



Maria J. Moncada
Senior Attorney
Florida Power & Light Company
700 Universe Boulevard
Juno Beach, FL 33408-0420
(561) 304-5795
(561) 691-7135 (Facsimile)
E-mail: maria.moncada@fpl.com

August 1, 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

Re: Docket No. 20180001-EI

REDACTED

Dear Ms. Stauffer:

I enclose for filing in the above docket Florida Power & Light Company's ("FPL") Second Request for Extension Confidential Classification of Materials Provided Pursuant to Audit No. 15-023-4-2. The request includes First Revised Exhibits A, B (two copies), C and Second Revised Exhibit D.

First Revised Exhibit A consists of the confidential documents, and all the information that FPL asserts is entitled to confidential treatment has been highlighted. First Revised Exhibit B is an edited version of First Revised Exhibit A, in which the information FPL asserts is confidential has been redacted. First Revised Exhibit C is a justification table in support of FPL's Second Request for Extension of Confidential Classification. Second Revised Exhibit D contains the declaration in support of FPL's Request.

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

Sincerely,

Maria J. Moncada

RECEIVED-FPSC
2018 AUG -1 PM 12:18
COMMISSION
CLERK

Enclosure

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

- COM _____
- AFD exh. B
- APA _____
- ECO _____
- ENG _____
- GCL _____
- IDM _____
- CLK _____

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

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

Docket No: 20180001-EI

Date: August 1, 2018

**FLORIDA POWER & LIGHT COMPANY'S SECOND REQUEST
FOR EXTENSION OF CONFIDENTIAL CLASSIFICATION OF
MATERIALS PROVIDED PURSUANT TO AUDIT NO. 15-023-4-2**

Pursuant to Section 366.093, Florida Statutes ("Section 366.093"), and Rule 25-22.006, Florida Administrative Code, Florida Power & Light Company ("FPL") hereby submits its Second Request for Extension of Confidential Classification of Information Provided Pursuant to Audit No. 15-023-4-2 ("Confidential Information"). In support of this request, FPL states as follows:

1. On May 21, 2015, FPL filed a Request for Confidential Classification of the Confidential Information, which included Exhibits A, B, C and D ("May 21, 2015 Request"). By Order No. PSC-15-0378-CFO-EI, dated September 10, 2015 ("Order 0378"), the Commission granted FPL's May 21, 2015 Request.

2. On January 20, 2017, FPL filed its First Request for Extension of Confidential Classification of Confidential Materials, which included First Revised Exhibit D ("January 20, 2017 Request"). By Order No. PSC-17-0046-CFO-EI, dated February 6, 2017 ("Order 0046"), the Commission granted FPL's January 20, 2017 Request. FPL adopts and incorporates by reference the January 20, 2017 Request and Order 0046.

3. The period of confidential treatment granted by Order 0046 will soon expire. Some of the Confidential Information that was the subject of FPL's January 20, 2017 Request and Order 0046 warrants continued treatment as proprietary and confidential business

information within the meaning of Section 366.093(3). Accordingly, FPL hereby submits its Second Request for Extension of Confidential Classification.

4. Included with this request are First Revised Exhibit A, First Revised Exhibit B, together with First Revised Exhibit C to reduce the number of pages for which confidential treatment is sought. FPL has identified in First Revised Exhibits A, B and C all of the information in work papers that warrants continued confidential treatment. First Revised Exhibit C is a table that identifies the specific pages, lines or columns that remain confidential. The table also references the specific statutory basis for confidentiality and the declarants who support the requested classification.

5. Included as Second Revised Exhibit D is the declaration of Gerard J. Yupp in support of this request.

6. The Confidential Information is intended to be and has been treated by FPL as private, its confidentiality has been maintained, and its disclosure would cause harm to FPL and its customers. Pursuant to Section 366.093, such materials are entitled to confidential treatment and are exempt from the disclosure provisions of the public records law. Thus, once the Commission determines 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.

7. As more fully described in the declaration included as Second Revised Exhibit D, certain documents 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 and services on favorable terms. This information is protected by Section 366.093(3)(d), Fla. Stat.

8. Also, certain information in these documents and materials concern FPL's competitive interests and would place FPL at a disadvantage when coupled with the other information that is publicly available. This information is protected by Section 366.093(3)(e), Fla. Stat.

9. Pursuant Section 366.093(4), F.S., the information for which confidential classification is granted remains protected from disclosure up to 18 months unless good cause is shown to grant protection from disclosure for a longer period. Currently, the Commission retains audit reports for period of seven years at which time the audit materials are returned to FPL unless Commission staff or another affected person requests that these audit materials continue to be retained. The nature of these materials will not change in the next three years. Therefore, to promote administrative efficiency, FPL requests confidential classification for a period of thirty-six (36) months. 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 thirty-six (36) 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, Florida Power & Light Company respectfully requests that its Second

Request for Extension of Confidential Classification be granted.

Respectfully submitted,

Maria J. Moncada
Senior Attorney
Florida Power & Light Company
700 Universe Boulevard
Juno Beach, FL 33408
Telephone: (561) 304-5795
Facsimile: (561) 691-7135
Email: maria.moncada@fpl.com

By: 

Maria J. Moncada
Florida Bar No. 0773301

CERTIFICATE OF SERVICE
Docket No. 20180001-EI

I **HEREBY CERTIFY** that a true and correct copy of the foregoing Second Request for Extension of Confidential Classification has been furnished by electronic service on this 1st day of August 2018 to the following:

Suzanne Brownless, Esq.
Danijela Janjic, Esq.
Division of Legal Services
Florida Public Service Commission
2540 Shumard Oak Blvd.
Tallahassee, Florida 32399-0850
sbrownle@psc.state.fl.us
djanjic@psc.state.fl.us

J.R. Kelly, Esq.
Patricia Christensen, Esq.
Charles Rehwinkel, Esq.
Erik L. Saylor, Esq.
Office of Public Counsel
c/o The Florida Legislature
111 West Madison Street, Room 812
Tallahassee, Florida 32399
kelly.jr@leg.state.fl.us
christensen.patty@leg.state.fl.us
rehwinkel.charles@leg.state.fl.us
saylor.erik@leg.state.fl.us

Paula K. Brown, Manager
Tampa Electric Company
Regulatory Coordinator
Post Office Box 111
Tampa, Florida 33601-0111
regdept@tecoenergy.com

James D. Beasley, Esq.
J. Jeffrey Wahlen, Esq.
Ausley & McMullen
P.O. Box 391
Tallahassee, Florida 32302
jbeasley@ausley.com
jwahlen@ausley.com
Attorneys for Tampa Electric Company

Andrew Maurey
Michael Barrett
Division of Accounting and Finance
Florida Public Service Commission
2540 Shumard Oak Blvd.
Tallahassee, Florida 32399-0850
amaurey@psc.state.fl.us
mbarrett@psc.state.fl.us

Matthew R. Bernier, Esq.
106 East College Avenue, Suite 800
Tallahassee, Florida 32301
matthew.bernier@duke-energy.com

Dianne M. Triplett, Esq.
299 First Avenue North
St. Petersburg, Florida 33701
dianne.triplett@duke-energy.com
Attorneys for Duke Energy Florida

Jeffrey A. Stone
Rhonda J. Alexander
Gulf Power Company
One Energy Place
Pensacola, Florida 32520-0780
jastone@southernco.com
rjalexad@southernco.com

Russell A. Badders, Esq.
Steven R. Griffin, Esq.
Beggs & Lane
P.O. Box 12950
Pensacola, Florida 32591-2950
rab@beggslane.com
srg@beggslane.com
Attorneys for Gulf Power Company

Mike Cassel
Director, Regulatory and Governmental
Affairs

Florida Public Utilities Company
1750 S.W. 14th Street, Suite 200
Fernandina Beach, Florida 32034
mcassel@fpuc.com

Beth Keating, Esq.
Gunster Law Firm
215 South Monroe St., Suite 601
Tallahassee, Florida 32301-1804
bkeating@gunster.com

**Attorneys for Florida
Public Utilities Company**

Robert Scheffel Wright, Esq.
John T. LaVia, III, Esq.
Gardner, Bist, Wiener, et al
1300 Thomaswood Drive
Tallahassee, Florida 32308
schef@gbwlegal.com
jlavia@gbwlegal.com

Attorneys for Florida Retail Federation

James W. Brew, Esq.
Laura A. Wynn, Esq.
Stone Mattheis Xenopoulos & Brew, PC
1025 Thomas Jefferson Street, NW
Eighth Floor, West Tower
Washington, DC 20007-5201
jbrew@smxblaw.com
law@smxblaw.com

**Attorneys for PCS Phosphate -
White Springs**

Jon C. Moyle, Esq.
Moyle Law Firm, P.A.
118 N. Gadsden St.
Tallahassee, Florida 32301
jmoyle@moylelaw.com

**Attorneys for Florida Industrial Power
Users Group**

By: _____


Maria J. Moncada
Florida Bar No. 0773301

**FIRST REVISED
EXHIBIT A**

**CONFIDENTIAL
FILED UNDER SEPARATE COVER**

**FIRST REVISED
EXHIBIT B**

REDACTED COPIES

Qualifying Facility Monthly Billing Statement

Billing Month: April, 2014

Florida Power & Light (E1802)
Capacity Cost Recovery Clause
Dkt.#150001-EI, ACN 15-023-4-2
TYE 2014

4/15/14
EHP
2/15

Facility Name: INDIANTOWN

Region: SOUTHEAST

Title Purchased Power

Number of Hours in Month: 696 (A)

Number of Peak Hours in Month: 261

1 Number of Available Run Hours: [REDACTED]

2 Number of Available Run On-Peak Hours: [REDACTED]

3 Number of Dispatch Hours: [REDACTED]

Committed Capacity: 330.000 MW *Bill Demand*

4 Excess Energy, All Hours: [REDACTED] MWH

5 Excess Energy, All Peak Hours: [REDACTED] MWH

Energy Received, All Hours: 69,076.862 MWH

6 Energy Received, All Peak Hours: [REDACTED] MWH

7 Maximum Hourly Energy: [REDACTED] MWH at [REDACTED]

8 Capacity Billing Factor: [REDACTED] %

9 Annual Capacity Factor: [REDACTED] %

10 Annual Peak Capacity Factor: [REDACTED] %

11 Unit Energy Cost: [REDACTED] \$/MWH

Monthly Energy Payment: \$4,888,682.92

Monthly Capacity Payment: ⁴⁶⁻² 2006 \$11,548,398.51 *PC* (46-2/1)

12 ICL Fuel Cost for Month: [REDACTED]

13 ICL Fuel Cost for Year: [REDACTED]

CONFIDENTIAL

Computation Date/Time : 05/01/14 at 14:19:27



PCB

Qualifying Facility Monthly Billing Statement

Billing Month: March, 2014

est.

4/15/14 JHP 3/15

Facility Name: INDIANTOWN

Region: SOUTHEAST

Number of Hours in Month: 743

(A)

Number of Peak Hours in Month: 271

Florida Power & Light (E1802)
Capacity Cost Recovery Clause
Dkt.#150001-EI, ACN 15-023-4-2
TYE 2014

Title Revised Power

CONFIDENTIAL

- 1 Number of Available Run Hours: [REDACTED]
- 2 Number of Available Run On-Peak Hours: [REDACTED]
- 3 Number of Dispatch Hours: [REDACTED]
- Committed Capacity: 330.000 MW

4 Excess Energy, All Hours: [REDACTED] MWH

5 Excess Energy, All Peak Hours: [REDACTED] MWH

Energy Received, All Hours: 22,053.024 MWH

6 Energy Received, All Peak Hours: [REDACTED] MWH

7 Maximum Hourly Energy: [REDACTED] MWH at [REDACTED] NCP

8 Capacity Billing Factor: [REDACTED] %

9 Annual Capacity Factor: [REDACTED] % 1

10 Annual Peak Capacity Factor: [REDACTED] % 2

11 Unit Energy Cost: [REDACTED] \$/MWH

Monthly Energy Payment: \$1,639,298.27

Monthly Capacity Payment: \$11,548,398.51

(A) 46-2 / 1-1

12 ICL Fuel Cost for Month: [REDACTED]

13 ICL Fuel Cost for Year: [REDACTED]

Computation Date/Time : 04/07/14 at 10:44:20.



D/m
46-2
2-2

REDACTED VERSION OF CONFIDENTIAL DOCUMENTS

Capacity Audit Workpaper Number 46-2/2-3

[Pages 1 through 3]

Purchased Power

INDIANTOWN O & M CREDIT

SECTION 8.6 & APPENDIX A

Title

Purchased Power

A B C D E A2

*4/15
02/18/15
JLP 4/15*

PERIOD	JEFOMMS %				Calculation	O&M AMOUNT	ADJUSTMENTS
2012	1st	1.836	1.833	1.834	1.832	3/11 vs 2/11	
	2nd	1.847	1.846	1.846		4/11 vs 3/11	
	3rd	1.842	1.841	1.842	1.841	1/12 vs 4/11	
	4th	1.837	1.842	1.840	1.841	2/12 vs 1/12	
2013	1st	1.854	1.853	1.854	1.010	3/12 vs 2/12	
	2nd	1.858	1.012			4/12 vs 3/12	
	3rd	1.862	1.015			1/13 vs 4/12	
	4th	1.014	1.013			2/13 vs 1/13	
2014	1st	1.016	1.015			3/13 vs 2/13	
	2nd	1.020				4/13 vs 3/13	
	3rd	1.024				1/14 vs 4/13	
	4th	1.021				2/14 vs 1/14	
2015	1st	1.019				3/14 vs 2/14	
	2nd					4/14 vs 3/14	
	3rd					1/15 vs 4/14	
	4th					2/15 vs 1/15	

New Changes

CONFIDENTIAL

(A)

*See 46-2
2-3
F1*

for explanation

*46-2
2-3
1-1*

[Redacted]

per calculation

*on 46-2
2-3 p1*

PBC

*46-2
2-3 p1*

JAP
4/15 4/15

Title Purchased Power

Capacity Cost Recovery Clause - Docket No. 150001-EI
Audit Request No. 21 Follow-Up

CONFIDENTIAL

Q:

1. Please explain the discrepancy of the O&M Credit amount of [redacted] used in calculation and [redacted] per Section 8.6 & Appendix A attachment, 2
2. Please explain what CIL - Change in Law - represents in relation to the capacity charges.
3. Please explain why no CAPA charge is on invoice or recovery amount.

A:

1. The Indiantown O&M Credit table provided in response to capacity clause audit request no. 20 was from the first quarter of 2015-- the most recent version available when the audit request was received. However, the first quarter 2014 table should have been provided as well.

46-2
2-3
1-1

46-2
2-3 p4

In early April 2014 the most recently available index value was from the third quarter of 2013. Consequently, the third quarter index value was used to calculate the first quarter 2014 base O&M Credit amount and the March 2014 capacity payment. The first quarter 2014 table has been included as part of this response. [redacted] used in the calculation has been highlighted.

C

3

2. The Plant Scherer Unit No. 3 contract provided in response to capacity clause audit request no. 21 includes an explanation of how the Change in Law provision affects payments/charges. Article 11, Change in Law, begins on page 43 and ends on page 45.

46-2
2-3
1-2

46-4
2

3. The Harris unit was not in-service during May 2014. The plant was in an outage, so Accounting did not initially accrue a CAPA amount for the period. CAPA amounts for the May to September period were included in the October billing. The October invoice has been included as part of this response.

46-2
2-3
1-3

46-5
2



SOURCE Req 21 follow up

46-2
2-3
1

INDIANTOWN O & M CREDIT
 CONFIDENTIAL AUDIT REQUEST NO. 21 FOLLOW UP

4/15/15
 JHP
 4/15
 04/09/15

Title Purchased Power

SECTION 8.6 & APPENDIX A

PERIOD	JEFOMMS %				Calculation	O&MC AMOUNT	ADJUSTMENTS
	2nd	3rd	4th	1st			
	2nd	1.766	1.788	1.798	1.799	3/10 vs 3/10	
	3rd	1.792	1.807	1.820	1.821	1/11 vs 4/10	
	4th	1.796	1.811	1.812	1.816	2/11 vs 1/11	
2012	1st	1.836	1.833	1.834	1.832	3/11 vs 2/11	
	2nd	1.847	1.845	1.846		4/11 vs 3/11	
	3rd	1.842	1.841	1.842	1.841	1/12 vs 4/11	
	4th	1.837	1.842	1.840	1.841	2/12 vs 1/12	
2013	1st	1.854	1.853	1.854		3/12 vs 2/12	
	2nd	1.858				4/12 vs 3/12	
	3rd	1.862				1/13 vs 4/12	
	4th					2/13 vs 1/13	
2014	1st					3/13 vs 2/13	
	2nd					4/13 vs 3/13	
	3rd					1/14 vs 4/13	
	4th					2/14 vs 1/14	

New
 Changes

46-2
 2-3 P4

See explanation 46-2
 2-3
 1

CONFIDENTIAL



SOURCE Req 21 Follow up

rate Ag 1st a Ag

4/16/14

JHP
3/15

Title Purchased Power Billing Facility Monthly Billing Statement

Facility Name: BROWARD RESOURCE RECOVERY SOUTH
Region: Southeast
Billing Month: April, 2014

EST.

Number of Hours in Month: 720

Number of Peak Hours in Month: 270

A B C
C1 C2

Energy Received, All Hours: 29,120.767 MWH 6,341.973 MWH (AA) 2,520.000 MWH ('91)

- 1 Energy Received, All Peak Hours: [REDACTED]
- 2 Sales (Wheeled): [REDACTED] MWH
- 3 Net Energy Received, All Hours: [REDACTED] MWH
- 4 Maximum Hourly Energy: [REDACTED] MWH at [REDACTED]
- Committed Capacity: $\frac{46.2}{53}$ 3,500 MW ('91) Bill Demand
- 5 Monthly Billing Capacity Factors: $\frac{46.2}{53}$ [REDACTED] % ('91)
- 6 Monthly Peak Capacity Factor: [REDACTED] % ('91)
- 7 Annual Capacity Factor: [REDACTED] % ('91)
- 8 Annual Peak Capacity Factor: [REDACTED] % ('91)
- 9 Billing Capacity Factor: [REDACTED] % ('91)
- 10 Unit Energy Cost: [REDACTED] \$/MWH ('91)

Monthly Energy Payment: (As Available) \$196,000.21 + \$69,718.92 = Total \$265,719.13

Monthly Capacity Payment: \$103,215.00 = \$103,215.00

Execution Date/Time: 05/01/14 at 04:05:56
Invoice ID: 511

$\frac{46.2}{53}$
1



CONFIDENTIAL

P26

$\frac{46.2}{5}$

Florida Power & Light (E1802)
 Capacity Cost Recovery Clause
 Dkt.#150001-EI, ACN 15-023-4-2
 TYE 2014

Title Purchased Power

71 108 of Separate Contracts 4/15 JHP 3/K

FLORIDA POWER & LIGHT COMPANY

Billing Statement
 For Purchased Power From
WHEELABRATOR SOUTH BROWARD
 For Transaction Period:

Act

MARCH 1, 2014 through MARCH 31, 2014

<u>A</u>	<u>B</u>	<u>AMOUNT</u>
<u>GENERATION</u>		
15,311.648 MWH ('09 AA)		\$ 434,196.02
██████████		1,183.06
		435,329.08
2,590.000 MWH ('91 CONTRACT)		71,422.66
17,901.648 Total MWH	Monthly Energy Payment	506,751.74
Amount Due for Capacity Payment		
	('91 CONTRACT)	103,215.00
	Monthly Capacity Payment	103,215.00
FPL Customer Charge ²		(1491.99)
TOTAL		\$ 608,474.75

4.2 / 1-1

² Revised '91 Contract Unit Energy Cost
¹ GSLDT-3 Rate Schedule effective 1/02/14

Bill Demand 3.5 ✓



INVOICE NO: EMT-0314-07-07

CONFIDENTIAL

4.2 / 5-1

Title Purchase Power

4/15/14
 JHP
 3/15
 Est

Qualifying Facility Monthly Billing Statement

Facility Name: BROWARD RESOURCE RECOVERY SOUTH
 Region: SOUTHEAST
 Billing Month: March, 2014

- Number of hours in Month : 743 A B C
- Number of peak hours in Month : 271 C1 C2
- Energy Received, All Hours : 37,465.758 MWH 15,311.648 MWH (AA) 2,590.000 MWH ('91)
- 1 Energy Received, All Peak Hours [REDACTED] [REDACTED] [REDACTED]
- 2 Sales (Wheeled): [REDACTED] MWH
- 3 Net Energy Received, All Hours: [REDACTED] MWH
- 4 Maximum Hourly Energy : [REDACTED] MWH at [REDACTED] DCP CICE
- Committed Capacity : 3,500 MW ('91)
- 5 Monthly Billing Capacity Factor : [REDACTED] % ('91)
- 6 Monthly Peak Capacity Factor: [REDACTED] % ('91)
- 7 Annual Capacity Factor : [REDACTED] % ('91)
- 8 Annual Peak Capacity Factor : [REDACTED] % ('91)
- 9 Billing Capacity Factor : [REDACTED] % ('91) C2
- 10 Unit Energy Cost : [REDACTED] \$/MWH ('91)

	(As Available)		('91)	=	Total
Monthly Energy Payment:	\$434,196.02	+	\$71,422.66	=	\$505,618.68
Monthly Capacity Payment :			\$103,215.00	=	\$103,215.00

46.2
 1-1

Execution Date/Time : 04/21/14 at 13:56:26

CONFIDENTIAL



46.2
 5-2

REDACTED VERSION OF CONFIDENTIAL DOCUMENTS

Capacity Audit Workpaper Number 46-2/5-3

[Pages 1 through 2]

Purchased Power

**FIRST REVISED
EXHIBIT C**

JUSTIFICATION TABLE

SECOND REVISED EXHIBIT C

COMPANY: Florida Power & Light Company
 TITLE: List of Confidential Workpapers
 AUDIT: FPL Capacity Audit
 AUDIT CONTROL NO: 15-023-4-2
 DOCKET NO: 20180001-EI
 DATE: August 1, 2018

Bold denotes revision to reduce the amount of confidential classification previously requested or a new declarant

Workpaper No.	Description	No. of Pages	Conf Y/N	Line No./Column No.	Florida Statute 366.093 (3) Subsection	Declarant
16-3/1	Capital Sample	2	N			
42-2	Transmission Revenues	1	N			
42-2/1	Transmission Revenues	5	N			
42-2/1-1	Transmission Revenues	1	N			
42-2/2	Sales	1	N			
42-2/2-1	Sales	1	N			
42-2/2-2	Sales	1	N			
42-3	Transmission Revenues	1	N			
42-3/1	Transmission Revenues	6	N			
44-4	Incremental Fee Sample	5	N			
45-1	Transmission Charges	1	N			
45-2	Transmission Charges	1	N			
45-2/1	Transmission Charges	1	N			
45-3	Transmission Charges	1	N			
45-3/1	Transmission Charges	1	N			
45-3/2	Transmission Charges	1	N			
45-4	Transmission Charges	1	N			
45-4/1	Transmission Charges	1	N			
45-5	Transmission Charges	1	N			
45-6	Transmission Charges	1	N			
45-6/1	Transmission Charges	1	N			
45-7	Transmission Charges	1	N			
45-7/1	Transmission Charges	1	N			
45-8	Explanation of Transmission Charges	1	N			
46-2	Purchased Power	1	N			
46-2/1	Purchased Power	1	N			
46-2/1-1	Purchased Power	1	N			
46-2/2	Purchased Power	1	Y	Col. A, Lns. 1-13	(d), (e)	G. Yupp
46-2/2-1	Purchased Power	1	N			
46-2/2-2	Purchased Power	1	Y	Col. A, Lns. 1-13	(d), (e)	G. Yupp
46-2/2-3	Purchased Power	4	Y	Pgs. 1-3, ALL Pg. 4, Cols. A-E, F	(d)	G. Yupp
46-2/2-3/1	Purchased Power	1	Y	Col. A, Line 1 Col. B, Line 2 Col. C, Line 3	(d)	G. Yupp

Workpaper No.	Description	No. of Pages	Conf Y/N	Line No./Column No.	Florida Statute 366.093 (3) Subsection	Declarant
46-2/2-3/1-1	Purchased Power	1	Y	Cols. A-E	(d)	G. Yupp
46-2/2-3/1-2	Purchased Power	3	N			
46-2/2-3/1-3	Purchased Power	1	N			
46-2/3	Purchased Power	1	N			
46-2/3-1	Purchased Power	1	N			
46-2/3-2	Purchased Power	1	N			
46-2/3-3	Purchased Power	4	N			
46-2/4	Purchased Power	1	N			
46-2/4-1	Purchased Power	1	N			
46-2/4-2	Purchased Power	1	N			
46-2/4-3	Purchased Power	2	N			
46-2/5	Purchased Power	1	Y	Col. A, Lns. 1-10 Col. B, Lns 1, 4 Col. C, Line 1	(d), (e)	G. Yupp
46-2/5-1	Purchased Power	1	Y	Cols. A-B, Line 1	(d)	G. Yupp
46-2/5-2	Purchased Power	1	Y	Col. A, Lns. 1-10 Col. B, Lns 1, 4 Col. C, Line 1	(d), (e)	G. Yupp
46-2/5-3	Purchased Power	2	Y	ALL	(d)	G. Yupp
46-2/6	Purchased Power	1	N			
46-2/6-1	Purchased Power	1	N			
46-2/6-2	Purchased Power	1	N			
46-2/6-3	Purchased Power	3	N			
46-3	Purchased Power	1	N			
46-3/1	Purchased Power	1	N			
46-3/1-1	Purchased Power	1	N			
46-4	Purchased Power	1	N			
46-4/1	Purchased Power	1	N			
46-4/1-1	Purchased Power	1	N			
46-4/1-2	Purchased Power	1	N			
46-4/2	Purchased Power	1	N			
46-4/2-1	Purchased Power	1	N			
46-4/2-2	Purchased Power	3	N			
46-4/2-3	Purchased Power	2	N			
46-5	Purchased Power	1	N			
46-5/1	Purchased Power	1	N			
46-5/1-1	Purchased Power	1	N			
46-5/1-2	Purchased Power	1	N			
46-5/2	Purchased Power	1	N			
46-5/2-1	Purchased Power	2	N			
46-5/2-2	Purchased Power	1	N			
46-5/2-3	Purchased Power	3	N			
46-6	Purchased Power	1	N			
46-6/1	Purchased Power	1	N			
46-6/1-1	Purchased Power	1	N			
46-6/1-2	Purchased Power	1	N			
46-6/2	Purchased Power	1	N			
46-6/2-1	Purchased Power	4	N			
46-6/2-2	Purchased Power	1	N			
46-6/2-3	Purchased Power	3	N			

Workpaper No.	Description	No. of Pages	Conf Y/N	Line No./Column No.	Florida Statute 366.093 (3) Subsection	Declarant
53-1	NRC Fees	1	N			
53-2	NRC Fees	1	N			
53-3	NRC Fees	3	N			
53-3/1	NRC Schedule of Fees	1	N			

**SECOND REVISED
EXHIBIT D**

DECLARATION

SECOND REVISED EXHIBIT D

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

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

Docket No: 20180001-EI

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 business unit. I have personal knowledge of the matters stated in this written declaration.

2. I have reviewed the documents referenced and incorporated in FPL's Second Request for Extension of Confidential Classification of Information Obtained in Connection with Audit No. 15-023-4-2 for which I am identified as the declarant. The documents or materials that I have reviewed and which are asserted by FPL to be proprietary confidential business information contain or constitute contractual data such as pricing formulas and other terms, payment records, supplier operations, and vendor and supplier rates for capacity and energy transactions, the disclosure of which would impair the efforts of FPL to contract for capacity and energy on favorable terms for the benefit of its customers, and would impair the competitive interests of FPL and its vendors. Certain information in these documents and materials 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. Nothing has occurred since the issuance of Order No. PSC-17-0046-CFO-EI to render the information stale or public, such that continued confidential treatment would not be appropriate. Therefore, the information should remain confidential for a period of not less than 36 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.


GERARD J. YUPP

Date: 7/30/18