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June 8, 2022

VIA HAND DELIVERY

Mr. Adam Teitzman
Division of the Commission Clerk and Administrative Services
Florida Public Service Commission
2540 Shumard Oak Blvd.
Tallahassee, FL 32399-0850

REDACTED

Re: Docket No. 20220007-EI
Florida Power & Light Company Request for Confidential Classification

Dear Mr. Teitzman:

Enclosed for filing in the above docket is Florida Power & Light Company's ("FPL's") Request for Confidential Classification of certain information provided in response to the Staff of the Florida Public Service Commission's Third Set of Interrogatories, No. 30. The request includes Exhibits A, B (two copies), C and D.

Exhibit A consists of the confidential documents, and all the information that FPL asserts is entitled to confidential treatment has been highlighted. 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.

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

- COM _____
- AFD _____
- APA _____
- ECO _____
- ENG 1 E4h "B"
- GCL _____
- IDM _____
- CLK _____

Sincerely,

s/Joel T. Baker
Joel T. Baker
Fla. Bar No. 0108202

RECEIVED-FPSC
2022 JUN -8 PM 4:21
COMMISSION
CLERK

Enclosures

cc: Counsel for Parties of Record (w/ copy of FPL's Request for Confidential Classification)

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Environmental Cost Recovery Clause

Docket No. 20220007-EI

Filed: June 8, 2022

**FLORIDA POWER & LIGHT COMPANY'S REQUEST FOR CONFIDENTIAL
CLASSIFICATION OF INFORMATION PROVIDED IN RESPONSE TO THE
STAFF OF THE FLORIDA PUBLIC SERVICE COMMISSION'S THIRD
SET OF INTERROGATORIES, NO. 30**

Pursuant to Section 366.093, Florida Statutes ("Section 366.093"), and Rule 25-22.006, Florida Administrative Code ("F.A.C."), Florida Power & Light Company ("FPL") hereby requests confidential classification of certain information provided in response to the Staff of the Florida Public Service Commission's Third Set of Interrogatories, No. 30 (the "Confidential Document"). In support of this Request, FPL states as follows:

1. This Request is being filed to request confidential classification of certain information contained in the Confidential Document, consistent with Rule 25-22.006, F.A.C.
2. The following exhibits are attached to and made a part of this Request:
 - a. Exhibit A consists of a copy of the Confidential Document on which all information that FPL asserts is entitled to confidential treatment is highlighted.
 - b. Exhibit B consists of an edited version of the Confidential Document on which all information that FPL asserts is entitled to confidential treatment is redacted.
 - c. Exhibit C is a table that identifies the information highlighted in Exhibit A and references the specific statutory basis for the claim of confidentiality and identifies the Declarant who supports the requested classification.

d. Exhibit D consists of the declaration of Katharine MacGregor in support of this Request.

3. FPL submits that the highlighted information in Exhibit A is proprietary and confidential business information, and its disclosure would cause harm to FPL and its customers. Pursuant to Section 366.093, Florida Statutes (“F.S.”) 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 in Exhibit D, the confidential business information contains information concerning contractual pricing data, the disclosure of which would impair the efforts of FPL to contract for goods or services on favorable terms. This information is protected by Sections 366.093(3)(d), F.S.

5. Upon a finding by the Commission that the information contained in the Confidential Document is proprietary and confidential business information, the information should not be declassified for at least eighteen (18) month period and should be returned to FPL as soon as it is no longer necessary for the Commission to conduct its business. *See* Section 366.093(4), F.S.

WHEREFORE, for the above and foregoing reasons, as more fully set forth in the supporting materials, Florida Power & Light Company respectfully requests that its Request for Confidential Classification be granted.

Respectfully submitted this 8th day of June 2022

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By: s/Joel T. Baker
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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing¹ has been furnished by Electronic Mail to the following parties of record this 8th day of June 2022 to the following:

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¹ The exhibits to this Request are not included with the service copies, but copies of Exhibits B, C and D are available upon request.

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By: s/ Joel T. Baker
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EXHIBIT B

REDACTED

QUESTION:

For the following questions, please refer to FPL's witness MacGregor's direct testimony filed April 1, 2022, page 5, lines 4 through 8, and FPL's responses to Staff's Second Set of Interrogatories, No. 25.

Does FPL have an estimated mobilization and demobilization rate for the contractor(s) that would be performing the testing?

- a. If so, what is/are the rate(s)?

RESPONSE:

Yes.

- 1 a. FPL has received a quote of ██████ per site mobilization/demobilization and a quote of
2 ██████ per rush mobilization/demobilization (*i.e.*, less than 5 days' notice) where system
dispatch requirements impact scheduled testing. The mobilization/demobilization charge
is in addition to the other stack testing costs including per stack testing fee, project support
(test protocol, reports, etc.) and crew per diem.

EXHIBIT C

JUSTIFICATION TABLE

EXHIBIT C

COMPANY: Florida Power & Light Company
TITLE: List of Confidential Documents
DOCKET NO.: 20220007-EI
DOCKET TITLE: Environmental Cost Recovery Clause
SUBJECT: FPL's Responses to Staff's Third Set of Interrogatories (No. 30)
DATE: June 8, 2022

Staff's Third Set	Bates Nos. / Page Nos.	Description	Line No./ Col. No.	Florida Statute 366.093(3) Subsection	Declarant
Interrogatory No. 30	Page 1	Dollar Amounts	Lines 1-2	(d)	Katharine MacGregor

EXHIBIT D

DECLARATIONS

EXHIBIT D

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Environmental Cost Recovery Clause

Docket No: 20220007-EI

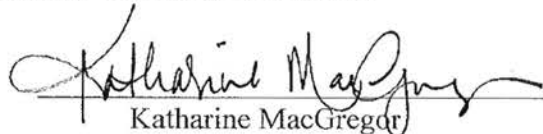
DECLARATION OF KATHARINE MACGREGOR

1. My name is Katharine MacGregor. I am currently employed by Florida Power & Light Company ("FPL") as Vice President of Environmental Services. I have personal knowledge of the matters stated in this written declaration.

2. I have reviewed the document and information included in Exhibit A to FPL's Request for Confidential Classification. The document in Exhibit A which is asserted by FPL to contain proprietary confidential business information contains information concerning contractual pricing data, the disclosure of which would impair the efforts of FPL to contract for goods or services on favorable terms. Specifically, the document contains pricing information that vendors have offered to FPL for particularized services. To the best of my knowledge, FPL has maintained the confidentiality of this information.

3. Consistent with the provisions of the Florida Administrative Code, such material should remain confidential for a period of eighteen (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.


Katharine MacGregor

Date: 06/06/2022