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August 15, 2019

VIA HAND DELIVERY

Mr. Adam Teitzman
Division of the Commission Clerk and Administrative Services
Florida Public Service Commission
2540 Shumard Oak Blvd.
Tallahassee, FL 32399-0850

RECEIVED-FPSC
2019 AUG 15 PM 3:08
COMMISSION CLERK

Re: Docket No. 20190061-EI **REDACTED**

Dear Mr. Teitzman:

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 OPC's Third Request for Production of Documents, No. 6. 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.

- COM _____
- AFD _____
- APA _____
- ECO _____
- ENG 1
- GCL _____
- IDM _____
- CLK _____

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

Sincerely,

Maria Jose Moncada
for Maria Jose Moncada

Enclosure

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

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Petition for approval of FPL SolarTogether program and tariff, by Florida Power & Light Company

Docket No: 20190061-EI

Date: August 15, 2019

**FLORIDA POWER AND LIGHT COMPANY'S
REQUEST FOR CONFIDENTIAL CLASSIFICATION
OF INFORMATION PROVIDED IN RESPONSE TO OPC'S
THIRD REQUEST FOR PRODUCTION OF DOCUMENTS (No. 6)**

Pursuant to Section 366.093, Florida Statutes ("Section 366.093"), and Rule 25-22.006, Florida Administrative Code, Florida Power & Light Company ("FPL") hereby requests confidential classification of certain information provided in response to OPC's Third Request for Production of Documents, No.6 (the "Confidential Data Responses"). In support of this request, FPL states as follows:

1. FPL served its responses to OPC's Third Request for Production of Documents (Nos. 5-6) on August 14, 2019. This request is being filed in order to request confidential classification of certain information contained in its response to No. 6, consistent with Rule 25-22.006, Florida Administrative Code.
2. The following exhibits are attached to and made a part of this request:
 - a. Exhibit A consists of a copy of the Confidential Documents on which all information that FPL asserts is entitled to confidential treatment is highlighted. All of the documents that comprise Exhibit A are provided on a disc.
 - b. Exhibit B consists of an edited version of the Confidential Documents on which all information that FPL asserts is entitled to confidential treatment

is redacted. Where the document is confidential in its entirety, only an identifying cover page is provided.

- c. Exhibit C is a table that identifies the information highlighted in Exhibit A and references the specific statutory bases for the claim of confidentiality and identifies the Declarant who supports the requested classification.
- d. Exhibit D consists of the declarations of Juan E. Enjamio and William F. Brannen in support of this Request.

3. FPL submits that the highlighted information in Exhibit A is proprietary and confidential business information, 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.


4. As the declarations included as Exhibit D indicate, the Confidential Documents relate 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.

5. Upon a finding by the Commission that the Confidential Documents are proprietary and confidential business information, the information should not be declassified for at least 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, Florida Power & Light Company respectfully requests that its Request for Confidential Classification be granted.

Respectfully submitted this 15th day of August 2019.

Maria Jose Moncada
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William P. Cox
Senior Attorney
Florida Power & Light Company
700 Universe Boulevard
Juno Beach, FL 33408
Telephone: (561) 304-5795
Facsimile: (561) 691-7135

By: 
for _____
Maria Jose Moncada
Florida Bar No. 0773301

CERTIFICATE OF SERVICE
Docket No. 20190061-EI

I HEREBY CERTIFY that a true and correct copy of the foregoing has been furnished by electronic service on this 15th day of August 2019 to the following:

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Office of the General Counsel
Florida Public Service Commission
2540 Shumard Oak Blvd.
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wtrierwe@psc.state.fl.us

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Attorneys for Walmart, Inc.

By: s/ Maria Jose Moncada
Fla. Bar No. 0773301

EXHIBIT B

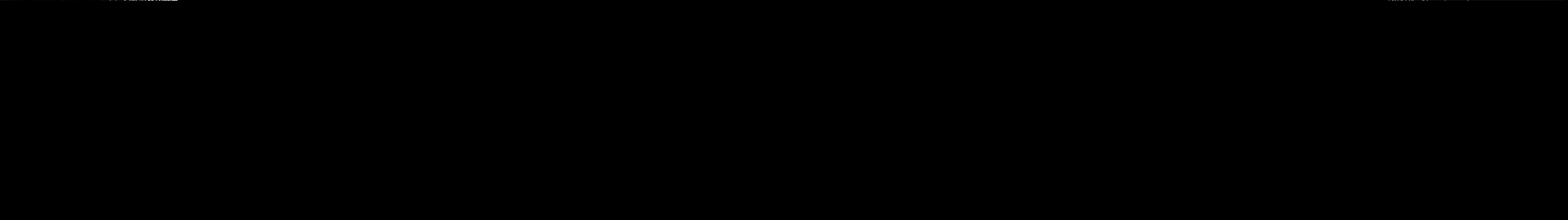
REDACTED

CONFIDENTIAL

AC/DC Voltage Packaging Module Eff Module Cost Project	Solar Together 1			Solar Together 2			Solar Together 3					Solar Together 4				Solar Together 5				
	1.52 74.5 Fixed \$25/330	1.53 74.5 Fixed \$25/330	1.77 74.5 Tracker \$25/330	1.27 74.5 Tracker \$30	1.54 74.5 Fixed \$30	1.57 74.5 Fixed \$30	1.81 74.5 Fixed \$35	1.26 74.5 Tracker \$35	1.26 74.5 Tracker \$35	1.52 74.5 Fixed \$35	1.26 74.5 Tracker \$35	1.26 74.5 Tracker \$35	1.52 74.5 Fixed \$35	1.26 74.5 Tracker \$35	1.52 74.5 Fixed \$35	1.26 74.5 Tracker \$35	1.81 74.5 Fixed \$35	1.81 74.5 Fixed \$35		
1	1	1	2	2	2	3	3	3	3	3	3	4	4	4	4	5	5	5	6	
1	2	3	1	2	3	1	2	3	4	5	6	1	2	3	4	1	2	3	4	
Site	Sweetbay	Northern Preserve	Cattle Ranch	Twin Lakes	Blue Heron	Redcock Preserve	Lakeville	Kennedy	Magnolia Springs	Egret (MIT)	Pelican (F1 Male)	Rodro (Proxy CR)	Nesau	Palm Bay (C2)	Union Springs	Orange Blossom (Campbell)	Trailblazer	Sebat Palm (Hole Carol)	Revere (Proxy Campbell)	Delmonree South (Proxy Various)

1480

Capital cost (\$Millions)



Break Out for Filing	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20
	74.5	74.5	74.5	74.5	74.5	74.5	74.5	74.5	74.5	74.5	74.5	74.5	74.5	74.5	74.5	74.5	74.5	74.5	74.5	74.5
PV Array (Generation)	\$71,241,672	\$67,813,085	\$79,829,646	\$78,647,945	\$79,188,487	\$76,641,282	\$72,390,780	\$71,914,776	\$78,024,097	\$71,291,530	\$77,637,177	\$74,218,592	\$79,262,010	\$76,133,409	\$76,946,959	\$76,444,397	\$76,612,862	\$78,589,899	\$69,929,494	\$75,767,691
Transmission Interconnection and Integration (Includes GSU)	\$7,235,000	\$6,435,000	\$5,863,323	\$6,925,868	\$7,233,000	\$6,085,597	\$7,235,000	\$6,435,000	\$7,235,000	\$9,470,537	\$9,499,710	\$5,961,523	\$9,347,883	\$7,235,000	\$6,435,000	\$7,035,000	\$6,435,000	\$9,019,565	\$7,535,000	\$6,535,000
Land	\$5,359,390	\$5,162,750	\$15,000	\$1,824,200	\$5,077,300	\$4,495,000	\$7,272,498	\$0	\$6,187,500	\$2,267,000	\$4,262,412	\$15,000	\$9,707,000	\$5,392,399	\$6,468,418	\$4,356,750	\$6,876,000	\$9,990,000	\$4,870,000	\$9,300,000
AFUDC	\$2,643,445	\$2,500,323	\$2,755,598	\$2,888,403	\$2,912,814	\$2,889,684	\$2,688,889	\$2,638,171	\$2,704,937	\$2,720,428	\$2,837,225	\$2,791,852	\$2,859,401	\$2,809,909	\$2,805,309	\$2,811,958	\$2,800,792	\$2,851,072	\$2,814,403	\$2,772,523
Total	\$86,479,447	\$81,721,958	\$88,561,767	\$90,296,411	\$90,413,501	\$93,051,508	\$89,787,133	\$80,688,947	\$90,150,924	\$85,749,495	\$94,236,522	\$82,891,277	\$96,883,094	\$91,576,913	\$92,553,677	\$90,648,065	\$92,724,654	\$100,228,329	\$84,898,987	\$88,375,013
PV Array (Generation)	\$71.2	\$67.6	\$75.8	\$78.6	\$79.2	\$79.8	\$72.6	\$71.9	\$79.0	\$71.3	\$77.6	\$74.2	\$75.9	\$76.1	\$76.8	\$76.4	\$76.6	\$78.6	\$69.9	\$75.8
Transmission Interconnection and Integration (Includes GSU)	\$7.2	\$6.4	\$5.9	\$6.9	\$7.2	\$6.1	\$7.2	\$6.4	\$7.2	\$9.5	\$9.5	\$6.0	\$9.4	\$7.2	\$6.4	\$7.0	\$6.4	\$9.0	\$7.5	\$6.5
Land	\$5.4	\$5.2	\$0.0	\$1.8	\$5.1	\$4.5	\$7.3	\$0.0	\$6.2	\$2.3	\$4.3	\$0.0	\$9.4	\$5.4	\$6.5	\$4.4	\$6.9	\$9.7	\$4.9	\$9.3
AFUDC	\$2.6	\$2.5	\$2.8	\$2.9	\$2.9	\$2.7	\$2.7	\$2.7	\$2.7	\$2.8	\$2.7	\$2.7	\$2.9	\$2.8	\$2.8	\$2.8	\$2.8	\$2.8	\$2.8	\$2.8
Total	\$86.5	\$81.7	\$84.6	\$90.3	\$90.4	\$93.1	\$89.8	\$81.0	\$90.2	\$85.7	\$94.2	\$82.9	\$96.8	\$91.8	\$92.8	\$90.6	\$92.7	\$100.2	\$84.7	\$88.4
PV Array (Generation)	\$956.3	\$907.7	\$1,017.8	\$1,055.7	\$1,062.9	\$1,069.0	\$974.4	\$985.8	\$989.9	\$1,042.1	\$998.2	\$1,010.2	\$1,021.9	\$1,031.5	\$1,026.1	\$1,028.4	\$1,054.9	\$998.7	\$1,017.0	\$1,017.0
Transmission Interconnection and Integration (Includes GSU)	\$97.1	\$86.4	\$80.0	\$89.0	\$97.1	\$81.7	\$97.1	\$86.4	\$97.1	\$127.1	\$127.5	\$80.0	\$125.5	\$97.1	\$86.4	\$94.4	\$86.4	\$121.1	\$101.1	\$87.0
Land	\$71.9	\$68.8	\$0.0	\$24.5	\$68.0	\$59.5	\$97.0	\$0.0	\$63.1	\$30.4	\$57.2	\$0.0	\$125.8	\$72.4	\$99.8	\$56.5	\$92.3	\$129.7	\$62.0	\$44.3
AFUDC	\$29.5	\$33.8	\$37.0	\$38.9	\$39.1	\$38.8	\$36.1	\$35.4	\$38.3	\$36.5	\$38.1	\$36.3	\$38.5	\$37.7	\$37.7	\$37.7	\$37.7	\$37.6	\$35.1	\$37.2
Total	\$1,186.8	\$1,096.9	\$1,135.1	\$1,211.9	\$1,207.3	\$1,248.0	\$1,205.2	\$1,067.1	\$1,194.7	\$1,151.0	\$1,264.9	\$1,112.8	\$1,299.0	\$1,228.1	\$1,242.1	\$1,216.8	\$1,244.6	\$1,345.2	\$1,196.9	\$1,196.2

1 - NOT APPROVED
 2 - 01/15/2019
 3 - 01/15/2019
 4 - 01/15/2019
 5 - 01/15/2019
 6 - 01/15/2019
 7 - 01/15/2019
 8 - 01/15/2019
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 10 - 01/15/2019
 11 - 01/15/2019
 12 - 01/15/2019
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 15 - 01/15/2019
 16 - 01/15/2019
 17 - 01/15/2019
 18 - 01/15/2019
 19 - 01/15/2019
 20 - 01/15/2019

EXHIBIT B

FPL's responses to OPC's Request for Production of Documents

**No. 6
Bates No. 000030**

is confidential in its entirety

EXHIBIT B

FPL's responses to OPC's Request for Production of Documents

**No. 6
Bates No. 000031**

is confidential in its entirety

EXHIBIT B

FPL's responses to OPC's Request for Production of Documents

**No. 6
Bates No. 000032**

is confidential in its entirety

EXHIBIT B

FPL's responses to OPC's Request for Production of Documents

**No. 6
Bates No. 000033**

is confidential in its entirety

EXHIBIT B

**FPL's responses to
OPC's Request for Production of
Documents**

**No. 6
Bates No. 000034**

is confidential in its entirety

EXHIBIT B

FPL's responses to OPC's Request for Production of Documents

**No. 6
Bates No. 000035**

is confidential in its entirety

EXHIBIT B

FPL's responses to OPC's Request for Production of Documents

**No. 6
Bates No. 000036**

is confidential in its entirety

EXHIBIT B

**FPL's responses to
OPC's Request for Production of
Documents**

**No. 6
Bates No. 000037**

is confidential in its entirety

EXHIBIT B

FPL's responses to OPC's Request for Production of Documents

**No. 6
Bates No. 000038**

is confidential in its entirety

EXHIBIT B

**FPL's responses to
OPC's Request for Production of
Documents**

**No. 6
Bates No. 000039**

is confidential in its entirety

EXHIBIT B

**FPL's responses to
OPC's Request for Production of
Documents**

**No. 6
Bates No. 000040**

is confidential in its entirety

EXHIBIT B

FPL's responses to OPC's Request for Production of Documents

**No. 6
Bates No. 000041**

is confidential in its entirety

EXHIBIT B

FPL's responses to OPC's Request for Production of Documents

**No. 6
Bates No. 000042**

is confidential in its entirety

EXHIBIT B

FPL's responses to OPC's Request for Production of Documents

**No. 6
Bates No. 000043**

is confidential in its entirety

EXHIBIT B

FPL's responses to OPC's Request for Production of Documents

**No. 6
Bates No. 000044**

is confidential in its entirety

EXHIBIT B

FPL's responses to OPC's Request for Production of Documents

**No. 6
Bates No. 000045**

is confidential in its entirety

EXHIBIT B

**FPL's responses to
OPC's Request for Production of
Documents**

**No. 6
Bates No. 000046**

is confidential in its entirety

EXHIBIT B

FPL's responses to OPC's Request for Production of Documents

**No. 6
Bates No. 000047**

is confidential in its entirety

EXHIBIT B

FPL's responses to OPC's Request for Production of Documents

No. 6

Bates No. 000048

is confidential in its entirety

EXHIBIT B

FPL's responses to OPC's Request for Production of Documents

**No. 6
Bates No. 000049**

is confidential in its entirety

EXHIBIT B

FPL's responses to OPC's Request for Production of Documents

**No. 6
Bates No. 000050**

is confidential in its entirety

EXHIBIT C

JUSTIFICATION TABLE

EXHIBIT C

COMPANY: Florida Power & Light Company
TITLE: List of Confidential Documents
DOCKET NO.: 20190061-EI
DOCKET TITLE: FPL Petition for approval of FPL SolarTogether Program and Tariff
SUBJECT: FPL's Responses to OPC's Third Request for Production of Documents, No. 6
DATE: August 14, 2019

OPC's 3rd Set of POD's	Description	Line No./ Col. No.	Florida Statute 366.093(3) Subsection	Declarant
Request No. 6	ST 1 - 5 Cost	Line Nos. 6, 10-28	(e)	W. Brannen
Request No. 6	File Name: Babcock_Preserve_FL_74.5MWac_99.83MWdc_12x24_net_cf_DST_20190214 CONFIDENTIAL	ALL	(e)	J. Enjamio
Request No. 6	File name: Blue_Heron_FL_74.5MWac_99.83MWdc_12x24_net_cf_DST_20190214 CONFIDENTIAL	ALL	(e)	J. Enjamio
Request No. 6	File name: Campbell_FL_74.5MWac_113.24MWdc_12x24_net_cf_DST_20190211 CONFIDENTIAL	ALL	(e)	J. Enjamio
Request No. 6	File Name: Cattle_Ranch_FL_74.5MWac_95.04MWdc_12x24_net_cf_DST_20190110 CONFIDENTIAL	ALL	(e)	J. Enjamio
Request No. 6	File Name: Del_Monte_FL_74.5MWac_93.87MWdc_12x24_net_cf_DST_2019221 CONFIDENTIAL	ALL	(e)	J. Enjamio
Request No. 6	File Name: FL_Maid_FL_74.5MWac_113.24MWdc_12x24_net_cf_DST_20190211 (Pelican) CONFIDENTIAL	ALL	(e)	J. Enjamio
Request No. 6	File Name: Iota_Carol_FL_74.5MWac_113.24MWdc_12x24_net_cf_DST_20190211 CONFIDENTIAL	ALL	(e)	J. Enjamio
Request No. 6	File Name: Kennedy_FL_74.5MWac_98.34MWdc_12x24_net_cf_DST_20190211 CONFIDENTIAL	ALL	(e)	J. Enjamio

Request No. 6	File Name: KJZ_FL_74.5MWac_113.24M Wdc_12x24_net_cf_DST_201 90211 (Palm Bay) CONFIDENTIAL	ALL	(e)	J. Enjamio
Request No. 6	File Name: Lakeside_FL_74.5MWac_113. 24MWdc_12x24_net_cf_DST_ 20190211 CONFIDENTIAL	ALL	(e)	J. Enjamio
Request No. 6	File Name: Magnolia_FL_74.5MWac_93.8 7MWdc_12x24_net_cf_DST_2 0190211 CONFIDENTIAL	ALL	(e)	J. Enjamio
Request No. 6	File Name: MRT_FL_74.5MWac_93.87M Wdc_12x24_net_cf_DST_201 90211 (Egret) CONFIDENTIAL	ALL	(e)	J. Enjamio
Request No. 6	File Name: Nassau_FL_74.5MWac_93.87 MWdc_12x24_net_cf_DST_20 190211 CONFIDENTIAL	ALL	(e)	J. Enjamio
Request No. 6	File Name: Northern_Preserve_FL_74.5M Wac_99.68MWdc_12x24_net _cf_DST_20190201 CONFIDENTIAL	ALL	(e)	J. Enjamio
Request No. 6	File Name: Revels_FL_74.5MWac_98.34 MWdc_12x24_net_cf_DST_2 0190221 CONFIDENTIAL	ALL	(e)	J. Enjamio
Request No. 6	File Name: Rodeo_FL_74.5MWac_96.85 MWdc_12x24_net_cf_DST_20 190211 CONFIDENTIAL	ALL	(e)	J. Enjamio
Request No. 6	File Name: Sweetbay_FL_74.5MWac_99. 653MWdc_12x24_net_cf_DST _20190110 CONFIDENTIAL	ALL	(e)	J. Enjamio
Request No. 6	File Name: Trailside_FL_74.5MWac_93.8 7MWdc_12x24_net_cf_DST_2 0190211 CONFIDENTIAL	ALL	(e)	J. Enjamio
Request No. 6	File Name: Twin_Lakes_FL_74.5MWac_9 5.04MWdc_12x24_net_cf_DS T_20190201 CONFIDENTIAL	ALL	(e)	J. Enjamio
Request No. 6	File Name: Union_Springs_FL_74.5MWac _93.87MWdc_12x24_net_cf_ DST_20190211 CONFIDENTIAL	ALL	(e)	J. Enjamio

EXHIBIT D

DECLARATIONS

EXHIBIT D

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Petition by Florida Power & Light
Company for Approval of FPL SolarTogether
Program and Tariff

Docket No: 20190061-EI

DECLARATION OF JUAN E. ENJAMIO

1. My name is Juan E. Enjamio. I am currently employed by Florida Power & Light Company ("FPL") as Manager of Analytics in the Finance Department. I have personal knowledge of the matters stated in this declaration.

2. I have reviewed the documents and information included in Exhibit A to FPL's Request for Confidential Classification, 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 concerning projected solar generation profiles and solar firm capacity values which are based on proprietary modeling performed by a third party. Disclosure of this proprietary information could place FPL and the provider in a competitive disadvantage. 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 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.



Juan E. Enjamio

Date: 8/14/2019

EXHIBIT D

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Petition by Florida Power & Light
Company for Approval of FPL SolarTogether
Program and Tariff

Docket No: 20190061-EI


DECLARATION OF WILLIAM F. BRANNEN

1. My name is William F. Brannen. I am currently employed by Florida Power & Light Company ("FPL") as Senior Director of Due Dilligence in the Engineering and Construction department. I have personal knowledge of the matters stated in this declaration.

2. I have reviewed the documents and information included in Exhibit A to FPL's Request for Confidential Classification, 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 concerning competitive interests. Specifically, the information concerns negotiated pricing, such as third party information subject to non-disclosure agreements. Disclosure of this information would impair the efforts of the company or its affiliates to contract for goods or services on favorable terms. Additionally, the disclosure of this information would impair the competitive business of provider of information. 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 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.


William F. Brannen

Date: August 13, 2019