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October 19, 2015

VIA HAND DELIVERY

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

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COMMISSION
CLERK

Re: Docket No. 150001-EI

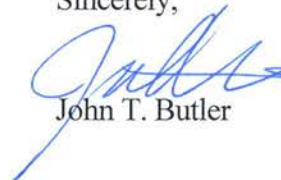
Dear Ms. Stauffer:

I enclose for filing in the above docket FPL's Request for Confidential Classification of Certain Information Provided in Response to Staff's Fourteenth Set of Interrogatories No. 90. The Request includes Exhibits A, B, C and D.

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 the affidavit in support of FPL's Request for Confidential Classification.

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

Sincerely,


John T. Butler

COM
AFD Redacted
APA _____
ECO _____
ENG _____
GCL _____
IDM _____
TEL _____
CLK _____

Enclosures

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

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Fuel and purchase power cost recovery
clause with generating performance incentive
factor

Docket No: 150001-EI
Date: October 19, 2015

**FLORIDA POWER & LIGHT COMPANY'S REQUEST FOR
CONFIDENTIAL CLASSIFICATION OF INFORMATION PROVIDED
IN RESPONSE TO STAFF OF THE FLORIDA PUBLIC SERVICE
COMMISSION'S FOURTEENTH SET OF INTERROGATORIES (No. 90)**

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 response to the Staff of the Florida Public Service Commission's ("Staff") Fourteenth Set of Interrogatories (No. 90) ("Confidential Discovery Responses"). In support of its Request, FPL states as follows:

1. On September 28, 2015, Staff served its Fourteenth Set of Interrogatories (No. 90) on FPL. FPL's Response to Staff's Fourteenth Set of Interrogatories (No. 90) contains information of a confidential nature, which is proprietary confidential business information within the meaning of Section 366.093(3), Florida Statutes.

2. FPL served its responses to Staff's Fourteenth Set of Interrogatories (No. 90) on October 19, 2015. This request is being filed contemporaneously with the service of FPL's responses to Staff's discovery in order to request confidential classification of the Confidential Discovery Responses consistent with Rule 25-22.006, Florida Administrative Code.

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

a. Exhibit A consists of a copy of the Confidential Discovery Responses on which all information that FPL asserts is entitled to confidential treatment is highlighted.

b. Exhibit B consists of an edited version of the Confidential Discovery Responses on which all information that FPL asserts is entitled to confidential treatment is redacted.

c. Exhibit C is a table containing an identification of the information highlighted in Exhibit A by page and line and a brief description of the Confidential Information. Exhibit C also references the specific statutory bases for the claim of confidentiality and identifies the affiant who supports of the requested classification.

d. Exhibit D is the affidavit of Gerard J. Yupp, Senior Director of Wholesale Operation in the Energy Marketing and Trading Division.

4. 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, 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.

5. As the description included in Exhibit C and the affidavit included in Exhibit D indicate, the Confidential Discovery Responses provided by FPL contains information related to information concerning bids or other contractual data, the disclosure of which would impair the efforts of FPL and its vendors to contract for goods or services on favorable terms. This information is protected by Section 366.093(3)(d), Fla. Stat.

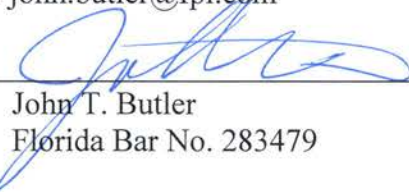
6. Upon a finding by the Commission that the Confidential Information remains proprietary and confidential business information, the information should not be declassified for at least an additional eighteen (18) month period and should be returned to FPL as soon as it is no longer necessary for the 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 affidavits included herewith, Florida Power & Light Company respectfully requests that its Request for Confidential Classification be granted.

Respectfully submitted,

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By: _____


John T. Butler
Florida Bar No. 283479

CERTIFICATE OF SERVICE
Docket No. 150001-EI

I HEREBY CERTIFY that a true and correct copy of the foregoing* has been furnished by electronic mail on this 19th day of October 2015 to the following:

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By: _____



John T. Butler
Florida Bar No. 283479

* 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 COPIES

Florida Power & Light Company
Docket No. 150001-EI
Staff's 14th Set of Interrogatories
Interrogatory No. 90
Page 1 of 1

Q. Please refer to Florida Power & Light Company's response to Staff Interrogatory No. 74. Please update the information in the chart for actual data for August and September 2015.

A.

A

	Market Price @ Perryville Hub \$/MMBtu	Delivered Cost of Woodford Project gas @ Perryville in \$/MMBtu	Transportation Cost of Woodford Project gas delivered to Perryville in \$/MMBtu	Other Transportation Cost of Woodford Project gas delivered to Perryville in \$/MMBtu	Quantity of Woodford Project gas delivered to Perryville in MCF	Quantity of Woodford Project gas delivered to Perryville in MMBtu
March 2015	\$2.73	\$6.53		\$0.00	77,354	72,945
April 2015	\$2.52	\$12.59		\$0.00	56,093	52,896
May 2015	\$2.77	\$12.25		\$0.00	61,260	57,768
June 2015	\$2.69	\$6.90		\$0.00	260,262	245,427
July 2015	\$2.78	\$3.90		\$0.00	483,825	456,247
August 2015	\$2.71	\$4.38		\$0.00	1,081,625	1,019,972
September 2015	\$2.57	\$3.73		\$0.00	959,116	904,446
October 2015	\$2.65	\$3.13		\$0.00	1,346,556	1,269,803

Note: Monthly index and volumetric data has been updated to reflect the actual index values and MMBtu amounts delivered by the natural gas transporter to FPL at Perryville/Columbia Gulf Mainline. These values match those included in FPL's hedging activity reports.

Note: The monthly MCF values are based on an average conversion factor of 943 MMBtu/1000MCF.

Note: March through September values are based on actual results. October values are based on estimates.

Note: The variances between projections and actuals for the unit costs and delivered volumes of gas in August and September 2015 are primarily the result of short-term timing differences in the drilling schedule and availability of gathering system capacity for the Woodford Project. Those are temporary events that FPL does not expect to significantly affect longer term unit costs or production volumes.

EXHIBIT C

JUSTIFICATION TABLE

EXHIBIT C

COMPANY: Florida Power & Light Company
TITLE: List of Confidential Documents
DOCKET NO.: 150001-EI
DOCKET TITLE: Fuel and Purchased Power Cost Recovery Clause
SUBJECT: FPL's Responses to Staff's Fourteenth Set of Interrogatories (No. 90)
DATE: October 19, 2015

FPL's Answers to Staff's 14th Set of Interrogatories	Description	Line No./ Col. No.	Florida Statute 366.093(2) Subsection	Affiant
No. 90	Gas Transportation Costs for delivery from Woodford Project to Perryville	Col. A, except Line 1	(d)	G. Yupp

EXHIBIT D

AFFIDAVIT

EXHIBIT D

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Fuel and Purchase Power Cost
Recovery Clause with Generating
Performance Incentive Factor

Docket No. 150001-EI

STATE OF FLORIDA)
)
PALM BEACH COUNTY)

AFFIDAVIT OF GERARD J. YUPP

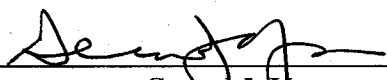
BEFORE ME, the undersigned authority, personally appeared Gerard J. Yupp who, being first duly sworn, deposes and says:

1. My name is Gerard J. Yupp. I am currently employed by Florida Power & Light Company ("FPL") as Senior Director of Wholesale Operations in the Energy Marketing and Trading Division. I have personal knowledge of the matters stated in this affidavit.

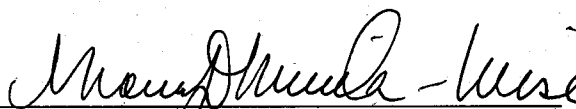
2. I have reviewed the documents and information included in Exhibit A to FPL's Request for Confidential Classification. The documents and materials in Exhibit A which are asserted by FPL to be proprietary confidential business information consist of the details of FPL's fuel transportation contracts. Additionally, the confidential information relates to contractual data, the disclosure of which would impair the efforts of FPL to contract for goods and services on favorable terms for the benefit of its customers and would impair the competitive interests of FPL and its vendors. Certain information in this document would also place FPL at a disadvantage when coupled with other information that is publically available. To the best of my knowledge, FPL has 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.


Gerard J. Yupp

SWORN TO AND SUBSCRIBED before me this 14 day of October 2015, by Gerard J. Yupp, who is personally known to me and who did take an oath.


Notary Public, State of Florida

My Commission Expires:

