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August 8, 2023

REDACTED

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

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2023 AUG -8 PM 4:16
COMMISSION
CLERK

**Re: Docket No. 20230001-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") Request for Confidential Classification of certain information provided in response to the Office of Public Counsel's ("OPC") Second Request for Production of Documents, Nos. 10, 12, 15, 16 and 27. The request includes Exhibits A, B (two copies), C and D.

Exhibit A consists of the confidential documents, wherein all the information that FPL asserts is entitled to confidential treatment has been highlighted yellow, and they are contained in an envelope marked "CONFIDENTIAL". Exhibit B consists of an edited version of Exhibit A, in which the information FPL asserts is confidential has been redacted. As the documents in Exhibit A are all confidential in their entirety, FPL has only included in Exhibit B an insert page for each document in Exhibit A. 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.

Sincerely,

David M. Lee

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

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

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Fuel and Purchased Power Cost
Recovery Clause with Generating
Performance Incentive Factor.

Docket No. 20230001-EI

Filed: August 8, 2023

**FLORIDA POWER & LIGHT COMPANY’S REQUEST FOR CONFIDENTIAL
CLASSIFICATION OF INFORMATION PROVIDED IN RESPONSE
TO THE OFFICE OF PUBLIC COUNSEL’S SECOND REQUEST
FOR PRODUCTION OF DOCUMENTS Nos. 10, 12, 15, 16 and 27**

Pursuant to Section 366.093, Florida Statutes (“Section 366.093”), and Rule 25-22.006, Florida Administrative Code, Florida Power & Light Company (“FPL”) hereby requests confidential classification of certain information provided in response to the Office of Public Counsel’s (“OPC”) Second Request for Production of Documents (Nos. 10, 12, 15, 16 and 27) (the “Confidential Documents”). In support of this Request, FPL states as follows:

1. On June 14, 2023, OPC served its Second Request for Production of Documents on FPL. FPL’s Responses to OPC’s Second Request for Production of Documents Nos. 10, 12, 15, 16, and 27, contain information of a confidential nature within the meaning of Section 366.093(3), Florida Statutes.

2. FPL served its response to OPC’s Second Request for Production of Documents (Nos. 10, 12, 15, 16, and 27) on August 8, 2023. This request is being filed contemporaneously with the service of the response to request confidential classification of the Confidential Documents consistent with Rule 25-22.006, Florida Administrative Code.

3. The following exhibits are attached to and made a part of this Request:

- a. Exhibit A consists of the confidential documents in which all the information that FPL asserts is entitled to confidential treatment is highlighted in yellow.

- b. Exhibit B is an edited version of Exhibit A, in which the information FPL asserts is confidential has been redacted. As the documents in Exhibit A are confidential in their entirety, FPL has only included in Exhibit B an insert page for each confidential document in Exhibit A.
- 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 Dean Curtland in support of this Request.

4. FPL submits that the highlighted information in Exhibit A is proprietary confidential business information within the meaning of Section 366.093(3), Florida Statutes. This information is intended to be and is treated by FPL as private, and its confidentiality has been maintained. 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.

5. As the descriptions included in Exhibit C and the declaration included in Exhibit D indicate, the Confidential Documents contain information relating to the competitive business interests of FPL and the third-parties providing the information that if made public, would impair the competitive business interests of FPL and the third-party who provided the information to FPL. Specifically, the confidential documents contain information that was provided to FPL by a third-party as confidential, and which are proprietary to that third-party. If FPL were to publicly disclose

this information, third-parties may refuse to share this type of information with FPL in the future, to the detriment of FPL and its customers. Additionally, the Confidential Documents contain contractual data or other information that if made public, would impair the efforts of FPL to contract for goods or services on favorable terms in the future with the third-parties. This information is protected by Sections 366.093(3)d) and (e), F.S.

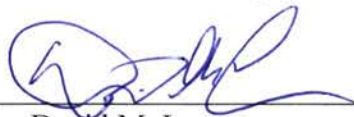
6. Upon a finding by the Commission that the information contained in the Confidential Documents is proprietary and confidential business information, the information should not be declassified for at least eighteen (18) months and should be returned to FPL as soon as it is no longer necessary for the 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,

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By: _____


David M. Lee
Florida Bar No. 103152

CERTIFICATE OF SERVICE
Docket 20220001-EI

I **HEREBY CERTIFY** that a true and correct copy of the foregoing* has been furnished by electronic delivery on this 8th day of August 2023 to the following:

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Agricultural Chemicals, Inc. d/b/a PCS
Phosphate – White Springs**

By: 
David M. Lee
Florida Bar No. 103152

* Copies of Attachments B, C and D are available upon request

Docket No. 20230001-EI

EXHIBIT “B”

REDACTED

**FPL’s RESPONSES TO OPC’S SECOND
REQUEST FOR PRODUCTION OF
DOCUMENTS (NOS. 10, 12, 15, 16 AND 27)**

REDACTED VERSION OF CONFIDENTIAL DOCUMENT

The document responsive to OPC's Second Request for
Production of Document No. 10, Bates Nos.
FCR-23-002743 – FCR-23-002808, is confidential
in its entirety.

REDACTED VERSION OF CONFIDENTIAL DOCUMENT

The document responsive to OPC's Second Request for
Production of Document No. 10, Bates Nos.
FCR-23-002809 – FCR-23-002877, is confidential
in its entirety.

REDACTED VERSION OF CONFIDENTIAL DOCUMENT

The document responsive to OPC's Second Request for
Production of Document No. 10, Bates Nos.
FCR-23-002878 – FCR-23-002903, is confidential
in its entirety.

REDACTED VERSION OF CONFIDENTIAL DOCUMENT

The document responsive to OPC's Second Request for
Production of Document No. 10, Bates Nos.
FCR-23-002904 – FCR-23-002929, is confidential
in its entirety.

REDACTED VERSION OF CONFIDENTIAL DOCUMENT

The document responsive to OPC's Second Request for
Production of Document No. 12, Bates Nos.
FCR-23-003596 – FCR-23-003843, is confidential
in its entirety.

REDACTED VERSION OF CONFIDENTIAL DOCUMENT

The document responsive to OPC's Second Request for
Production of Document No. 15, Bates Nos.
FCR-23-005666 – FCR-23-005693, is confidential
in its entirety.

REDACTED VERSION OF CONFIDENTIAL DOCUMENT

The document responsive to OPC's Second Request for
Production of Document No. 15, Bates Nos.
FCR-23-005694 – FCR-23-005902, is confidential
in its entirety.

REDACTED VERSION OF CONFIDENTIAL DOCUMENT

The document responsive to OPC's Second Request for
Production of Document No. 15, Bates Nos.
FCR-23-005903 – FCR-23-005945, is confidential
in its entirety.

REDACTED VERSION OF CONFIDENTIAL DOCUMENT

The document responsive to OPC's Second Request for
Production of Document No. 15, Bates Nos.
FCR-23-005946 – FCR-23-005984, is confidential
in its entirety.

REDACTED VERSION OF CONFIDENTIAL DOCUMENT

The document responsive to OPC's Second Request for
Production of Document No. 15, Bates Nos.
FCR-23-005985 – FCR-23-006020, is confidential
in its entirety.

REDACTED VERSION OF CONFIDENTIAL DOCUMENT

The document responsive to OPC's Second Request for
Production of Document No. 15, Bates Nos.
FCR-23-006021 – FCR-23-006094, is confidential
in its entirety.

REDACTED VERSION OF CONFIDENTIAL DOCUMENT

The document responsive to OPC's Second Request for
Production of Document No. 16, Bates Nos.
FCR-23-003006 – FCR-23-003095, is confidential
in its entirety.

REDACTED VERSION OF CONFIDENTIAL DOCUMENT

The document responsive to OPC's Second Request for
Production of Document No. 16, Bates Nos.
FCR-23-003096 – FCR-23-003273, is confidential
in its entirety.

REDACTED VERSION OF CONFIDENTIAL DOCUMENT

The document responsive to OPC's Second Request for
Production of Document No. 27, Bates Nos.
FCR-23-003277 – FCR-23-003350, is confidential
in its entirety.

REDACTED VERSION OF CONFIDENTIAL DOCUMENT

The document responsive to OPC's Second Request for
Production of Document No. 27, Bates Nos.
FCR-23-003351 – FCR-23-003462, is confidential
in its entirety.

REDACTED VERSION OF CONFIDENTIAL DOCUMENT

The document responsive to OPC's Second Request for
Production of Document No. 27, Bates Nos.
FCR-23-003463 – FCR-23-003468, is confidential
in its entirety.

Docket No. 20230001-EI

EXHIBIT "C"

**FPL's RESPONSES TO OPC'S SECOND
REQUEST FOR PRODUCTION OF
DOCUMENTS (NOS. 10, 12, 15, 16 AND 27)**

EXHIBIT C

COMPANY: Florida Power & Light Company
TITLE: List of Confidential Documents
DOCKET NO.: 20230001-EI
DOCKET TITLE: Fuel and Purchased Power Cost Recovery Clause with Generating Performance Incentive Factor
SUBJECT: FPL's Response to OPC's Second Request for Production of Documents (Nos. 10, 12, 15, 16 and 27)
DATE: August 8, 2023

Item No.	Bates Nos. / Page Nos.	Description	Line No./ Col. No.	Florida Statute 366.093(3) Subsection	Declarant
OPC 2 nd POD, No. 10	FRC -23-002743 to FRC -23-002808	Structural Integrity Associates, Inc. Metallurgical Analysis Titanium Condenser Tubes U3-C32 Turkey Point	ALL	(d)(e)	Dean Curtland
OPC 2 nd POD, No. 10	FRC -23-002809 to FRC -23-002877	Curtis-Wright Eddy Current Inspection Report Turkey Point 3	ALL	(d)(e)	Dean Curtland
OPC 2 nd POD, No. 10	FRC -23-002878 to FRC -23-002903	Framatome, Inc PTN DCS Forensics Services Cause Investigation Report - Turkey Point 3	ALL	(d)(e)	Dean Curtland
OPC 2 nd POD, No. 10	FRC -23-002904 to FRC -23-002929	Framatome, Inc PTN DCS Forensics Services Cause Investigation Report - Turkey Point 3	ALL	(d)(e)	Dean Curtland
OPC 2 nd POD, No. 12	FRC -23-003596 to FRC -23-003843	Siemens' Instruction Book Hydrogen Inner-Cooled Turbine Generator - Turkey Point 3 & 4	ALL	(d)(e)	Dean Curtland
OPC 2 nd POD, No. 15	FRC -23-005666 to FRC -23-005693	Siemens' Generator Crawl-through and Limited Exciter Inspection Customer Final Report - Turkey Point 4	ALL	(d)(e)	Dean Curtland

Item No.	Bates Nos. / Page Nos.	Description	Line No./ Col. No.	Florida Statute 366.093(3) Subsection	Declarant
OPC 2 nd POD, No. 15	FRC -23-005694 to FRC -23-005902	Siemens' Generator Stator Rigiflex Rewind Customer Final Report Turkey Point 4	ALL	(d)(e)	Dean Curtland
OPC 2 nd POD, No. 15	FRC -23-005903 to FRC -23-005945	Siemens' Generator Crawl-Through and Exciter Inspection Customer Final Report Turkey Point 4	ALL	(d)(e)	Dean Curtland
OPC 2 nd POD, No. 15	FRC -23-005946 to FRC -23-005984	Siemens' Spring 2016 Generator Crawl-Through and Exciter Inspections Customer Final Report Turkey Point 4	ALL	(d)(e)	Dean Curtland
OPC 2 nd POD, No. 15	FRC -23-005985 to FRC -23-006020	Siemens' Fall 2017 Exciter Inspection Customer Final Report Turkey Point 4	ALL	(d)(e)	Dean Curtland
OPC 2 nd POD, No. 15	FRC -23-006021 to FRC -23-006094	Siemens' Generator Field Service Procedure 370/ Exciter Field Inspection Procedure 346 Inspections Turkey Point 4	ALL	(d)(e)	Dean Curtland
OPC 2 nd POD, No. 16	FRC -23-003006 to FRC -23-003095	EPRI Life Cycle Management Planning Sourcebooks Volume 5 Main Generator	ALL	(d)(e)	Dean Curtland
OPC 2 nd POD, No. 16	FRC -23-003096 to FRC -23-003273	EPRI Tools to Optimize Maintenance of Generator Excitation System, Voltage Regulator and Field Ground Detection	ALL	(d)(e)	Dean Curtland
OPC 2 nd POD, No. 27	FRC -23-003277 to FRC -23-003350	Siemens' Generator Field Service Procedure 370/ Exciter Field Inspection Procedure 346 Inspections - 2019 Turkey Point 4	ALL	(d)(e)	Dean Curtland

Item No.	Bates Nos. / Page Nos.	Description	Line No./ Col. No.	Florida Statute 366.093(3) Subsection	Declarant
OPC 2 nd POD, No. 27	FRC -23-003351 to FRC -23-003462	Siemens' Generator Minor, Exciter Rotor Replacement, Valves – Customer Final Report 2019 Turkey Point 4	ALL	(d)(e)	Dean Curtland
OPC 2 nd POD, No. 27	FRC -23-003463 to FRC -23-003468	Siemens' 3.2.2 Exciter Disassembly and Reassembly Turkey Point 4	ALL	(d)(e)	Dean Curtland

Docket No. 20230001-EI

EXHIBIT "D"

**FPL's RESPONSES TO OPC'S SECOND
REQUEST FOR PRODUCTION OF
DOCUMENTS (NOS. 10, 12, 15, 16 AND 27)**

EXHIBIT D

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Fuel and Purchase Power Cost Recovery
Clause with Generating Performance Incentive
Factor

Docket No: 20230001-EI

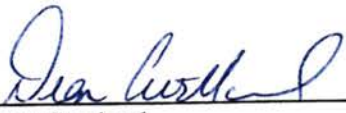
DECLARATION OF DEAN CURTLAND

1. My name is Dean Curtland. I am currently employed by Florida Power & Light Company ("FPL") as a Management Consultant. I have personal knowledge of the matters stated in this written declaration.

2. I have reviewed Exhibit C and the documents that are included in FPL's Request for Confidential Classification of Information provided in response to OPC's Second Request for Production of Documents, Nos. 10, 12, 15, 16 and 27, for which I am designated as the declarant. The documents or materials that I have reviewed and which are asserted by FPL to be proprietary confidential business information, contain information relating to FPL's competitive interests as well as the competitive interests of the providers of the documents, the disclosure of which would impair the competitive business of FPL and the providers of the information. The confidential documents contain information that was provided to FPL by a third-party as confidential, and which are proprietary to that third-party. Additionally, the Confidential Documents contain contractual data or other information that if made public, would impair the efforts of FPL to contract for goods or services on favorable terms in the future with the third-parties. 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.



Dean Curtland

Date: 8/1/2023