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May 23, 2016

VIA HAND DELIVERY

Ms. Carlotta S. Stauffer
Division of the Commission Clerk and Administrative Services
Florida Public Service Commission
2540 Shumard Oak Blvd.
Tallahassee, FL 32399-0850

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2016 MAY 23 PM 1:10
COMMISSION CLERK

Re: Docket Nos. 160021-EI, 160061-EI, 160062-EI, 160088-EI

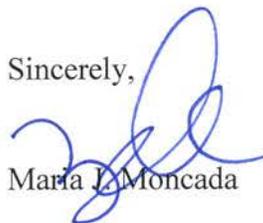
Dear Ms. Stauffer:

I enclose for filing in the above docket Florida Power & Light Company's ("FPL's") Second Request for Confidential Classification of information provided in response to discovery requests propounded Staff of the Florida Service Commission and Office of Public Counsel. The request includes Exhibits A, B (two copies), 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 declarations in support of FPL's request.

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

Sincerely,



Maria J. Moncada

Enclosure

cc: Counsel for Parties of Record (w/ copy of FPL's Request for Confidential Classification)

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IDM _____
TEL _____
CLK _____

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Petition for rate increase by Florida Power & Light Company	Docket No. 160021-EI
In re: Petition for approval of 2016-2018 storm hardening plan, by Florida Power & Light Company	Docket No. 160061-EI
In re: 2016 depreciation and dismantlement study by Florida Power & Light Company	Docket No. 160062-EI
In re: Petition for limited proceeding to modify and continue incentive mechanism by Florida Power & Light Company	Docket No. 160088-EI Filed: May 23, 2016

**FLORIDA POWER & LIGHT COMPANY'S
SECOND 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 provided in response to discovery requests ("Confidential Discovery Responses") propounded by the Staff of the Florida Public Service Commission ("Staff") and Office of Public Counsel ("OPC"). In support of its Request, FPL states as follows:

1. On May 3, 2016, FPL filed a Notice of Intent to Request Confidential Classification of responses to the following discovery requests propounded by Staff and OPC:

- OPC's First Request for Production of Documents, Nos. 2 (section labeled "Slattery's confidential file"), 8, 10, 15, 19, 28, 34, 36 and 38
- OPC's Third Request for Production of Documents, No. 89
- Staff's First Set of Interrogatories, No. 3

- Staff's Third Set of Interrogatories, Nos. 89¹ and 114
- Staff's Third Request for Production of Documents, Nos. 15, 18 and 20

2. 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. Where responsive documents are confidential in their entirety, FPL has included only the identifying cover pages in Exhibit B.

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 declarant who supports of the requested classification.

d. Exhibit D contains the declarations of Robert Barrett, Joseph Balzano, Marty Domenech, Keith R. Ferguson, Sufia Fleming, Kim Ousdahl, Kathleen Slattery and Gerard J. Yupp 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, 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

¹ Although FPL's answer to Staff's Third Set of Interrogatories, No. 89 was identified in its Notice of Intent, FPL has determined that the narrative response is not confidential. Accordingly, it is not included or referenced in the Exhibits included with this Request.

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 harm of disclosure against the public interest in access to the information.

4. As described more fully in the declarations included as Exhibit D indicate, certain Confidential Discovery Responses provided by FPL contain information concerning bids or other contractual data, the disclosure of which would impair the efforts of FPL or its vendors to contract for goods or services on favorable terms. This information is protected by Section 366.093(3)(d), Fla. Stat.

5. Also, certain information relates to competitive interests, the disclosure of which would impair the competitive business of the provider of the information. This information is protected by Section 366.093(3)(e), Fla. Stat.

6. Additionally, certain documents contain competitively sensitive information related to certain employees' compensation. Public disclosure of compensation information for particular positions would enable competing employers to meet or beat the compensation offered by FPL, resulting in the loss of talented employees, or conversely, the need to increase the level of compensation already paid in order to retain these employees and attract new talent. The quality of service and the cost of service implications would be detrimental to FPL and its customers. This information is protected by Section 366.093(3)(e), Fla. Stat.

7. Lastly, some documents pertain to employee personnel information unrelated to compensation, duties, qualifications or responsibilities. This information is protected by Section 366.093(3)(f), Fla. Stat.

8. Upon a finding by the Commission that the Confidential Information remains proprietary and confidential business information, the information should not be declassified for

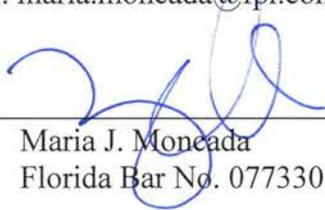
at least an additional eighteen (18) month period and should be returned to FPL as soon as it is no longer necessary for the Commission to conduct its business. See § 366.093(4), Fla. Stat.

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

Respectfully submitted,

John T. Butler
Assistant General Counsel - Regulatory
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By: _____


Maria J. Moncada
Florida Bar No. 0773301

CERTIFICATE OF SERVICE

Docket No. 160021-EI

I HEREBY CERTIFY that a true and correct copy of the foregoing Request for Confidential Classification has been furnished by electronic mail this 23rd day of May 2016 to the following parties:

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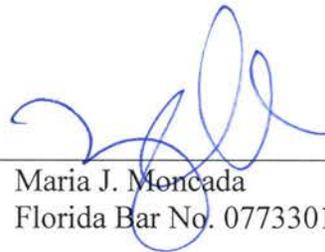
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By: _____



Maria J. Mençada
Florida Bar No. 0773301

* 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

**FPL's response to
OPC's 1st Request for Production No. 2
Bates Nos.
OPC 006748-006786
are confidential in their entirety**

**FPL's response to
OPC's 1st Request for Production No. 8
Bates Nos.
OPC 007034-007126
are confidential in their entirety**

**FPL's response to
OPC's 1st Request for Production No. 10
Bates Nos.
OPC 013801-014373
are confidential in their entirety**

**FPL's response to
OPC's 1st Request for Production No. 15
Bates Nos.
OPC 009897-009932
are confidential in their entirety**

Comparative Analysis-Incl Exp PR Tax (A/Fc)-Redacted

	A	B	C	D	E	F	G	H	I	J	K	L	
80		UIMS.0000469.02.01	FireEye Web-FPL-O&M	\$ 12,908.57	\$ 958.20	\$ 348.40			\$ 113.89	\$ 52.20	\$ 37.89	\$ 13,614.22	
81		UIMS.0000486.02.01	Network Refresh-O&M	\$ 8,941.50	\$ 1,508.75	\$ 1,020.82						\$ 11,470.87	
82		UIMS.0000517.01.01	E.J.S. Enterprise Infrastructure Sup-O&M	\$ 388,879.96	\$ 85,617.47	\$ 44,388.26						\$ 498,985.69	
83		UIMS.0000518.01.01	IM Training - IMCT EIS-O&M	\$ 69.06	\$ 3.95	\$ 2.45			\$ 0.61	\$ 0.37	\$ 0.27	\$ 96.52	
84		UIMS.0000518.02.01	IM Training - IMCT Telecom Svc-O&M	\$ 682.72	\$ 30.30	\$ 18.91			\$ 6.22	\$ 2.85	\$ 2.07	\$ 743.07	
85		UIMS.0000518.03.01	IM Training - IMCT Svc Help Desk-O&M	\$ 6 787.57	\$ 289.95	\$ 187.14			\$ 61.52	\$ 28.20	\$ 20.51	\$ 7,384.88	
86		UIMS.0000518.04.01	IM Training - IMO Collaboration Svc-O&M	\$ 14,218.12	\$ 631.08	\$ 393.78			\$ 129.46	\$ 59.31	\$ 43.17	\$ 15,474.80	
87		UIMS.0000518.05.01	IM Training - IMS Security-O&M	\$ 1,870.48	\$ 83.02	\$ 51.80			\$ 17.03	\$ 7.80	\$ 5.87	\$ 2,035.72	
88		UIMS.0000518.06.01	IM Training - IMCT Infrastructure	\$ 314.48	\$ 53.06	\$ 35.89						\$ 403.41	
89		UIMS.0000518.07.01	IM TRAINING - ITS TELCOM SVCS	\$ 9 447.61	\$ 1 594.13	\$ 1 078.39						\$ 12 120.13	
90		UIMS.0000518.08.01	IM Training - IBM HR/Procurement Sys	\$ 1 326.61	\$ 223.04	\$ 151.40						\$ 1 701.05	
91		UIMS.0000518.14.01	IM Training - IMT Data Tech Svcs	\$ 4 060.73	\$ 492.53	\$ 62.01			\$ 21.25			\$ 4 635.52	
92		UIMS.0000518.15.01	IM Training - IMT App Hosting & Perf Mgt	\$ 3 233.48	\$ 388.28	\$ 50.19			\$ 17.19			\$ 3 749.08	
93		UIMS.0000518.17.01	IM Training - Enterprise Service Trng	\$ 433.23	\$ 73.10	\$ 48.45						\$ 555.78	
94		UIMS.0000545.02.01	LFO ITS OTC Dr Correl Rebal - O&M	\$ 62,098.74	\$ 2,754.48	\$ 1,718.64			\$ 595.01	\$ 258.58	\$ 188.34	\$ 67,544.19	
95		UIMS.0000673.01.01	SAP Analytics and Planning - Tech-O&M	\$ 452.87	\$ 31.37	\$ 7.30			\$ 4.48	\$ 4.24	\$ 2.69	\$ 502.75	
96		Result		\$ 15,057,727.87	\$ 1,309,455.35	\$ 550,621.42			\$ 1,169,899.05	\$ 61,147.65	\$ 40,728.19	\$ 17,173,529.67	
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147		NEE Financial BU	UCOR.00000505.02.04	Planning Compliance Controversy O&M	\$ 1 483 360.17	\$ 43 759.82	\$ 10 207.65	\$ 7 591.00	\$ 3 972.28	\$ 30 810.50	\$ 5 356.18	\$ 4 465.40	\$ 1 587 234.11
148			UCOR.0000051.01.01	Trust Funds Corporate Actvty	\$ 96 774.58	\$ 2 854.94	\$ 1 194.43	\$ 495.27	\$ 233.06	\$ 2 010.04	\$ 349.58	\$ 291.33	\$ 104 203.23
149			UCOR.0000052.01.01	Corporate Finance	\$ 848 035.45	\$ 27 897.40	\$ 11 700.81	\$ 4 851.39	\$ 2 283.18	\$ 18 699.35	\$ 3 424.63	\$ 2 863.55	\$ 1 020 807.66
150			UCOR.0000053.01.01	Annual Report	\$ 553.90	\$ 28.16	\$ 11.78	\$ 4.90	\$ 2.21	\$ 18.52	\$ 3.44	\$ 2.94	\$ 1 027.13
151			UCOR.0000053.01.02	Analyst Meetings	\$ 30 105.96	\$ 888.11	\$ 371.97	\$ 184.04	\$ 72.50	\$ 605.28	\$ 108.16	\$ 90.61	\$ 32 416.44
152			UCOR.0000053.01.03	A1 Other	\$ 18 897.86	\$ 888.68	\$ 233.78	\$ 95.89	\$ 45.63	\$ 383.36	\$ 66.41	\$ 56.94	\$ 20 381.21
153			UCOR.0000053.01.04	Annual Meeting	\$ 288 043.39	\$ 7 807.38	\$ 3 308.20	\$ 1 371.68	\$ 645.52	\$ 5 507.46	\$ 968.22	\$ 800.61	\$ 288 818.64
154			UCOR.0000053.01.05	Transfer Agent	\$ 44 154.52	\$ 1 302.58	\$ 544.94	\$ 225.96	\$ 108.33	\$ 917.11	\$ 169.52	\$ 132.91	\$ 47 543.87
155			UCOR.0000053.01.06	Panel	\$ 208 480.78	\$ 6 091.60	\$ 2 548.55	\$ 1 056.74	\$ 487.77	\$ 4 288.98	\$ 745.94	\$ 621.41	\$ 223 341.27
156			UCOR.0000053.01.07	Investor Targeting	\$ 220.87	\$ 6.71	\$ 2.78	\$ 1.18	\$ 0.55	\$ 4.73	\$ 0.82	\$ 0.88	\$ 244.30
157			UCOR.0000053.01.08	Information Services	\$ 35 548.75	\$ 1 048.71	\$ 438.70	\$ 181.89	\$ 85.61	\$ 738.37	\$ 128.38	\$ 107.08	\$ 37 527.49
158			UCOR.0000054.01.01	Group Forecasting	\$ 150 924.08	\$ 4 452.38	\$ 1 862.64	\$ 772.41	\$ 363.49	\$ 3 134.77	\$ 545.20	\$ 464.07	\$ 162 509.02
159			UCOR.0000055.02.01	NEE Controller's Staff O&M	\$ 322 731.01	\$ 9 520.59	\$ 3 963.17	\$ 1 651.49	\$ 777.21	\$ 6 703.37	\$ 1 185.77	\$ 971.57	\$ 347 504.18

**FPL's response to
OPC's 1st Request for Production No. 28
Bates Nos.
OPC 009971
OPC 009989
OPC 009991
are confidential in their entirety**

**FPL's response to
OPC 1st Request for Production No. 34
Bates Nos.
OPC 011007-012458
are confidential in their entirety**

**FPL's response to
OPC's 1st Request for Production No. 36
Bates Nos.
OPC 009994-009996
are confidential in their entirety**

Florida Power and Light Company
 Analysis of Interval Length on Average Service Life for New CSP Components

OPC 005396
 FPL RC-16

CONFIDENTIAL

6.5 Historical Average Service Life (based on statistical analysis)

1	A	B	C	D	E		G	H	I	J
					ASL (Historical)	Interval Length (thousand hours)				
2	CSP Part	2017 Balance			Past/Current	Future				
3	GE	1,410,744,721.72								11,932,197,684
4	145.0252 : TRANSITION NOZZLE	54,052,415.89	6.5		24			8.67	468,454,271	
5	145.0255 : COMPRESSOR ROTOR/WHEEL	293,819,633.53	6.5		144			8.67	2,546,436,824	
6	145.0257 : COMPRESSOR BLADES (ROTAT	77,345,376.32	6.5		144			8.67	670,326,586	
7	145.0258 : COMPRESSOR BLADES (STATI	121,571,899.09	6.5		144			8.67	1,053,623,125	
8	145.0259 : BURNER BASKET	298,648.76	6.5		24			6.50	1,941,217	
9	145.0263 : FUEL NOZZLE	49,868,983.34	6.5		24			8.67	432,197,856	
10	145.0265 : COMBUSTOR LINER	37,943,606.77	6.5		24			8.67	328,844,592	
11	145.0266 : TURBINE ROTOR/WHEEL	135,512,076.15	6.5		144			6.50	880,828,495	
12	145.0268 : TURBINE BLADES (ROTATING	302,315,977.74	6.5		24			8.67	2,620,071,807	
13	145.0269 : TURBINE BLADES (STATIONAR	208,936,703.63	6.5		24			8.67	1,810,784,765	
14	145.0270 : TURBINE SHROUD SEALS	59,817,944.40	6.5		24			8.67	518,422,185	
15	145.0271 : END COVERS	11,566,579.18	6.5		24			8.67	100,243,686	
16	145.0272 : COMBUSTOR CAPS	31,326,165.41	6.5		24			8.67	271,493,434	
17	145.0273 : FORWARD CASINGS	4,687,083.29	6.5		24			8.67	40,621,389	
18	145.0274 : FLOW SLEEVES	11,697,421.67	6.5		24			8.67	101,377,654	
19	145.0279 : BEARING ASSEMBLY	9,984,207.56	6.5		48			8.67	86,529,799	
20	Mitsubishi	442,690,780.28								3,514,883,949
21	145.0252 : TRANSITION NOZZLE	20,469,635.97	6.5		12			13.00	266,105,268	
22	145.0254 : CROSS FLAME TUBES	20,327,092.44	6.5		12			13.00	264,252,202	
23	145.0255 : COMPRESSOR ROTOR/WHEEL	60,572,885.57	6.5		96			6.50	393,723,756	
24	145.0257 : COMPRESSOR BLADES (ROTAT	35,305,791.85	6.5		96			6.50	229,487,647	
25	145.0258 : COMPRESSOR BLADES (STATI	40,898,201.73	6.5		96			6.50	265,838,311	
26	145.0259 : BURNER BASKET	4,473,680.72	6.5		12			13.00	58,157,849	
27	145.0260 : INTERSTAGE SEAL ASSY	4,400,220.04	6.5		24			6.50	28,601,430	
28	145.0263 : FUEL NOZZLE	3,696,004.05	6.5		12			13.00	48,048,053	
29	145.0265 : COMBUSTOR LINER	8,492,862.47	6.5		12			13.00	110,407,212	
30	145.0266 : TURBINE ROTOR/WHEEL	60,572,878.96	6.5		96			6.50	393,723,713	
31	145.0268 : TURBINE BLADES (ROTATING	68,304,233.87	6.5		24			6.50	443,977,520	
32	145.0269 : TURBINE BLADES (STATIONAR	58,229,226.82	6.5		24			6.50	378,489,974	
33	145.0270 : TURBINE SHROUD SEALS	12,013,604.91	6.5		24			6.50	78,088,432	
34	145.0271 : END COVERS	8,015,100.31	6.5		12			13.00	104,196,304	
35	145.0272 : COMBUSTOR CAPS	11,478,830.21	6.5		12			13.00	149,224,793	
36	145.0273 : FORWARD CASINGS	8,017,612.83	6.5		12			13.00	104,228,967	
37	145.0274 : FLOW SLEEVES	4,875,863.56	6.5		12			13.00	63,386,226	
38	145.0275 : BLADE RING	2,341,430.20	6.5		24			6.50	15,219,296	
39	145.0277 : COMBUSTOR SWIRLER HLDR	5,857,516.45	6.5		12			13.00	76,147,714	
40	145.0279 : BEARING ASSEMBLY	1,991,709.80	6.5		48			6.50	12,946,114	
41	145.0280 : TRAN SEALS (INNER & OUT	2,356,397.51	6.5		12			13.00	30,633,168	
42	Siemens	560,260,351.03								4,240,662,745
43	145.0252 : TRANSITION NOZZLE	28,970,796.78	6.5		12			13.54	392,312,873	
44	145.0255 : COMPRESSOR ROTOR/WHEEL	45,781,333.34	6.5		96			6.50	297,578,667	
45	145.0257 : COMPRESSOR BLADES (ROTAT	31,315,228.87	6.5		96			6.50	203,548,988	
46	145.0258 : COMPRESSOR BLADES (STATI	53,153,590.81	6.5		96			6.50	345,498,340	
47	145.0259 : BURNER BASKET	6,712,898.65	6.5		12			13.54	90,903,836	
48	145.0260 : INTERSTAGE SEAL ASSY	5,678,259.20	6.5		24			6.77	38,446,547	
49	145.0263 : FUEL NOZZLE	21,854,586.00	6.5		12			13.54	295,947,519	
50	145.0265 : COMBUSTOR LINER	1,940,273.44	6.5		12			13.54	26,274,536	
51	145.0266 : TURBINE ROTOR/WHEEL	63,644,826.69	6.5		96			6.50	413,691,373	
52	145.0268 : TURBINE BLADES (ROTATING	150,897,684.07	6.5		24			6.77	1,021,703,069	
53	145.0269 : TURBINE BLADES (STATIONAR	102,761,215.87	6.5		24			6.77	695,779,066	
54	145.0270 : TURBINE SHROUD SEALS	26,781,372.82	6.5		24			6.77	181,332,212	
55	145.0271 : END COVERS	251,791.84	6.5		12			13.54	3,409,681	
56	145.0272 : COMBUSTOR CAPS	1,747,710.72	6.5		12			13.54	23,666,916	
57	145.0273 : FORWARD CASINGS	3,175,581.73	6.5		12			13.54	43,002,669	
58	145.0274 : FLOW SLEEVES	6,111,685.38	6.5		12			13.54	82,767,406	
59	145.0275 : BLADE RING	1,551,293.68	6.5		24			6.77	10,503,551	
60	145.0276 : COMP/TURB ROTOR WBLAD	1,360,783.92	6.5		48			6.77	9,213,641	
61	145.0279 : BEARING ASSEMBLY	3,526,046.60	6.5		48			6.77	23,874,274	
62	145.0280 : TRAN SEALS (INNER & OUT	3,043,390.64	6.5		12			13.54	41,212,582	
63	Siemens - LaudCC	126,485,600.26								822,156,402
64	145.0252 : TRANSITION NOZZLE	6,215,574.48	6.5		12			6.50	40,401,234	
65	145.0255 : COMPRESSOR ROTOR/WHEEL	27,725,185.56	6.5		48			6.50	180,213,706	
66	145.0257 : COMPRESSOR BLADES (ROTAT	9,614,168.92	6.5		24			6.50	62,492,098	
67	145.0258 : COMPRESSOR BLADES (STATI	19,767,543.52	6.5		24			6.50	128,489,033	
68	145.0259 : BURNER BASKET	2,598,415.52	6.5		12			6.50	16,889,701	
69	145.0260 : INTERSTAGE SEAL ASSY	1,231,987.93	6.5		24			6.50	8,007,922	
70	145.0263 : FUEL NOZZLE	653,433.18	6.5		24			6.50	4,247,316	
71	145.0266 : TURBINE ROTOR/WHEEL	6,132,075.68	6.5		48			6.50	39,858,492	
72	145.0268 : TURBINE BLADES (ROTATING	21,866,155.14	6.5		24			6.50	142,130,008	
73	145.0269 : TURBINE BLADES (STATIONAR	23,241,291.16	6.5		24			6.50	151,068,393	
74	145.0270 : TURBINE SHROUD SEALS	4,445,795.57	6.5		24			6.50	28,897,674	
75	145.0272 : COMBUSTOR CAPS	0.00	6.5							
76	145.0275 : BLADE RING	2,502,939.20	6.5		24			6.50	16,269,105	
77	145.0279 : BEARING ASSEMBLY	433,271.67	6.5		48			6.50	2,816,266	
78	145.0280 : TRAN SEALS (INNER & OUT	57,762.33	6.5		12			6.50	375,455	
79	Grand Total	2,540,181,453.29							20,509,900,781	
80										
81										
82	Manufacturer	ASL x Cost Weight	2017 Balance	Weighted ASL for new intervals				8.074	Weighted ASL for new intervals	
83	ALL	20,509,900,781	2,540,181,453	8.07						
84	GE	11,932,197,684	1,410,744,722	8.46						
85	Mitsubishi	3,514,883,949	442,690,780	7.94						
86	Siemens	4,240,662,745	560,260,351	7.57						
87	Siemens - LaudCC	822,156,402	126,485,600	6.50						



**FPL's response to
OPC's 3rd Request for Production No. 89
Bates Nos.
OPC 024480-024514
are confidential in their entirety**

CONFIDENTIAL

1
2 **Miami Dade-Davis Land Sale**

3 In September 2015, FPL sold to City of Doral the Dade-Davis vacant land at a sales price of
4 \$1.96 million. The sale included 5 acres of land, which was purchased in 1965. After taking
5 into account the closing cost, the sale resulted in a gain of \$1.95 million, which was deferred and
6 is being amortized into income over a five year period consistent with the FPSC Order
7 referenced above.

7
8 **Boca Grande Land Sale**

9 In March 2016, FPL expects to sell to [REDACTED] the Boca Grande Oil Terminal at
10 a sales price of [REDACTED]. The sale included [REDACTED] of land, which was purchased in 1957
11 and 1998. After taking into account closing cost, a gain of approximately \$12.74 million is
12 anticipated. This amount will be deferred and amortized into income over a five year period
13 consistent with the FPSC Order referenced above.

13
14 **Miami Beach Development Rights Sale**

15 FPL entered into a purchase agreement in June 2014 with [REDACTED] to sell the Miami Beach
16 Substation development rights for the sales price of [REDACTED]. The sale includes [REDACTED]
17 of unused floor development rights and is expected to occur in June 2016. FPL
18 anticipates a gain on the sale of \$5.88 million, which will be deferred and amortized into income
19 over a five year period consistent with the FPSC Order referenced above.

19
20 **Aviation Assets Transfer**

21 In 2011, FPL recorded a gain of \$6.15 million as a result of transferring its aviation assets to its
22 parent, NextEra Energy, Inc. The net book value of the transferred aircraft, related assets and the
23 sale of a purchase contract for an aircraft under construction, amounted to \$33.462 million. The
24 resulting gain for the difference between the appraised value of transferred assets and net book
25 value was deferred and has been amortized into income over a five year period consistent with
the FPSC Order referenced above.

26
27 **Desoto Acre Land Sale**

28 In December 2014, FPL sold to French Golden Gate, LLC and Optimum Agriculture LLC the
29 Desoto vacant land at a sales price of \$21.9 million. The sale included 8,806 acres of land,
30 which was purchased in 1974 and 1998. After taking into account the closing cost, the sale
31 resulted in a gain of \$14.79 million, which was deferred and is being amortized into income over
32 a five year period consistent with the FPSC Order referenced above.

32
33 **Desoto Land Sale**

34 In June 2014, FPL sold to US Highway 07 Properties, LLC the Desoto vacant parcel 2 at a sales
35 price of \$1.7 million. The sale included 575 acres of land, which was purchased in 1975. After
36 taking into account the closing cost, the sale resulted in a gain of \$1.24 million, which was
37 deferred and is being amortized into income over a five year period consistent with the FPSC
Order referenced above.

**FPL's response to
Staff's 3rd Request for Production No. 15
Bates Nos.
STAFF 000193-000211
are confidential in their entirety**

**FPL's response to
Staff's 3rd Request for Production No. 18
Bates Nos.
STAFF 000213-000214
are confidential in their entirety**

**FPL's response to
Staff's 3rd Request for Production No. 20
Bates Nos.
STAFF 000221-000222
are confidential in their entirety**

	A	B	C	D	E	F	G	H	I
	Counterparty	Portfolio	Unit Of Measure	Deal Number	Direction	Contract Month	Volume (Signed)	Strategy	Trade Date
1		FPL Optimization Program	MMBTU	1367961	SALE			STORAOPTIM	
2		FPL Optimization Program	MMBTU	1435152	SALE			STORAOPTIM	
3		FPL Optimization Program	MMBTU	1379518	SALE			STORAOPTIM	
4		FPL Optimization Program	MMBTU	1382244	SALE			STORAOPTIM	
5		FPL Optimization Program	MMBTU	1382605	SALE			STORAOPTIM	
6		FPL Optimization Program	MMBTU	1371304	SALE			STORAOPTIM	
7		FPL Optimization Program	MMBTU	1386715	SALE			STORAOPTIM	
8		FPL Optimization Program	MMBTU	1376407	SALE			STORAOPTIM	
9		FPL Optimization Program	MMBTU	1382246	SALE			STORAOPTIM	
10		FPL Optimization Program	MMBTU	1382252	SALE			STORAOPTIM	
11		FPL Optimization Program	MMBTU	1370814	SALE			STORAOPTIM	
12		FPL Optimization Program	MMBTU	1382625	SALE			STORAOPTIM	
13		FPL Optimization Program	MMBTU	1384037	SALE			STORAOPTIM	
14		FPL Optimization Program	MMBTU	1395728	SALE			STORAOPTIM	
15		FPL Optimization Program	MMBTU	1391187	SALE			STORAOPTIM	
16		FPL Optimization Program	MMBTU	1404808	SALE			STORAOPTIM	
17		FPL Optimization Program	MMBTU	1448105	SALE			STORAOPTIM	
18		FPL Optimization Program	MMBTU	1461779	SALE			STORAOPTIM	
19		FPL Optimization Program	MMBTU	1405416	SALE			STORAOPTIM	
20		FPL Optimization Program	MMBTU	1465322	SALE			STORAOPTIM	
21		FPL Optimization Program	MMBTU	1465982	SALE			STORAOPTIM	
22		FPL Optimization Program	MMBTU	1465986	SALE			STORAOPTIM	
23		FPL Optimization Program	MMBTU	1465989	SALE			STORAOPTIM	
24		FPL Optimization Program	MMBTU	1465981	SALE			STORAOPTIM	
25		FPL Optimization Program	MMBTU	1465924	SALE			STORAOPTIM	
26		FPL Optimization Program	MMBTU	1465326	SALE			STORAOPTIM	
27		FPL Optimization Program	MMBTU	1465346	SALE			STORAOPTIM	
28		FPL Optimization Program	MMBTU	1465985	SALE			STORAOPTIM	
29		FPL Optimization Program	MMBTU	1465910	SALE			STORAOPTIM	
30		FPL Optimization Program	MMBTU	1465992	SALE			STORAOPTIM	
31		FPL Optimization Program	MMBTU	1488583	SALE			STORAOPTIM	
32		FPL Optimization Program	MMBTU	1488583	SALE			STORAOPTIM	
33		FPL Optimization Program	MMBTU	1488602	SALE			STORAOPTIM	
34		FPL Optimization Program	MMBTU	1488602	SALE			STORAOPTIM	

	A	B	C	D	E	F	G	H	I
	Counterparty	Portfolio	Unit Of Measure	Deal Number	Direction	Contract Month	Volume (Signed)	Strategy	Trade Date
1		FPL Optimization Program	MMBTU	1489386	SALE			STORAOPTIM	
2		FPL Optimization Program	MMBTU	1490716	SALE			STORAOPTIM	
3		FPL Optimization Program	MMBTU	1490716	SALE			STORAOPTIM	
4		FPL Optimization Program	MMBTU	1490716	SALE			STORAOPTIM	
5		FPL Optimization Program	MMBTU	1498238	SALE			STORAOPTIM	
6		FPL Optimization Program	MMBTU	1491152	SALE			STORAOPTIM	
7		FPL Optimization Program	MMBTU	1500948	SALE			STORAOPTIM	
8		FPL Optimization Program	MMBTU	1500948	SALE			STORAOPTIM	
9		FPL Optimization Program	MMBTU	1500948	SALE			STORAOPTIM	
10		FPL Optimization Program	MMBTU	1500948	SALE			STORAOPTIM	
11		FPL Optimization Program	MMBTU	1485286	SALE			STORAOPTIM	
12		FPL Optimization Program	MMBTU	1490088	SALE			STORAOPTIM	
13		FPL Optimization Program	MMBTU	1496317	SALE			STORAOPTIM	
14		FPL Optimization Program	MMBTU	1489410	SALE			STORAOPTIM	
15		FPL Optimization Program	MMBTU	1500352	SALE			STORAOPTIM	
16		FPL Optimization Program	MMBTU	1500352	SALE			STORAOPTIM	
17		FPL Optimization Program	MMBTU	1501732	SALE			STORAOPTIM	
18		FPL Optimization Program	MMBTU	1506280	SALE			STORAOPTIM	
19		FPL Optimization Program	MMBTU	1528331	SALE			STORAOPTIM	
20		FPL Optimization Program	MMBTU	1543255	SALE			STORAOPTIM	
21		FPL Optimization Program	MMBTU	1536123	SALE			STORAOPTIM	
22		FPL Optimization Program	MMBTU	1545360	SALE			STORAOPTIM	
23		FPL Optimization Program	MMBTU	1533548	SALE			STORAOPTIM	
24		FPL Optimization Program	MMBTU	1505488	SALE			STORAOPTIM	
25		FPL Optimization Program	MMBTU	1515896	SALE			STORAOPTIM	
26		FPL Optimization Program	MMBTU	1504971	SALE			STORAOPTIM	
27		FPL Optimization Program	MMBTU	1559990	SALE			STORAOPTIM	
28		FPL Optimization Program	MMBTU	1559547	SALE			STORAOPTIM	
29		FPL Optimization Program	MMBTU	1560980	SALE			STORAOPTIM	
30		FPL Optimization Program	MMBTU	1562721	SALE			STORAOPTIM	
31		FPL Optimization Program	MMBTU	1534728	SALE			STORAOPTIM	
32		FPL Optimization Program	MMBTU	1593354	SALE			STORAOPTIM	
33		FPL Optimization Program	MMBTU	1593356	SALE			STORAOPTIM	
34		FPL Optimization Program	MMBTU	1574980	SALE			STORAOPTIM	

	A	B	C	D	E	F	G	H	I
	Counterparty	Portfolio	Unit Of Measure	Deal Number	Direction	Contract Month	Volume (Signed)	Strategy	Trade Date
1		FPL Optimization Program	MMBTU	1605938	SALE			STORAOPTIM	
2		FPL Optimization Program	MMBTU	1598662	SALE			STORAOPTIM	
3		FPL Optimization Program	MMBTU	1598664	SALE			STORAOPTIM	
4		FPL Optimization Program	MMBTU	1609383	SALE			STORAOPTIM	
5		FPL Optimization Program	MMBTU	1599516	SALE			STORAOPTIM	
6		FPL Optimization Program	MMBTU	1609384	SALE			STORAOPTIM	
7		FPL Optimization Program	MMBTU	1593384	SALE			STORAOPTIM	
8		FPL Optimization Program	MMBTU	1605897	SALE			STORAOPTIM	
9		FPL Optimization Program	MMBTU	1606640	SALE			STORAOPTIM	
10		FPL Optimization Program	MMBTU	1607471	SALE			STORAOPTIM	
11		FPL Optimization Program	MMBTU	1608225	SALE			STORAOPTIM	
12		FPL Optimization Program	MMBTU	1586315	SALE			STORAOPTIM	
13		FPL Optimization Program	MMBTU	1585197	SALE			STORAOPTIM	
14		FPL Optimization Program	MMBTU	1585207	SALE			STORAOPTIM	
15		FPL Optimization Program	MMBTU	1585188	SALE			STORAOPTIM	
16		FPL Optimization Program	MMBTU	1585199	SALE			STORAOPTIM	
17		FPL Optimization Program	MMBTU	1619006	SALE			STORAOPTIM	
18		FPL Optimization Program	MMBTU	1616932	SALE			STORAOPTIM	
19		FPL Optimization Program	MMBTU	1617857	SALE			STORAOPTIM	
20		FPL Optimization Program	MMBTU	1591230	SALE			STORAOPTIM	
21		FPL Optimization Program	MMBTU	1591229	SALE			STORAOPTIM	
22		FPL Optimization Program	MMBTU	1589406	SALE			STORAOPTIM	
23		FPL Optimization Program	MMBTU	1546242	SALE			STORAOPTIM	
24		FPL Optimization Program	MMBTU	1554175	SALE			STORAOPTIM	
25		FPL Optimization Program	MMBTU	1548055	SALE			STORAOPTIM	
26		FPL Optimization Program	MMBTU	1551900	SALE			STORAOPTIM	
27		FPL Optimization Program	MMBTU	1548479	SALE			STORAOPTIM	
28		FPL Optimization Program	MMBTU	1550381	SALE			STORAOPTIM	
29		FPL Optimization Program	MMBTU	1551463	SALE			STORAOPTIM	
30		FPL Optimization Program	MMBTU	1551463	SALE			STORAOPTIM	

EXHIBIT C

JUSTIFICATION TABLE

EXHIBIT C

COMPANY: Florida Power & Light Company
 TITLE: List of Confidential Documents
 DOCKET NO: 160021-EI
 DOCKET TITLE: Petition for Increase in Rates by Florida Power & Light Company
 DATE: May 23, 2016

Discovery Set	Item No.	Conf. Y/N	Bates Number	Line/Column	Florida Statute 366.093(3) Subsection	Declarant	
OPC First POD	2	Y	OPC 006748-006750	ALL	(e), (f)	K. Slattery	
		Y	OPC 006751-006752	ALL	(e)	K. Slattery	
		Y	OPC 006753-006786	ALL	(e)	K. Slattery	
	8	Y	OPC 007034-007126	ALL	(e)	K. Slattery	
	10	Y	OPC 013801-014373	ALL	(d), (e)	J. Balzano	
	15	Y	OPC 009897-009932	ALL	(e)	K. Slattery	
	19	Y	OPC 007357	Cols. A-L, Lns. 97-146	(e)	K. Slattery	
		Y	OPC 007358	Cols. A-L, Lns. 95-147	(e)	K. Slattery	
	28	N	OPC 009966-9970				
		Y	OPC 009971	ALL	(e)	K. Ousdahl	
		N	OPC 009972-009988				
		Y	OPC 009989	ALL	(e)	K. Ousdahl	
		N	OPC 009990				
	34	Y	OPC 009991	ALL	(e)	K. Ousdahl	
		Y	OPC 011007-012464	ALL	(d), (e)	J. Balzano	
36	Y	OPC 009994-009996	ALL	(e)	B. Barrett		
38	N	OPC 005395					
	Y	OPC 005396	Col. F, Lns. 4-78 Col. G, Lns. 4-78	(d), (e)	M. Domenech		
	N	OPC 005397					
	N	OPC 005398					
	N	OPC 005399					
OPC Third POD	89	Y	OPC 024480-024495	ALL	(e)	K. Ferguson	
		Y	OPC 024496-024514	ALL	(e)	S. Fleming	

Discovery Set	Item No.	Conf. Y/N	Bates Number	Line/Column	Florida Statute 366.093(3) Subsection	Declarant
Staff First Set of Ints	3	N	Staff 000099			
		Y	Staff 000100	Ln. 8A Lns. 9A, 9B Ln. 14A Lns. 15A, 15B Ln. 16A	(d)	K. Ousdahl
		N	Staff 000101			
Staff Third Set of Ints	114	Y	Staff 000260	Col. A, Lns. 2-34 Col. F, Lns. 2-34 Col. G, Lns. 2-34 Col. I, Lns. 2-34	(d), (e)	G. Yupp
		Y	Staff 000261	Col. A, Lns. 2-34 Col. F, Lns. 2-34 Col. G, Lns. 2-34 Col. I, Lns. 2-34	(d), (e)	G. Yupp
		Y	Staff 000262	Col. A, Lns. 2-30 Col. F, Lns. 2-30 Col. G, Lns. 2-30 Col. I, Lns. 2-30	(d), (e)	G. Yupp
Staff Third POD	15	Y	Staff 000192	Cols. F-U, Ln. 4 Cols. F-U, Ln. 5	(d), (e)	J. Balzano
		Y	Staff 000193-000211	ALL	(d), (e)	J. Balzano
	18	Y	Staff 00213-00214	ALL	(d), (e)	J. Balzano
	20	Y	Staff 000221-000222	ALL	(d), (e)	J. Balzano

EXHIBIT D

DECLARATIONS

EXHIBIT D

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Petition for rate increase by Florida
Power & Light Company.

Docket No: 160021-EI

STATE OF FLORIDA)
)
COUNTY OF PALM BEACH) WRITTEN DECLARATION OF
) JOSEPH BALZANO

1. My name is Joseph Balzano. I am currently employed by NextEra Energy, Inc. as Assistant Treasurer. I have personal knowledge of the matters stated in this written declaration.

2. I have reviewed the documents referenced and incorporated in FPL's Request for Confidential Classification for which I am identified as a declarant. The documents that I have reviewed and which are asserted by FPL to be proprietary confidential business information contain or constitute information relating to competitive interests, the disclosure of which would impair the competitive interests of FPL or its vendors. Specifically, the materials include proprietary long-term and short-term forecast information sold by vendors; the seller's business and competitive interests would be harmed if these documents were in the public domain. The documents also contain information regarding negotiated rating agency fees, which could impair the company's ability to negotiate such rates on favorable terms in the future. Additionally, the rating agency fees are kept confidential from the rating agency analysts in order to protect the unbiased nature of corporate credit ratings. Other materials contain non-public, forecasted company information, potential investments and/or divestitures, and the company's financial strategy. Finally, the designated materials include communications with rating agencies, which are made subject to an expectation of privacy and confidentiality. To the best of my knowledge, FPL has maintained the confidentiality of this information.

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. Under penalties of perjury, I declare that I have read the foregoing declaration and that the facts stated in it are true to the best of my knowledge and belief.


JOSEPH BALZANO

Date: May 20, 2016

EXHIBIT D

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Petition for rate increase by Florida
Power & Light Company.

Docket No: 160021-EI

STATE OF FLORIDA)
)
COUNTY OF PALM BEACH)

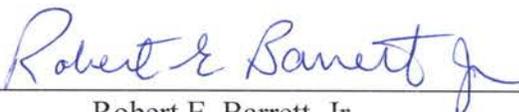
WRITTEN DECLARATION OF **ROBERT E. BARRETT**

1. My name is Robert E. Barrett, Jr. I am currently employed by Florida Power & Light Company ("FPL") as Vice President, Finance. I have personal knowledge of the matters stated in this written declaration.

2. I have reviewed the documents referenced and incorporated in FPL's Request for Confidential Classification for which I am identified as a declarant. The documents or materials that I have reviewed and which are asserted by FPL to be proprietary confidential business information relate to FPL's competitive interests. Specifically, the documents contain information regarding financing rates negotiated and procured by FPL. Disclosure of this information could impair FPL's competitive advantage and impede its ability to negotiate similar financing terms in the future for the benefit of FPL customers. 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 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. Under penalties of perjury, I declare that I have read the foregoing declaration and that the facts stated in it are true to the best of my knowledge and belief.



Robert E. Barrett, Jr.

Date: 5/16/16

EXHIBIT D

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Petition for rate increase by Florida
Power & Light Company.

Docket No: 160021-EI

STATE OF FLORIDA)
)
COUNTY OF PALM BEACH) **WRITTEN DECLARATION OF**
) **MARTY DOMENECH**

1. My name is Marty Domenech. I am currently employed by Florida Power & Light Company ("FPL") as Senior Director, Power Generation. I have personal knowledge of the matters stated in this written declaration.

2. I have reviewed the documents referenced and incorporated in FPL's Request for Confidential Classification for which I am identified as a declarant. The documents or materials that I have reviewed and which are asserted by FPL to contain information concerning contractual data, the disclosure of which would impair the efforts of the FPL or its affiliates to contract for goods and services on favorable terms. The information also relates to competitive interests, the disclosure of which would impair the competitive business of the provider of the information. Specifically, the documents contain information related to FPL's contractual future expected maintenance intervals with our major component replacement vendors. Release of this information would put FPL at a competitive disadvantage because it would negatively impact our ability to negotiate with vendors in the future, to the detriment of customers. 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 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. Under penalties of perjury, I declare that I have read the foregoing declaration and that the facts stated in it are true to the best of my knowledge and belief.



Marty Domenech

Date: _____

5/20/2016

FIRST REVISED EXHIBIT D

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Petition for rate increase by Florida
Power & Light Company.

Docket No: 160021-EI

STATE OF FLORIDA)
)
COUNTY OF PALM BEACH) **WRITTEN DECLARATION OF**
) **KEITH FERGUSON**

1. My name is Keith Ferguson. I am currently employed by Florida Power & Light Company ("FPL") as Assistant Controller. I have personal knowledge of the matters stated in this written declaration.

2. I have reviewed the documents referenced and incorporated in FPL's Request for Confidential Classification for which I am identified as a declarant. The documents or materials that I have reviewed and which are asserted by FPL to contain confidential business information constitutes contractual data and information relating to competitive interests, the disclosure of which would impair the competitive business of the provider of the information. Specifically, the materials consist of a negotiated depreciation consulting agreement which FPL is contractually required to maintain confidential. In addition, disclosure of the negotiated terms would impair FPL's ability to negotiate favorable terms for such services in the future, to the detriment of customers. 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 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. Under penalties of perjury, I declare that I have read the foregoing declaration and that the facts stated in it are true to the best of my knowledge and belief.



KEITH FERGUSON

Date: 5/19/16

FIRST REVISED EXHIBIT D

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Petition for rate increase by Florida
Power & Light Company.

Docket No: 160021-EI

STATE OF FLORIDA)
) **WRITTEN DECLARATION OF SUFIA FLEMING**
COUNTY OF PALM-BEACH)

1. My name is Sufia Fleming. I am currently employed by Florida Power & Light Company (“FPL”) as Manager, Cost & Performance. I have personal knowledge of the matters stated in this written declaration.

2. I have reviewed the documents referenced and incorporated in FPL’s Request for Confidential Classification for which I am identified as an affiant. The documents or materials that I have reviewed and which are asserted by FPL to be confidential contain or constitute contractual data such as pricing and other terms, and also contain information relating to competitive interests, the disclosure of which would impair the competitive business of FPL and FPL’s vendors. Specifically, the confidential materials consist of contracts for the engagement of legal services pursuant to negotiated terms and conditions. Public disclosure of these documents would impair FPL’s ability to negotiate competitive terms for legal services in the future, to the detriment of FPL customers. 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 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. Under penalties of perjury, I declare that I have read the foregoing declaration and that the facts stated in it are true to the best of my knowledge and belief.



SUFIA FLEMING

Date: May 19, 2016

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Petition for rate increase by Florida
Power & Light Company.

Docket No: 160021-EI

STATE OF FLORIDA)
)
COUNTY OF PALM BEACH)

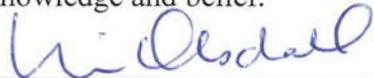
WRITTEN DECLARATION OF **KIM OUSDAHL**

1. My name is Kim Ousdahl. I am currently employed by Florida Power & Light Company ("FPL") as Vice President Controller & Chief Accounting Officer. I have personal knowledge of the matters stated in this written declaration.

2. I have reviewed the documents referenced and incorporated in FPL's Request for Confidential Classification for which I am identified as the affiant. The documents or materials that I have reviewed and which are asserted by FPL to contain confidential information relate to FPL's competitive interests. Specifically, some of the documents contain information concerning environmental liabilities. Other documents provided contain contractual data. Specifically, the confidential documents information concerning negotiated terms and conditions of un consummated real estate contracts. Disclosure of this information could impair FPL's ability to negotiate terms for real estate contracts on similar or favorable terms in the future. Finally, the documents also contain pro forma tax documentation that was incorporated into Nextera Energy's tax return, which is confidential pursuant to 26 U.S.C. § 6103.

3. To the best of my knowledge, FPL has maintained the confidentiality of these documents and materials. 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. Under penalties of perjury, I declare that I have read the foregoing declaration and that the facts stated in it are true to the best of my knowledge and belief.



KIM OUSDAHL

Date: May 17, 2016

EXHIBIT D

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Petition for rate increase by Florida
Power & Light Company.

Docket No: 160021-EI

STATE OF FLORIDA)
)
COUNTY OF PALM BEACH)

**WRITTEN DECLARATION OF
KATHLEEN SLATTERY**

1. My name is Kathleen Slattery. I am currently employed by Florida Power & Light Company ("FPL") as Senior Director of Executive Services & Compensation. I have personal knowledge of the matters stated in this written declaration.

2. I have reviewed the documents and information included in Exhibit A to FPL's Request for Confidential Classification filed this date, for which I am listed as the declarant on Exhibit C. The documents that I have reviewed and which are asserted by FPL to be proprietary confidential business information contain or constitute information relating to ompetitive interests, the disclosure of which would impair the competitive business of the provider of the information. Specifically, the materials contain third party proprietary methodology for calculating per employee per year medical costs, proprietary salary budget survey result provided and available only to paying participants, and proprietary benefits anaylsis (medical cost drivers, retirement plans) provided and available only to paying participants. In addition, certain files contain employee personnel information unrelated to compensation, duties, qualifications, or responsibilities, such as individual ages to two decimal places as of a date in time, linked to job titles from which private personnel information can be deduced. Additionally, some of the documents contain compensation information such as salary data, severance program accruals or other information that would allow for the calculation of compensation for employees and employment positions. Public disclosure of compensation information for particular positions would enable competing employers to meet or beat the compensation offered by FPL, resulting in the loss of talented employees, or conversely, the need to increase the level of compensation already paid in order to retain these employees and attract new talent. The quality of service and the cost of service implications would be detrimental to FPL and its customers.

3. To the best of my knowledge, FPL has maintained the confidentiality of these documents and materials.

4. 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.

5. Under penalties of perjury, I declare that I have read the foregoing declaration and that the facts stated in it are true to the best of my knowledge and belief.

Kathleen Slattery
KATHLEEN SLATTERY

Date: 5-18-2016

EXHIBIT D

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Petition for rate increase by Florida Power & Light Company.

Docket No: 160021-EI

STATE OF FLORIDA)
COUNTY OF PALM BEACH)

WRITTEN DECLARATION OF GERARD J. YUPP

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 written declaration.

2. I have reviewed the documents referenced and incorporated in FPL's Request for Confidential Classification. The document that I have reviewed and which is asserted by FPL to be proprietary confidential business information contains or constitutes information such as pricing and other contractual terms related to FPL's natural gas optimization transactions. The disclosure of this information would impair the efforts of FPL to contract for goods or 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 publicly 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 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. Under penalties of perjury, I declare that I have read the foregoing declaration and that the facts stated in it are true to the best of my knowledge and belief.

Handwritten signature of Gerard J. Yupp over a horizontal line.

Gerard J. Yupp

Date: 5/4/16