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August 9, 2021

VIA HAND DELIVERY

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

REDACTED

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 the CLEO Institute, Inc. and Vote Solar's Fifth Set of Interrogatories, No. 145. The request includes Exhibits A, B (two copies), C and D.

Exhibit A consists of the document 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. Exhibit C is a justification table in support of FPL's Request for Confidential Classification. Exhibit D contains the declaration in support of FPL's Request. In accordance with Rule 25-22.006(3)(d), FPL requests confidential treatment of the information in Exhibit A pending disposition of FPL's Request for Confidential Classification.

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

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

Sincerely,

s/ Maria Jose Moncada
Maria Jose Moncada
Senior Attorney
Fla. Bar No. 0773301

COMMISSION
CLERK

2021 AUG -9 PM 3:29

RECEIVED-FPSC

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: August 9, 2021

**FLORIDA POWER & LIGHT COMPANY'S REQUEST FOR CONFIDENTIAL
CLASSIFICATION OF CERTAIN INFORMATION PROVIDED IN ITS
RESPONSE TO THE CLEO INSTITUTE, INC. AND VOTE SOLAR'S
FIFTH SET OF INTERROGATORIES (NO. 145)**

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 response to the CLEO Institute, Inc. and Vote Solar's ("Vote Solar") Fifth Set of Interrogatories, No. 145 (the "Confidential Information"). In support of its Request, FPL states as follows:

1. FPL served its responses to Vote Solar's Fifth Set of Interrogatories on August 9, 2021. This request is being filed contemporaneously with service of those responses to request confidential classification of certain information contained in its response to Vote Solar's Fifth Set of Interrogatories, No. 145, 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 document, on which all the information that is entitled to confidential treatment under Florida law has been redacted.
 - 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 declarant who supports the requested classification.

d. Exhibit D contains the declaration of the individual who supports 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, Florida Statutes, 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 declaration included as Exhibit D, the Confidential Information consists of information relating to competitive interests, the disclosure of which would impair the competitive business of the provider of the information. Specifically, the information contains projections from fuel source efficiency models. This information is protected by Section 366.093(3)(e), Florida Statutes

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 Section 399.093(4), Florida Statutes

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 9th day of August 2021 to the following parties:

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* 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

QUESTION:

Please refer to FPL's response to CLEO/Vote Solar Int. No. 61(a). Note that these documents have been identified by FPL as Highly Sensitive Information / Attorneys' Eyes Only.

- a. Please describe the purpose(s) of these analyses.
- b. Please provide a list of all analyses/scenarios/runs conducted related to these documents, along with the various inputs, differences and results for each analysis/scenario/run, if they have not been provided in the documents themselves.
- c. Please state the technology cost assumptions underlying the modeling provided in this response, and the sources relied on for those assumptions. Please describe whether any of these cost assumptions were utilized in modeling done for the 2021 rate case filing, and if not, why not, and how the cost assumptions used in the 2021 rate case filing differ.
- d. Please state which specific generation units are impacted by these analyses, and whether results of these analyses impact the service life of any units (and if so, please explain which ones and how).
- e. Please list each generation unit and state how each unit would be treated under the analyses provided, and include time periods if relevant. If FPL does not have unit-specific information, please provide responses in the aggregate across FPL's system. Please provide this for each separate modeling run referred to in the documents provided in response to CLEO/VS Int. No. 61(a).
- f. Please explain the scenario listed at **(provided confidentially to FPL counsel)**, describe assumptions, any model runs and results that utilized this scenario, and explain why this scenario was not modeled in the analyses that were provided by FPL in its response.
- g. Please see the discussion on **(provided confidentially to FPL counsel)**. Does this pertain to plant or transmission infrastructure?
- h. Please state whether the cost projections for the technology analyzed at **(provided confidentially to FPL counsel)** include both plant and transmission infrastructure costs, and provide sources for these cost assumptions.
- i. Please state how FPL plans to use these analyses.
- j. Please state whether FPL has conducted updated analyses since these analyses were conducted.

RESPONSE:

- a. The purpose of these analyses was to evaluate hypothetical scenarios as discussed in further detail on page 62 of the August 24, 2020 document.
- b. Please see FPL's July 19, 2021 objections to this subpart.
- c. Please see FPL's July 19, 2021 partial objections to this subpart. As to the cost assumptions on page 41 of the July 13, 2020 document, those assumptions were not used in modeling used in this rate case because they are not applicable to any modeling done for use in this rate case.
- d. Please see page 12 of the July 13, 2020 document. The results of these analyses do not impact the current anticipated service lives of any units.
- e. Please see FPL's July 19, 2021 objections to this subpart.
- f. Please see FPL's July 19, 2021 partial objections to this subpart. [REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
- g. The information discussed on page 65 of the August 24, 2020 document pertains to gas transportation infrastructure.
- h. Please see FPL's July 19, 2021 partial objections to this subpart. [REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
- i. FPL may use these analyses as a starting point for potential future analyses for the purpose stated on page 62 of the August 24, 2020 document.
- j. Yes.

EXHIBIT C

JUSTIFICATION TABLE

EXHIBIT C

COMPANY: Florida Power & Light Company
TITLE: Petition by Florida Power & Light Company for Base Rate Increase and Rate Unification
DOCKET NO.: 20210015-EI
DATE: August 9, 2021

Int/POD No.	Begin Bates Number	End Bates Number	Description	Confidential	Line/Col	Florida Statute 366.093 (3) Subsection	Declarant
Vote Solar 5 th INT 145	070610	070610	FPL Response to Vote Solar 5 th INT 145, parts a-e	N	All	N/A	N/A
Vote Solar 5 th INT 145	070610	070610	FPL Response to Vote Solar 5 th INT 145, part f	N	1/A-F	N/A	N/A
Vote Solar 5 th INT 145	070610	070610	FPL Response to Vote Solar 5 th INT 145, part f	Y	1/G through 6D	(e)	Matt Valle
Vote Solar 5 th INT 145	070610	070610	FPL Response to Vote Solar 5 th INT 145, part g	N	All	N/A	N/A
Vote Solar 5 th INT 145	070610	070610	FPL Response to Vote Solar 5 th INT 145, part h	N	1/A-F	N/A	N/A
Vote Solar 5 th INT 145	070610	070610	FPL Response to Vote Solar 5 th INT 145, part h	Y	7/G through 10/H	(e)	Matt Valle
Vote Solar 5 th INT 145	070610	070610	FPL Response to Vote Solar 5 th INT 145, parts i-j	N	All	N/A	N/A

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

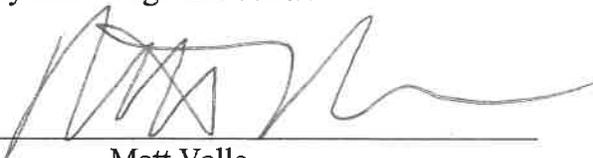
DECLARATION OF MATT VALLE

1. My name is Matt Valle. I am currently employed by Florida Power & Light Company ("FPL") as Vice-President, 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 information contained in FPL's response Vote Solar's Fifth Set of Interrogatories, No. 145. The documents or materials that I have reviewed and which are asserted by FPL to be proprietary confidential business information contain information relating to competitive interests, the disclosure of which would impair the competitive business of the provider of the information. Specifically, the information contains projections from fuel source efficiency models. 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.



Matt Valle

Date: 8/5/21