

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Petition by Florida Power & Light Company
for Base Rate Increase and Rate Unification

Docket No. 20210015-EI

Filed: January 30, 2023

**FLORIDA POWER & LIGHT COMPANY’S FIRST REQUEST FOR EXTENSION OF
CONFIDENTIAL CLASSIFICATION OF CERTAIN INFORMATION PROVIDED IN
ITS RESPONSES TO THE CLEO INSTITUTE AND VOTE SOLAR’S FIRST
REQUEST FOR PRODUCTION OF DOCUMENTS NOS. 9, 15 AND 37,
AND FIRST SET OF INTERROGATORIES, NO. 88**

Pursuant to Section 366.093, Florida Statutes, and Rule 25-22.006, Florida Administrative Code, Florida Power & Light Company (“FPL”) hereby submits its First Request for Extension of Confidential Classification of certain information provided in its responses to The CLEO Institute and Vote Solar’s (“Vote Solar”) First Request for Production of Documents Nos. 9, 15 and 37 and First Set of Interrogatories, No. 88 (the “Confidential Information”). In support of its Request, FPL states as follows:

1. On June 14, 2021 FPL filed a Request for Confidential Classification of the Confidential Information, which included Exhibits A, B, C and D (“June 14, 2021 Request”). Document No. 04839-2021. By Order No. PSC-2021-0281-CFO-EI, dated July 29, 2021 (“Order No. 0281”), the Commission granted FPL’s June 14, 2021 Request. FPL adopts and incorporates by reference the June 14, 2021 Request and Order No. 0281.

2. The period of confidential treatment granted by Order 0281 will soon expire. The Confidential Discovery Responses that were the subject of FPL’s June 14, 2021 Request and Order 0281 warrant continued treatment as proprietary and confidential business information within the meaning of Section 366.093(3). Accordingly, FPL hereby submits its First Request for Extension of Confidential Classification.

3. All of the information designated in Exhibits A and B to the June 14, 2021 Request remain confidential. Accordingly, those exhibits will not be reproduced or reattached here. Regarding First Revised Exhibit C, all of the information listed in the June 14, 2021 Request remains confidential; Exhibit C is revised only to identify Scott Bores and Thomas Allain as new declarants who are sponsoring information that was previously supported by Robert E. Barrett and Michael Spoor.

4. Also included is First Revised Exhibit D, which consists of the declarations of Scott Bores, Thomas Allain, Jose Chacon, Christopher Chapel and James Coyne.

5. 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.

6. As described in the declarations included as Exhibit D, the certain documents contain information concerning bids, pricing information or other contractual data, specifically transmission unit costs, the disclosure of which would impair the efforts of FPL to contract for goods or services on favorable terms to the detriment of FPL and its customers. This information is protected by Section 366.093(3)(d), Fla. Stat.

7. Also, certain information contained in the Confidential Information consists of information relating to competitive interests, specifically credit analyses, customer surveys, and collections policies, the disclosure of which would impair the competitive business of FPL or the

party providing the information to FPL. This information is protected by Section 366.093(3) (e), Fla. Stat.

8. 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, FPL respectfully requests that its First Request for Extension of Confidential Classification be granted.

Respectfully submitted,

FLORIDA POWER & LIGHT COMPANY

By: /s/ Maria Jose Moncada

Maria Jose Moncada
Managing Attorney
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Florida Power & Light Company
700 Universe Boulevard
Juno Beach, Florida 33408-0420
(561) 691-7101
(561) 691-7135 (fax)

CERTIFICATE OF SERVICE
20210015-EI

I HEREBY CERTIFY that a true and correct copy of the foregoing has been furnished by electronic mail this 30th day of January 2023 to the following parties:

Suzanne Brownless
Bianca Lherisson
Shaw Stiller
Florida Public Service Commission
Office of the General Counsel
2540 Shumard Oak Boulevard
Tallahassee, Florida 32399-0850
sbrownle@psc.state.fl.us
blheriss@psc.state.fl.us
sstiller@psc.state.fl.us

By: s/Maria Jose Moncada
Maria Jose Moncada
Florida Bar No. 0773301

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FIRST REVISED EXHIBIT “C”

FIRST REVISED EXHIBIT C

COMPANY: Florida Power & Light Company
TITLE: Petition by Florida Power & Light Company for Base Rate Increase and Rate Unification
DOCKET NO.: 20210015-EI
DATE: January 30, 2023

Bold denotes revision to reflect a new declarant

Int/POD No.	Description	No. of Pages	Conf. Y/N	Bates Nos.	Line / Column	Florida Statute 366.093(3) Subsection	Declarants
Vote Solar 1 st POD, No. 9	Collection Policies	8	Y	064453-064460	All	(e)	Christopher Chapel
Vote Solar 1 st POD, No. 15	Moody's_FloridaPowerLightCompany_08.25.2020	12	Y	063189-063200	All	(e)	James Coyne
Vote Solar 1 st POD, No. 15	NextEra Energy Inc Still Delivering - Morgan Stanley - 18 - 21-Jun-19	18	Y	063171-063188	All	(e)	Scott Bores
Vote Solar 1 st POD, No. 37	EMC April Reliability	4	Y	064690-064693	All	(e)	Jose Chacon
Vote Solar 1 st POD, No. 37	Maslansky – FPL Value Message Phase I	3	Y	064694-064696	All	(e)	Jose Chacon
Vote Solar 1 st POD, No. 37	Maslansky – FPL Value Message Phase II	4	Y	064697-064700	All	(e)	Jose Chacon
Vote Solar 1 st POD, No. 37	Segmentation - Reliability	1	Y	064701	All	(e)	Jose Chacon
Vote Solar 1 st Interrogatory, No. 88	Transmission Unit Replacement Costs	1	Y	064680	Line 2	(d)	Thomas Allain

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FIRST REVISED EXHIBIT “D”

FIRST REVISED EXHIBIT D

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Petition by Florida Power & Light
Company for Base Rate Increase and Rate
Unification

Docket No: 20210015-EI

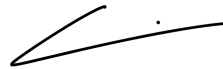
DECLARATION OF CHRISTOPHER CHAPEL

1. My name is Christopher Chapel. I am currently employed by Florida Power & Light Company (“FPL”) as Vice President of Customer Service. 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 Vote Solar’s First Request for Production of Documents, No. 9. The documents or materials that I have reviewed are proprietary confidential business information relating to competitive interests, the disclosure of which would impair the competitive business of the provider of the information. Specifically, the information contains copies of FPL’s collection policies. To the best of my knowledge, FPL has maintained the confidentiality of these documents and materials.

3. Nothing has occurred since the issuance of Order No. PSC-2021-0281-CFO-EI to render the designated information stale or public, such that continued confidential treatment would not be appropriate. Therefore, consistent with the provisions of the Florida Administrative Code, such materials should remain confidential for a period of at least an additional 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.



Christopher Chapel

Date: 1.27.23

FIRST REVISED EXHIBIT D

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Petition by Florida Power & Light
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DECLARATION OF JAMES COYNE

1. My name is James Coyne, and I am employed by Concentric Energy Advisors, Inc. as a Senior Vice President. I have personal knowledge of the matters stated in this 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 Vote Solar's First Request for Production of Documents No. 15. 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 materials include information that relates to credit analyses. To the best of my knowledge, FPL has maintained the confidentiality of these documents and materials.

3. Nothing has occurred since the issuance of Order No. PSC-2021-0281-CFO-EI to render the designated information stale or public, such that continued confidential treatment would not be appropriate. Therefore, consistent with the provisions of the Florida Administrative Code, such materials should remain confidential for a period of at least an additional 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 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

January 26, 2023

Date: _____

FIRST REVISED EXHIBIT D

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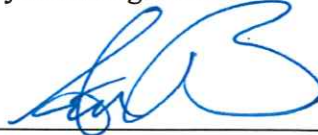
DECLARATION OF SCOTT BORES

1. My name is Scott Bores. I am currently employed by Florida Power & Light Company ("FPL") as Vice-President, Finance. I have personal knowledge of the matters stated in this declaration.

2. I have reviewed the documents referenced and incorporated in FPL's Request for Confidential Classification, specifically the materials provided in response Vote Solar's First Request for Production of Documents No. 15. 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 materials include information that relates to credit analyses. To the best of my knowledge, FPL has maintained the confidentiality of these documents and materials.

3. Nothing has occurred since the issuance of Order No. PSC-2021-0281-CFO-EI to render the designated information stale or public, such that continued confidential treatment would not be appropriate. Therefore, consistent with the provisions of the Florida Administrative Code, such materials should remain confidential for a period of at least an additional 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 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: 01/30/2023

FIRST REVISED EXHIBIT D

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DECLARATION OF JOSE CHACON

1. My name is Jose Chacon. I am currently employed by Florida Power & Light Company (“FPL”) as Senior Director of Marketing. 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 Vote Solar’s First Request for Production of Documents, No. 37. 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, it contains results of customer surveys. To the best of my knowledge, FPL has maintained the confidentiality of these documents and materials.

3. Nothing has occurred since the issuance of Order No. PSC-2021-0281-CFO-EI to render the designated information stale or public, such that continued confidential treatment would not be appropriate. Therefore, consistent with the provisions of the Florida Administrative Code, such materials should remain confidential for a period of at least an additional 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.



Jose Chacon

Date: 1/30/23

FIRST REVISED EXHIBIT D

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Docket No: 20210015-EI

DECLARATION OF THOMAS ALLAIN

1. My name is Thomas Allain. I am currently employed by Florida Power & Light Company (“FPL”) as Director of Compliance and Regulatory, Power Delivery. 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 Vote Solar’s First Set of Interrogatories, No. 88. The documents or materials that I have reviewed and which are asserted by FPL to be proprietary confidential business information contain information relating to bids or other contractual data, the disclosure of which would impair the efforts of FPL or its affiliates to contract for goods or services on favorable terms. Specifically, some information in the response contains transmission asset unit costs. To the best of my knowledge, FPL has maintained the confidentiality of these documents and materials.

3. Nothing has occurred since the issuance of Order No. PSC-2021-0281-CFO-EI to render the designated information stale or public, such that continued confidential treatment would not be appropriate. Therefore, consistent with the provisions of the Florida Administrative Code, such materials should remain confidential for a period of at least an additional 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.

Thomas Allain

Thomas Allain

Date: 1/27/2023