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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

REDACTED

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2021 JUN 14 PM 3:06
COMMISSION CLERK

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") Eleventh Request for Production of Documents, Nos. 128 and 129, and Thirteenth Set of Interrogatories No. 236.

The request includes Exhibits A, B (two copies), C and D. Exhibit A consists of the documents containing confidential information. Exhibit A is submitted for filing in an envelope marked "EXHIBIT A" – CONFIDENTIAL. Some documents in Exhibit A are voluminous and are being provided on disk. 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

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: June 14, 2021

**FLORIDA POWER & LIGHT COMPANY'S REQUEST FOR CONFIDENTIAL
CLASSIFICATION OF CERTAIN INFORMATION PROVIDED IN ITS
RESPONSES TO OPC'S ELEVENTH REQUEST FOR PRODUCTION OF
DOCUMENTS, NOS. 128 AND 129, AND THIRTEENTH SET OF INTERROGATORIES**

No. 236

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 Thirteenth Set of Interrogatories No. 236 (the "Confidential Information"). In support of its Request, FPL states as follows:

1. FPL served responses to OPC's Eleventh Request for Production of Documents, Nos. 128 and 129, and Thirteenth Set of Interrogatories No. 236, on June 14, 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 Eleventh Request for Production of Documents, Nos. 128 and 129 Thirteenth Set of Interrogatories No. 236, 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. Some responses are voluminous and are being provided on disk.

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 bids or other contractual data, the disclosure of which would impair the efforts of FPL to contract for goods or services on favorable terms as well as Information relating to competitive interests, the disclosure of which would impair the competitive business of the provider of the information. Specifically, some information pertains to insurance contracts and pricing, and projected insurance costs. 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

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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 14th day of June 2021 to the following parties:

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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

	A	B	C	D	E	F	G	H
1	FPL 064779							
2	20210015-EI							
3	OPC's 13th Set of Interrogatories, No. 236							
4	Attachment No. 2							
5				Palms Insurance Expense				
6				Actuals^a				Forecast^a
7	Policy			Gulf	Gulf	Gulf	Gulf	
8				2017	2018	2019	2020	2021
9	<u>FERC ACCOUNT 924 - PROPERTY INSURANCE:</u>							
10	Property ^(b)			\$ -	\$ -	\$ 84,447	\$ 718,953	
11	Crime			-	-		10,873	
12	Total			\$ -	\$ -	\$ 84,447	\$ 729,826	
13								
14	<u>FERC ACCOUNT 925 - LIABILITY INSURANCE:</u>							
15	Directors & Officers			\$ -	\$ -	\$ -	\$ 31,392	
16	Fiduciary			-	-	-	21,083	
17	Excess Liability			-	-	81,325	176,306	
18	Total			\$ -	\$ -	\$ 81,325	\$ 228,781	
19								
20								
21	<u>FERC ACCOUNT 588 - FLEET LIABILITY INSURANCE</u>			\$ -	\$ -	\$ 261,000	\$ 320,738	
22								
23	<u>VARIOUS ACCOUNTS</u>							
24	Employee Worker's Comp ^(c)			\$ -	\$ -	\$ 550,000	\$ 484,509	
25								
26								
27	^a			Gulf records premiums paid to Palms to a prepaid account and amortizes the premiums to expense over the policy term, which may not coincide with a calendar year. For the forecast periods, the amounts reflected are based on the expected premiums invoiced by Palms for each respective policy since Gulf does not forecast at the vendor level.				
28								
29	^b			Beginning in 2020, Palms provided additional coverage to Gulf Power versus 2019. In addition, property insurance expense is expected to increase in the 2021 renewal due to adverse market conditions.				
30								
31	^c			Worker's compensation is initially charged to a cost pool and then allocated between O&M and capital based on payroll charges. Therefore, amounts reflected represent the total policy premium paid to Palms.				

The documents responsive to OPC's Eleventh Request for Production of Documents No. 128 Bates Nos. 0646475-067009, are confidential in their entirety.

The documents responsive to OPC's Eleventh Request for Production of Documents No. 129 Bates Nos. 064855-064863, 066343-066362 and 066365-066474 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
OPC'S 13 th Set of Interrogatories, No. 236	064778	064778	FPL Property Insurance Data	1	Y	Lines 14-16, 19-22, 25, 28-29 / Cols. I-M	(d), (e)	Keith Ferguson and Meredith Quick
OPC'S 13 th Set of Interrogatories, No. 236	064779	064779	Gulf Property Insurance Data	1	Y	Lines 10-12, 15-18, 21 & 24 / Col. H	(d), (e)	Keith Ferguson and Meredith Quick
OPC 11 th POD, No. 128	066475	066475	9-WCC-2012 Renewal 2017 endt 7 CONFIDENTIAL.pdf	1	Y	All	(d), (e)	Meredith Quick
OPC 11 th POD, No. 128	066476	066483	2018 - 2019 Palms Excess Liability Policy PALMS-XSL-2018 CONFIDENTIAL_Redacted.pdf	8	Y	All	(d), (e)	Meredith Quick

Int/POD No.	Begin Bates Number	End Bates Number	Description	No. of Pages	Confidential	Line/Col	Florida Statute 366.093 (3) Subsection	Declarant
OPC 11 th POD, No. 128	066484	066516	2018 Palms BAR Policy 30 32-BAR-2018 -signed CONFIDENTIAL_Redacted Applied_Redacted.pdf	33	Y	All	(d), (e)	Meredith Quick
OPC 11 th POD, No. 128	066517	066521	2019 - 2020 Palms Employee WC 15-WC-2019 CONFIDENTIAL.pdf	5	Y	All	(d), (e)	Meredith Quick
OPC 11 th POD, No. 128	066522	066526	2019 - 2020 Palms FPL Contractor Wrap Up 9-WCC-2019 CONFIDENTIAL.pdf	5	Y	All	(d), (e)	Meredith Quick
OPC 11 th POD, No. 128	066527	066531	2019 - 2020 Palms Property Excess Policy 19-PDXS-2019 CONFIDENTIAL.pdf	5	Y	All	(d), (e)	Meredith Quick
OPC 11 th POD, No. 128	066532	066566	2019-2020 Palms BAR Policy 30 32-BAR-2019 CONFIDENTIAL_Redacted.pdf	35	Y	All	(d), (e)	Meredith Quick
OPC 11 th POD, No. 128	066567	066571	2019-2020 Palms FPL Auto 20-AL-2019 CONFIDENTIAL.pdf	5	Y	All	(d), (e)	Meredith Quick
OPC 11 th POD, No. 128	066572	066605	BAR Policy 30 32-BAR-2017_AKB Updates (002)_Redacted.pdf	34	Y	All	(d), (e)	Meredith Quick
OPC 11 th POD, No. 128	066606	066658	Crime Insurance Policy (2021-22) - Executed CONFIDENTIAL.pdf	53	Y	All	(d), (e)	Meredith Quick
OPC 11 th POD, No. 128	066659	066680	Fiduciary Insurance Policy (2021-22) - Executed CONFIDENTIAL.pdf	22	Y	All	(d), (e)	Meredith Quick
OPC 11 th POD, No. 128	066681	066681	Fleet Policy FLTAL2004 Endt 17 Rnl 17 CONFIDENTIAL.pdf	1	Y	All	(d), (e)	Meredith Quick
OPC 11 th POD, No. 128	066682	066788	Palms - NEE - FL Property - Final 43-PD-2020-FL CONFIDENTIAL_Redacted.pdf	107	Y	All	(d), (e)	Meredith Quick
OPC 11 th POD, No. 128	066789	066793	Palms 15-WC-2017 CONFIDENTIAL.pdf	5	Y	All	(d), (e)	Meredith Quick
OPC 11 th POD, No. 128	066794	066798	Palms 20-AL-2021 Policy CONFIDENTIAL.pdf	5	Y	All	(d), (e)	Meredith Quick

Int/POD No.	Begin Bates Number	End Bates Number	Description	No. of Pages	Confidential	Line/Col	Florida Statute 366.093 (3) Subsection	Declarant
OPC 11 th POD, No. 128	066799	066804	Palms 37-BAR-2017 (Okeechobee BAR) CONFIDENTIAL.pdf	6	Y	All	(d), (e)	Meredith Quick
OPC 11 th POD, No. 128	066805	066852	Palms 44-BAR-2020 50-per QS - (Final) CONFIDENTIAL_Redacted.pdf	48	Y	All	(d), (e)	Meredith Quick
OPC 11 th POD, No. 128	066853	066857	Palms Auto Policy NO. 20-AL-2020 CONFIDENTIAL.pdf	5	Y	All	(d), (e)	Meredith Quick
OPC 11 th POD, No. 128	066858	066910	Palms Crime Policy -40-CRI-2020 pdf 3-30-2020 CONFIDENTIAL.pdf	53	Y	All	(d), (e)	Meredith Quick
OPC 11 th POD, No. 128	066911	066915	Palms D&O Insurance (Policy 2021-22) - Executed CONFIDENTIAL.pdf	5	Y	All	(d), (e)	Meredith Quick
OPC 11 th POD, No. 128	066916	066921	Palms D&O Policy (2020-21) CONFIDENTIAL.pdf	6	Y	All	(d), (e)	Meredith Quick
OPC 11 th POD, No. 128	066922	066926	Palms Employee WC 15-WC-2018 CONFIDENTIAL.pdf	5	Y	All	(d), (e)	Meredith Quick
OPC 11 th POD, No. 128	066927	066931	Palms Employee WC Policy - 15-WCE-2020 CONFIDENTIAL.pdf	5	Y	All	(d), (e)	Meredith Quick
OPC 11 th POD, No. 128	066932	066939	Palms EXCESS LIABILITY Policy 38-XSL-2020 CONFIDENTIAL_Redacted.pdf	8	Y	All	(d), (e)	Meredith Quick
OPC 11 th POD, No. 128	066940	066943	Palms Excess Liability Policy -XLS2-2020 CONFIDENTIAL.pdf	4	Y	All	(d), (e)	Meredith Quick
OPC 11 th POD, No. 128	066944	066965	Palms Fiduciary Policy 41-FID-2020 pdf 03-30_2020 CONFIDENTIAL.pdf	22	Y	All	(d), (e)	Meredith Quick
OPC 11 th POD, No. 128	066966	066970	Palms FPL Auto 20-AL-2018 CONFIDENTIAL.pdf	5	Y	All	(d), (e)	Meredith Quick
OPC 11 th POD, No. 128	066971	066975	Palms FPL Contractor Wrap Up 9-WCC-2018 CONFIDENTIAL.pdf	5	Y	All	(d), (e)	Meredith Quick

Int/POD No.	Begin Bates Number	End Bates Number	Description	No. of Pages	Confidential	Line/Col	Florida Statute 366.093 (3) Subsection	Declarant
OPC 11 th POD, No. 128	066976	066980	Palms FPL Contractor Wrap Up Policy 9-WCC-2021 2-18-2021 CONFIDENTIAL.pdf	5	Y	All	(d), (e)	Meredith Quick
OPC 11 th POD, No. 128	066981	066986	Palms NO-39BAR-2019 Builders Risk Policy CONFIDENTIAL.pdf	6	Y	All	(d), (e)	Meredith Quick
OPC 11 th POD, No. 128	066987	066991	Palms POLICY NO. 9-WCC-2020 CONFIDENTIAL.pdf	5	Y	All	(d), (e)	Meredith Quick
OPC 11 th POD, No. 128	066992	066996	Palms Property Excess Policy 19-PDXS-2017 CONFIDENTIAL.pdf	5	Y	All	(d), (e)	Meredith Quick
OPC 11 th POD, No. 128	066997	067001	Palms Property Excess Policy 19-PDXS-2018 -signed CONFIDENTIAL.pdf	5	Y	All	(d), (e)	Meredith Quick
OPC 11 th POD, No. 128	067002	067009	Palms XSL-2019 Excess Liability_AKB Updates_Redacted.pdf	8	Y	All	(d), (e)	Meredith Quick
OPC 11 th POD, No. 129	066344	066345	FPL-2017_Palms CWCI_Redacted.pdf	2	Y	All	(d), (e)	Keith Ferguson and Meredith Quick
OPC 11 th POD, No. 129	066346	066346	FPL-2017_Palms CWCI_Redacted.pdf	1	Y	All	(d), (e)	Keith Ferguson and Meredith Quick
OPC 11 th POD, No. 129	066347	066347	FPL-2017_Palms Excess__Redacted.pdf	1	Y	All	(d), (e)	Keith Ferguson and Meredith Quick

Int/POD No.	Begin Bates Number	End Bates Number	Description	No. of Pages	Confidential	Line/Col	Florida Statute 366.093 (3) Subsection	Declarant
OPC 11 th POD, No. 129	066348	066348	FPL-2017_Palms Fleet__Redacted.pdf	1	Y	All	(d), (e)	Keith Ferguson and Meredith Quick
OPC 11 th POD, No. 129	066349	066349	FPL-2017_Palms Refund Engineering (no redactions).pdf	1	Y	All	(d), (e)	Keith Ferguson and Meredith Quick
OPC 11 th POD, No. 129	066350	066350	FPL-2017_Palms Risk__Redacted.pdf	1	Y	All	(d), (e)	Keith Ferguson and Meredith Quick
OPC 11 th POD, No. 129	066351	066351	FPL-2017_Palms Solar_Redacted.pdf	1	Y	All	(d), (e)	Keith Ferguson and Meredith Quick
OPC 11 th POD, No. 129	066352	066352	FPL-2017_Palms Solar__Redacted.pdf	1	Y	All	(d), (e)	Keith Ferguson and Meredith Quick
OPC 11 th POD, No. 129	066353	066353	FPL-2017_Palms Solar__Redacted.pdf	1	Y	All	(d), (e)	Keith Ferguson and Meredith Quick

Int/POD No.	Begin Bates Number	End Bates Number	Description	No. of Pages	Confidential	Line/Col	Florida Statute 366.093 (3) Subsection	Declarant
OPC 11 th POD, No. 129	066354	066354	FPL-2017_Palms Solar__Redacted.pdf	1	Y	All	(d), (e)	Keith Ferguson and Meredith Quick
OPC 11 th POD, No. 129	066355	066355	FPL-2017_Palms Solar__Redacted.pdf	1	Y	All	(d), (e)	Keith Ferguson and Meredith Quick
OPC 11 th POD, No. 129	066356	066356	FPL-2017_Palms Solar__Redacted.pdf	1	Y	All	(d), (e)	Keith Ferguson and Meredith Quick
OPC 11 th POD, No. 129	066357	066357	FPL-2017_Palms Solar_Redacted.pdf	1	Y	All	(d), (e)	Keith Ferguson and Meredith Quick
OPC 11 th POD, No. 129	066358	066358	FPL-2017_Palms Solar__Redacted.pdf	1	Y	All	(d), (e)	Keith Ferguson and Meredith Quick
OPC 11 th POD, No. 129	066359	066359	FPL-2017_Palms Solar_Redacted.pdf	1	Y	All	(d), (e)	Keith Ferguson and Meredith Quick

Int/POD No.	Begin Bates Number	End Bates Number	Description	No. of Pages	Confidential	Line/Col	Florida Statute 366.093 (3) Subsection	Declarant
OPC 11 th POD, No. 129	066360	066360	FPL-2017_Palms Solar_Redacted.pdf	1	Y	All	(d), (e)	Keith Ferguson and Meredith Quick
OPC 11 th POD, No. 129	066361	066361	FPL-2017_Palms Solar__Redacted.pdf	1	Y	All	(d), (e)	Keith Ferguson and Meredith Quick
OPC 11 th POD, No. 129	066362	066362	FPL-2018_Palms CWCI__Redacted.pdf	1	Y	All	(d), (e)	Keith Ferguson and Meredith Quick
OPC 11 th POD, No. 129	066365	066367	FPL-2018_Palms CWCI_Redacted.pdf	3	Y	All	(d), (e)	Keith Ferguson and Meredith Quick
OPC 11 th POD, No. 129	066368	066369	FPL-2018_Palms Excess__Redacted.pdf	2	Y	All	(d), (e)	Keith Ferguson and Meredith Quick
OPC 11 th POD, No. 129	066370	066371	FPL-2018_Palms Excess_Redacted.pdf	2	Y	All	(d), (e)	Keith Ferguson and Meredith Quick

Int/POD No.	Begin Bates Number	End Bates Number	Description	No. of Pages	Confidential	Line/Col	Florida Statute 366.093 (3) Subsection	Declarant
OPC 11 th POD, No. 129	066372	066373	FPL-2018_Palms Excess Redacted.pdf	2	Y	All	(d), (e)	Keith Ferguson and Meredith Quick
OPC 11 th POD, No. 129	066374	066374	FPL-2018_Palms Excess__Redacted.pdf	1	Y	All	(d), (e)	Keith Ferguson and Meredith Quick
OPC 11 th POD, No. 129	066375	066375	FPL-2018_Palms Excess_Redacted.pdf	1	Y	All	(d), (e)	Keith Ferguson and Meredith Quick
OPC 11 th POD, No. 129	066376	066376	FPL-2018_Palms Excess_Redacted.pdf	1	Y	All	(d), (e)	Keith Ferguson and Meredith Quick
OPC 11 th POD, No. 129	066377	066377	FPL-2018_Palms Fleet_(true-up pmt)_Redacted.pdf	1	Y	All	(d), (e)	Keith Ferguson and Meredith Quick
OPC 11 th POD, No. 129	066378	066378	FPL-2018_Palms Fleet_(inital pmt)_Redacted.pdf	1	Y	All	(d), (e)	Keith Ferguson and Meredith Quick

Inf/POD No.	Begin Bates Number	End Bates Number	Description	No. of Pages	Confidential	Line/Col	Florida Statute 366.093 (3) Subsection	Declarant
OPC 11 th POD, No. 129	066379	066379	FPL-2018_Palms FPLES__Redacted.pdf	1	Y	All	(d), (e)	Keith Ferguson and Meredith Quick
OPC 11 th POD, No. 129	066380	066380	FPL-2018_Palms Refund Engineering (no redactions).pdf	1	Y	All	(d), (e)	Keith Ferguson and Meredith Quick
OPC 11 th POD, No. 129	066343	066343	FPL-2018_Palms Risk_Redacted.pdf	1	Y	All	(d), (e)	Keith Ferguson and Meredith Quick
OPC 11 th POD, No. 129	066381	066381	FPL-2018_Palms Risk_Redacted.pdf	1	Y	All	(d), (e)	Keith Ferguson and Meredith Quick
OPC 11 th POD, No. 129	066382	066383	FPL-2019_Palms CWCI_Redacted.pdf	2	Y	All	(d), (e)	Keith Ferguson and Meredith Quick
OPC 11 th POD, No. 129	066384	066385	FPL-2019_Palms CWCI_Redacted.pdf	2	Y	All	(d), (e)	Keith Ferguson and Meredith Quick

Int/POD No.	Begin Bates Number	End Bates Number	Description	No. of Pages	Confidential	Line/Col	Florida Statute 366.093 (3) Subsection	Declarant
OPC 11 th POD, No. 129	064859	064862	FPL-2019_Palms Excess_Redacted.pdf	4	Y	All	(d), (e)	Keith Ferguson and Meredith Quick
OPC 11 th POD, No. 129	066386	066387	FPL-2019_Palms Excess_Redacted.pdf	2	Y	All	(d), (e)	Keith Ferguson and Meredith Quick
OPC 11 th POD, No. 129	064863	064863	FPL-2019_Palms Fleet_ (initial pmt)_Redacted.pdf	1	Y	All	(d), (e)	Keith Ferguson and Meredith Quick
OPC 11 th POD, No. 129	066388	066388	FPL-2019_Palms Refund Engineering Redacted.pdf	1	Y	All	(d), (e)	Keith Ferguson and Meredith Quick
OPC 11 th POD, No. 129	064855	064858	FPL-2019_Palms Risk_Redacted.pdf	4	Y	All	(d), (e)	Keith Ferguson and Meredith Quick
OPC 11 th POD, No. 129	066389	066390	FPL-2019_Palms Risk_Redacted.pdf	2	Y	All	(d), (e)	Keith Ferguson and Meredith Quick

Int/POD No.	Begin Bates Number	End Bates Number	Description	No. of Pages	Confidential	Line/Col	Florida Statute 366.093 (3) Subsection	Declarant
OPC 11 th POD, No. 129	066391	066393	FPL-2019_Palms Risk_Redacted.pdf	3	Y	All	(d), (e)	Keith Ferguson and Meredith Quick
OPC 11 th POD, No. 129	066394	066395	FPL-2019_Palms Risk_Redacted.pdf	2	Y	All	(d), (e)	Keith Ferguson and Meredith Quick
OPC 11 th POD, No. 129	066396	066399	FPL-2020_Palms All Risk_Redacted.pdf	4	Y	All	(d), (e)	Keith Ferguson and Meredith Quick
OPC 11 th POD, No. 129	066400	066402	FPL-2020_Palms Builder All Risk_Redacted.pdf	3	Y	All	(d), (e)	Keith Ferguson and Meredith Quick
OPC 11 th POD, No. 129	066403	066406	FPL-2020_Palms Crime_Redacted.pdf	4	Y	All	(d), (e)	Keith Ferguson and Meredith Quick
OPC 11 th POD, No. 129	066407	066410	FPL-2020_Palms CWCI_Redacted.pdf	4	Y	All	(d), (e)	Keith Ferguson and Meredith Quick

Int/POD No.	Begin Bates Number	End Bates Number	Description	No. of Pages	Confidential	Line/Col	Florida Statute 366.093 (3) Subsection	Declarant
OPC 11 th POD, No. 129	066411	066414	FPL-2020_Palms CWCI_Redacted.pdf	4	Y	All	(d), (e)	Keith Ferguson and Meredith Quick
OPC 11 th POD, No. 129	066415	066418	FPL-2020_Palms D&O_Redacted.pdf	4	Y	All	(d), (e)	Keith Ferguson and Meredith Quick
OPC 11 th POD, No. 129	066419	066421	FPL-2020_Palms Excess_Redacted.pdf	3	Y	All	(d), (e)	Keith Ferguson and Meredith Quick
OPC 11 th POD, No. 129	066422	066423	FPL-2020_Palms Excess_Redacted.pdf	2	Y	All	(d), (e)	Keith Ferguson and Meredith Quick
OPC 11 th POD, No. 129	066424	066425	FPL-2020_Palms Excess_Redacted.pdf	2	Y	All	(d), (e)	Keith Ferguson and Meredith Quick
OPC 11 th POD, No. 129	066426	066434	FPL-2020_Palms Fiduciary_Redacted.pdf	9	Y	All	(d), (e)	Keith Ferguson and Meredith Quick

Int/POD No.	Begin Bates Number	End Bates Number	Description	No. of Pages	Confidential	Line/Col	Florida Statute 366.093 (3) Subsection	Declarant
OPC 11 th POD, No. 129	066435	066436	FPL-2020_Palms Fleet__Redacted.pdf	2	Y	All	(d), (e)	Keith Ferguson and Meredith Quick
OPC 11 th POD, No. 129	066437	066438	FPL-2020_Palms Risk_Redacted.pdf	2	Y	All	(d), (e)	Keith Ferguson and Meredith Quick
OPC 11 th POD, No. 129	066439	066440	FPL-2020_Palms Risk_Redacted.pdf	2	Y	All	(d), (e)	Keith Ferguson and Meredith Quick
OPC 11 th POD, No. 129	066441	066442	Gulf-2019_Palms Builders_Redacted.pdf	2	Y	All	(d), (e)	Keith Ferguson and Meredith Quick
OPC 11 th POD, No. 129	066443	066446	Gulf-2019_Palms CWCI__Redacted.pdf	4	Y	All	(d), (e)	Keith Ferguson and Meredith Quick
OPC 11 th POD, No. 129	066447	066449	Gulf-2019_Palms Excess_Redacted.pdf	3	Y	All	(d), (e)	Keith Ferguson and Meredith Quick

Int/POD No.	Begin Bates Number	End Bates Number	Description	No. of Pages	Confidential	Line/Col	Florida Statute 366.093 (3) Subsection	Declarant
OPC 11 th POD, No. 129	066450	066451	Gulf-2019_Palms Excess_Redacted.pdf	2	Y	All	(d), (e)	Keith Ferguson and Meredith Quick
OPC 11 th POD, No. 129	066452	066453	Gulf-2019_Palms Excess_Redacted.pdf	2	Y	All	(d), (e)	Keith Ferguson and Meredith Quick
OPC 11 th POD, No. 129	066454	066454	Gulf-2019_Palms Fleet_Redacted.pdf	1	Y	All	(d), (e)	Keith Ferguson and Meredith Quick
OPC 11 th POD, No. 129	066455	066457	Gulf-2020_Palms All Risk_Redacted.pdf	3	Y	All	(d), (e)	Keith Ferguson and Meredith Quick
OPC 11 th POD, No. 129	066458	066460	Gulf-2020_Palms All Risk_Redacted.pdf	3	Y	All	(d), (e)	Keith Ferguson and Meredith Quick
OPC 11 th POD, No. 129	066461	066464	Gulf-2020_Palms CWCI_Redacted.pdf	4	Y	All	(d), (e)	Keith Ferguson and Meredith Quick

Int/POD No.	Begin Bates Number	End Bates Number	Description	No. of Pages	Confidential	Line/Col	Florida Statute 366.093 (3) Subsection	Declarant
OPC 11 th POD, No. 129	066465	066466	Gulf-2020_Palms Excess_Redacted.pdf	2	Y	All	(d), (e)	Keith Ferguson and Meredith Quick
OPC 11 th POD, No. 129	066467	066468	Gulf-2020_Palms Fleet_Redacted.pdf	2	Y	All	(d), (e)	Keith Ferguson and Meredith Quick
OPC 11 th POD, No. 129	066469	066474	Gulf-2021_Palms Reimbursement_Redacted.pdf	6	Y	All	(d), (e)	Keith Ferguson and Meredith Quick

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

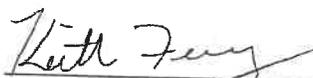
DECLARATION OF KEITH FERGUSON

1. My name is Keith Ferguson. I am currently employed by Florida Power & Light Company ("FPL") as Vice President, Accounting and Controller. 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 OPC's Thirteenth Set of Interrogatories No. 236, and Eleventh Request for Production of Documents, No. 129. The documents or materials that I have reviewed and which are asserted by FPL to be proprietary confidential business information contain information concerning bids or other contractual data, the disclosure of which would impair the efforts of the public utility or its affiliates to contract for goods or services on favorable terms. Specifically, the information contains insurance costs and projected insurance costs. 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.



Keith Ferguson

Date: June 11, 2021

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 MEREDITH QUICK

1. My name is Meredith Quick. I am currently employed by Florida Power & Light Company ("FPL") as Senior Director, Risk Management. 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 OPC's Thirteenth Set of Interrogatories, No. 236, and Eleventh Request for Production of Documents, Nos. 128 and 129. The documents or materials that I have reviewed and which are asserted by FPL to be proprietary confidential business information contain competitive business information the disclosure of which would impair the competitive business of the provider of the information. Specifically, the information contains insurance costs and projected insurance costs. 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.



Meredith Quick

Date: 6/11/21