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May 18, 2018

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

RECEIVED-FPSC
2018 MAY 18 PM 3:10
COMMISSION CLERK

Re: Docket No. 180000-EI

Dear Ms. Stauffer:

I enclose for filing in the above docket Florida Power & Light Company's ("FPL's") Request for Confidential Classification of Information Provided in Response to Staff's First Supplemental Data Request (No. 62 and 65). 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 declaration in support of FPL's request.

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

Sincerely,

Kevin I.C. Donaldson

Enclosure

6608328

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BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Florida Power & Light Company's
2017 Ten Year Site Plan

Docket No. 180000-EI
Filed: May 18, 2018

**FLORIDA POWER & LIGHT COMPANY'S
REQUEST FOR CONFIDENTIAL CLASSIFICATION
OF INFORMATION PROVIDED IN RESPONSE TO
STAFF OF THE FLORIDA PUBLIC SERVICE COMMISSION'S
FIRST SUPPLEMENTAL DATA REQUEST (NOS. 62 AND 65)**

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") First Supplemental Data Request (Nos. 62 and 65) ("Confidential Discovery Responses"). In support of its Request, FPL states as follows:

1. On March 6, 2018, Staff served its First Supplemental Data Request (Nos. 1-80) on FPL. FPL's Response to Staff's First Supplemental Data Request (Nos. 62 and 65) contain information of a confidential nature within the meaning of Section 366.093(3), Florida Statutes.

2. FPL served its responses to Staff's First Supplemental Data Request (Nos. 1-80) on May 18, 2018. This request is being filed contemporaneously with the service of the 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 a page-and-line identification of the information highlighted in Exhibit A and a brief description of the Confidential Information. Exhibit C also references the specific statutory bases for the claim of confidentiality and identifies the declarants who support the requested classification.

d. Exhibit D contains the declaration of Tomey Tuttle in support of this Request.

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

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

6. Additionally, certain information relates to the competitive interests of FPL and its vendors, the disclosure of which would impair their competitive interests. This information is protected by Section 366.093(3)(e), Fla. Stat.

7. 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,

John T. Butler
Assistant General Counsel - Regulatory
Kevin I.C. Donaldson
Senior Attorney
Florida Power & Light Company
700 Universe Boulevard
Juno Beach, FL 33408
Telephone: (561) 304-5170
Facsimile: (561) 691-7135
Email: kevin.donaldson@fpl.com

By: _____

Kevin I.C. Donaldson
Florida Bar No. 833401

CERTIFICATE OF SERVICE
Docket No. 180000-EI

I **HEREBY CERTIFY** that a true and correct copy of the foregoing Request for Confidential Classification* has been furnished by electronic service this 18th day of May 2018 to the following:

Moniaishi Mtenga
Division of Engineering
Florida Public Service Commission
2540 Shumard Oak Blvd.
Tallahassee, FL 32399

By: _____


Kevin I.C. Donaldson
Florida Bar No. 833401

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

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EXHIBIT A

CONFIDENTIAL

FILED UNDER SEPARATE COVER

EXHIBIT B

REDACTED COPIES

CONFIDENTIAL

Florida Power & Light Company
 2018 Ten-Year Site Plan - Staff's Supplemental Data Request # 1
 Question No. 62
 Page 2 of 2

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SJRPP CCR is managed in the onsite landfill or applied to a beneficial use. The current landfill will be closed with the decommissioning of the facility. The landfill closure plan required by the CCR rule was filed by October, 2016.

- c. The engineering details for closure of Scherer ash pond are under development and closure process is expected to begin late 2018 and take several years to complete. The SJRPP landfill will close as part of the decommissioning of the site. FPL does not anticipate any adverse impacts to operation of its generating units to comply with the CCR rule at this time.
- d. Construction of the new CCR landfill at Plant Scherer to meet the CCR requirements will require a solid waste permit from the Georgia Environmental Protection Department and is not expected to impact the timeline.
- e. FPL does anticipate seeking cost recovery for the additional costs attributed to the CCR rule requiring early closure of the Scherer ash pond and construction of a new landfill that is compliant with the new design standard. FPL also anticipates seeking cost recovery for the costs of additional closure and monitoring elements for the SJRPP ash landfill.

Year	Estimated Coal Combustion Residuals Rule (CCR) Impacts (2018 \$ millions)			
	Capital Costs	O&M Costs	Fuel Costs	Total Costs
		*	N/A	
		*	N/A	
		*	N/A	
		*	N/A	
		*	N/A	
		*	N/A	
		*	N/A	
		*	N/A	
		*	N/A	
		*	N/A	
<i>Notes</i>				
*Costs projections are not available for the period.				
Capital costs include closure of existing Scherer ash pond and constructions of a new landfill for CCR management.				

Florida Power & Light Company
 2018 Ten-Year Site Plan - Staff's Supplemental Data Request # 1
 Question No. 65
 Attachment No. 1
 Tab 1 of 1

CONFIDENTIAL

Estimated Unit Cost of EPA's New and Proposed Rules

Unit	Unit Type	Fuel Type	Net Sum Capacity (MW)	Estimated Cost of New or Proposed EPA Rules Impacts (2018 \$ millions)					
				MATS	CSAPR/CAIR	CWIS	CCB Non-Hazardous Waste	CCB Special Waste	Total Cost
Cape Canaveral 3	CC	NG, ULSD	1210	N/A	0	9.14	N/A	N/A	9.14
Fort Myers Gas Turbines 1 & 9	GT	DFO	108	N/A	0	N/A	N/A	N/A	0
Fort Myers 2	CC	NG	1524	N/A	0	14.56	N/A	N/A	14.56
Fort Myers 3 A-D	GT	NG, ULSD	786	N/A	0	N/A	N/A	N/A	0
Lauderdale 4 ****	CC	NG, DFO	442	N/A	0	6.08	N/A	N/A	6.08
Lauderdale 5****	CC	NG, DFO	442	N/A	0	6.08	N/A	N/A	6.08
Lauderdale Gas Turbines 3 & 5	GT	NG, DFO	69	N/A	0	N/A	N/A	N/A	0
Lauderdale 6 A-F	GT	NG, DFO	1055	N/A	0	N/A	N/A	N/A	0
Port Everglades 5	CC	NG, ULSD	1055	N/A	0	8.12	N/A	N/A	8.12
Riviera 5	CC	NG, ULSD	1219	N/A	0	7.95	N/A	N/A	7.95
Sanford 4	CC	NG	950	N/A	0	0.01	N/A	N/A	0.01
Sanford 5	CC	NG, DFO	950	N/A	0	0.01	N/A	N/A	0.01
Turkey Point 3	PWR	NUC	811	N/A	N/A	N/A	N/A	N/A	0
Turkey Point 4	PWR	NUC	821	N/A	N/A	N/A	N/A	N/A	0
Turkey Point 5	CC	NG, ULSD	1187	N/A	0	N/A	N/A	N/A	0
Manatee 1	ST	NG, RFO	809	ESP Installation Completed 2013	800 MW Cycling Project Completed	0.003	N/A	N/A	0.003
Manatee 2	ST	NG, RFO	809	ESP Installation Completed 2012	800 MW Cycling Project Completed	0.003	N/A	N/A	0.003
Manatee 3	CC	NG	943	N/A	0	0.003	N/A	N/A	0.003
Martin 1****	ST	NG, RFO	823	ESP Installation Completed 2014	800 MW Cycling Project Completed	N/A	N/A	N/A	0
Martin 2****	ST	NG, RFO	803	ESP Installation Completed 2015	800 MW Cycling Project Completed	N/A	N/A	N/A	0
Martin 3	CC	NG	487	N/A	0	0.003	N/A	N/A	0.003
Martin 4	CC	NG	478	N/A	0	0.003	N/A	N/A	0.003
Martin 8	CC	NG, ULSD	1129	N/A	0	0.003	N/A	N/A	0.003
Martin SOLAR	ST	SUN	75****	N/A	N/A	0.003	N/A	N/A	0.003
St. Lucie 1	PWR	NUC	981	N/A	N/A	6.27	N/A	N/A	6.27
St. Lucie 2	PWR	NUC	840**	N/A	N/A	6.27	N/A	N/A	6.27
West County Energy Center 1	CC	NG, ULSD	1219	N/A	0	N/A	N/A	N/A	0
West County Energy Center 2	CC	NG, ULSD	1219	N/A	0	N/A	N/A	N/A	0
West County Energy Center 3	CC	NG, ULSD	1219	N/A	0	N/A	N/A	N/A	0
SJRPP 1****	ST	BIT	127**	N/A	N/A	N/A	Estimate Not Available from operator	N/A	Estimate Not Available from operator
SJRPP 2****	ST	BIT	127**	N/A	N/A	N/A	Estimate Not Available from operator	N/A	Estimate Not Available from operator
Scherer 4	ST	SUB	634**	Hg Control Installed 2010, FGD Installation 2012	SCR & FGD Installed 2012				
Indiantown Cogeneration	ST	BIT	330	0	N/A	N/A	N/A	N/A	N/A
Space Coast Solar Energy	PV	SUN	10	N/A	N/A	N/A	N/A	N/A	None
Desoto Solar Energy	PV	SUN	25	N/A	N/A	N/A	N/A	N/A	None
Manatee Solar Energy	PV	SUN	74.5	N/A	N/A	N/A	N/A	N/A	None
Babcock Ranch Solar Energy	PV	SUN	74.5	N/A	N/A	N/A	N/A	N/A	None
Citrus Solar Energy	PV	SUN	74.5	N/A	N/A	N/A	N/A	N/A	None
Barefoot Bay Solar Energy	PV	SUN	74.5	N/A	N/A	N/A	N/A	N/A	None
Coral Farms Solar Energy	PV	SUN	74.5	N/A	N/A	N/A	N/A	N/A	None
Hammock Solar Energy	PV	SUN	74.5	N/A	N/A	N/A	N/A	N/A	None
Horizon Solar Energy	PV	SUN	74.5	N/A	N/A	N/A	N/A	N/A	None
Indian River Solar Energy	PV	SUN	74.5	N/A	N/A	N/A	N/A	N/A	None
Loggerhead Solar Energy	PV	SUN	74.5	N/A	N/A	N/A	N/A	N/A	None
Wildflower Solar Energy	PV	SUN	74.5	N/A	N/A	N/A	N/A	N/A	None

Notes

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
 **** SJRPP Units 1 & 2 were retired January 2018 and Martin Units 1 & 2 and Lauderdale Units 4 & 5 are scheduled for retirement in Q4 2018.

EXHIBIT C

JUSTIFICATION TABLE

EXHIBIT C

COMPANY: Florida Power & Light Company
TITLE: List of Confidential Documents
DOCKET NO: 180000-EI
DOCKET TITLE: 2018 Ten-Year Site Plan
DATE: May 18, 2018

Set	Data Request	Conf. Y/N	Line/Column	Florida Statute 366.093(3) Subsection	Declarant
Staff's First Supplemental	62	N	Pg. 1	(d), (e)	Tomey Tuttle
		Y	Pg. 2, Cols. A-B, E, Lns. 22-31		
	65 (Attachment No. 1)	Y	Cols: H-K, Ln. 44	(d), (e)	Tomey Tuttle

EXHIBIT D

DECLARATION

EXHIBIT D

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Florida Power & Light's 2018-2027 Ten-Year Site Plan.

Docket No: 180000-EI


STATE OF FLORIDA)
)
COUNTY OF PALM BEACH) **WRITTEN DECLARATION OF**
) **TOMEY TUTTLE**

1. My name is Tomey Tuttle. I am currently employed by Florida Power & Light Company ("FPL") as Manager in Environmental Services. 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 bids or other 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 (SECTION 366.093(3)(D), F.S.). The information also relates to competitive interests, the disclosure of which would impair the competitive business of the provider of the information (SECTION 366.093(3)(E), F.S.). Specifically, the documents contain information related to FPL's contract with a particular vendor. 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.



Tomey Tuttle

Date: May 4, 2018