



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

June 8, 2021

**VIA HAND DELIVERY**

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

**Re: Docket No. 20210015-EI**

**REDACTED**

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 Vote Solar's First Request for Production of Documents Nos. 10, 42 and 43. The request includes Exhibits A, B (two copies), C and D.

Exhibit A consists of the documents containing confidential information that is the subject of FPL's Request for Confidential Classification. Some of the files in Exhibit A are voluminous, and are therefore being provided electronically on disc. Exhibit A is submitted for filing in an envelope marked "EXHIBIT A" – CONFIDENTIAL. 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: \_\_\_\_\_

Enclosure

Sincerely,

s/ Maria Jose Moncada  
Maria Jose Moncada

RECEIVED-FPSC  
2021 JUN -8 PM 3:43  
COMMISSION  
CLERK

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: June 8, 2021

**FLORIDA POWER & LIGHT COMPANY'S REQUEST FOR CONFIDENTIAL  
CLASSIFICATION OF CERTAIN INFORMATION PROVIDED IN ITS  
RESPONSES TO VOTE SOLAR'S FIRST REQUEST FOR  
PRODUCTION OF DOCUMENTS NOS. 10, 42 AND 43**

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 responses to The CLEO Institute and Vote Solar's ("Vote Solar") First Request for Production of Documents Nos. 10, 42 and 43 (the "Confidential Information"). In support of its Request, FPL states as follows:

1. FPL served responses to Vote Solar's First Request for Production of Documents Nos. 10, 42 and 43, on June 8, 2021. This request is being filed contemporaneously with service of those responses to request confidential classification of certain information contained in its response to Vote Solar's First Request for Production of Documents Nos. 10, 42 and 43, 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 FPL's responses to Vote Solar's First Request for Production of Documents, No. 42 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 information relating to competitive interests, the disclosure of which would impair the competitive business of FPL, as well as information describing security measures, systems, or procedures. Specifically, some information is data provided by a third-party vendor which is proprietary to the vendor and cannot be released without its consent, other information contains response plans for a transmission outage which is confidential for security purposes. This information is protected by Section 366.093(3) (c) 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

R. Wade Litchfield  
Vice President and General Counsel  
Authorized House Counsel No. 0062190  
wade.litchfield@fpl.com  
John T. Burnett  
Vice President and Deputy General Counsel  
Florida Bar No. 173304  
john.t.burnett@fpl.com  
Russell Badders  
Vice President and Associate General Counsel  
Florida Bar No. 007455  
russell.badders@nexteraenergy.com  
Maria Jose Moncada  
Senior Attorney  
Florida Bar No. 0773301  
will.p.cox@fpl.com  
Florida Power & Light Company  
700 Universe Boulevard  
Juno Beach, Florida 33408-0420  
(561) 691-7101  
(561) 691-7135 (fax)

**CERTIFICATE OF SERVICE**  
**20210015-EI**

I **HEREBY CERTIFY** that a true and correct copy of the foregoing\* has been furnished by electronic mail this 8<sup>th</sup> day of June 2021 to the following parties:

Suzanne Brownless  
Bianca Lherisson  
Shaw Stiller  
Florida Public Service Commission  
Office of the General Counsel  
2540 Shumard Oak Boulevard  
Tallahassee, Florida 32399-0850  
sbrownle@psc.state.fl.us  
blheriss@psc.state.fl.us  
sstiller@psc.state.fl.us

Thomas A. Jernigan, GS-13, DAF AFIMSC/JA  
Holly L. Buchanan, Maj, USAF AF/JAOE-  
ULFSC  
Robert J. Friedman, Capt., USAF  
Arnold Braxton, TSgt, USAF  
Ebony M. Payton  
Scott L. Kirk, Maj, USAF  
139 Barnes Drive, Suite 1  
Tyndall Air Force Base, Florida 32403  
ULFSC.Tyndall@us.af.mil  
thomas.jernigan.3@us.af.mil  
Holly.buchanan.1@us.af.mil  
robert.friedman.5@us.af.mil  
arnold.braxton@us.af.mil  
ebony.payton.ctr@us.af.mil  
scott.kirk.2@us.af.mil

**Attorneys for Federal Executive Agencies**

Office of Public Counsel  
Richard Gentry  
Patricia A. Christensen  
Anastacia Pirrello  
c/o The Florida Legislature  
111 W. Madison St., Rm 812  
Tallahassee FL 32399-1400  
gentry.richard@leg.state.fl.us  
christensen.patty@leg.state.fl.us  
pirrello.anastacia@leg.state.fl.us

**Attorneys for the Citizens  
of the State of Florida**

James W. Brew  
Laura Wynn Baker  
Joseph R. Briscar  
Stone Mattheis Xenopoulos & Brew, PC  
1025 Thomas Jefferson St, NW  
Suite 800 West  
Washington, D.C. 20007  
jbrew@smxblaw.com  
lwb@smxblaw.com  
jrb@smxblaw.com

**Attorneys for Florida Retail Federation**

Jon C. Moyle, Jr.  
Karen A. Putnal  
Moyle Law Firm, P.A.  
118 North Gadsden Street  
Tallahassee, Florida 32301  
jmoyle@moylelaw.com  
kputnal@moylelaw.com  
mqalls@moylelaw.com

**Attorneys for Florida Industrial Power Users  
Group**

George Cavros  
Southern Alliance for Clean Energy  
120 E. Oakland Park Blvd., Suite 105  
Fort Lauderdale, Florida 33334  
george@cavros-law.com  
**Attorney for Southern Alliance for Clean  
Energy**

Nathan A. Skop, Esq.  
420 NW 50th Blvd.  
Gainesville, FL 32607  
n\_skop@hotmail.com  
**Attorney for Mr. & Mrs. Daniel R. Larson**

Bradley Marshall  
Jordan Luebke  
Earthjustice  
111 S. Martin Luther King Jr. Blvd.  
Tallahassee, Florida 32301  
bmarshall@earthjustice.org  
jluebke@earthjustice.org

Christina I. Reichert  
Earthjustice  
4500 Biscayne Blvd., Ste. 201  
Miami, FL 33137  
creichert@earthjustice.org  
flcascupdates@earthjustice.org  
**Attorneys for Florida Rising, Inc.**  
**League of United Latin American Citizens of Florida**  
**Environmental Confederation of Southwest Florida, Inc.**

Katie Chiles Ottenweller  
Southeast Director  
Vote Solar  
838 Barton Woods Road  
Atlanta, GA 30307  
katie@votesolar.org  
**Attorney for Vote Solar**

Robert Scheffel Wright  
John T. LaVia, III  
Gardner, Bist, Bowden, Dee, LaVia, Wright & Perry, P.A.  
1300 Thomaswood Drive  
Tallahassee, Florida 32308  
schef@gbwlegal.com  
jlavia@gbwlegal.com  
**Attorneys for Floridians Against Increased Rates, Inc.**

William C. Garner  
Law Office of William C. Garner, PLLC  
3425 Bannerman Road  
Unit 105, #414  
Tallahassee, FL 32312  
bgarner@wcglawoffice.com  
**Attorney for The CLEO Institute Inc.**

Stephanie U. Eaton  
SPILMAN THOMAS & BATTLE, PLLC  
110 Oakwood Drive, Suite 500  
Winston-Salem, NC 27103  
seaton@spilmanlaw.com  
**Attorney for Walmart**

Barry A. Naum  
SPILMAN THOMAS & BATTLE, PLLC  
1100 Bent Creek Boulevard, Suite 101  
Mechanicsburg, PA 17050  
bnaum@spilmanlaw.com  
**Attorney for Walmart**

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**

The document responsive to CLEO & Vote Solar's First Request for Production of Documents No. 10, Bates No. 061507, is confidential in its entirety.

The documents responsive to CLEO & Vote Solar's First Request for Production of Documents No.42, Bates Nos. 061511-062022, are confidential in their entirety.

The document responsive to CLEO & Vote Solar's First Request for Production of Documents No.43, Bates Nos. 063128, is confidential in its entirety.

**EXHIBIT C**

**COMPANY:** Florida Power & Light Company  
**TITLE:** Petition by Florida Power & Light Company for Rate Unification and for Base Rate Increase  
**DOCKET NO.:** 20210015-EI  
**DATE:** June 8, 2021

<b>Int/POD No.</b>	<b>Description</b>	<b>No. of Pages</b>	<b>Conf. Y/N</b>	<b>Bates Nos.</b>	<b>Line / Column</b>	<b>Florida Statute 366.093(3) Subsection</b>	<b>Declarants</b>
Vote Solar 1 <sup>st</sup> POD, No. 10	SAIDI Benchmarking Data	1	Y	061507	All	(e)	Michael Spoor
Vote Solar 1 <sup>st</sup> POD, No. 42	Substation Inspection Manual	380	Y	061511-061889	ALL	(c)	Michael Spoor
Vote Solar 1 <sup>st</sup> POD, No. 42	How to Conduct Substation Assessment	6	Y	061890-061895	ALL	(c)	Michael Spoor
Vote Solar 1 <sup>st</sup> POD, No. 42	Transformer Oil Sampling Instructions	15	Y	061896-061910	ALL	(c)	Michael Spoor

<b>Int/POD No.</b>	<b>Description</b>	<b>No. of Pages</b>	<b>Conf. Y/N</b>	<b>Bates Nos.</b>	<b>Line / Column</b>	<b>Florida Statute 366.093(3) Subsection</b>	<b>Declarants</b>
Vote Solar 1 <sup>st</sup> POD, No. 42	Transformer Oil Sampling Instructions	15	Y	061896-061910	All	(c)	Michael Spoor
Vote Solar 1 <sup>st</sup> POD, No. 42	Transmission Operations Procedures - 1	6	Y	061911-061916	All	(c)	Michael Spoor
Vote Solar 1 <sup>st</sup> POD, No. 42	Transmission Operations Procedures - 2	1	Y	061917	All	(c)	Michael Spoor
Vote Solar 1 <sup>st</sup> POD, No. 42	Transmission Operations Procedures -3	2	Y	061918-061919	All	(c)	Michael Spoor
Vote Solar 1 <sup>st</sup> POD, No. 42	Transmission Operations Procedures -4	6	Y	061920-061925	All	(c)	Michael Spoor
Vote Solar 1 <sup>st</sup> POD, No. 42	Transmission Operations Procedures -5	1	Y	061926	All	(c)	Michael Spoor
Vote Solar 1 <sup>st</sup> POD, No. 42	Transmission Operations Procedures -6	2	Y	061927-061928	All	(c)	Michael Spoor

<b>Int/POD No.</b>	<b>Description</b>	<b>No. of Pages</b>	<b>Conf. Y/N</b>	<b>Bates Nos.</b>	<b>Line / Column</b>	<b>Florida Statute 366.093(3) Subsection</b>	<b>Declarants</b>
Vote Solar 1 <sup>st</sup> POD, No. 42	Transmission Operations Procedures -7	2	Y	061929-061930	All	(c)	Michael Spoor
Vote Solar 1 <sup>st</sup> POD, No. 42	Transmission Operations Procedures -8	4	Y	061931-061934	All	(c)	Michael Spoor
Vote Solar 1 <sup>st</sup> POD, No. 42	Transmission Operations Procedures -13.1	30	Y	061935-061964	All	(c)	Michael Spoor
Vote Solar 1 <sup>st</sup> POD, No. 42	Transmission Operations Procedures -13.2	26	Y	061965-061990	All	(c)	Michael Spoor
Vote Solar 1 <sup>st</sup> POD, No. 42	Transmission Operations Procedures -14	8	Y	061991-061998	All	(c)	Michael Spoor
Vote Solar 1 <sup>st</sup> POD, No. 42	Transmission Operations Procedures -15	4	Y	061999-062002	All	(c)	Michael Spoor
Vote Solar 1 <sup>st</sup> POD, No. 42	Transmission Operations Procedures -16	3	Y	062003-062005	All	(c)	Michael Spoor

<b>Int/POD No.</b>	<b>Description</b>	<b>No. of Pages</b>	<b>Conf. Y/N</b>	<b>Bates Nos.</b>	<b>Line / Column</b>	<b>Florida Statute 366.093(3) Subsection</b>	<b>Declarants</b>
Vote Solar 1 <sup>st</sup> POD, No. 42	Transmission Operations Procedures -17	16	Y	062006-062021	All	(c)	Michael Spoor
Vote Solar 1 <sup>st</sup> POD, No. 42	Transmission Operations Procedures -18	1	Y	062022	All	(c)	Michael Spoor
Vote Solar 1 <sup>st</sup> POD, No. 43	Event Response Process	1	Y	063128	All	(c)	Michael Spoor

**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

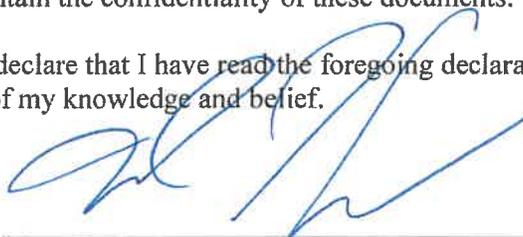
**DECLARATION OF MICHAEL SPOOR**

1. My name is Michael Spoor. I am currently employed by Gulf Power Company ("FPL") as Vice-President. 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 FPL's response to Vote Solar's First Request for Production of Documents Nos. 10, 42 and 43. The documents or materials that I have reviewed and which are asserted by FPL to be proprietary confidential business information contain information relating to competitive interests, the disclosure of which would impair the competitive business of FPL, as well as information describing security measures, systems, or procedures. Specifically, some information is data provided by a third-party vendor which is proprietary to the vendor and cannot be released without its consent, other information contains response plans for a transmission outage which is confidential for security purposes. 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.



\_\_\_\_\_  
Michael G Spoor

Date: 6/7/21