

Steel Hector & Davis
Miami, Florida

John T. Butler
(305) 577-2899

November 21, 1990

Steve Tribble
Director, Division of Records and Reporting
Florida Public Service Commission
101 East Gaines Street
Tallahassee, FL 32399

Re: Bucket No. 900796-FI

Dear Mr. Tribble:

Enclosed for filing please find the original and fifteen (15) copies of Florida Power & Light Company's Notice of Intent to Request Confidential Classification. The Notice reflects that FPL requests that its responses to Interrogatory Nos. 1, 3 and a portion of its response to Interrogatory No. 8 of the Staff's First Set of Interrogatories be kept confidential.

I have provided a copy of this letter and the Notice to counsel for all parties of record in this matter.

Respectfully submitted,



John T. Butler

Enclosure

cc: Counsel for all parties of record (w/encl.)

Miami Office
4000 Southeast Financial Center
Miami, FL 33131-2398
(305) 577-2800
Fax: (305) 358-1418

1200 Northbridge Centre 1
West Palm Beach, FL 33401-4307
(305) 650-7200
Fax: (305) 655-1509

440 Royal Palm Way
Palm Beach, FL 33480
(305) 650-7200

1200 Corporate Place
1200 North Federal Highway
Boca Raton, FL 33432
(305) 394-5000
Fax: (305) 394-4856

201 South Monroe
Tallahassee, FL 32301-1848
(904) 222-4194
Fax: (904) 222-8410

DOCUMENT NUMBER-DATE

10448 NOV 21 1990

FPC-RECORDS/REPORTING

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In Re: Petition of Florida Power &
Light Company for Inclusion of
the Scherer Unit 4 Purchase in
Rate Base.

Docket No. 900796-EI
Filed: 11/21/90

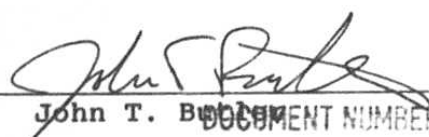
**NOTICE OF INTENT TO REQUEST
CONFIDENTIAL CLASSIFICATION**

Pursuant to Florida Administrative Code Rule 25-22.006(3)(a), Florida Power and Light Company ("FPL") hereby provides notice of its intent to request confidential classification for (1) the documents to be provided in response to Interrogatory Nos. 1 and 3 of the Staff's First Set of Interrogatories; and (2) portions of the documents to be provided in response to Interrogatory No. 8 of the Staff's First Set of Interrogatories. (A copy of the Staff's First Set of Interrogatories is attached as Exhibit "A".) It is FPL's belief that these documents contain proprietary confidential business information and should be exempt from public disclosure. To maintain continued confidential handling of the material during the course of this proceeding, FPL will file a Request for Confidential Classification within 21 days after the confidential documents are provided to the Staff.

Respectfully submitted,

STEEL HECTOR & DAVIS
4000 Southeast Financial
Center
Miami, FL 33131-2398
Attorneys for Florida Power &
Light Company

By



John T. Borden DOCUMENT NUMBER-DATE

RECEIVED

OCT 29 1980

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

310
TALLAHASSEE

In Re: Petition of Florida Power)
& Light Company for inclusion of)
the Scherer Unit 4 Purchase in)
Rate Base.)

DOCKET NO. 900796-EI

STAFF'S FIRST SET OF INTERROGATORIES TO
FLORIDA POWER & LIGHT COMPANY (NOS. 1-18)

The Staff of the Florida Public Service Commission, by and through its undersigned attorney, propounds the following interrogatories, pursuant to Rule 1.340, Florida Rules of Civil Procedure, to Florida Power & Light Company (FPL). These interrogatories shall be answered under oath by you or your agent, who is qualified and who will be identified, with the answers being served as provided by the Rules of Civil Procedure. As provided by Rule 1.340(a), Florida Rules of Civil Procedure, each interrogatory shall be answered separately and fully in writing under oath unless it is objected to. Each answer shall be signed by the person making it.

Give the name, address and relationship to FPL to those persons providing the answers to each of the following interrogatories.

EXHIBIT A

1. Please provide copies of all the fuel contracts, including any amendments, for those with terms greater than one year that relate to Scherer Unit 4.

2. Please provide the monthly ending inventories of coal fuel stock, in tons and dollars for Scherer Unit 4 since commercial operation. Please explain how the stockpile of coal for the Scherer plant is allocated among the various generating units.

3. Please provide copies of any fuel transportation contracts that relate to Scherer Unit 4.

4. Please provide a description of the transportation route(s) for getting fuel to Scherer Unit 4.

5. Please provide a market analysis of the expected average cost of fuel for Scherer Unit 4.

6. Please provide a copy of the "Initial UPS" contract as discussed on page 8 of 18, Document No. 2, testimony of witness Cepero.

7. Please explain the drop in coal volumes from a 1996 level of 482,972 tons to a 1998 level of 286,348 tons shown on page 17 of 18, Document No. 2, testimony of witness Cepero.

8. Please provide the detailed methodology used in the evaluation process for the 1989 RFP mentioned on page 7, testimony of witness Denis. Include the weights used to evaluate both price and non-price factors.

9. Please provide a list of the facilities that have been retained from the RFP process in the event a final agreement is not reached on Scherer Unit 4. [Also, please provide a copy of the final proposals that have been retained.]

10. Please explain why FPL considers demand-side options first, QF's second, and purchased power third when looking at alternatives to construction of generating units in its generation expansion planning process as mentioned on pages 5 and 6, testimony of S. Waters.

11. Please give the location and a general description of the new transmission capacity (500 MW) associated with the purchase of Scherer Unit 4 mentioned on page 18, testimony of S. Waters.

12. Please provide a year-by-year breakdown of the fixed cost of the Scherer purchase shown on page 1 of 1, Document 10, testimony of S. Waters, separating the costs into transmission and non-transmission categories. Do this on both a nominal and present value basis.

13. Please provide a listing of the unscheduled outages since commercial operation of Scherer Unit 4. Include the date of each outage, the duration of each outage, and a description of the reason for the outage.

14. Since the Scherer Unit 4 purchase will delay the construction of the Martin units 5 and 6 from 1996 to 1998, how does this fit in with the ICL project which is designed to eliminate the 1996 need for one of these units?

15. Please explain how the commitment and dispatching of Scherer Unit 4 will be coordinated between JEA and FPL.

16. Please explain the rationale for the 25% factor in the statement on page 4 of 18, Document No. 2, witness Cepero, that "... both JEA and FPL will pay for all fuel received under all existing contracts for Plant Scherer based upon their respective aggregate ownership percentage at various points in time multiplied by 25 percent."

17. Please explain in detail the transmission limitations that may exist prior to June 1993 that could inhibit FPL's ability to transmit its ownership entitlement from Scherer Unit 4 as mentioned on page 6 of 18, Document 2, witness Cepero. Also, please explain why these limitations won't exist after June 1993.

18. Please explain in detail the efforts that the Southern Companies are making in regard to negotiations with peninsular Florida utilities for the construction of additional transmission facilities so as to increase the Southern/Florida interface as mentioned on page 6 of 18, Document No.2, witness Cepero.

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BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In Re: Petition of Florida Power & Light Company for inclusion of the Scherer Unit & Purchase in Rate Base.) DOCKET NO. 900796-EI
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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that Staff's First Set of Interrogatories, Numbers 1 through 18, have been served by U.S. Mail, Postage Prepaid on Matthew M. Childs, Esquire, (Florida Power & Light Company), Steel, Hector & Davis, 215 South Monroe Street, Suite 601, Tallahassee, Florida 32301, with copies mailed by U.S. Mail, Postage Prepaid to the following parties of record, this 26th day of October, 1990:

Jack Shreve, Esquire
Office of Public Counsel
111 West Madison Street
Suite 801
Tallahassee, FL 32399-1400

Frederick J. Murrell
Schroder & Murrell
The Barnett Center, Ste. 375
1001 Third Avenue West
Bradenton, Florida 34205

H.G. Wells
Director
Coalition of Local Governments
Post Office Box 4748
Clearwater, Florida 34618-4748


EDWARD A. TELLECHEA
Staff Counsel

FLORIDA PUBLIC SERVICE COMMISSION
101 East Gaines Street
Fletcher Building, - Room 226
Tallahassee, FL 32399-0850
(904)487-2740

EAT:bmi
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BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In Re: Petition of Florida Power &
Light Company for Inclusion of
the Scherer Unit 4 Purchase in
Rate Base.

Docket No. 900796-EI

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing Florida Power & Light Company's Notice of Intent to Request Confidential Classification has been hand-delivered or served by U.S. Mail this 21st day of November, 1990 on the following:

Frederick J. Murrell, Esquire
Schroder & Murrell
The Barnett Center Suite 375
1001 Third Avenue West
Bradenton, Florida 34205

Frederick M. Bryant, Esquire
Moore, Williams, Bryant,
Peebles & Gautier, P.A.
Post Office Box 1169
Tallahassee, Florida 32302

Robert C. Williams
Director of Engineering
7201 Lake Ellenor Drive
Orlando, Florida 32809

Joseph A. McGlothlin
522 East Park Avenue
Suite 200
Tallahassee, Florida 32301
(courtesy copy)

Jack Shreve, Esquire
Office of Public Counsel
111 West Madison Street
Suite 801
Tallahassee, Florida 32399-1400

Edward A. Tellechea, Esquire
Staff Counsel
Florida Public Service Commission
101 East Gaines Street
Fletcher Building - Room 226
Tallahassee, Florida 32399-0850

H. G. Wells
Director, Coalition of Local Governments
P.O. Box 4748
Clearwater, Florida 34618-4748


John T. Butler