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October 8, 2019

**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. 20190061-EI**

Dear Mr. Teitzman:

I enclose for filing in the above docket Florida Power & Light Company's ("FPL's") Request for Confidential Classification of Information Provided in the Response to the Office of Public Counsel's Seventh Request for Production of Documents, No. 23. The request includes Exhibits A, B (two copies), C and D.

Exhibit A consists of the confidential document, which is confidential in its entirety and is provided on a disc. Exhibit B is an edited version of Exhibit A, consisting of an identifying cover page. Exhibit C is a justification table in support of FPL's Request for Confidential Classification. Exhibit D contains a declaration in support of FPL's request.

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

Sincerely,

A handwritten signature in blue ink, appearing to read 'Maria J. Moncada', is written over the typed name.

Maria J. Moncada

RECEIVED-FPSC  
2019 OCT -8 PM 2:46  
COMMISSION  
CLERK

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 for approval of FPL SolarTogether Program and Tariff, by Florida Power & Light Company

Docket No.: 20190061-EI

Date: October 8, 2019

**FLORIDA POWER & LIGHT COMPANY'S  
REQUEST FOR CONFIDENTIAL CLASSIFICATION OF  
INFORMATION PROVIDED IN RESPONSE TO THE OFFICE OF PUBLIC  
COUNSEL'S SEVENTH REQUEST FOR PRODUCTION OF DOCUMENTS (No. 23)**

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 Seventh Request for Production of Documents, No. 23 (collectively, the "Confidential Document"). In support of this Request, FPL states as follows:

1. FPL served its response to the Office of Public Counsel's Seventh Request for Production of Documents, No. 23 on October 8, 2019. This Request is being filed in order to request confidential classification of certain information contained in its responses to Request, No. 23, consistent with Rule 25-22.006, Florida Administrative Code.

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. The Confidential Document that comprises Exhibit A is confidential in its entirety and is provided on a disc.
- 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. Because the document is confidential in its entirety, only an identifying cover page is provided.

- 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 Juan Enjamio in support of this Request.

3. As described in the declaration in Exhibit D, the confidential business information belongs to a third party and contains or constitute information that FPL is contractually obligated to maintain as confidential. Disclosure of this proprietary information would impair the third party' competitive interests and would be a contractual breach on the part of FPL. This information is protected by Section 366.093(3)(e), Fla. Stat.

4. 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) month period and should be returned to FPL as soon as it is no longer necessary for the Commission to conduct its business. *See* § 366.093(4), Fla. Stat.

**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 October 2019.

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By: \_\_\_\_\_

Maria Jose Moncada  
Florida Bar No. 0773301

**CERTIFICATE OF SERVICE**  
**Docket No. 20190061-EI**

I HEREBY CERTIFY that a true and correct copy of the foregoing has been furnished by electronic service on this 8th day of October 2019 to the following:

Walter Trierweiler  
Kristen Simmons  
**Office of the General Counsel**  
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By: \_\_\_\_\_



Maria Jose Moncada  
Florida Bar No. 0773301

# **EXHIBIT A**

**Filed Under Separate Cover**

**EXHIBIT B**

**REDACTED**

**FPL's response to  
OPC's Seventh Request for Production of  
Documents**

**No. 23**

**Bates No. 007963 – 008445**

**is confidential in its entirety**

# **EXHIBIT C**

## **JUSTIFICATION TABLE**

EXHIBIT C

**COMPANY:** Florida Power & Light Company  
**TITLE:** List of Confidential Documents  
**DOCKET NO.:** 20190061-EI  
**DOCKET TITLE:** FPL Petition for approval of FPL SolarTogether Program and Tariff  
**SUBJECT:** FPL's Response to the Office of Public Counsel's Seventh Request for Production of Documents, Request No. 23  
**DATE:** October 8, 2019

Discovery Request	Bates Number	Description	Line No./ Col. No.	Florida Statute 366.093(3) Subsection	Declarant
FPL's response to Office of Public Counsel's 7th Request for Production of Documents, No. 23	FPL 007963-008445  (on CD)	UPLAN-Altos: The Electric Utility Planning System User's Manual	All	(e)	Juan Enjamio

**EXHIBIT D**

**DECLARATION**

**EXHIBIT D**

**BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION**

In re: Petition by Florida Power & Light  
Company for Approval of FPL SolarTogether  
Program and Tariff

Docket No: 20190061-EI

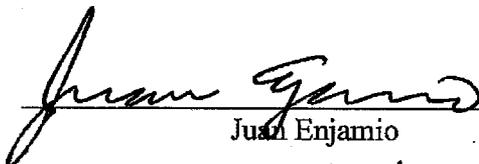
**DECLARATION OF JUAN ENJAMIO**

1. My name is Juan Enjamio. I am currently employed by Florida Power & Light Company ("FPL") as the Manager of Analytics in the Finance and Resource Planning department. I have personal knowledge of the matters stated in this declaration.

2. I have reviewed the documents and information included in Exhibit A to FPL's Request for Confidential Classification, for which I am listed as the declarant on Exhibit C. The documents that I have reviewed and which are asserted by FPL to be proprietary confidential business information contain or constitute information considered a trade secret by at third party. Specifically, this document is the User's Manual for the UPLAN model. This manual is considered confidential by the developer of UPLAN, LCG Consulting. FPL is contractually obligated to maintain the confidentiality of this document. Disclosure of this proprietary information would impair the vendors' competitive interests and would be a contractual breach on the part of FPL. 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 materials 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.

  
\_\_\_\_\_  
Juan Enjamio

Date: 10/7/2019