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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

RECEIVED-FPSC
2021 JUN 14 PM 3:17
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 Vote Solar's First Request for Production of Documents Nos. 9, 15 and 37; and First Set of Interrogatories, No. 88. 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. 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
- cc: Counsel for Parties of Record (w/ copy of FPL's Request for Confidential Classification)

Sincerely,

s/ Maria Jose Moncada
Maria Jose Moncada

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 VOTE SOLAR’S FIRST REQUEST FOR
PRODUCTION OF DOCUMENTS NOS. 9, 15 AND 37,
AND FIRST SET OF INTERROGATORIES, No. 88**

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. 9, 15 and 37 and First Set of Interrogatories, No. 88 (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. 9, 15 and 37 and First Set of Interrogatories, No. 88, 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 First Request for Production of Documents Nos. 9, 15 and 37 and First Set of Interrogatories, No. 88, 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.

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 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 contains credit analyses, while other information contains transmission unit 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:

Suzanne Brownless
Bianca Lherisson
Shaw Stiller
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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

The document responsive to CLEO & Vote Solar's First Request for Production of Documents No. 9, Bates No. 064453-064460, is confidential in its entirety.

The documents responsive to CLEO & Vote Solar's First Request for Production of Documents No.15, Bates Nos. 063171-063200, are confidential in their entirety.

The documents responsive to CLEO & Vote Solar's First Request for Production of Documents No.37, Bates Nos. 064690-064701, are confidential in their entirety.

b)

	Actual 2019	Actual 2020	Actual/Estimated 2021	Estimated 2022	Estimated 2023
500kV transmission structure ¹	80	428	1,506	820	497

- 1 c) The Cost for replacing a 500kV transmission structure can vary, but typically the cost
 2 for a tangent structure can range between [REDACTED] per structure.

¹ Estimates could vary based on a number of factors, including, but not limited to: permitting, easement issues, change in scope; resource constraints, and/or extreme weather.

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.	Description	No. of Pages	Conf. Y/N	Bates Nos.	Line / Column	Florida Statute 366.093(3) Subsection	Declarants
Vote Solar 1 st POD, No. 9	Collection Policies	8	Y	064453-064460	All	(e)	Christopher Chapel
Vote Solar 1 st POD, No. 15	Moodys_FloridaPowerLightCompany_08.25.2020	12	Y	063189-063200	ALL	(e)	James Coyne
Vote Solar 1 st POD, No. 15	NextEra Energy Inc Still Delivering - Morgan Stanley - 18 - 21-Jun-19	18	Y	063171-063188	ALL	(e)	Robert E. Barrett
Vote Solar 1 st POD, No. 37	EMC April Reliability	4	Y	064690-064693	ALL	(e)	Jose Chacon

Int/POD No.	Description	No. of Pages	Conf. Y/N	Bates Nos.	Line / Column	Florida Statute 366.093(3) Subsection	Declarants
Vote Solar 1 st POD, No. 37	Maslansky – FPL Value Message Phase I	3	Y	064694-064696	All	(e)	Jose Chacon
Vote Solar 1 st POD, No. 37	Maslansky – FPL Value Message Phase II	4	Y	064697-064700	All	(e)	Jose Chacon
Vote Solar 1 st POD, No. 37	Segmentation - Reliability	1	Y	064701	All	(e)	Jose Chacon
Vote Solar 1 st Interrogatory, No. 88	Transmission Unit Replacement Costs	1	Y	064680	Line 2	(e)	Michael Spoor

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 JOSE CHACON

1. My name is Jose Chacon. I am currently employed by Florida Power & Light Company ("FPL") as Senior Director of Marketing. 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, No. 37. 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 results of customer surveys. 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.



Jose Chacon

Date: 6-11-21

EXHIBIT D

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

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

Docket No: 20210015-EI

DECLARATION OF CHRISTOPHER CHAPEL

1. My name is Christopher Chapel. I am currently employed by Florida Power & Light Company ("FPL") as Vice President of customer service. 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, No. 9. The documents or materials that I have reviewed are proprietary confidential business information relating to competitive interests, the disclosure of which would impair the competitive business of the provider of the information. Specifically, the information contains copies of FPL's collection policies. 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.



Christopher Chapel

Date: 6.11.21

EXHIBIT D

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

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

Docket No: 20210015-EI

DECLARATION OF JAMES COYNE

1. My name is James. I am employed by Concentric Energy Advisors, Inc. as a Senior 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 No. 15. 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, the information contains credit analyses. 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.



James Coyne

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 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 Set of Interrogatories No. 88. The documents or materials that I have reviewed and which are asserted by FPL to be proprietary confidential business information contain information relating to bids or other contractual data, the disclosure of which would impair the efforts of FPL or its affiliates to contract for goods or services on favorable terms.. Specifically, some information is transmission asset unit 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.



Michael Spoor

Date: 6/11/21

EXHIBIT D

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

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

Docket No: 20210015-EI

DECLARATION OF ROBERT E. BARRETT

1. My name is Robert E. Barrett. I am currently employed by Florida Power & Light Company ("FPL") as Vice-President, Finance. I have personal knowledge of the matters stated in this written declaration.

2. I have reviewed the documents referenced and incorporated in FPL's Request for Confidential Classification, specifically the materials provided in response Vote Solar's First Request for Production of Documents No. 15. 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 relates to credit analyses. 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.



Robert E. Barrett

Date: 6 / 11 / 21