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June 14, 2021

#### VIA HAND DELIVERY

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



7 PA 3. 5

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 Vote Solar's Second Request for Production of Documents Nos. 61 and 76. 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.

AFD 1 EXA B

Sincerely,

Sincerely,

Sincerely,

Sincerely,

Maria Jose Moncada

Maria Jose Moncada

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Confidential Classification)

### BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Petition by Florida Power & Light | Docket No. 20210015-EI

Company for Rate Unification and for Base

Rate Increase

Filed: June 14, 2021

FLORIDA POWER & LIGHT COMPANY'S REQUEST FOR CONFIDENTIAL CLASSIFICATION OF CERTAIN INFORMATION PROVIDED IN ITS RESPONSES TO VOTE SOLAR'S SECOND REQUEST FOR PRODUCTION OF DOCUMENTS NOS. 61 AND 76

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") Second Request for Production of Documents Nos. 61 and 76 (the "Confidential Information"). In support of its Request, FPL states as follows:

- 1. FPL served responses to Vote Solar's Second Request for Production of Documents Nos. 61 and 76, on June 14, 2021. This request is being filed contemporaneously with service of those responses to request confidential classification of certain information contained in FPL's response to Vote Solar's Second Request for Production of Documents Nos. 61 and 76, consistent with Rule 25-22.006, Florida Administrative Code.
  - 2. The following exhibits are included with and made a part of this request:
- Exhibit A consists of a copy of the confidential material on which all the a. information that FPL asserts is entitled to confidential treatment has been highlighted. Some attachments to FPL's responses to Vote Solar's Second Request for Production of Documents, Nos. 61 and 76 are voluminous and confidential in their entirety, and they are being provided electronically on disc.
- Exhibit B consists of a copy of the confidential documents, on which all the b. 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 bids or other contractual data, the disclosure of which would impair the efforts of FPL to contract for goods or services on favorable terms. Specifically, some information consists of system load projections, and other information contains vendor bids for construction projects. This information is protected by Section 366.093(3) (d) 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 14<sup>th</sup> day of June 2021 to the following parties:

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By: s/ Maria Jose Moncada

Maria Jose Moncada

Florida Bar No. 0773301

<sup>\*</sup> 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 documents responsive to Vote Solar's Second Request for Production of Documents No. 61 Bates Nos. 064714-064770, are confidential in their entirety.

The documents responsive to Vote Solar's Second Request for Production of Documents No. 76 Bates Nos. 063225-066924, are confidential in their entirety.

# **EXHIBIT C**

# JUSTIFICATION TABLE

## **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 14, 2021

Int/POD No.	Begin Bates Number	End Bates Number	Description	No. of Pages	Confidential	Line/Col	Florida Statute 366.093 (3) Subsection	Declarant
Vote Solar 2 <sup>nd</sup> POD, No. 61	064715	064732	CPF Model - 2019 DSM Goals - 2026 CC - Benefits Comparison	18	Y	All	(e)	Steve Sim
Vote Solar 2 <sup>nd</sup> POD, No. 61	064733	064750	CPF Model - 2021 TYSP Update - 2031 3x1 CC - CDR Analysis	18	Y	All	(e)	Steve Sim
Vote Solar 2 <sup>nd</sup> POD, No. 61	064751	064760	cpf2014-	10	Y	All	(e)	Steve Sim
Vote Solar 2 <sup>nd</sup> POD, No. 61	064761	064762	d2019ccJ_unit-	2	Y	All	(e)	Steve Sim
Vote Solar 2 <sup>nd</sup> POD, No. 61	064763	064767	finance2014_withCO2	5	Y	All	(e)	Steve Sim

Int/POD No.	Begin Bates Number	End Bates Number	Description	No. of Pages	Confidential	Line/Col	Florida Statute 366.093 (3) Subsection	Declarant
Vote Solar 2 <sup>nd</sup> POD, No. 61	064768	064770	inputcpf	3	Y	All	(e)	Steve Sim
Vote Solar 2 <sup>nd</sup> POD, No. 76	063225	063225	- RFP DAB110620 Addendum 3 Letter (Bates 063225).pdf	1	Y	All	(e)	Matthew Valle
Vote Solar 2 <sup>nd</sup> POD, No. 76	063226	063231	- Addendum 6_ RFP_DAB110620 2022 Florida Rate Based Solar EPCs.pdf	6	Y	All	(e)	Matthew Valle
Vote Solar 2 <sup>nd</sup> POD, No. 76	063232	063236	- Addendum Files - Available Upon Request.pdf	5	Y	All	(e)	Matthew Valle
Vote Solar 2 <sup>nd</sup> POD, No. 76	063237	063237	- RFP DAB110620 Addendum 1 Letter (Bates 063237).pdf	1	Y	All	(e)	Matthew Valle
Vote Solar 2 <sup>nd</sup> POD, No. 76	063238	063238	- RFP DAB110620 Addendum 2 Letter (Bates 063238).pdf	1	Y	All	(e)	Matthew Valle
Vote Solar 2 <sup>nd</sup> POD, No. 76	063239	063239	- RFP DAB110620 Addendum 4 Letter (Bates 063239).pdf	1	Y	All	(e)	Matthew Valle
Vote Solar 2 <sup>nd</sup> POD, No. 76	063240	063240	- RFP DAB110620 Addendum 5 Letter (Bates 063240).pdf	1	Y	All	(e)	Matthew Valle

Int/POD No.	Begin Bates Number	End Bates Number	Description	No. of Pages	Confidential	Line/Col	Florida Statute 366.093 (3) Subsection	Declarant
Vote Solar 2 <sup>nd</sup> POD, No. 76	063676	063681	Confidential - Approved County Permit_FPL Elder Branch_061820	6	Y	All	(e)	Matthew Valle
Vote Solar 2 <sup>nd</sup> POD, No. 76	063682	063706	Confidential - Final Site Plan signed & sealed drawings_052820	25	Y	All	(e)	Matthew Valle
Vote Solar 2 <sup>nd</sup> POD, No. 76	063675	063675	- Elder Branch FDOT Appr Utl Permit_040720 (063675).pdf	13	Y	All	(e)	Matthew Valle
Vote Solar 2 <sup>nd</sup> POD, No. 76	063620	063645	- Elder Branch FDOT Drvwy Conn Appr Permit_021220(063620-063645).pdf	16	Y	All	(e)	Matthew Valle
Vote Solar 2 <sup>nd</sup> POD, No. 76	063646	063658	- FGT Crossing Agreement_041420.pdf	13	Y	All	(e)	Matthew Valle
Vote Solar 2 <sup>nd</sup> POD, No. 76	063659	063674	- WUP_122619.pdf	16	Y	All	(e)	Matthew Valle
Vote Solar 2 <sup>nd</sup> POD, No. 76	063543	063573	- Approved Gulfstream Easement Crossing Agreement_041620.pdf	31	Y	All	(e)	Matthew Valle
Vote Solar 2 <sup>nd</sup> POD, No. 76	063574	063619	- Elder Branch ERP_032320.pdf	46	Y	All	(e)	Matthew Valle

Int/POD No.	Begin Bates Number	End Bates Number	Description	No. of Pages	Confidential	Line/Col	Florida Statute 366.093 (3) Subsection	Declarant
Vote Solar 2 <sup>nd</sup> POD, No. 76	063444	063444	Exhibit A Attachment 2 - Boundary Survey_ 01-23- 19 (Bates 063444).pdf	1	Y	All	(e)	Matthew Valle
Vote Solar 2 <sup>nd</sup> POD, No. 76	063445	063445	Exhibit A Attachment 3 - Topographic Survey_07- 24-19 (Bates 063445).pdf	1	Y	All	(e)	Matthew Valle
Vote Solar 2 <sup>nd</sup> POD, No. 76	063446	063446	Exhibit A Attachment 4 - Preliminary Geo Rpt_04- 20-20 (Bates 063446).pdf	1	Y	All	(e)	Matthew Valle
Vote Solar 2 <sup>nd</sup> POD, No. 76	063431	063440	Exhibit A Attachment 5 - PV Facilities Commissioning Reqmts_12-5-19.docx	10	Y	All	(e)	Matthew Valle
Vote Solar 2 <sup>nd</sup> POD, No. 76	063447	063448	Exhibit A Attachment 6 - Clean Fill Criteria Rev. 9-1-17.pdf	2	Y	All	(e)	Matthew Valle
Vote Solar 2 <sup>nd</sup> POD, No. 76	063449	063490	Exhibit A Attachment 7 - FPL Facility Interconnection Requirements, Rev. 7-5-17.pdf	42	Y	All	(e)	Matthew Valle
Vote Solar 2 <sup>nd</sup> POD, No. 76	063491	063491	Exhibit A Attachment 8 - FPL Equipment Naming Convention_02-24-20.pdf	1	Y	All	(e)	Matthew Valle
Vote Solar 2 <sup>nd</sup> POD, No. 76	063492	063524	Exhibit A Attachment 9 - Spec D-2 Substation Earthwork, Rev. 10-6-17.pdf	33	Y	All	(e)	Matthew Valle

Int/POD No.	Begin Bates Number	End Bates Number	Description	No. of Pages	Confidential	Line/Col	Florida Statute 366.093 (3) Subsection	Declarant
Vote Solar 2 <sup>nd</sup> POD, No. 76	063441	063441	Exhibit C-1 - Project Milestone Schedule 11-05- 20.xlsx	1	Y	All	(e)	Matthew Valle
Vote Solar 2 <sup>nd</sup> POD, No. 76	063442	063442	Exhibit H - FPL Elder Branch Solar Energy Center List of Permits_102820.xlsx	1	Y	All	(e)	Matthew Valle
Vote Solar 2 <sup>nd</sup> POD, No. 76	063443	063443	Exhibit N-1 - Owner Furnished Equipment Delivery Schedule Elder Branch_11.6.20.xlsx	1	Y	All	(e)	Matthew Valle
Vote Solar 2 <sup>nd</sup> POD, No. 76	063525	063542	Exhibit N-2 Equipment Data Sheets Elder Branch 11-6-20.pdf	18	Y	All	(e)	Matthew Valle
Vote Solar 2 <sup>nd</sup> POD, No. 76	063708	063736	Exhibit A Attachment 1 Preliminary Site Plan 1.12.2018.pdf	24	Y	All	(e)	Matthew Valle
Vote Solar 2 <sup>nd</sup> POD, No. 76	063862	063862	Exhibit A Attachment 2 - Boundary Survey North Parcel (063862).dwg	1	Y	All	(e)	Matthew Valle
Vote Solar 2 <sup>nd</sup> POD, No. 76	063863	063863	Exhibit A Attachment 2 - Boundary Survey South Parcel (063863).dwg	1	Y	All	(e)	Matthew Valle
Vote Solar 2 <sup>nd</sup> POD, No. 76	063737	063744	Exhibit A Attachment 2 - Site Boundary Survey 9.7.2017.pdf	8	Y	All	(e)	Matthew Valle

Int/POD No.	Begin Bates Number	End Bates Number	Description	No. of Pages	Confidential	Line/Col	Florida Statute 366.093 (3) Subsection	Declarant
Vote Solar 2 <sup>nd</sup> POD, No. 76	063684	063684	Exhibit A Attachment 3 - Substation Topo Survey (063864).dwg	1	Y	All	(e)	Matthew Valle
Vote Solar 2 <sup>nd</sup> POD, No. 76	063745	063752	Exhibit A Attachment 3 - Topographic Survey 8.4.2017.pdf	8	Y	All	(e)	Matthew Valle
Vote Solar 2 <sup>nd</sup> POD, No. 76	063865	063865	Exhibit A Attachment 3 Ghost Orchid Topo (063865).dwg	1	Y	All	(e)	Matthew Valle
Vote Solar 2 <sup>nd</sup> POD, No. 76	063753	063753	Exhibit A Attachment 4 - Hendry Solar Geotech Rpt 11.30.2017(063753).pdf	1	Y	All	(e)	Matthew Valle
Vote Solar 2 <sup>nd</sup> POD, No. 76	063866	063875	Exhibit A Attachment 5 - PV Facilities Commissioning Reqmts_12-5-19.docx	10	Y	All	(e)	Matthew Valle
Vote Solar 2 <sup>nd</sup> POD, No. 76	063754	063755	Exhibit A Attachment 6 - Clean Fill Criteria Rev. 9-1-17.pdf	2	Y	All	(e)	Matthew Valle
Vote Solar 2 <sup>nd</sup> POD, No. 76	063756	063797	Exhibit A Attachment 7 - FPL Facility Interconnection Requirements, Rev. 7-5-17.pdf	42	Y	All	(e)	Matthew Valle
Vote Solar 2 <sup>nd</sup> POD, No. 76	063798	063798	Exhibit A Attachment 8 - FPL Equipment Naming Convention_022420.pdf	1	Y	All	(e)	Matthew Valle

Int/POD No.	Begin Bates Number	End Bates Number	Description	No. of Pages	Confidential	Line/Col	Florida Statute 366.093 (3) Subsection	Declarant
Vote Solar 2 <sup>nd</sup> POD, No. 76	063799	063831	Exhibit A Attachment 9 - Spec D-2 Substation Earthwork, Rev. 10-6-17.pdf	33	Y	All	(e)	Matthew Valle
Vote Solar 2 <sup>nd</sup> POD, No. 76	063832	063839	Exhibit A Attachment 10 Landscape Set 6.21.2018.pdf	8	Y	All	(e)	Matthew Valle
Vote Solar 2 <sup>nd</sup> POD, No. 76	063840	063840	Exhibit A Attachment 11 Hendry North GCP 5.9.2017.pdf	1	Y	All	(e)	Matthew Valle
Vote Solar 2 <sup>nd</sup> POD, No. 76	063841	063841	Exhibit A Attachment 12 Temporary Facilities 8.1.2018.pdf	1	Y	All	(e)	Matthew Valle
Vote Solar 2 <sup>nd</sup> POD, No. 76	063842	063861	Exhibit A Attachment 13 MV Collection 11.4.2020.pdf	20	Y	All	(e)	Matthew Valle
Vote Solar 2 <sup>nd</sup> POD, No. 76	063876	063876	Exhibit C-1 - Project Milestone Schedule 11-6- 20.xlsx	1	Y	All	(e)	Matthew Valle
Vote Solar 2 <sup>nd</sup> POD, No. 76	063877	063877	Exhibit H - FPL Ghost Orchid Solar Energy Center List of Permits 11-5-2020.xlsx	1	Y	All	(e)	Matthew Valle
Vote Solar 2 <sup>nd</sup> POD, No. 76	063878	063935	Exhibit A - Attachment 1 Prelim Site Plan GROVE SOLAR, Rev 11.17.20.pdf	58	Y	All	(e)	Matthew Valle

Int/POD No.	Begin Bates Number	End Bates Number	Description	No. of Pages	Confidential	Line/Col	Florida Statute 366.093 (3) Subsection	Declarant
Vote Solar 2 <sup>nd</sup> POD, No. 76	063936	063938	Exhibit A Attachment 2 - Boundary Survey 02-09- 17.pdf	3	Y	All	(e)	Matthew Valle
Vote Solar 2 <sup>nd</sup> POD, No. 76	063939	063942	Exhibit A Attachment 3 - Topographic Survey 10-20- 20.pdf	4	Y	All	(e)	Matthew Valle
Vote Solar 2 <sup>nd</sup> POD, No. 76	065000	065182	Exhibit A Attachment 4 - Preliminary Geotechnical Report 11-02-20.pdf	183	Y	All	(e)	Matthew Valle
Vote Solar 2 <sup>nd</sup> POD, No. 76	063989	063998	Exhibit A Attachment 5 - PV Facilities Commissioning Reqmts 12-5-19.pdf	10	Y	All	(e)	Matthew Valle
Vote Solar 2 <sup>nd</sup> POD, No. 76	063943	063944	Exhibit A Attachment 6 - Clean Fill Criteria Rev. 9-1-17.pdf	2	Y	All	(e)	Matthew Valle
Vote Solar 2 <sup>nd</sup> POD, No. 76	063945	063986	Exhibit A Attachment 7 - FPL Facility Interconnection Requirements, Rev. 7-5-17.pdf	42	Y	All	(e)	Matthew Valle
Vote Solar 2 <sup>nd</sup> POD, No. 76	063987	063987	Exhibit A Attachment 8 - FPL Equipment Naming Convention 02-24-20.pdf	1	Y	All	(e)	Matthew Valle
Vote Solar 2 <sup>nd</sup> POD, No. 76	065183	065215	Exhibit A Attachment 9 - Spec D-2 Substation Earthwork, Rev. 10-6-17.pdf	33	Y	All	(e)	Matthew Valle

Int/POD No.	Begin Bates Number	End Bates Number	Description	No. of Pages	Confidential	Line/Col	Florida Statute 366.093 (3) Subsection	Declarant
Vote Solar 2 <sup>nd</sup> POD, No. 76	063988	063988	Exhibit A Attachment 10 Grove Proposed Distribution Line.pdf	1	Y	All	(e)	Matthew Valle
Vote Solar 2 <sup>nd</sup> POD, No. 76	065216	065369	Exhibit A Attachment 11 - Drainage Report - Grove Solar, Rev. 11.24.20.pdf	154	Y	All	(e)	Matthew Valle
Vote Solar 2 <sup>nd</sup> POD, No. 76	065370	065400	Exhibit A EPC Scope of Work - Grove Solar Energy Center_2020-11-05.pdf	31	Y	All	(e)	Matthew Valle
Vote Solar 2 <sup>nd</sup> POD, No. 76	065401	065401	Exhibit C-1 - Project Milestone Schedule 11-05- 20.xlsx	1	Y	All	(e)	Matthew Valle
Vote Solar 2 <sup>nd</sup> POD, No. 76	065402	065402	Exhibit H - FPL Grove Solar Energy Center List of Permits 11-6-2020.xlsx	1	Y	All	(e)	Matthew Valle
Vote Solar 2 <sup>nd</sup> POD, No. 76	065403	065403	Exhibit N-1 - Owner Furnished Equipment Delivery Schedule Grove_11.6.20.xlsx	1	Y	All	(e)	Matthew Valle
Vote Solar 2 <sup>nd</sup> POD, No. 76	065690	065704	Confidential - Immokalee SEC- AJD and NPR Request 10-26-2020	15	Y	All	(e)	Matthew Valle
Vote Solar 2 <sup>nd</sup> POD, No. 76	065404	065405	Exhibit A Attachment 1 - Preliminary Site Plan 11.6.20.pdf	2	Y	All	(e)	Matthew Valle

Int/POD No.	Begin Bates Number	End Bates Number	Description	No. of Pages	Confidential	Line/Col	Florida Statute 366.093 (3) Subsection	Declarant
Vote Solar 2 <sup>nd</sup> POD, No. 76	065406	065411	Exhibit A Attachment 2 - Boundary Survey 8-20- 20.pdf	6	Y	All	(e)	Matthew Valle
Vote Solar 2 <sup>nd</sup> POD, No. 76	065412	065414	Exhibit A Attachment 3 - Topographic Survey 10-15- 20.pdf	3	Y	All	(e)	Matthew Valle
Vote Solar 2 <sup>nd</sup> POD, No. 76	065415	065596	Exhibit A Attachment 4 - Preliminary Geotechnical Report 10-30-20.pdf	182	Y	All	(e)	Matthew Valle
Vote Solar 2 <sup>nd</sup> POD, No. 76	065597	065606	Exhibit A Attachment 5 - PV Facilities Commissioning Reqmts_12-5-19.pdf	10	Y	All	(e)	Matthew Valle
Vote Solar 2 <sup>nd</sup> POD, No. 76	065607	065608	Exhibit A Attachment 6 - Clean Fill Criteria Rev. 9-1-17.pdf	2	Y	All	(e)	Matthew Valle
Vote Solar 2 <sup>nd</sup> POD, No. 76	065609	065650	Exhibit A Attachment 7 - FPL Facility Interconnection Requirements, Rev. 7-5-17.pdf	42	Y	All	(e)	Matthew Valle
Vote Solar 2 <sup>nd</sup> POD, No. 76	065651	065651	Exhibit A Attachment 8 - FPL Equipment Naming Convention_022420.pdf	1	Y	All	(e)	Matthew Valle
Vote Solar 2 <sup>nd</sup> POD, No. 76	065652	065684	Exhibit A Attachment 9 - Spec D-2 Substation Earthwork, Rev. 10-6-17.pdf	33	Y	All	(e)	Matthew Valle

Int/POD No.	Begin Bates Number	End Bates Number	Description	No. of Pages	Confidential	Line/Col	Florida Statute 366.093 (3) Subsection	Declarant
Vote Solar 2 <sup>nd</sup> POD, No. 76	065686	065686	Exhibit A Attachment 10 - Preliminary Site Plan CAD 11-13-20 (065686).dwg	1	Y	All	(e)	Matthew Valle
Vote Solar 2 <sup>nd</sup> POD, No. 76	065685	065685	Exhibit A Attachment 11 - Preliminary Culvert Survey 11-11-20.pdf	1	Y	All	(e)	Matthew Valle
Vote Solar 2 <sup>nd</sup> POD, No. 76	065687	065687	Exhibit C-1 - Project Milestone Schedule 11-05- 20.xlsx	1	Y	All	(e)	Matthew Valle
Vote Solar 2 <sup>nd</sup> POD, No. 76	065688	065688	Exhibit H - FPL Immokalee Solar Energy Center List of Permits 11-6-20.xlsx	*****	Y	All	(e)	Matthew Valle
Vote Solar 2 <sup>nd</sup> POD, No. 76	065689	065689	Exhibit N-1 - Owner Furnished Equipment Delivery Schedule_11.6.20.xlsx	1	Y	All	(e)	Matthew Valle
Vote Solar 2 <sup>nd</sup> POD, No. 76	065705	065714	Exhibit A Attachment 1 Preliminary Site Plan.pdf	10	Y	All	(e)	Matthew Valle
Vote Solar 2 <sup>nd</sup> POD, No. 76	065715	065749	Exhibit A Attachment 3 - Topographic Survey 07-27- 18.pdf	35	Y	All	(e)	Matthew Valle
Vote Solar 2 <sup>nd</sup> POD, No. 76	065750	065759	Exhibit A Attachment 5 - PV Facilities Commissioning Reqmts 12-5-19.pdf	10	Y	All	(e)	Matthew Valle

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Vote Solar 2 <sup>nd</sup> POD, No. 76	065760	065761	Exhibit A Attachment 6 - Clean Fill Criteria Rev. 9-1-17.pdf	2	Y	All	(e)	Matthew Valle
Vote Solar 2 <sup>nd</sup> POD, No. 76	065762	065803	Exhibit A Attachment 7 - FPL Facility Interconnection Requirements, Rev. 7-5-17.pdf	42	Y	All	(e)	Matthew Valle
Vote Solar 2 <sup>nd</sup> POD, No. 76	065804	065804	Exhibit A Attachment 8 - FPL Equipment Naming Convention 02-24-20.pdf	1	Y	All	(e)	Matthew Valle
Vote Solar 2 <sup>nd</sup> POD, No. 76	065805	065837	Exhibit A Attachment 9 - Spec D-2 Substation Earthwork, Rev. 10-6-17.pdf	33	Y	All	(e)	Matthew Valle
Vote Solar 2 <sup>nd</sup> POD, No. 76	065838	065838	Exhibit A Attachment 10 Ghost Substation Preliminary Plan, Rev 12.2.20(065838).pdf	1	Y	All	(e)	Matthew Valle
Vote Solar 2 <sup>nd</sup> POD, No. 76	065839	065839	Exhibit C-1 - Project Milestone Schedule 11-05- 20.xlsx	1	Y	All	(e)	Matthew Valle
Vote Solar 2 <sup>nd</sup> POD, No. 76	065840	065840	Exhibit H - FPL Sawgrass Solar Energy Center List of Permits 11-10-2020.xlsx	1	Y	All	(e)	Matthew Valle
Vote Solar 2 <sup>nd</sup> POD, No. 76	065841	065841	Exhibit N-1 - Owner Furnished Equipment Delivery Schedule Sawgrass_11.6.20.xlsx	1	Y	All	(e)	Matthew Valle

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Vote Solar 2 <sup>nd</sup> POD, No. 76	066283	066284	Confidential - FPL Sundew CUP Supplement 1	2	Y	All	(e)	Matthew Valle
Vote Solar 2 <sup>nd</sup> POD, No. 76	066285	066286	Confidential - FPL Sundew Legal Description	2	Y	All	(e)	Matthew Valle
Vote Solar 2 <sup>nd</sup> POD, No. 76	066287	066287	Confidential - FPL Sundew Waiver Supplement - Lot Coverage_09-25-2020	1	Y	All	(e)	Matthew Valle
Vote Solar 2 <sup>nd</sup> POD, No. 76	066288	066289	Confidential - FPL Sundew Waiver Supplement 9	2	Y	All	(e)	Matthew Valle
Vote Solar 2 <sup>nd</sup> POD, No. 76	066290	066291	Confidential - FPL Sundew Waiver Supplement_Landscape_09-25-2020	2	Y	All	(e)	Matthew Valle
Vote Solar 2 <sup>nd</sup> POD, No. 76	065979	065995	Confidential - FPL Sundew MSP & CUP Apps with Legal Description & Narrative Statement 9-9-20	17	Y	All	(e)	Matthew Valle
Vote Solar 2 <sup>nd</sup> POD, No. 76	065996	066012	Confidential - Sundew Solar AJD-NPR Request_10-07-20	17	Y	All	(e)	Matthew Valle
Vote Solar 2 <sup>nd</sup> POD, No. 76	066013	066282	Confidential - Sundew Solar ERP Application_09-18-20	270	Y	All	(e)	Matthew Valle

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Vote Solar 2 <sup>nd</sup> POD, No. 76	066306	066306	Confidential - STL2018_286027 (Bates 066306)	1	Y	All	(e)	Matthew Valle
Vote Solar 2 <sup>nd</sup> POD, No. 76	066307	066307	Confidential - STL2018_286326 (Bates 066307)	1	Y	All	(e)	Matthew Valle
Vote Solar 2 <sup>nd</sup> POD, No. 76	066308	066308	Confidential - STL2018_286327 (Bates 066308)	1	Y	All	(e)	Matthew Valle
Vote Solar 2 <sup>nd</sup> POD, No. 76	066309	066309	Confidential - Table1	1	Y	All	(e)	Matthew Valle
Vote Solar 2 <sup>nd</sup> POD, No. 76	066310	066310	Confidential Figure V-52 Soil Tracking Prevention Device	1	Y	All	(e)	Matthew Valle
Vote Solar 2 <sup>nd</sup> POD, No. 76	066311	066311	dutch (Bates 066311).ttf	1	Y	All	(e)	Matthew Valle
Vote Solar 2 <sup>nd</sup> POD, No. 76	066312	066312	italice (Bates 066312).shx	1	Y	All	(e)	Matthew Valle
Vote Solar 2 <sup>nd</sup> POD, No. 76	066313	066313	swissb (Bates 066313).ttf	1	Y	All	(e)	Matthew Valle

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Vote Solar 2 <sup>nd</sup> POD, No. 76	066314	066314	swisscb (Bates 066314).ttf	1	Y	All	(e)	Matthew Valle
Vote Solar 2 <sup>nd</sup> POD, No. 76	066315	066315	swissk (Bates 066315).ttf	1	Y	All	(e)	Matthew Valle
Vote Solar 2 <sup>nd</sup> POD, No. 76	066316	066316	times (Bates 066316).ttf	1	Y	All	(e)	Matthew Valle
Vote Solar 2 <sup>nd</sup> POD, No. 76	066317	066317	verdana (Bates 066317).ttf	1	Y	All	(e)	Matthew Valle
Vote Solar 2 <sup>nd</sup> POD, No. 76	066318	066318	verdanab (Bates 066318).ttf	1	Y	All	(e)	Matthew Valle
Vote Solar 2 <sup>nd</sup> POD, No. 76	066319	066319	verdanai (Bates 066319).ttf	1	Y	All	(e)	Matthew Valle
Vote Solar 2 <sup>nd</sup> POD, No. 76	066320	066320	verdanaz (Bates 066320).ttf	1	Y	All	(e)	Matthew Valle
Vote Solar 2 <sup>nd</sup> POD, No. 76	066321	066321	Confidential -DWF6 ePlot (Bates 066321)	1	Y	All	(e)	Matthew Valle

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Vote Solar 2 <sup>nd</sup> POD, No. 76	066322	066322	Confidential -DWG To PDF (Bates 066322)	1	Y	All	(e)	Matthew Valle
Vote Solar 2 <sup>nd</sup> POD, No. 76	066323	066323	Confidential -normal2 (Bates 066323)	1	Y	All	(e)	Matthew Valle
Vote Solar 2 <sup>nd</sup> POD, No. 76	066324	066324	Confidential - Medium Monument (Bates 066324)	1	Y	All	(e)	Matthew Valle
Vote Solar 2 <sup>nd</sup> POD, No. 76	066325	066325	Confidential - Architectural Imperial (Bates 066325)	1	Y	All	(e)	Matthew Valle
Vote Solar 2 <sup>nd</sup> POD, No. 76	066326	066326	Confidential - Turbidity Barrier	1	Y	All	(e)	Matthew Valle
Vote Solar 2 <sup>nd</sup> POD, No. 76	066333	066333	18-003 Alta Boundary Srvy Ridge Farms south(066333)	1	Y	All	(e)	Matthew Valle
Vote Solar 2 <sup>nd</sup> POD, No. 76	066334	066334	Alta Boundary Srvy Ridge Farms south-CT MOD (066334)	1	Y	All	(e)	Matthew Valle
Vote Solar 2 <sup>nd</sup> POD, No. 76	066335	066335	Conf-18-003 Alta Boundary Srvy Ridge Farms south(066335)	1	Y	All	(e)	Matthew Valle

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Vote Solar 2 <sup>nd</sup> POD, No. 76	066336	066336	Confidential -19-164 Power Line (Bates 066336)	1	Y	All	(e)	Matthew Valle
Vote Solar 2 <sup>nd</sup> POD, No. 76	066337	066337	Confidential -19070 - RIDGE FARMS - FIXED - MP (Bates 066337)	1	Y	All	(e)	Matthew Valle
Vote Solar 2 <sup>nd</sup> POD, No. 76	066338	066338	St Lucie 924 (Bates 066338)	1	Y	All	(e)	Matthew Valle
Vote Solar 2 <sup>nd</sup> POD, No. 76	066339	066339	Confidential -19070-RIDGE FARMS-FIXED-MP (Bates 066339)	1	Y	All	(e)	Matthew Valle
Vote Solar 2 <sup>nd</sup> POD, No. 76	066340	066340	Confidential-19-164, 2020.01.24,Substation(Bates 066340)	1	Y	All	(e)	Matthew Valle
Vote Solar 2 <sup>nd</sup> POD, No. 76	066341	066341	Confidential-19-164, 2020.10.14,Substation(Bates 066341)	1	Y	All	(e)	Matthew Valle
Vote Solar 2 <sup>nd</sup> POD, No. 76	066342	066342	Confidential - St Lucie 924 (Bates 066342)	1	Y	All	(e)	Matthew Valle
Vote Solar 2 <sup>nd</sup> POD, No. 76	066327	066327	Confidential - 19-164 Power Line (Bates 066327)	<b>T</b>	Y	All	(e)	Matthew Valle

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Vote Solar 2 <sup>nd</sup> POD, No. 76	066328	066328	Confidential - FPL LOGO (Bates 066328)	1	Y	All	(e)	Matthew Valle
Vote Solar 2 <sup>nd</sup> POD, No. 76	066329	066329	Confidential - I-10 (Bates 066329)	1	Y	All	(e)	Matthew Valle
Vote Solar 2 <sup>nd</sup> POD, No. 76	066332	066332	Confidential - Pages from FLErosionSedimentManual060709	1	Y	All	(e)	Matthew Valle
Vote Solar 2 <sup>nd</sup> POD, No. 76	066330	066330	Confidential - PV Panel Detail - 2 (Bates 066330)	1	Y	All	(e)	Matthew Valle
Vote Solar 2 <sup>nd</sup> POD, No. 76	066331	066331	Confidential - USH-90 (Bates 066331)	1	Y	All	(e)	Matthew Valle
Vote Solar 2 <sup>nd</sup> POD, No. 76	066292	066292	19-164 Base IFB (Bates 066292).dwg	1	Y	All	(e)	Matthew Valle
Vote Solar 2 <sup>nd</sup> POD, No. 76	066293	066293	19-164 Cover IFB (Bates 066293).dwg	1	Y	All	(e)	Matthew Valle
Vote Solar 2 <sup>nd</sup> POD, No. 76	066294	066924	19-164 Details IFB (Bates 066294).dwg	1	Y	All	(e)	Matthew Valle

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Vote Solar 2 <sup>nd</sup> POD, No. 76	066295	066295	19-164 Development Plan IFB (Bates 066295).dwg	1	Y	All	(e)	Matthew Valle
Vote Solar 2 <sup>nd</sup> POD, No. 76	066296	066296	19-164 Existing Pipe Network (Bates 066296).dwg	1	Y	All	(e)	Matthew Valle
Vote Solar 2 <sup>nd</sup> POD, No. 76	066297	066297	19-164 Impact Hatch (Bates 066297).dwg	1	Y	All	(e)	Matthew Valle
Vote Solar 2 <sup>nd</sup> POD, No. 76	066298	066298	19-164 Key Plan IFB (Bates 066298).dwg	1	Y	All	(e)	Matthew Valle
Vote Solar 2 <sup>nd</sup> POD, No. 76	066299	066299	19-164 MDP IFB (Bates 066299).dwg	1	Y	All	(e)	Matthew Valle
Vote Solar 2 <sup>nd</sup> POD, No. 76	066300	066300	19-164 PV LAYOUT IFB (Bates 066300).dwg	1	Y	All	(e)	Matthew Valle
Vote Solar 2 <sup>nd</sup> POD, No. 76	066301	066301	19-164 Site Plan - Jurisdictional IFB (Bates 066301).dwg	1	Y	All	(e)	Matthew Valle
Vote Solar 2 <sup>nd</sup> POD, No. 76	066302	066302	19-164 SWPP Details IFB (Bates 066302).dwg	1	Y	All	(e)	Matthew Valle

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Vote Solar 2 <sup>nd</sup> POD, No. 76	066303	066303	19-164 West Ditch Plan IFB (Bates 066303).dwg	1	Y	All	(e)	Matthew Valle
Vote Solar 2 <sup>nd</sup> POD, No. 76	066304	066304	FPL Sundew Solar Energy Cntr-Issue for Bid Plans (066304).dst	1	Y	All	(e)	Matthew Valle
Vote Solar 2 <sup>nd</sup> POD, No. 76	066305	066305	FPL Sundew Solar Energy Cntr-Issue for Bid Plans(066305).txt	1	Y	All	(e)	Matthew Valle
Vote Solar 2 <sup>nd</sup> POD, No. 76	065842	065859	Exhibit A Attachment 1 - Preliminary Site Plan 12-1-20.pdf	18	Y	All	(e)	Matthew Valle
Vote Solar 2 <sup>nd</sup> POD, No. 76	065860	065863	Exhibit A Attachment 2 - Boundary Survey 07-31- 18.PDF	4	Y	All	(e)	Matthew Valle
Vote Solar 2 <sup>nd</sup> POD, No. 76	065864	065867	Exhibit A Attachment 3 - Topographic Survey 06-28- 19.pdf	4	Y	All	(e)	Matthew Valle
Vote Solar 2 <sup>nd</sup> POD, No. 76	065415	065596	Exhibit A Attachment 4 - Preliminary Geotechnical Report 12-11-20.pdf	183	Y	All	(e)	Matthew Valle
Vote Solar 2 <sup>nd</sup> POD, No. 76	065868	065877	Exhibit A Attachment 5 - PV Facilities Commissioning Reqmts_12-5-19.pdf	10	Y	All	(e)	Matthew Valle

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Vote Solar 2 <sup>nd</sup> POD, No. 76	065878	065879	Exhibit A Attachment 6 - Clean Fill Criteria Rev. 9-1-17.pdf	2	Y	All	(e)	Matthew Valle
Vote Solar 2 <sup>nd</sup> POD, No. 76	065880	065921	Exhibit A Attachment 7 - FPL Facility Interconnection Requirements, Rev. 7-5-17.pdf	42	Y	All	(e)	Matthew Valle
Vote Solar 2 <sup>nd</sup> POD, No. 76	065922	065922	Exhibit A Attachment 8 - FPL Equipment Naming Convention_022420.pdf	1	Y	All	(e)	Matthew Valle
Vote Solar 2 <sup>nd</sup> POD, No. 76	065923	065955	Exhibit A Attachment 9 - Spec D-2 Substation Earthwork, Rev. 10-6-17.pdf	33	Y	All	(e)	Matthew Valle
Vote Solar 2 <sup>nd</sup> POD, No. 76	065976	065976	Exhibit C-1 - Project Milestone Schedule 11-05- 20.xlsx	1	Y	All	(e)	Matthew Valle
Vote Solar 2 <sup>nd</sup> POD, No. 76	065977	065977	Exhibit H - List of Permits - Sundew Solar 11-10- 20.xlsx	1	Y	All	(e)	Matthew Valle
Vote Solar 2 <sup>nd</sup> POD, No. 76	065978	065978	Exhibit N-1 - Owner Furnished Equipment Delivery Schedule_11.6.20.xlsx	1	Y	All	(e)	Matthew Valle
Vote Solar 2 <sup>nd</sup> POD, No. 76	065956	065975	Exhibit N-2 Equipment Data Sheets Sundew 11-6- 20.pdf	20	Y	All	(e)	Matthew Valle

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Vote Solar 2 <sup>nd</sup> POD, No. 76	063242	063430	Confidential Commercial Docs 2022 Solar RFP	189	Y	All	(e)	Matthew Valle
Vote Solar 2 <sup>nd</sup> POD, No. 76	064233	064235	Appendix A Exhibit 1 FPL Everglades (Clyman) 85MVA 141.5kV.pdf	3	Y	All	(e)	Matthew Valle
Vote Solar 2 <sup>nd</sup> POD, No. 76	064323	064325	Appendix A Exhibit 1 FPL Grove 85MVA 241.5kV.pdf	3	Y	All	(e)	Matthew Valle
Vote Solar 2 <sup>nd</sup> POD, No. 76	064326	064328	Appendix A Exhibit 1 FPL Immakollee 85MVA 241.5kV.pdf	3	Y	All	(e)	Matthew Valle
Vote Solar 2 <sup>nd</sup> POD, No. 76	064329	064331	Appendix A Exhibit 1 FPL Meadowlark 85MVA 241.5kV.pdf	3	Y	All	(e)	Matthew Valle
Vote Solar 2 <sup>nd</sup> POD, No. 76	064332	064338	Appendix A Exhibit 1 FPL Okeechobee 3 85MVA 26-34.5kV.pdf	7	Y	All	(e)	Matthew Valle
Vote Solar 2 <sup>nd</sup> POD, No. 76	064339	064341	Appendix A Exhibit 1 FPL Saffold 85MVA 241.5kV.pdf	3	Y	All	(e)	Matthew Valle
Vote Solar 2 <sup>nd</sup> POD, No. 76	064342	064344	Appendix A Exhibit 1 FPL Sundew (Athena) 85MVA 241.5kV.pdf	3	Y	All	(e)	Matthew Valle

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Vote Solar 2 <sup>nd</sup> POD, No. 76	064345	064347	Appendix A Exhibit 1 FPL White Tail (Kiwi) 85MVA 241.5kV.pdf	3	Y	All	(e)	Matthew Valle
Vote Solar 2 <sup>nd</sup> POD, No. 76	064348	064350	Appendix A Exhibit 1 GULF Apalachee 85MVA 117.5kV.pdf	3	Y	All	(e)	Matthew Valle
Vote Solar 2 <sup>nd</sup> POD, No. 76	064351	065353	Appendix A Exhibit 1 GULF Blackwater Creek 85MVA 241.5kV.pdf	3	Y	All	(e)	Matthew Valle
Vote Solar 2 <sup>nd</sup> POD, No. 76	064354	065356	Appendix A Exhibit 1 GULF Canoe 85MVA 117.5kV.pdf	3	Y	All	(e)	Matthew Valle
Vote Solar 2 <sup>nd</sup> POD, No. 76	064357	065359	Appendix A Exhibit 1 GULF Chipola (Community) 85MVA 241.5kV.pdf	3	Y	All	(e)	Matthew Valle
Vote Solar 2 <sup>nd</sup> POD, No. 76	064360	064362	Appendix A Exhibit 1 GULF Cotton Creek (RMS Timberland) 85MVA 117.5kV.pdf	3	Y	All	(e)	Matthew Valle
Vote Solar 2 <sup>nd</sup> POD, No. 76	064363	064365	Appendix A Exhibit 1 GULF First City 85MVA 241.5kV.pdf	3	Y	All	(e)	Matthew Valle
Vote Solar 2 <sup>nd</sup> POD, No. 76	064366	064368	Appendix A Exhibit 1 GULF Flowers Creek 85MVA 117.5kV.pdf	3	Y	All	(e)	Matthew Valle

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Vote Solar 2 <sup>nd</sup> POD, No. 76	064369	064372	Appendix A Exhibit 1 GULF Herman Walker (Liddie) 85 MVA 241.5kV.pdf	4	Y	All	(e)	Matthew Valle
Vote Solar 2 <sup>nd</sup> POD, No. 76	064373	064375	Appendix A Exhibit 1 GULF Wild Azalea 85MVA 241.5kV.pdf	3	Y	A11	(e)	Matthew Valle
Vote Solar 2 <sup>nd</sup> POD, No. 76	064387	064387	Appendix A Exhibit 2 Data Sheet Final 1-14-20.xlsx	1	Y	All	(e)	Matthew Valle
Vote Solar 2 <sup>nd</sup> POD, No. 76	064388	064388	Appendix A Exhibit 2-B Data Sheet-Design Criteria 1-14-20.xlsx	1	Y	All	(e)	Matthew Valle
Vote Solar 2 <sup>nd</sup> POD, No. 76	064376	064376	Appendix A Exhibit 3 Doc Submittal Schedule FINAL 091411.pdf	1	Y	All	(e)	Matthew Valle
Vote Solar 2 <sup>nd</sup> POD, No. 76	064443	064451	Appendix A SOW 021017 R7.1.docx	9	Y	All	(e)	Matthew Valle
Vote Solar 2 <sup>nd</sup> POD, No. 76	064389	064391	Appendix B Compensation and Cancellation schedule 1-14-20.doc	3	Y	All	(e)	Matthew Valle
Vote Solar 2 <sup>nd</sup> POD, No. 76	064386	064386	Appendix B-1 GSU Pricing Table 9-20-20.xls	1	Y	All	(e)	Matthew Valle

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Vote Solar 2 <sup>nd</sup> POD, No. 76	064377	064385	Appendix C Performance Guarantees FINAL 091511.pdf	9	Y	All	(e)	Matthew Valle
Vote Solar 2 <sup>nd</sup> POD, No. 76	064452	064452	Appendix C-1 Performance Guarantees 1-14-20.docx	1	Y	All	(e)	Matthew Valle
Vote Solar 2 <sup>nd</sup> POD, No. 76	064390	064392	Appendix D Delivery and Work Schedule 1-14- 20.doc	3	Y	All	(e)	Matthew Valle
Vote Solar 2 <sup>nd</sup> POD, No. 76	064393	064396	Appendix E Liquidated Damages 1-14-20.doc	3	Y	All	(e)	Matthew Valle
Vote Solar 2 <sup>nd</sup> POD, No. 76	064236	064236	Appendix F Spare Parts Special Tools FINAL 4-8- 11.pdf	1	Y	All	(e)	Matthew Valle
Vote Solar 2 <sup>nd</sup> POD, No. 76	064707	064713	Appendix G Technical Direction of Installation and Training (Final 4-8-11).pdf	7	Y	All	(e)	Matthew Valle
Vote Solar 2 <sup>nd</sup> POD, No. 76	064237	064244	Appendix H Form of Lien Waivers Rev 11-2-11.pdf	8	Y	All	(e)	Matthew Valle
Vote Solar 2 <sup>nd</sup> POD, No. 76	064245	064250	Appendix J Form of Parent Guaranty (Final 4-8-11).pdf	6	Y	All	(e)	Matthew Valle

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Vote Solar 2 <sup>nd</sup> POD, No. 76	064251	064260	Appendix K Contractor Safety Requirements (11.1.11).pdf	10	Y	All	(e)	Matthew Valle
Vote Solar 2 <sup>nd</sup> POD, No. 76	064261	064265	Appendix L SupplierSafeandSecureWorkplacePolicy 040715.pdf	5	Y	All	(e)	Matthew Valle
Vote Solar 2 <sup>nd</sup> POD, No. 76	064266	064266	Appendix M Supplier Subcontractors (Final 4-4-11).pdf	1	Y	All	(e)	Matthew Valle
Vote Solar 2 <sup>nd</sup> POD, No. 76	064267	064271	Appendix N Quality Control Requirements (Final 4-4-11).pdf	5	Y	All	(e)	Matthew Valle
Vote Solar 2 <sup>nd</sup> POD, No. 76	064396	064442	NEE GSU T's C's Rev 5-5-17.pdf	47	Y	All	(e)	Matthew Valle
Vote Solar 2 <sup>nd</sup> POD, No. 76	064272	064322	Standard MDCR-101-2020 R2.pdf	51	Y	All	(e)	Matthew Valle
Vote Solar 2 <sup>nd</sup> POD, No. 76	064231	064232	RFP Florida Solar GSUs	2	Y	All	(e)	Matthew Valle
Vote Solar 2 <sup>nd</sup> POD, No. 76	064479	064495	E-A008499-SPCG261213_RA	17	Y	All	(e)	Matthew Valle

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Vote Solar 2 <sup>nd</sup> POD, No. 76	064496	064511	E-A008499-SPCG261214_RA	16	Y	All	(e)	Matthew Valle
Vote Solar 2 <sup>nd</sup> POD, No. 76	064512	064512	E-D008499-STWL10007_S01_RA	1	Y	All	(e)	Matthew Valle
Vote Solar 2 <sup>nd</sup> POD, No. 76	064513	064452	01. Appendix A SOW 4'1-1R37-Transformer General Requirements.pdf	40	Y	All	(e)	Matthew Valle
Vote Solar 2 <sup>nd</sup> POD, No. 76	064220	064229	01a. Appendix A SOW NEER 061215 R7-0.pdf	10	Y	All	(e)	Matthew Valle
Vote Solar 2 <sup>nd</sup> POD, No. 76	064553	064556	Appendix A EXHIBIT 1 - 2018 Hendry (Ghost) - 85mva-34.5kv_rev1 - IFB Signed.pdf	4	Y	All	(e)	Matthew Valle
Vote Solar 2 <sup>nd</sup> POD, No. 76	064557	064560	Appendix A EXHIBIT 1 - 2018 Okeechobee - 85mva, 26-34.5kv_rev1 - IFB Signed.pdf	4	Y	All	(e)	Matthew Valle
Vote Solar 2 <sup>nd</sup> POD, No. 76	064677	064677	Appendix A Exhibit 2 Data Sheet Final 3-20-18.xlsx	1	Y	All	(e)	Matthew Valle
Vote Solar 2 <sup>nd</sup> POD, No. 76	064614	064614	Appendix A Exhibit 2-B Data Sheet-Design Criteria 3-20-18.xlsx	1	Y	All	(e)	Matthew Valle

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Vote Solar 2 <sup>nd</sup> POD, No. 76	064601	064601	Appendix A Exhibit 3 Doc Submittal Schedule FINAL 091411.pdf	1	Y	All	(e)	Matthew Valle
Vote Solar 2 <sup>nd</sup> POD, No. 76	064602	064604	Appendix B Compensation and Cancellation Schedule 3-20-18.doc	3	Y	All	(e)	Matthew Valle
Vote Solar 2 <sup>nd</sup> POD, No. 76	064678	064687	Appendix B-1 GSU pricing table 3-20-18.xls	1	Y	All	(e)	Matthew Valle
Vote Solar 2 <sup>nd</sup> POD, No. 76	064091	064099	Appendix C Performance Guarantees FINAL 091511.pdf	9	Y	All	(e)	Matthew Valle
Vote Solar 2 <sup>nd</sup> POD, No. 76	064681	064689	Appendix C Performance Guarantees FINAL 091511a.pdf	9	Y	All	(e)	Matthew Valle
Vote Solar 2 <sup>nd</sup> POD, No. 76	064230	064230	Appendix C-1 Performance Guarantees 3-20-18.docx	1	Y	All	(e)	Matthew Valle
Vote Solar 2 <sup>nd</sup> POD, No. 76	064674	064676	Appendix D Delivery and Work Schedule 3-20- 18.doc	3	Y	All	(e)	Matthew Valle
Vote Solar 2 <sup>nd</sup> POD, No. 76	064670	064672	Appendix E Liquidated Damages 3-20-18.doc	3	Y	All	(e)	Matthew Valle

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Vote Solar 2 <sup>nd</sup> POD, No. 76	064174	064174	Appendix F Spare Parts Special Tools FINAL 4-8- 11.pdf	1	Y	All	(e)	Matthew Valle
Vote Solar 2 <sup>nd</sup> POD, No. 76	064561	064567	Appendix G Technical Direction of Installation and Training (Final 4-8-11).pdf	7	Y	All	(e)	Matthew Valle
Vote Solar 2 <sup>nd</sup> POD, No. 76	064175	064182	Appendix H Form of Lien Waivers Rev 11-20-15 (FPL).pdf	8	Y	All	(e)	Matthew Valle
Vote Solar 2 <sup>nd</sup> POD, No. 76	064183	064188	Appendix J Form of Parent Guaranty (FPL) Rev 11-20-15.pdf	6	Y	All	(e)	Matthew Valle
Vote Solar 2 <sup>nd</sup> POD, No. 76	064189	064198	Appendix K Contractor Safety Requirements (11.1.11).pdf	10	Y	A11	(e)	Matthew Valle
Vote Solar 2 <sup>nd</sup> POD, No. 76	064199	064203	Appendix L SupplierSafeandSecureWorkplacePolicy 040715.pdf	5	Y	All	(e)	Matthew Valle
Vote Solar 2 <sup>nd</sup> POD, No. 76	064204	064204	Appendix M Supplier Subcontractors (Final 4-4-11).pdf	1	Y	All	(e)	Matthew Valle
Vote Solar 2 <sup>nd</sup> POD, No. 76	064160	064164	Appendix N Quality Control Requirements (Final 4-4-11).pdf	5	Y	All	(e)	Matthew Valle

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Vote Solar 2 <sup>nd</sup> POD, No. 76	064623	064669	NEE GSU T's C's Rev 5-5-17.pdf	47	Y	All	(e)	Matthew Valle
Vote Solar 2 <sup>nd</sup> POD, No. 76	064158	064159	RFP Ghost OCEC	2	Y	All	(e)	Matthew Valle
Vote Solar 2 <sup>nd</sup> POD, No. 76	064155	064155	BESS Inverter Spec 7-28-2020	1	Y	All	(e)	Matthew Valle
Vote Solar 2 <sup>nd</sup> POD, No. 76	064156	064156	BESS use case by project 7-29-2020	1	Y	All	(e)	Matthew Valle
Vote Solar 2 <sup>nd</sup> POD, No. 76	064157	064157	Exhibit 1 - PCU Site Information NEER RFP 7- 18-2020 R1	1	Y	All	(e)	Matthew Valle
Vote Solar 2 <sup>nd</sup> POD, No. 76	064461	064462	RFP No. PV_BESS-2021, Solar Photovoltaic (PV) & BESS Pwr Conv Units for 2021 Proj Addendum 2	2	Y	All	(e)	Matthew Valle
Vote Solar 2 <sup>nd</sup> POD, No. 76	064007	064007	Appendix A - Att 4 Supplier Test Summary 3-9- 20.xlsx	1	Y	All	(e)	Matthew Valle
Vote Solar 2 <sup>nd</sup> POD, No. 76	064008	064009	Appendix A - Att 1 Site Specific Requirements Noname Sample 8-15-18.docx	2	Y	All	(e)	Matthew Valle

Int/POD No.	Begin Bates Number	End Bates Number	Description	No. of Pages	Confidential	Line/Col	Florida Statute 366.093 (3) Subsection	Declarant
Vote Solar 2 <sup>nd</sup> POD, No. 76	064010	064022	Appendix A - Att 3-Medum Voltage Transformer Specification 8-6-18.docx	13	Y	All	(e)	Matthew Valle
Vote Solar 2 <sup>nd</sup> POD, No. 76	064023	064064	Appendix A - Att 5 - FPL Facility Interconnection Requirements.pdf	42	Y	All	(e)	Matthew Valle
Vote Solar 2 <sup>nd</sup> POD, No. 76	064065	064074	Appendix A - Solar PCU Specification 3-6-2020.docx	10	Y	All	(e)	Matthew Valle
Vote Solar 2 <sup>nd</sup> POD, No. 76	064077	064079	Appendix B - Compensation TEMPLATE 3-22- 2020.docx	3	Y	All	(e)	Matthew Valle
Vote Solar 2 <sup>nd</sup> POD, No. 76	064609	064613	Appendix C - Performance Guarantees Rev 11-2- 16.docx	5	Y	All	(e)	Matthew Valle
Vote Solar 2 <sup>nd</sup> POD, No. 76	064081	064083	Appendix C - Searcy Solar Inverter Specifications.pdf	3	Y	All	(e)	Matthew Valle
Vote Solar 2 <sup>nd</sup> POD, No. 76	064615	064617	Appendix D - PCU Performance Test Procedure 11-3-16.docx	3	Y	All	(e)	Matthew Valle
Vote Solar 2 <sup>nd</sup> POD, No. 76	064085	064087	Appendix E - Delivery Schedule and Storage 8-6-18 FINAL.doc	3	Y	All	(e)	Matthew Valle

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Vote Solar 2 <sup>nd</sup> POD, No. 76	064088	064090	Appendix F - Liquidated Damages Rev 8-1-18.docx	3	Y	All	(e)	Matthew Valle
Vote Solar 2 <sup>nd</sup> POD, No. 76	064621	064622	Appendix G - Commissioning 7-25-18.docx	2	Y	All	(e)	Matthew Valle
Vote Solar 2 <sup>nd</sup> POD, No. 76	064000	064000	Appendix H - Lien Waiver Forms (SAMPLE) 10-12- 15.docx	1	Y	All	(e)	Matthew Valle
Vote Solar 2 <sup>nd</sup> POD, No. 76	064103	064110	Appendix I - Form of Letter of Credit Rev 11-21-14 Final.docx	8	Y	All	(e)	Matthew Valle
Vote Solar 2 <sup>nd</sup> POD, No. 76	064111	064111	Appendix J - Recommended Spare Parts and Special Tools Rev 2-17-15.docx	1	Y	All	(e)	Matthew Valle
Vote Solar 2 <sup>nd</sup> POD, No. 76	064112	064117	Appendix K - Form of Parent Guaranty 2-16-15.doc	6	Y	All	(e)	Matthew Valle
Vote Solar 2 <sup>nd</sup> POD, No. 76	064118	064118	Appendix L - Commissioning Completion Form 11- 3-16.docx	1	Y	All	(e)	Matthew Valle
Vote Solar 2 <sup>nd</sup> POD, No. 76	064119	064119	Appendix M - Form of Final Acceptance Certificate 5-6-15 FINAL.doc	1	Y	All	(e)	Matthew Valle

Int/POD No.	Begin Bates Number	End Bates Number	Description	No. of Pages	Confidential	Line/Col	Florida Statute 366.093 (3) Subsection	Declarant
Vote Solar 2 <sup>nd</sup> POD, No. 76	064120	064120	Appendix N - Approved Equipment List Rev 8-1-18.doc	1	Y	All	(e)	Matthew Valle
Vote Solar 2 <sup>nd</sup> POD, No. 76	064121	064121	Appendix O - Quality Control Program Requirements 2-16-15.doc	1	Y	All	(e)	Matthew Valle
Vote Solar 2 <sup>nd</sup> POD, No. 76	064122	064130	Appendix P - Site Rules 2-16-15.pdf	9	Y	All	(e)	Matthew Valle
Vote Solar 2 <sup>nd</sup> POD, No. 76	064131	064135	Appendix Q - Supplier Safe and Secure Workplace Policy 4-7-15 FINAL.pdf	5	Y	All	(e)	Matthew Valle
Vote Solar 2 <sup>nd</sup> POD, No. 76	064136	064138	Appendix R - E&C Contractor Safety Req Policy Rev 11-21-16 FINAL.doc	3	Y	All	(e)	Matthew Valle
Vote Solar 2 <sup>nd</sup> POD, No. 76	064139	064139	Appendix U - Form of Request for Change Order Rev 7-18-2020 Final.doc	1	Y	All	(e)	Matthew Valle
Vote Solar 2 <sup>nd</sup> POD, No. 76	064140	064141	2022 Inverter RFP.pdf	2	Y	All	(e)	Matthew Valle
Vote Solar 2 <sup>nd</sup> POD, No. 76	064142	064146	Appendix C - PCU - Performance Guarantees LONG DURATION 07-25-2017.docx	5	Y	All	(e)	Matthew Valle

Int/POD No.	Begin Bates Number	End Bates Number	Description	No. of Pages	Confidential	Line/Col	Florida Statute 366.093 (3) Subsection	Declarant
Vote Solar 2 <sup>nd</sup> POD, No. 76	064147	064150	Appendix D - PCU Test Procedures LONG DURATION 07-17-2017.docx	4	Y	All	(e)	Matthew Valle
Vote Solar 2 <sup>nd</sup> POD, No. 76	064151	064151	Exhibit 1 - PCU Site Information NEER RFP 7-18- 2020.xlsx	1	Y	All	(e)	Matthew Valle
Vote Solar 2 <sup>nd</sup> POD, No. 76	064152	064152	Exhibit 2 - Inverter RFP Datasheet 3-9-20.xlsx	1	Y	All	(e)	Matthew Valle
Vote Solar 2 <sup>nd</sup> POD, No. 76	064154	064154	Inverter-Tx Component Summary re China.xlsx	1	Y	All	(e)	Matthew Valle
Vote Solar 2 <sup>nd</sup> POD, No. 76	064153	064153	Solar & BESS Inverter Procurement_2021 Inverter Summary_7-18-2020.xlsx	1	Y	All	(e)	Matthew Valle
Vote Solar 2 <sup>nd</sup> POD, No. 76	064702	064702	FPL RFP PV022221 Cover Letter	5	Y	All	(e)	Matthew Valle
Vote Solar 2 <sup>nd</sup> POD, No. 76	064002	064006	RFP Letter Solar Modules 9-25-20 R1	5	Y	All	(e)	Matthew Valle

# **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 MATTHEW VALLE**

- 1. My name is Matthew Valle. I am currently employed by Florida Power & Light Company ("FPL") as Vice President of Development. 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 Vote Solar's Second Request for Production of Documents, No. 76. The documents or materials that I have reviewed and which are proprietary confidential business 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. Specifically, the information contains vendor bids for construction projects. 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.

Matthew Valle

Date:

0:

#### 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

- My name is Steve Sim. I am currently employed by Florida Power & Light 1. Company ("FPL") as Director of Integrated Resource Planning. I have personal knowledge of the matters stated in this written declaration.
- I have reviewed the documents referenced and incorporated in FPL's Request for Confidential Classification, specifically the materials provided in my response to Vote Solar's Seconc Request for Production of Documents, No. 61. 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 system load projections. To the best of my knowledge, FPL has maintained the confidentiality of these documents and materials.
- 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.
- 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: 6/11/2021