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April 26, 2021

VIA HAND DELIVERY

Mr. Adam Teitzman
Commission Clerk
Florida Public Service Commission
2540 Shumard Oak Blvd.
Tallahassee, FL 32399-0850

REDACTED

PROBATIONARY
COMMISSION
CLERK
APR 26 2021 1:25

Re: Docket No. 20210015-EI

Dear Mr. Teitzman:

I enclose for filing in the above docket Florida Power & Light Company's ("FPL") Request for Confidential Classification of Information contained in its response to Office of Public Counsel's ("OPC") Third Set of Interrogatories No. 146 and OPC's Third Request for Production of Documents No. 76. The request includes Exhibits A, B (two copies), C and D.

Exhibit A consists of the documents containing confidential information, some of which are on a disc due to volume, that is the subject of FPL's Request for Confidential Classification. Exhibit A is submitted for filing in an envelope marked "EXHIBIT A" – CONFIDENTIAL. Certain documents in Exhibit A are voluminous and confidential in their entirety, and they are being provided electronically on a disc. Exhibit B is an edited version of Exhibit A, in which the information FPL asserts is confidential has been redacted. For the documents that are confidential in their entirety, FPL has included only identifying cover pages in Exhibit B. 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. In accordance with Rule 25-22.006(3)(d), FPL requests confidential treatment of the information in Exhibit A pending disposition of FPL's Request for Confidential Classification.

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

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

Sincerely,

s/ Maria Jose Moncada

Maria Jose Moncada
Senior Attorney
Florida Bar No. 0773301

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 by Florida Power & Light
Company for Rate Unification and for Base
Rate Increase

Docket No. 20210015-EI

Filed: April 26, 2021

**FLORIDA POWER & LIGHT COMPANY'S REQUEST FOR CONFIDENTIAL
CLASSIFICATION OF CERTAIN INFORMATION PROVIDED IN ITS
RESPONSES TO OPC'S THIRD SET OF INTERROGATORIES AND
THIRD REQUEST FOR PRODUCTION OF DOCUMENTS**

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 its supplemental responses to Office of Public Counsel's ("OPC") Third Set of Interrogatories and OPC's Third Request for Production of Documents (the "Confidential Information"). In support of its Request, FPL states as follows:

1. FPL served its responses to OPC's Third Set of Interrogatories ("INT") and OPC's Request for Production of Documents ("POD") on April 6, 2021. This request is being filed contemporaneously with service of those responses to request confidential classification of certain information contained in its response to OPC's Third Set of Interrogatories No. 146 and OPC's Third Request for Production of Documents No. 76, consistent with Rule 25-22.006, Florida Administrative Code.

2. The following exhibits are included with and made a part of this request:

a. Exhibit A consists of a copy of the confidential material on which all the information that FPL asserts is entitled to confidential treatment has been highlighted. Attachments to OPC's Third Set of Interrogatories No. 146 are voluminous and confidential in their entirety, and they are being provided electronically on disc.

b. Exhibit B consists of a copy of the confidential documents, on which all the information that is entitled to confidential treatment under Florida law has been redacted. For the

documents that are confidential in their entirety, FPL has included only identifying cover pages in Exhibit B.

c. Exhibit C is a table that identifies by column and line the information for which confidential treatment is being sought and references the specific statutory basis for the claim of confidentiality. Exhibit C also identifies the declarants who support the requested classification.

d. Exhibit D contains the declarations of the individuals who support the requested classification.

3. 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, Fla. Stat., 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 described in the declarations included as Exhibit D, the Confidential Information consists of proprietary confidential business information, the disclosure of which would cause harm to FPL's customers and its business operations. Specifically, some information contains data that is proprietary to third party vendors and subject to non-disclosure agreements. Other confidential information consists of internal audits. This information is protected by Sections 366.093(3) (b) and (e), Fla. Stat.

5. Upon a finding by the Commission that the Confidential Information is proprietary confidential business information, the information should not be declassified for a period of at

least eighteen (18) months and should be returned to FPL as soon as the information is no longer necessary for the Commission to conduct its business. See § 399.093(4), Fla. Stat.

WHEREFORE, for the above and foregoing reasons, as more fully set forth in the supporting materials and declarations included herewith, FPL respectfully requests that its Request for Confidential Classification be granted.

Respectfully submitted,

FLORIDA POWER & LIGHT COMPANY

By: /s/ Maria Jose Moncada

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CERTIFICATE OF SERVICE
20210015-EI

I **HEREBY CERTIFY** that a true and correct copy of the foregoing* has been furnished by electronic mail this 26th day of April 2021 to the following parties:

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League of United Latin American Citizens of
Florida
Environmental Confederation of Southwest
Florida, Inc.**

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

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

EXHIBIT B

REDACTED

All documents responsive to OPC's 3rd Request for Production of Documents No. 76, Bates Nos. 022632-026498, are confidential in their entirety

FPL's response to OPC's 3rd Set of Interrogatories No. 146,
Attachment No. 1, Bates No. 027043, is confidential in its
entirety

EXHIBIT C

JUSTIFICATION TABLE

EXHIBIT C

COMPANY: Florida Power & Light Company
TITLE: Petition by Florida Power & Light Company for Base Rate Increase and Rate Unification Company
DOCKET NO.: 20210015-EI
DATE: April 26, 2021

Int/POD No.	Begin Bates Number	End Bates Number	Description	No. of Pages	Confidential	Line/Col	Florida Statute 366.093 (3) Subsection	Declarant
OPC'S 3rd Set of Interrogatories, No. 146	N/A	N/A	Reserve Margin Analysis Model	1	Y	All	(e)	Steve Sim
OPC's 3rd Request for Production of Documents, No. 76	025427	025432	A01 - FPL-FIN-AC-00-2013-0001-FPL Affiliate Management Fee Audit	6	Y	All	(b)	Antonio Maceo
OPC's 3rd Request for Production of Documents, No. 76	025433	025448	D01 - FY2013 CostAllocationManual-Final	16	Y	All	(b)	Antonio Maceo
OPC's 3rd Request for Production of Documents, No. 76	025449	025449	E01a - CMA Email to SAP Control Team to Input	1	Y	All	(b)	Antonio Maceo

Int/POD No.	Begin Bates Number	End Bates Number	Description	No. of Pages	Confidential	Line/Col	Florida Statute 366.093 (3) Subsection	Declarant
OPC's 3rd Request for Production of Documents, No. 76	025450	025450	E01b - CMA Email to Business Units - FY2013	1	Y	All	(b)	Antonio Maceo
OPC's 3rd Request for Production of Documents, No. 76	025451	025452	E02.02c - M - Kristin Manz Email including FPL AMF Payroll Support (FY2013)	2	Y	All	(b)	Antonio Maceo
OPC's 3rd Request for Production of Documents, No. 76	025453	025454	E02.02d - M - Barry Fisher Email including FPL AMF PPE & Revenue Support (FY2013)	2	Y	All	(b)	Antonio Maceo
OPC's 3rd Request for Production of Documents, No. 76	025455	025457	E02.02e - M - Email from CMA quantifying M3 Driver Error (FPLES and NEER)	3	Y	All	(b)	Antonio Maceo
OPC's 3rd Request for Production of Documents, No. 76	025458	025459	E02.03b - M - Patricia D'Annolfo Email including NEET, NHT & LST AMF Support (FY2013)	2	Y	All	(b)	Antonio Maceo
OPC's 3rd Request for Production of Documents, No. 76	025460	025461	E02.04b - M - William Strazinsky Email including NEER, Seabrook, Duane Arnold & Point Beach AMF Support (FY2013)	2	Y	All	(b)	Antonio Maceo

Int/POD No.	Begin Bates Number	End Bates Number	Description	No. of Pages	Confidential	Line/Col	Florida Statute 366.093 (3) Subsection	Declarant
OPC's 3rd Request for Production of Documents, No. 76	025462	025462	E02.05b - H - Mercedes Demick Email including H driver AMF Support (FY2013)	1	Y	All	(b)	Antonio Maceo
OPC's 3rd Request for Production of Documents, No. 76	025463	025464	E02.06c - S - Adriana Alvarez Email including Square Footage AMF Support (FY2013)	2	Y	All	(b)	Antonio Maceo
OPC's 3rd Request for Production of Documents, No. 76	025465	025466	E02.07b - MW - John Kenney Email including MW AMF Support (FY2013)	2	Y	All	(b)	Antonio Maceo
OPC's 3rd Request for Production of Documents, No. 76	025467	025468	E02.07c - MW - John Kenney Email including Updated MW AMF Support (FY2013)	2	Y	All	(b)	Antonio Maceo
OPC's 3rd Request for Production of Documents, No. 76	025469	025494	G_01.01 - Executed PO 2000083692 Reed Elsevler	26	Y	All	(b)	Antonio Maceo
OPC's 3rd Request for Production of Documents, No. 76	026302	026310	G_02.03 - EX - Executive Non-payroll	9	Y	All	(b)	Antonio Maceo

Int/POD No.	Begin Bates Number	End Bates Number	Description	No. of Pages	Confidential	Line/Col	Florida Statute 366.093 (3) Subsection	Declarant
OPC's 3rd Request for Production of Documents, No. 76	026311	026317	G_02.03A - EEI Invoice for 2013	7	Y	All	(b)	Antonio Maceo
OPC's 3rd Request for Production of Documents, No. 76	026318	026325	G_02.04 - Deloitte Invoice for Q1 2013 Audit Fees	8	Y	All	(b)	Antonio Maceo
OPC's 3rd Request for Production of Documents, No. 76	026326	026326	G_02.05 - Oracle Invoice for Database fees	1	Y	All	(b)	Antonio Maceo
OPC's 3rd Request for Production of Documents, No. 76	026327	026332	G_02.06 - Relocation Expense	6	Y	All	(b)	Antonio Maceo
OPC's 3rd Request for Production of Documents, No. 76	025495	025497	G_02.07A - CBRE PO Award #2400000548 Executed 121912	3	Y	All	(b)	Antonio Maceo
OPC's 3rd Request for Production of Documents, No. 76	025498	025499	G_02.09 - 4500447675-CHANGE LOUIS AND ASS INC	2	Y	All	(b)	Antonio Maceo

Int/POD No.	Begin Bates Number	End Bates Number	Description	No. of Pages	Confidential	Line/Col	Florida Statute 366.093 (3) Subsection	Declarant
OPC's 3rd Request for Production of Documents, No. 76	026333	026336	G_02.11 - Ricoh Framework PO 2400000228	4	Y	All	(b)	Antonio Maceo
OPC's 3rd Request for Production of Documents, No. 76	026337	026352	G_02.12 - Jan 2013 J Holmes Bus Airfare	16	Y	All	(b)	Antonio Maceo
OPC's 3rd Request for Production of Documents, No. 76	026353	026409	G_02.14 - FERC PUCT Compliance Plan_Master Template	57	Y	All	(b)	Antonio Maceo
OPC's 3rd Request for Production of Documents, No. 76	026410	026410	G_02.16 - Enterprise Florida payment	1	Y	All	(b)	Antonio Maceo
OPC's 3rd Request for Production of Documents, No. 76	026411	026411	G_02.17 - Center for Energy Workforce development	1	Y	All	(b)	Antonio Maceo
OPC's 3rd Request for Production of Documents, No. 76	026412	026414	G_02.18 - BellSouth PO 2400000602 Fully Executed-header	3	Y	All	(b)	Antonio Maceo

Int/POD No.	Begin Bates Number	End Bates Number	Description	No. of Pages	Confidential	Line/Col	Florida Statute 366.093 (3) Subsection	Declarant
OPC's 3rd Request for Production of Documents, No. 76	026415	026417	G_02.21A - Cyveillance Corporate Security Solutions PO	3	Y	All	(b)	Antonio Maceo
OPC's 3rd Request for Production of Documents, No. 76	026418	026434	G_02.21B - Cyveillance Corporate Security Solutions Contract	17	Y	All	(b)	Antonio Maceo
OPC's 3rd Request for Production of Documents, No. 76	026435	026467	G_02.23 - BMC Remedy Invoice for Maintenance fees	33	Y	All	(b)	Antonio Maceo
OPC's 3rd Request for Production of Documents, No. 76	026468	026475	G_02.24 - Corporate Credit Posting	8	Y	All	(b)	Antonio Maceo
OPC's 3rd Request for Production of Documents, No. 76	026476	026495	G_02.25 - IBM ELA 2013-2015 countersigned-header	20	Y	All	(b)	Antonio Maceo
OPC's 3rd Request for Production of Documents, No. 76	026496	026498	G_02.26 - Fibernet Invoice to FPL for Data Usage	3	Y	All	(b)	Antonio Maceo

Int/POD No.	Begin Bates Number	End Bates Number	Description	No. of Pages	Confidential	Line/Col	Florida Statute 366.093 (3) Subsection	Declarant
OPC's 3rd Request for Production of Documents, No. 76	022632	022634	G_02.27 - SAP_NextEra__fully_executed_062912	3	Y	All	(b)	Antonio Maceo
OPC's 3rd Request for Production of Documents, No. 76	022635	022666	G_02.28 - IBM Invoice for Maintenance fees	32	Y	All	(b)	Antonio Maceo
OPC's 3rd Request for Production of Documents, No. 76	022667	022688	G_02.30A - Clearion Software 2013 Invoice	22	Y	All	(b)	Antonio Maceo
OPC's 3rd Request for Production of Documents, No. 76	022689	022689	G_02.30B - Clearion FPL TVM - Quote 2013_V1-01	1	Y	All	(b)	Antonio Maceo
OPC's 3rd Request for Production of Documents, No. 76	022690	022719	E02.00 - 12-17-2012 2013 Budget Drivers with Backup Tabs W NEE	30	Y	All	(b)	Antonio Maceo
OPC's 3rd Request for Production of Documents, No. 76	022720	022734	E02.01 - Formatted 2013 AMF Drivers and Supporting Models Final 1 0-10-17-2012	15	Y	All	(b)	Antonio Maceo

Int/POD No.	Begin Bates Number	End Bates Number	Description	No. of Pages	Confidential	Line/Col	Florida Statute 366.093 (3) Subsection	Declarant
OPC's 3rd Request for Production of Documents, No. 76	022735	022735	E02.02a - M - FPL Utility Barry Fisher Preliminary 2013 - 2015 MF Components - FPL as of 12-17-2012	1	Y	All	(b)	Antonio Maceo
OPC's 3rd Request for Production of Documents, No. 76	022736	022736	E02.02b - M - Kristin Manz FPL Payroll Base Dollars AMF 12 18 12	1	Y	All	(b)	Antonio Maceo
OPC's 3rd Request for Production of Documents, No. 76	022737	022737	E02.03a - M - Transm -Preliminary 2013 - 2015 Mass Formula Components - as of 12-03-2012	1	Y	All	(b)	Antonio Maceo
OPC's 3rd Request for Production of Documents, No. 76	022738	022741	E02.04a - M - NEER Copy of Preliminary 2013 - 2015 Mass Formula Components - as of 12-03-2012 (2)	4	Y	All	(b)	Antonio Maceo
OPC's 3rd Request for Production of Documents, No. 76	022742	022747	E02.05a - H1 & H6 -Headcount by location 9-25-12 pivot only	6	Y	All	(b)	Antonio Maceo
OPC's 3rd Request for Production of Documents, No. 76	022748	022754	E02.06a - S - 2013 Square Footage Drivers	7	Y	All	(b)	Antonio Maceo

Int/POD No.	Begin Bates Number	End Bates Number	Description	No. of Pages	Confidential	Line/Col	Florida Statute 366.093 (3) Subsection	Declarant
OPC's 3rd Request for Production of Documents, No. 76	022755	022755	E02.06b - S - 2013 Unformatted Square Footage Drivers	1	Y	All	(b)	Antonio Maceo
OPC's 3rd Request for Production of Documents, No. 76	022756	022760	E02.07a - MW - 2013 - 2015 FPL vs NEER MWs using nameplate ratings	5	Y	All	(b)	Antonio Maceo
OPC's 3rd Request for Production of Documents, No. 76	022761	022772	E02.08a - CH - FINAL 2013 IM Capitalized Hardware Software Drivers	12	Y	All	(b)	Antonio Maceo
OPC's 3rd Request for Production of Documents, No. 76	022773	022773	G01A - BW Report_AMF Front End IO Report	1	Y	All	(b)	Antonio Maceo
OPC's 3rd Request for Production of Documents, No. 76	022774	022774	G01C - Dollars for AMF Front End IOs	1	Y	All	(b)	Antonio Maceo
OPC's 3rd Request for Production of Documents, No. 76	022775	022784	F01 - WBS Listing with AMF Type v7	10	Y	All	(b)	Antonio Maceo

Int/POD No.	Begin Bates Number	End Bates Number	Description	No. of Pages	Confidential	Line/Col	Florida Statute 366.093 (3) Subsection	Declarant
OPC's 3rd Request for Production of Documents, No. 76	022785	022785	G_02.07B - CBRE_FPL - Master Site List 2012-header	1	Y	All	(b)	Antonio Maceo
OPC's 3rd Request for Production of Documents, No. 76	022786	022820	G01 - Invoice Selections and Testing (Master)	35	Y	All	(b)	Antonio Maceo
OPC's 3rd Request for Production of Documents, No. 76	022821	022821	G03 - AMF Invoices - \$ Impact	1	Y	All	(b)	Antonio Maceo
OPC's 3rd Request for Production of Documents, No. 76	022822	022827	D03 - SOX Process - 08.38.01 - FPL Affiliate Management Fee	6	Y	All	(b)	Antonio Maceo
OPC's 3rd Request for Production of Documents, No. 76	022828	022833	A02 - FINAL - Affiliate Management Fee Audit 12 6 2013	6	Y	All	(b)	Antonio Maceo
OPC's 3rd Request for Production of Documents, No. 76	022834	022836	B01.1 - FY2013 Audit Plan - Affiliate Transactions	3	Y	All	(b)	Antonio Maceo

Int/POD No.	Begin Bates Number	End Bates Number	Description	No. of Pages	Confidential	Line/Col	Florida Statute 366.093 (3) Subsection	Declarant
OPC's 3rd Request for Production of Documents, No. 76	022837	022838	D02 - IA's Affiliate Management Fee Process - FY2013 v3	2	Y	All	(b)	Antonio Maceo
OPC's 3rd Request for Production of Documents, No. 76	022839	022852	G03b - AMF - Testing of IO charges - Follow up Questions 10 25 2013 - CMA Responses 11-8-2013	14	Y	All	(b)	Antonio Maceo
OPC's 3rd Request for Production of Documents, No. 76	022853	022857	IT Audit Planning Checklist v3 01232013	5	Y	All	(b)	Antonio Maceo
OPC's 3rd Request for Production of Documents, No. 76	022858	022858	B01.2 - RE FPL - AMF Audit	1	Y	All	(b)	Antonio Maceo
OPC's 3rd Request for Production of Documents, No. 76	022859	022859	E02.08b - CH - Fabian Tejedor -BW AMF Projects Cap forecast_v2	1	Y	All	(b)	Antonio Maceo
OPC's 3rd Request for Production of Documents, No. 76	022860	022860	G_02.02 - No Invoice or PO Included - Copy	1	Y	All	(b)	Antonio Maceo

Int/POD No.	Begin Bates Number	End Bates Number	Description	No. of Pages	Confidential	Line/Col	Florida Statute 366.093 (3) Subsection	Declarant
OPC's 3rd Request for Production of Documents, No. 76	022861	022861	G_02.02 - No Invoice or PO Included	1	Y	All	(b)	Antonio Maceo
OPC's 3rd Request for Production of Documents, No. 76	022862	022862	G_02.08 - No Invoice or PO Included	1	Y	All	(b)	Antonio Maceo
OPC's 3rd Request for Production of Documents, No. 76	022863	022863	G_02.10 - No Invoice or PO Included	1	Y	All	(b)	Antonio Maceo
OPC's 3rd Request for Production of Documents, No. 76	022864	022864	G_02.13 - No Invoice or PO Included	1	Y	All	(b)	Antonio Maceo
OPC's 3rd Request for Production of Documents, No. 76	022865	022865	G_02.15 - No Invoice or PO Included	1	Y	All	(b)	Antonio Maceo
OPC's 3rd Request for Production of Documents, No. 76	022866	022866	G_02.19 - No Invoice or PO Included	1	Y	All	(b)	Antonio Maceo

Int/POD No.	Begin Bates Number	End Bates Number	Description	No. of Pages	Confidential	Line/Col	Florida Statute 366.093 (3) Subsection	Declarant
OPC's 3rd Request for Production of Documents, No. 76	022867	022867	G_02.20 - No Invoice or PO Included	1	Y	All	(b)	Antonio Maceo
OPC's 3rd Request for Production of Documents, No. 76	022868	022868	G_02.22 - No Invoice or PO Included	1	Y	All	(b)	Antonio Maceo
OPC's 3rd Request for Production of Documents, No. 76	022869	022869	G_02.29 - No Invoice or PO Included	1	Y	All	(b)	Antonio Maceo
OPC's 3rd Request for Production of Documents, No. 76	022870	022874	A02 - FINAL - FPL Affiliate Direct Charges - 6 2 2014	5	Y	All	(b)	Antonio Maceo
OPC's 3rd Request for Production of Documents, No. 76	022875	022878	D02 - 4Q13 DRAFT SOX_08 38 03_Direct Affiliate Charge	4	Y	All	(b)	Antonio Maceo
OPC's 3rd Request for Production of Documents, No. 76	022879	022879	F01.01 NEER Overhead rate	1	Y	All	(b)	Antonio Maceo

Int/POD No.	Begin Bates Number	End Bates Number	Description	No. of Pages	Confidential	Line/Col	Florida Statute 366.093 (3) Subsection	Declarant
OPC's 3rd Request for Production of Documents, No. 76	022880	022880	F01.02 NEER Overhead Rate Support	1	Y	All	(b)	Antonio Maceo
OPC's 3rd Request for Production of Documents, No.76	022881	022891	G01 1. NSS - Support	11	Y	All	(b)	Antonio Maceo
OPC's 3rd Request for Production of Documents, No. 76	022892	022911	G01 3. NSS - Support	20	Y	All	(b)	Antonio Maceo
OPC's 3rd Request for Production of Documents, No. 76	022912	022915	G01 4. NSS - Support	4	Y	All	(b)	Antonio Maceo
OPC's 3rd Request for Production of Documents, No. 76	022916	022925	G01 5. NSS - Support	10	Y	All	(b)	Antonio Maceo
OPC's 3rd Request for Production of Documents, No. 76	022926	022929	G01 10. NSS - Support	4	Y	All	(b)	Antonio Maceo

Int/POD No.	Begin Bates Number	End Bates Number	Description	No. of Pages	Confidential	Line/Col	Florida Statute 366.093 (3) Subsection	Declarant
OPC's 3rd Request for Production of Documents, No. 76	022930	022934	G01 12. NSS - Support	5	Y	All	(b)	Antonio Maceo
OPC's 3rd Request for Production of Documents, No. 76	022935	022936	G01 16. SSS - Support - Re_FPL Affiliates Direct Charges Audit.	2	Y	All	(b)	Antonio Maceo
OPC's 3rd Request for Production of Documents, No. 76	022937	022938	G01 17. SSS - Support - RE_FPL Affiliates Direct Charges	2	Y	All	(b)	Antonio Maceo
OPC's 3rd Request for Production of Documents, No. 76	022939	022940	G01 18. SSS - Support - RE_FPL Affiliates Direct Charges	2	Y	All	(b)	Antonio Maceo
OPC's 3rd Request for Production of Documents, No. 76	022941	022942	G01 19. SSS - Support - RE_FPL Affiliates Direct Charges Audit	2	Y	All	(b)	Antonio Maceo
OPC's 3rd Request for Production of Documents, No. 76	022943	022944	G01 21. SSS - Support - RE_FPL Affiliates Direct Charges Audit	2	Y	All	(b)	Antonio Maceo

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OPC's 3rd Request for Production of Documents, No. 76	022945	022946	G01 22. SSS - Support - RE_FPL Affiliates Direct Charges Audit	2	Y	All	(b)	Antonio Maceo
OPC's 3rd Request for Production of Documents, No. 76	022947	022948	G01 23. SSS - Support - RE_FPL Affiliates Direct Charges Audit - here is the info	2	Y	All	(b)	Antonio Maceo
OPC's 3rd Request for Production of Documents, No. 76	022949	022949	G01 24. SSS - Support - FPL Affiliates Direct Charges Audit	1	Y	All	(b)	Antonio Maceo
OPC's 3rd Request for Production of Documents, No. 76	022950	022955	G01 26. SSS - Support	6	Y	All	(b)	Antonio Maceo
OPC's 3rd Request for Production of Documents, No. 76	022956	022959	G01 28. SSS - Support - COGNOS Expense	4	Y	All	(b)	Antonio Maceo
OPC's 3rd Request for Production of Documents, No. 76	022961	022962	G01 29. SSS - Support - FPL Affiliates Direct Charges Microsoft - AUDIT REQUEST	2	Y	All	(b)	Antonio Maceo

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OPC's 3rd Request for Production of Documents, No. 76	022963	022975	G01 30. Support EdLink January 2013 Invoice	13	Y	All	(b)	Antonio Maceo
OPC's 3rd Request for Production of Documents, No. 76	022976	022978	G02.03a - Fibernet Invoice 314570	3	Y	All	(b)	Antonio Maceo
OPC's 3rd Request for Production of Documents, No. 76	022979	022984	G02.03b - FREC Storm Bonds Collected by FPL	6	Y	All	(b)	Antonio Maceo
OPC's 3rd Request for Production of Documents, No. 76	022985	022990	G02.03c - Fibernet Revenue Collected by FPL	6	Y	All	(b)	Antonio Maceo
OPC's 3rd Request for Production of Documents, No. 76	022991	022991	G02.03d - IMO South Invoice 01-01-2013	1	Y	All	(b)	Antonio Maceo
OPC's 3rd Request for Production of Documents, No. 76	022992	022995	G02.03e - FPL Fibernet Invoice	4	Y	All	(b)	Antonio Maceo

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OPC's 3rd Request for Production of Documents, No. 76	023738	023743	G02.03f - FREC Storm Bonds Collected by FPL	6	Y	All	(b)	Antonio Maceo
OPC's 3rd Request for Production of Documents, No. 76	023744	023749	G02.03g - FREC Storm Bonds Collected by FPL	6	Y	All	(b)	Antonio Maceo
OPC's 3rd Request for Production of Documents, No. 76	023750	023752	G02.03h - FiberNet Invoice 315126 (2)	3	Y	All	(b)	Antonio Maceo
OPC's 3rd Request for Production of Documents, No. 76	023753	023753	G02.03i - Asset Transaction Worksheet	1	Y	All	(b)	Antonio Maceo
OPC's 3rd Request for Production of Documents, No. 76	023754	023760	G02.03j - FREC Storm Bonds Collected by FPL	7	Y	All	(b)	Antonio Maceo
OPC's 3rd Request for Production of Documents, No. 76	023761	023772	G02.03k - FPL Fibernet Invoice	12	Y	All	(b)	Antonio Maceo

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OPC's 3rd Request for Production of Documents, No. 76	023773	023775	G02.03l - Asset Transaction Worksheets	3	Y	All	(b)	Antonio Maceo
OPC's 3rd Request for Production of Documents, No. 76	023776	023777	G02.03n - FW_ FPL Direct Charge Audit - Affiliate to FPL Charge Audit Confirmation	2	Y	All	(b)	Antonio Maceo
OPC's 3rd Request for Production of Documents, No. 76	023778	023780	G02.03o - FW_ IMPORTANT_ FPL Direct Charge Audit - Affiliate to FPL Charge Audit Confirmation	3	Y	All	(b)	Antonio Maceo
OPC's 3rd Request for Production of Documents, No. 76	023781	023782	G02.03q - RE_ FPL Direct Charge Audit - Affiliate to FPL Charge Audit Confirmation	2	Y	All	(b)	Antonio Maceo
OPC's 3rd Request for Production of Documents, No. 76	023783	023794	F01.00 - 2013 - FPL Overhead Rates (1)	12	Y	All	(b)	Antonio Maceo
OPC's 3rd Request for Production of Documents, No. 76	023795	023795	G01.01 Summary Transactions Non-Settled Services Purchased by TP	1	Y	All	(b)	Antonio Maceo

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OPC's 3rd Request for Production of Documents, No. 76	023796	023796	G01.02 Summary Transactions Non-Settled Services Sold by TP	1	Y	All	(b)	Antonio Maceo
OPC's 3rd Request for Production of Documents, No. 76	023797	023799	G01.04 - Page 458 2013 DRAFT TO IA 4-14-14	3	Y	All	(b)	Antonio Maceo
OPC's 3rd Request for Production of Documents, No. 76	023800	023802	G01.05 - Summary Transactions Settled Services Sold for IA	3	Y	All	(b)	Antonio Maceo
OPC's 3rd Request for Production of Documents, No. 76	023803	023804	G02.03r - 2013 Income Tax Forecast Budget Tracking	2	Y	All	(b)	Antonio Maceo
OPC's 3rd Request for Production of Documents, No. 76	023805	023806	G01.00 NSS_NSP Reports	2	Y	All	(b)	Antonio Maceo
OPC's 3rd Request for Production of Documents, No. 76	023807	023838	G01.03 FPL Affiliate Direct Charges Lead Sheet	32	Y	All	(b)	Antonio Maceo

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OPC's 3rd Request for Production of Documents, No. 76	023839	023846	G02.01 - Affiliate to FPL Detail Charges (Settled & Non-Settled) - 1.1.13 - 12.31.13	8	Y	All	(b)	Antonio Maceo
OPC's 3rd Request for Production of Documents, No. 76	023847	023850	G02.02 - Affiliate to FPL Direct Charge Testing (both Settled and Non-Settled)	4	Y	All	(b)	Antonio Maceo
OPC's 3rd Request for Production of Documents, No. 76	023851	023853	G02.03p - Copy of F02.1 - 2013 EMT Service Fee Employees (Current)	3	Y	All	(b)	Antonio Maceo
OPC's 3rd Request for Production of Documents, No. 76	023854	023854	G01 9. NSS - Support - \$176K Intercompany Transaction Support	1	Y	All	(b)	Antonio Maceo
OPC's 3rd Request for Production of Documents, No. 76	023855	023855	G01 2. NSS - Support	1	Y	All	(b)	Antonio Maceo
OPC's 3rd Request for Production of Documents, No. 76	023856	023856	G01 6. NSS - Support	1	Y	All	(b)	Antonio Maceo

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OPC's 3rd Request for Production of Documents, No. 76	023857	023857	G01 7. NSS - Support	1	Y	All	(b)	Antonio Maceo
OPC's 3rd Request for Production of Documents, No. 76	023858	023858	G01 8. NSS - Support	1	Y	All	(b)	Antonio Maceo
OPC's 3rd Request for Production of Documents, No. 76	023859	023859	G01 11. NSS - Support	1	Y	All	(b)	Antonio Maceo
OPC's 3rd Request for Production of Documents, No. 76	023860	023860	G01 14. NSS - Support	1	Y	All	(b)	Antonio Maceo
OPC's 3rd Request for Production of Documents, No. 76	023861	023861	G01 15. NSS - Support	1	Y	All	(b)	Antonio Maceo
OPC's 3rd Request for Production of Documents, No. 76	023862	023862	G01 20. NSS - Support	1	Y	All	(b)	Antonio Maceo

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OPC's 3rd Request for Production of Documents, No. 76	023863	023863	G01 27. SSS - Support	1	Y	All	(b)	Antonio Maceo
OPC's 3rd Request for Production of Documents, No. 76	023864	023864	G02.03m - NEER Estimated State Income Tax Payment	1	Y	All	(b)	Antonio Maceo
OPC's 3rd Request for Production of Documents, No. 76	023865	023865	A01 - FPL-FIN-AC-00-2014-0001-FPL Affiliate Direct Charges Audit	1	Y	All	(b)	Antonio Maceo
OPC's 3rd Request for Production of Documents, No. 76	023866	023866	B03 - RE_ FPL Affiliate Direct Charges Fraud & IT Assessment	1	Y	All	(b)	Antonio Maceo
OPC's 3rd Request for Production of Documents, No. 76	023867	023867	D01 - FY2013 CostAllocationManual-Final	1	Y	All	(b)	Antonio Maceo
OPC's 3rd Request for Production of Documents, No. 76	023868	023873	A01 - FPL-FIN-AC-00-2014-0002-FPL Affiliate Service Fee Audit	6	Y	All	(b)	Antonio Maceo

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OPC's 3rd Request for Production of Documents, No. 76	023874	023879	A02 - DRAFT - FPL Service Fee Audit Report 3 31 2014 (Rating Included) FINAL	6	Y	All	(b)	Antonio Maceo
OPC's 3rd Request for Production of Documents, No. 76	023880	023880	B01 - FPL Service Fee Audit - Kick-Off Meeting	1	Y	All	(b)	Antonio Maceo
OPC's 3rd Request for Production of Documents, No. 76	023881	023882	B03 - IA Consideration of Fraud Risk & Use of IM	2	Y	All	(b)	Antonio Maceo
OPC's 3rd Request for Production of Documents, No. 76	023883	023898	D01 - FY2013 CostAllocationManual-Final	16	Y	All	(b)	Antonio Maceo
OPC's 3rd Request for Production of Documents, No. 76	023899	023902	D02 - 4Q13 DRAFT SOX_08 38 02_Svc_Fee_Narrative	4	Y	All	(b)	Antonio Maceo
OPC's 3rd Request for Production of Documents, No. 76	023903	023904	D03 - Affiliate Rule 25-6.1351	2	Y	All	(b)	Antonio Maceo

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OPC's 3rd Request for Production of Documents, No. 76	023905	023955	D04 - FERC Order 707-A	51	Y	All	(b)	Antonio Maceo
OPC's 3rd Request for Production of Documents, No. 76	023956	023956	E01.01 NEER Overhead rate	1	Y	All	(b)	Antonio Maceo
OPC's 3rd Request for Production of Documents, No. 76	023957	023957	E01.02 NEER Overhead Rate Support	1	Y	All	(b)	Antonio Maceo
OPC's 3rd Request for Production of Documents, No. 76	023958	023962	F02 - Nuclear Allocation Support	5	Y	All	(b)	Antonio Maceo
OPC's 3rd Request for Production of Documents, No. 76	023963	023964	F02.2 - Veronica Birch E-mail (Time Study Discussion)	2	Y	All	(b)	Antonio Maceo
OPC's 3rd Request for Production of Documents, No. 76	023965	023966	F02.4 - EMT Response for EMT to FPLES Service Fee Time Study	2	Y	All	(b)	Antonio Maceo

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OPC's 3rd Request for Production of Documents, No. 76	023967	023971	F02.5 - Management Analysis of Time Study Impact	5	Y	All	(b)	Antonio Maceo
OPC's 3rd Request for Production of Documents, No. 76	023972	023974	G01.02 - FY 2013 Nuclear employee Servia fee listing	3	Y	All	(b)	Antonio Maceo
OPC's 3rd Request for Production of Documents, No. 76	023975	023986	E01.00 - 2013 - FPL Overhead Rates (1)	12	Y	All	(b)	Antonio Maceo
OPC's 3rd Request for Production of Documents, No. 76	023987	023987	E02.01 - FY2013 Comparative Analysis- Incl Exp PR Tax (A@Fc) - 6-2013, 9-2013 Srvc Fee Budgets	1	Y	All	(b)	Antonio Maceo
OPC's 3rd Request for Production of Documents, No. 76	023988	023989	E02.02 - IM Nuclear 2013 BW Monthly Perf NSF	2	Y	All	(b)	Antonio Maceo
OPC's 3rd Request for Production of Documents, No. 76	023990	023990	E02.03 2013 Service Fee Actual vs Budget IA	1	Y	All	(b)	Antonio Maceo

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OPC's 3rd Request for Production of Documents, No. 76	23991	23991	G01.00 - Summary Transactions Settled Services Purchased for IA	1	Y	All	(b)	Antonio Maceo
OPC's 3rd Request for Production of Documents, No. 76	23992	23997	G01.01 - Lead Sheet Summary Transactions Settled Services Sold for IA	6	Y	All	(b)	Antonio Maceo
OPC's 3rd Request for Production of Documents, No. 76	24731	24733	F02.1 - 2013 EMT Service Fee Employees (Current)	3	Y	All	(b)	Antonio Maceo
OPC's 3rd Request for Production of Documents, No. 76	24734	24739	F02.3 - 2013-2014 EMTPMI Split Metrics (Time Study Support)	6	Y	All	(b)	Antonio Maceo
OPC's 3rd Request for Production of Documents, No. 76	24740	24762	G01.01a - Sample selection support	23	Y	All	(b)	Antonio Maceo
OPC's 3rd Request for Production of Documents, No. 76	24763	24764	G01.03 - Jan2013 SAP Details ZFCAT7 tie out	2	Y	All	(b)	Antonio Maceo

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OPC's 3rd Request for Production of Documents, No. 76	24765	24766	G01.04 - March2013 SAP Details ZFCAT7 tie out	2	Y	All	(b)	Antonio Maceo
OPC's 3rd Request for Production of Documents, No. 76	24767	24768	G01.05 - SAP Details to ZFCAT7 tie out June 2013	2	Y	All	(b)	Antonio Maceo
OPC's 3rd Request for Production of Documents, No. 76	24769	24770	G01.06 - SAP Details to ZFCAT7 tie out August 2013	2	Y	All	(b)	Antonio Maceo
OPC's 3rd Request for Production of Documents, No. 76	24771	24772	G01.07 - SAP Details to ZFCAT7 tie out dec 2013	2	Y	All	(b)	Antonio Maceo
OPC's 3rd Request for Production of Documents, No. 76	24773	24773	G02.1 - BW Report w. Service Fee IOs & FY2013 Amounts	1	Y	All	(b)	Antonio Maceo
OPC's 3rd Request for Production of Documents, No. 76	24774	24781	G02.2 - EMT Service Fee Reconciliation - SAP to ZFCAT7 Reports (FY2013)	8	Y	All	(b)	Antonio Maceo

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OPC's 3rd Request for Production of Documents, No. 76	24782	24785	G02.3 - EMT Service Fee Charges Audit Testing	4	Y	All	(b)	Antonio Maceo
OPC's 3rd Request for Production of Documents, No. 76	24786	24788	G04 - EMT & NEER Service Fee Loader Rates	3	Y	All	(b)	Antonio Maceo
OPC's 3rd Request for Production of Documents, No. 76	24789	24789	F01 - Service Fee IOs	1	Y	All	(b)	Antonio Maceo
OPC's 3rd Request for Production of Documents, No. 76	24790	24790	G01.02a Individuals in IM Nuclear Service Fee	1	Y	All	(b)	Antonio Maceo
OPC's 3rd Request for Production of Documents, No. 76	24791	24791	G01.09 RE IM Nuclear Service fee listing NEER Employees	1	Y	All	(b)	Antonio Maceo
OPC's 3rd Request for Production of Documents, No. 76	24792	24794	A02 Affiliate Transactions Review Report Cross-Referenced	3	Y	All	(b)	Antonio Maceo

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OPC's 3rd Request for Production of Documents, No. 76	24795	24795	B01 Opening Meeting Minutes	1	Y	All	(b)	Antonio Maceo
OPC's 3rd Request for Production of Documents, No. 76	24796	24796	B02 Risk Control Worksheet_Final	1	Y	All	(b)	Antonio Maceo
OPC's 3rd Request for Production of Documents, No. 76	24797	24797	B02 Risk ID_Final	1	Y	All	(b)	Antonio Maceo
OPC's 3rd Request for Production of Documents, No. 76	24798	24818	D01.1 Cost Allocation Manual	21	Y	All	(b)	Antonio Maceo
OPC's 3rd Request for Production of Documents, No. 76	24819	24822	D01.2 Direct Affiliate Charges SOX Narrative	4	Y	All	(b)	Antonio Maceo
OPC's 3rd Request for Production of Documents, No. 76	24823	24825	D03a - Lead Sheet - Review of FPA Affiliate Charges	3	Y	All	(b)	Antonio Maceo

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OPC's 3rd Request for Production of Documents, No. 76	24826	24827	D03a.1 - Meeting to discuss FP&A Review of Affiliates Charges	2	Y	All	(b)	Antonio Maceo
OPC's 3rd Request for Production of Documents, No. 76	24828	24829	D03a.2 - Negative confirmation that FPA process was approved by Regulatory Accounting	2	Y	All	(b)	Antonio Maceo
OPC's 3rd Request for Production of Documents, No. 76	24830	24832	D03a.4 - FPA Charging - Policy Process Methodology - Rev. 1 062419	3	Y	All	(b)	Antonio Maceo
OPC's 3rd Request for Production of Documents, No. 76	24833	24834	D03a.7 - email - FP&A Organizations - Cost Allocations have been Updated! - March 2020	2	Y	All	(b)	Antonio Maceo
OPC's 3rd Request for Production of Documents, No. 76	24835	24839	D03a.8 - email - FPA errors found in payroll allocations and other controls in place	5	Y	All	(b)	Antonio Maceo
OPC's 3rd Request for Production of Documents, No. 76	24840	24844	D03a.9 - email - FPA - why there were differences in the allocations for pp 3.13 for Project Team employees tested	5	Y	All	(b)	Antonio Maceo

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OPC's 3rd Request for Production of Documents, No. 76	24845	24848	D03a.10 - email - FPA payroll allocation testing - explanation for some of the errors found	4	Y	All	(b)	Antonio Maceo
OPC's 3rd Request for Production of Documents, No. 76	24849	24853	D03a.11 - email - FPA meeting with PGD to discuss charging process - invite - and % of FPA payroll charged to affiliates	5	Y	All	(b)	Antonio Maceo
OPC's 3rd Request for Production of Documents, No. 76	24854	24855	D03a.12 - RE_ Join us for a FP&A and TFI Brunch and Learn_ Charging across the Enterprise! - invite 1.29.20	2	Y	All	(b)	Antonio Maceo
OPC's 3rd Request for Production of Documents, No. 76	24856	24856	D03a.13 - email - FP&A Projects Team - PI-9 Project allocations announced	1	Y	All	(b)	Antonio Maceo
OPC's 3rd Request for Production of Documents, No. 76	24857	24862	D03a.14 - FP&A audit findings and corrections	6	Y	All	(b)	Antonio Maceo
OPC's 3rd Request for Production of Documents, No. 76	24863	24863	D03b - Lead Sheet - Review of FCOE Affiliate Charges	1	Y	All	(b)	Antonio Maceo

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OPC's 3rd Request for Production of Documents, No. 76	24864	24864	D03b.1 - Meeting to discuss FCOE Review of Affiliates Charges	1	Y	All	(b)	Antonio Maceo
OPC's 3rd Request for Production of Documents, No. 76	24865	24865	D03c - Lead Sheet - Review of IOs created via request form	1	Y	All	(b)	Antonio Maceo
OPC's 3rd Request for Production of Documents, No. 76	24866	24873	E01.1 CSC SOX Narratives	8	Y	All	(b)	Antonio Maceo
OPC's 3rd Request for Production of Documents, No. 76	24874	24874	E01.2 Mgmt. Q Review & Signif Events Memo	1	Y	All	(b)	Antonio Maceo
OPC's 3rd Request for Production of Documents, No. 76	24875	24875	A01 FPL-FIN-AC-00-2020-0007-Affiliate Transactions Review	1	Y	All	(b)	Antonio Maceo
OPC's 3rd Request for Production of Documents, No. 76	24876	24876	B01.1 Opening Meeting for Affiliate Transactions Review 6.5.2020	1	Y	All	(b)	Antonio Maceo

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OPC's 3rd Request for Production of Documents, No. 76	24877	24880	D03c.1 - Testing of IOs requested via Form	4	Y	All	(b)	Antonio Maceo
OPC's 3rd Request for Production of Documents, No. 76	24881	24918	D02.1 Direct Affiliate Charges Testing (Settled)	38	Y	All	(b)	Antonio Maceo
OPC's 3rd Request for Production of Documents, No. 76	24919	24935	D02.2 Population and Selections Files	17	Y	All	(b)	Antonio Maceo
OPC's 3rd Request for Production of Documents, No. 76	24936	24937	D02.3 Direct Affiliate Charges Testing (Non-Settled)	2	Y	All	(b)	Antonio Maceo
OPC's 3rd Request for Production of Documents, No. 76	24938	24940	D03a.3 - IA Testing and Timesheet Data for IA FPA affiliates testing	3	Y	All	(b)	Antonio Maceo
OPC's 3rd Request for Production of Documents, No. 76	24941	24945	D03a.5 - FPA 2020 Allocations by BU and Quarter - Q2 Analysis 042820	5	Y	All	(b)	Antonio Maceo

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OPC's 3rd Request for Production of Documents, No. 76	24946	24946	D03a.6 - FPA Projects Team - PI-10 Project allocation calculator 06 15 20	1	Y	All	(b)	Antonio Maceo
OPC's 3rd Request for Production of Documents, No. 76	24947	24949	D03b.2 - IA testing and FCOE Accounting Structure Consolidated	3	Y	All	(b)	Antonio Maceo
OPC's 3rd Request for Production of Documents, No. 76	24950	24953	E02.1.1 CSC % Testing	4	Y	All	(b)	Antonio Maceo
OPC's 3rd Request for Production of Documents, No. 76	24954	24962	E02.1.2 2020 Budget Drivers Testing	9	Y	All	(b)	Antonio Maceo
OPC's 3rd Request for Production of Documents, No. 76	24963	24967	E02.1.3 2019 Budget Drivers Testing	5	Y	All	(b)	Antonio Maceo
OPC's 3rd Request for Production of Documents, No. 76	24968	24972	E02.1.4 I.T. 2020 Budget Drivers Testing	5	Y	All	(b)	Antonio Maceo

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OPC's 3rd Request for Production of Documents, No. 76	24973	24974	E02.1.5 I.T. 2019 Budget Drivers Testing	2	Y	All	(b)	Antonio Maceo
OPC's 3rd Request for Production of Documents, No. 76	24975	24976	E02.1.6 Gulf \$235,128	2	Y	All	(b)	Antonio Maceo
OPC's 3rd Request for Production of Documents, No. 76	24977	24978	E02.1.7 Gulf \$321,382	2	Y	All	(b)	Antonio Maceo
OPC's 3rd Request for Production of Documents, No. 76	24979	24982	E02.2 CSC Subselection Detail Testing	4	Y	All	(b)	Antonio Maceo
OPC's 3rd Request for Production of Documents, No. 76	24983	24984	E02.2.1 CSC 2020 Population and Selections	2	Y	All	(b)	Antonio Maceo
OPC's 3rd Request for Production of Documents, No. 76	24985	24985	E02.2.2 CSC 2019 Population and Selections	1	Y	All	(b)	Antonio Maceo

Int/POD No.	Begin Bates Number	End Bates Number	Description	No. of Pages	Confidential	Line/Col	Florida Statute 366.093 (3) Subsection	Declarant
OPC's 3rd Request for Production of Documents, No. 76	24986	24986	D01.3 Periodic Email Communications Regarding Guidelines for Charging Affiliate IOs	1	Y	All	(b)	Antonio Macco

EXHIBIT D

DECLARATIONS

EXHIBIT D

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Petition by Florida Power & Light Company
for Rate Unification and for Base Rate Increase

Docket No: 20210015-EI

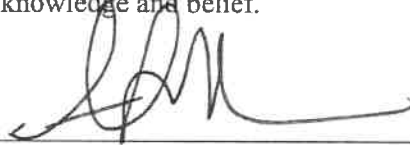
DECLARATION OF ANTONIO MACEO

1. My name is Antonio Maceo. I am currently employed by Florida Power & Light Company ("FPL") as Senior Manager, Internal Audit. 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, specifically the materials provided in response to Office of the Public Counsel's Third Request for Production of Documents No. 76. The documents or materials that I have reviewed and which are asserted by FPL to be proprietary confidential business information contain reports of internal auditors. 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.



Antonio Maceo

Date: _____

4/20/21

EXHIBIT D

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Petition by Florida Power & Light Company
for Rate Unification and for Base Rate Increase

Docket No: 20210015-EI

DECLARATION OF STEVE SIM

1. My name is Steve Sim. I am currently employed by Florida Power & Light Company ("FPL") as Director of Integrated Resource Planning. 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, specifically the materials provided in my response to Office of the Public Counsel's Third Set of Interrogatories, No. 146. The documents or materials that I have reviewed and which are proprietary confidential business information contain competitive business information the disclosure of which would impair the competitive business of the provider of the information. Specifically, it contains software that is proprietary to a third party vendor who provides it to FPL as part of a subscription service. 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.



Steve Sim

Date: 4/19/2021