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COMMISSION
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July 1, 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 Materials Provided Pursuant to Audit No. 2021-096-1-1. 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. Some of the files in Exhibit A are voluminous, and are therefore being provided electronically on disc. 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.

Sincerely,

/s/ Maria Jose Moncada

Maria Jose Moncada
Senior Attorney
Fla. Bar No. 0773301

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AFD I Exh B
APA _____
ECO _____
ENG _____
GCL _____
IDM _____
CLK _____
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 by Florida Power & Light
Company for Rate Unification and for Base
Rate Increase

Docket No. 20210015-EI

Filed: July 1, 2021

**FLORIDA POWER & LIGHT COMPANY'S
REQUEST FOR CONFIDENTIAL CLASSIFICATION**

Pursuant to Section 366.093, Florida Statutes, and Rule 25-22.006, Florida Administrative Code ("F.A.C"), Florida Power & Light Company ("FPL") requests confidential classification of certain material provided to the Staff of the Florida Public Service Commission ("Staff") pursuant to Audit Control No. 2021-096-1-1 ("the Audit"). In support of its Request, FPL states as follows:

1. During the Audit, FPL provided Staff with various work papers that FPL identified as confidential ("Confidential Information"). By letter dated June 10, 2021, Staff indicated its intent to retain certain of the Confidential Information. Pursuant to Rule 25-22.006(3)(a), F.A.C., FPL was given 21 days from the date of the letter to file a formal request for confidential classification with respect to the Confidential Information that Staff intended to retain. Accordingly, FPL files this Request for Confidential Classification to maintain continued confidential treatment of the Confidential Information Staff identified in its June 10 letter.

2. The following exhibits are included with and made a part of this request:

a. Exhibit A consists of a copy of the Confidential Information on which all the information that FPL asserts is entitled to confidential treatment has been highlighted. Some attachments are voluminous and confidential in their entirety, and they are being provided electronically on disc.

b. Exhibit B consists of a copy of the Confidential Information, 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, internal auditing controls and reports of internal auditors, and information concerning bids or other contractual data. Specifically, some information consists of Board of Directors meeting minutes, external audit workpapers, and vendor contracts with pricing information. This information is protected by Sections 366.093(3) (b) (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 1st day of July 2021 to the following parties:

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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 documents responsive to Audit ACN 2021-096-1-1, Bates Nos. 000001-000144, are confidential in their entirety.

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 Company
DOCKET NO.: 20210015-EI
DATE: July 1, 2021

Int/POD No.	Begin Bates Number	End Bates Number	Description	No. of Pages	Confidential	Line/Col	Florida Statute 366.093 (3) Subsection	Declarant
ACN2021-096-1-1	000001	000007	Board of Directors' Meeting Minutes	7	Y	All	(e)	W. Scott Seeley
ACN2021-096-1-1	000008	000012	External Audit Workpapers	5	Y	All	(b)	Liz Fuentes
ACN2021-096-1-1	000013	000088	FPL and Gulf CWIP Testing	76	Y	All	(d), (e)	Sharon Diaram Jorge Gutierrez
ACN2021-096-1-1	000089	000100	Affiliate Transactions	12	Y	All	(b)	Keith Ferguson
ACN2021-096-1-1	000101	000144	Cost Drivers	44	Y	All	(e)	Keith Ferguson

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. 201210015-EI,
Audit Control Number 2021-096-1-1

DECLARATION OF W. SCOTT SEELEY

1. My name is W. Scott Seeley. I am currently employed by Florida Power & Light Company ("FPL") as Vice President, Compliance and Corporate Secretary. I have personal knowledge of the matters stated in this written declaration.

2. I have reviewed the documents that are included in FPL's Request for Confidential Classification regarding the Rate Case Audit Work Papers Item No. 1, for which I am listed as the declarant on Exhibit C. The documents or materials that I have reviewed and which are asserted by FPL to be proprietary confidential business information constitute contractual data, the disclosure of which would impair the efforts of FPL to contract for goods and services on favorable terms. The documents or materials also contain or constitute information relating to competitive interests, the disclosure of which would impair FPL's competitive business. Specifically, the material consists of contractual terms related to the acquisition of land and pricing information related to property services. 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.



W. Scott Seeley

Date: June 21, 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. 201210015-EI,
Audit Control Number 2021-096-1-1

DECLARATION OF LIZ FUENTES

1. My name is Liz Fuentes. I am currently employed by Florida Power & Light Company ("FPL") as Senior Director Regulatory Accounting. I have personal knowledge of the matters stated in this written declaration.

2. I have reviewed the documents that are included in FPL's Request for Confidential Classification regarding the Rate Case Audit Work Papers Item No. 2, for which I am listed as the declarant on Exhibit C. The documents or materials that I have reviewed and which are asserted by FPL to be proprietary confidential business information constitute contractual data, the disclosure of which would impair the efforts of FPL to contract for goods and services on favorable terms. The documents or materials also contain or constitute information relating to competitive interests, the disclosure of which would impair FPL's competitive business. Specifically, the material consists of contractual terms related to the acquisition of land and pricing information related to property services. 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.


Liz Fuentes

Date: 6/16/2021

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. 201210015-EI,
Audit Control Number 2021-096-1-1

DECLARATION OF SHARON DIARAM

1. My name is Sharon Diaram. I am currently employed by Florida Power & Light Company ("FPL") as Sourcing Manager Compliance and Training. I have personal knowledge of the matters stated in this written declaration.

2. I have reviewed the documents that are included in FPL's Request for Confidential Classification regarding the Rate Case Audit Work Papers Item No. 3, for which I am listed as the declarant on Exhibit C. The documents or materials that I have reviewed and which are asserted by FPL to be proprietary confidential business information constitute contractual data, the disclosure of which would impair the efforts of FPL to contract for goods and services on favorable terms. The documents or materials also contain or constitute information relating to competitive interests, the disclosure of which would impair FPL's competitive business. Specifically, the material consists of contractual terms related to the acquisition of land and pricing information related to property services. 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.

 Sharon Diaram
2021.06.16 13:30:08
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Sharon Diaram

Date: 6/16/21

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. 201210015-EI,
Audit Control Number 2021-096-1-1

DECLARATION OF JORGE GUTIERREZ

1. My name is Jorge Gutierrez. I am currently employed by Florida Power & Light Company ("FPL") as Accounts Payable Manager. I have personal knowledge of the matters stated in this written declaration.

2. I have reviewed the documents that are included in FPL's Request for Confidential Classification regarding the Rate Case Audit Work Papers Item No. 3, for which I am listed as the declarant on Exhibit C. The documents or materials that I have reviewed and which are asserted by FPL to be proprietary confidential business information constitute contractual data, the disclosure of which would impair the efforts of FPL to contract for goods and services on favorable terms. The documents or materials also contain or constitute information relating to competitive interests, the disclosure of which would impair FPL's competitive business. Specifically, the material consists of contractual terms related to the acquisition of land and pricing information related to property services. 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.

Jorge Gutierrez

Jorge Gutierrez

Date: 6/16/2021

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. 201210015-EI,
Audit Control Number 2021-096-1-1

DECLARATION OF KEITH FERGUSON

1. My name is Keith Ferguson. I am currently employed by Florida Power & Light Company ("FPL") as Vice President, Accounting and Controller. I have personal knowledge of the matters stated in this written declaration.

2. I have reviewed the documents that are included in FPL's Request for Confidential Classification regarding the Rate Case Audit Work Papers Item No. 6, pages 44 to 44-2.3 and Item No. 7, pages 45.2 to 45-3.21, for which I am listed as the declarant on Exhibit C. The documents or materials that I have reviewed and which are asserted by FPL to be proprietary confidential business information constitute contractual data, the disclosure of which would impair the efforts of FPL to contract for goods and services on favorable terms. The documents or materials also contain or constitute information relating to competitive interests, the disclosure of which would impair FPL's competitive business. Specifically, the material consists of contractual terms related to the acquisition of land and pricing information related to property services. 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.



Keith Ferguson

Date: June 16, 2021