

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: February 12, 2018

FLORIDA POWER & LIGHT COMPANY'S FIRST REQUEST FOR EXTENSION OF CONFIDENTIAL CLASSIFICATION

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 First Request for Extension of Confidential Classification of information provided in response to AARP’s Third Set of Interrogatories (No. 74), Office of Public Counsel’s (“OPC”) First Set of Interrogatories, (No. 3, Attachment 1) and OPC’s Eighteenth Set of Interrogatories (No. 380); and FPL’s Supplemental (Amended) response to Staff’s First Set of Interrogatories (No. 37) (“Confidential Discovery Responses”). In support of this request, FPL states as follows:

1. On August 4, 2016, FPL filed a Request for Confidential Classification of the Confidential Discovery Responses, which included Exhibits A, B, C and D (“August 4, 2016 Request”). [Document Nos. 05883-16, 05884-16] By Order No. PSC-16-0331-CFO-EI, dated August 11, 2016 (“Order 0331”), the Commission granted FPL’s August 4, 2016 Request. FPL adopts and incorporates by reference the August 4, 2016 and Order 0331.

2. The period of confidential treatment granted by Order 0331 will soon expire. The Confidential Discovery Responses that were the subject of FPL’s August 4, 2016 Request and

Order 0331 warrant continued treatment as proprietary and confidential business information within the meaning of Section 366.093(3). Accordingly, FPL hereby submits its First Request for Extension of Confidential Classification.

3. All of the information designated in Exhibits A and B to the August 4, 2016 Request remain confidential. Accordingly, those exhibits will not be reproduced or reattached here. Regarding First Revised Exhibit C, all of the information listed in the August 4, 2016 Request remains confidential; the Exhibit is revised only to identify Meredith Quick as a new declarant.

4. Also included in support of this Request is First Revised Exhibit D, which consists of the declarations of Robert E. Barrett, Jr., Sam Forrest and Meredith Quick.

5. The Confidential Discovery Responses are intended to be and have 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.

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

7. Also, certain Confidential Discovery Responses relate 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.

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 First Request for Extension of Confidential Classification be granted.

Respectfully submitted,

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By: s/ Maria J. Moncada
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CERTIFICATE OF SERVICE
Docket No. 20160021-EI

I **HEREBY CERTIFY** that a true and correct copy of the foregoing First Request for Extension of Confidential Classification has been furnished by electronic mail this 12th day of February 2018 to the following parties:

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By: /s/ Maria J. Moncada
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FIRST REVISED EXHIBIT C

EXHIBIT C

COMPANY: Florida Power & Light Company
TITLE: List of Confidential Documents
DOCKET NO: 20160021-EI
DOCKET TITLE: Petition for Increase in Rates by Florida Power & Light Company
DATE: February 12, 2018

Bold denotes a new declarant.

Discovery Set	Item No.	Conf. Y/N	Bates Number	Line / Column	Florida Statute 366.093(3) Subsection	Declarant
AARP Third Set of Interrogatories	74	Y	AARP 003701	Ln. 31a	(e)	Robert E. Barrett, Jr.
		Y	AARP 003702	Lns. 2a, 2b		
	74	Y	AARP 003703	ALL		
		Y	AARP 003704	ALL		
		Y	AARP 003705	ALL		
		Y	AARP 003706	ALL		
OPC First Set of Interrogatories	3 (attachm 1)	Y	Page 1	Lns. 4a, 5a, 6a, 7a, 8a, 9a, 14a, 15a, 16a, 17a, 18a, 19a	(e)	Robert E. Barrett, Jr.
OPC Eighteenth Set of Interrogatories	380	Y	OPC 031284	Pg. 1, Cols. B-D, F-I, K-M, O (Lns 13-90) Cols. E, J, and N (Lns 13-24, 26-37, 39-50, 52-63, 65-76, 78-89) Pg. 2, Cols P-Q, S-U, W-Y, AA-AC, AE, (Lns. 13-90) Cols. R, V, Z, AD (Lns. 13-24, 26-37, 39-50, 52-63, 65-76, 78-89) Pg. 3, Cols. Cols AF-AG, AI-AK, AM, (Lns. 13-90) Cols. AH, AL (Lns. 13-24, 26-37, 39-50, 52-63, 65-76, 78-89)	(d), (e)	Sam Forrest
Staff's First Set of Interrogatories-Supplemental (Amended) Request of	37	Y	STAFF 000924	Lns. 16 and 17	(d), (e)	Meredith Quick

FIRST REVISED EXHIBIT D

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 **ROBER E BARRETT, Jr.**

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. The documents or materials that I have reviewed and which are asserted by FPL to be proprietary confidential business information contain competitive business information regarding our financial forecasts. The release of this information could impair our competitive interests and would violate Securities and Exchange Commission rules regarding the disclosure of material non-public information. 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-16-0331-CFO-EI to render the designated information stale or public, such that continued confidential treatment would not be appropriate. Therefore, consistent with the provisions of the Florida Administrative Code, such materials should remain confidential for a period of at least an additional eighteen (18) months. In addition, they should be returned to FPL as soon as the information is no longer necessary for the Commission to conduct its business so that FPL can continue to maintain the confidentiality of these documents.

4. 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: 1/17/18

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)

DECLARATION OF SAM FORREST

1. My name is Sam Forrest. I am currently employed by Florida Power & Light Company ("FPL") as Vice President of 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 and information included in Exhibit A to FPL's Request for Confidential Classification. The documents and materials in Exhibit A which are asserted by FPL to be proprietary confidential business information relating to competitive interests contain financial details related to FPL's asset optimization activities for natural gas and electric transmission. The disclosure of this information would impair FPL's ability to execute transactions for natural gas commodity sales, natural gas storage, natural gas transportation, natural gas options, asset management agreements, power options and electricity transmission on favorable terms for the benefit of its customers, would impair the competitive interests of FPL and its vendors, and would place FPL at a competitive disadvantage when coupled with other information that is publicly available. The information provided by FPL also contains or constitutes contractual data, the disclosure of which would impair the efforts of FPL to contract for goods or services on favorable terms. To the best of my knowledge, FPL has maintained the confidentiality of this information.

3. Nothing has occurred since the issuance of Order No. PSC-16-0331-CFO-EI to render the designated information stale or public, such that continued confidential treatment would not be appropriate. Therefore, consistent with the provisions of the Florida Administrative Code, such materials should remain confidential for a period of at least an additional eighteen (18) months. In addition, the materials 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.



SAM FORREST

Date: 1/25/18

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 **MEREDITH QUICK**

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

2. I have reviewed the document 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 document that I have reviewed and which is asserted by FPL to be proprietary confidential business information contain or constitute information relating to bids or other contractual data, the disclosure of which would impair the competitive business of the public utility or its affiliates to contract for goods or services on favorable terms. Specifically, the document contains negotiated liability insurance premiums. 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-16-0331-CFO-EI to render the designated information stale or public, such that continued confidential treatment would not be appropriate. Therefore, consistent with the provisions of the Florida Administrative Code, such materials should remain confidential for a period of at least an additional eighteen (18) months. In addition, they should be returned to FPL as soon as the information is no longer necessary for the Commission to conduct its business so that FPL can continue to maintain the confidentiality of these documents.

4. 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.


Meredith Quick

Date: 11/18/18