confidential Classification of Exhibits TLH-2 and DH-3
DOCKET TITLE: In re: Florida Power & Light Company's Petition for Approval of Arrangement To Mitigate Impact of Unfavorable Cedar Bay Power Purchase Obligation
DATE: March 6, 2015

Description	Page No.	Conf. Y/N	Col. No./ Line No.	Florida Statute 366.093(3) Subsection	Affiant
Exhibit TLH-2 Purchase and Sales Agreement	65	Y	ALL	(d), (e)	T. Hartman
Exhibit DH-3 Valuation of CBAS Power Holdings LLC	60	Y	ALL	(d), (e)	D. Herr

EXHIBIT D

AFFIDAVITS

EXHIBIT D

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Florida Power & Light Company's
Petition for Approval of Arrangement To
Mitigate Impact of Unfavorable Cedar Bay
Power Purchase Obligation

STATE OF FLORIDA)
)
COUNTY OF PALM BEACH)

AFFIDAVIT OF TOM HARTMAN

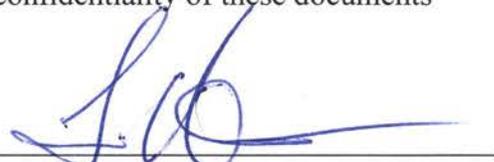
BEFORE ME, the undersigned authority, personally appeared Tom Hartman who, being first duly sworn, deposes and says:

1. My name is Tom Hartman. I am currently employed by Florida Power & Light Company ("FPL") as Director Business Development in the Energy Marketing and Trading Division. I have personal knowledge of the matters stated in this affidavit.

2. I have reviewed and have personal knowledge about Exhibit TLH-2, included in Exhibit A to FPL's Request for Confidential Classification. Exhibit TLH-2 contains information concerning contractual data, the disclosure of which would impair the efforts of FPL or its affiliates to contract for goods or services on favorable terms. It also includes proprietary information concerning the competitive interest of FPL and third parties, the disclosure of which would impair the competitive business of the provider of the information. Specifically, Exhibit TLH-2 consists of the specific negotiated terms between FPL and CBAS Holdings, LLC for the Cedar Bay Transaction, the disclosure of which would impair FPL's ability or position to attain favorable transactions for the benefit of its customers in the future. Likewise, disclosure would impair CBAS Holdings, LLC's ability to negotiate terms with third parties indirectly affected by the Cedar Bay Transaction.

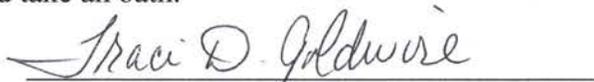
3. Consistent with the provisions of the Florida Administrative Code, such materials should remain confidential for a period of eighteen (18) months. In addition, they should be returned to FPL as soon as the information is no longer necessary for the Commission to conduct its business so that FPL can continue to maintain the confidentiality of these documents

4. Affiant says nothing further.



Tom Hartman

SWORN TO AND SUBSCRIBED before me this 5th day of March 2015, by Tom Hartman, who is personally known to me or who has produced personally known (type of identification) as identification and who did take an oath.



Notary Public, State of Florida

My Commission Expires:



EXHIBIT D

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Florida Power & Light Company's
Petition for Approval of Arrangement To
Mitigate Impact of Unfavorable Cedar Bay
Power Purchase Obligation

STATE OF TEXAS)
)
COUNTY OF HARRIS)

AFFIDAVIT OF DAVID HERR

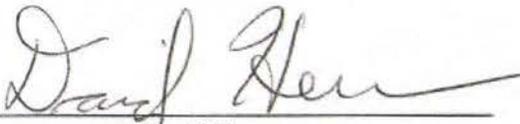
BEFORE ME, the undersigned authority, personally appeared David Herr who, being first duly sworn, deposes and says:

1. My name is David Herr. I am currently employed by Duff & Phelps LLC as Managing Director, the Philadelphia City Leader, and the Energy and Mining Industry leader. I have personal knowledge of the matters stated in this affidavit.

2. I have reviewed and have personal knowledge about Exhibit DH-3, included in Exhibit A to FPL's Request for Confidential Classification. Exhibit DH-3 is the valuation of the tangible and intangible assets of CBAS Power, Inc. which was performed by Duff & Phelps, Inc. This highly detailed valuation report identifies with specificity the proprietary methodology that Duff & Phelps employs in performing such valuations. Accordingly, public disclosure would impair the competitive businesses of Duff & Phelps and therefore should be treated confidentially. To the best of my knowledge, FPL and Duff & Phelps have maintained the confidentiality of these documents and materials.

3. Consistent with the provisions of the Florida Administrative Code, such materials should remain confidential for a period of eighteen (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.



David Herr

SWORN TO AND SUBSCRIBED before me this 6th day of March 2015, by David Herr, who is personally known to me or who has produced a Pennsylvania DL as identification and who did take an oath.



Notary Public, State of Texas

My Commission Expires:
February 29, 2016

