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July 26, 2021

VIA HAND DELIVERY

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

REDACTED

RECEIVED-FPSC
2021 JUL 26 PM 2:40
COMMISSION
CLERK

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 Florida Rising's, League Of United Latin American Citizens', and Environmental Confederation Of Southwest Florida's ("LULAC") Third Request for Production of Documents, No. 25. 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 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

COM _____
AFD I Exh B

APA _____

ECO _____

ENG _____

GCL _____

IDM _____ Enclosure

CLK _____ 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 26, 2021

**FLORIDA POWER & LIGHT COMPANY'S REQUEST FOR CONFIDENTIAL
CLASSIFICATION OF CERTAIN INFORMATION PROVIDED IN ITS RESPONSE
TO FLORIDA RISING'S, LEAGUE OF UNITED LATIN AMERICAN CITIZENS',
AND ENVIRONMENTAL CONFEDERATION OF SOUTHWEST FLORIDA'S
THIRD REQUEST FOR PRODUCTION OF DOCUMENTS NO. 25**

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 Florida Rising's, League Of United Latin American Citizens', and Environmental Confederation Of Southwest Florida's ("LULAC") Third Request for Production of Documents, No. 25 (the "Confidential Information"). In support of its Request, FPL states as follows:

1. FPL served its responses to LULAC's Third Request for Production of Documents on July 26, 2021. This request is being filed contemporaneously with service of those responses to request confidential classification of certain information contained in its response to LULAC's Third Request for Production of Documents No. 25, 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 documents, 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 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 the provider of the information. Specifically, the Confidential Information includes: rating agency reports; data provided by a third-party vendor which is proprietary to the vendor; financial forecasts and projected interest rates. This information is protected by Sections 366.093(3) (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 26th day of July 2021 to the following parties:

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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 LULAC's Third Request for Production of Documents No. 25, Bates Nos. 068650-068707, 068752, 068773-068777 and 068792-068794 are confidential in their entirety.

EXHIBIT C

JUSTIFICATION TABLE

EXHIBIT C

COMPANY: Florida Power & Light Company
TITLE: Petition by Florida Power & Light Company for Rate Unification and for Base Rate Increase
DOCKET NO.: 20210015-EI
DATE: July 26, 2021

Int/POD No.	Begin Bates Number	End Bates Number	Description	Confidential	Page No.	Line/Col	Florida Statute 366.093 (3) Subsection	Declarant
LULAC 3 rd POD No. 25	068773	068777	LULAC POD 25 2021-2023 LTD Issuances CONFIDENTIAL	Y	All	All	(e)	Robert E. Barrett
LULAC 3 rd POD No. 25	068650	068650	LULAC POD 25 NextEra Energy Inc NYSE NEE Credit Stats Direct Financials Capital Structure CONFIDENTIAL	Y	All	All	(e)	Robert E Barrett
LULAC 3 rd POD No. 25	068778	068791	LULAC POD 25 Exhibit SRB-12 - 2024 and 2025 Revenue Requirements CONFIDENTIAL	N	All	All	(e)	Scott Bores
LULAC 3 rd POD No. 25	068792	068794	LULAC POD 25 Exhibit SRB-12 - 2024 and 2025 Revenue Requirements CONFIDENTIAL	Y	All	All	(e)	Scott Bores
LULAC 3 rd POD No. 25	068795	068795	LULAC POD 25 Exhibit SRB-12 - 2024 and 2025 Revenue Requirements CONFIDENTIAL	N	All	All	(e)	Scott Bores

Int/POD No.	Begin Bates Number	End Bates Number	Description	Confidential	Page No.	Line/Col	Florida Statute 366.093 (3) Subsection	Declarant
LULAC 3 rd POD No. 25	068651	068653	LULAC POD 25, Attachment 6_Risk Premium Analysis [CONFIDENTIAL]	Y	All	All	(e)	James Coyne
LULAC 3 rd POD No. 25	068654	068655	LULAC POD 25, Attachment 12_Authorized Electric ROEs CONFIDENTIAL	Y	All	All	(e)	James Coyne
LULAC 3 rd POD No. 25	068656	068656	LULAC POD 25, Attachment 13_Authorized Electric Equity Ratios [CONFIDENTIAL]	Y	All	All	(e)	James Coyne
LULAC 3 rd POD No. 25	068657	068707	LULAC POD 25, Attachment 15_FN 11_Moody's Utilities rating methodology 2017 [CONFIDENTIAL]	Y	All	All	(e)	James Coyne
LULAC 3 rd POD No. 25	068708	068751	LULAC POD 25 - Confidential Exhibit JJR-16 Workpaper	N	All	All	(e)	John Reed
LULAC 3 rd POD No. 25	068752	068752	LULAC POD 25 - Confidential Exhibit JJR-16 Workpaper	Y	All	All	(e)	John Reed
LULAC 3 rd POD No. 25	068753	068755	LULAC POD 25 - Confidential Exhibit JJR-16 Workpaper	N	All	All	(e)	John Reed

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

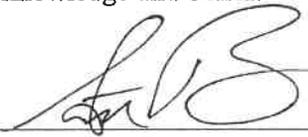
DECLARATION OF SCOTT BORES

1. My name is Scott Bores. I am currently employed by Florida Power & Light Company ("FPL") as Senior Director, Financial Planning and Analysis. 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 materials provided in FPL's response to Florida Rising's, League Of United Latin American Citizens', and Environmental Confederation Of Southwest Florida's Third Request for Production of Documents No. 25. The documents or materials that I have reviewed and which are 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 financial forecasts and projected interest rates. 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.



Scott Bores

Date: 7/23/2021

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: 20210015-EI

DECLARATION OF JAMES COYNE

1. My name is James. I am employed by Concentric Energy Advisors, Inc. as a Senior Vice President. 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 materials provided in FPL's response to Florida Rising's, League Of United Latin American Citizens', and Environmental Confederation Of Southwest Florida's Third Request for Production of Documents No. 25. The documents or materials that I have reviewed and which are proprietary confidential business information contain competitive business information the disclosure of which would impair the competitive business of the provider of the information. Specifically, the information is data that is proprietary to a third party vendor who provided it to Concentric pursuant to a subscription agreement. 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.


James Coyne

Date: July 23, 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: 20210015-EI

DECLARATION OF ROBERT E. BARRETT

1. My name is Robert E. Barrett. I am currently employed by Florida Power & Light Company ("FPL") as Vice-President, Finance. 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 materials provided in FPL's response to Florida Rising's, League Of United Latin American Citizens', and Environmental Confederation Of Southwest Florida's Third Request for Production of Documents No. 25. The documents or materials that I have reviewed and which are asserted by FPL to be proprietary confidential business information contain competitive business information the disclosure of which would impair the competitive business of the provider of the information. Specifically, the information relates to rating agency reports. 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.



Robert E. Barrett

Date: 07/22/2021

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: 20210015-EI

DECLARATION OF JOHN REED

1. My name is John Reed. I am the Chairman and Chief Executive Officer of Concentric Energy Advisors, Inc. 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 materials provided in FPL's response to Florida Rising's, League Of United Latin American Citizens', and Environmental Confederation Of Southwest Florida's Third Request for Production of Documents No. 25. The documents or materials that I have reviewed and which are proprietary confidential business information contain competitive business information the disclosure of which would impair the competitive business of the provider of the information. Specifically, the information is data that is proprietary to a third party vendor who provided it to Concentric pursuant to a subscription agreement. 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.



John Reed

Date: July 26, 2021