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August 25, 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 25 PM 3:49
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 Staff of Florida Public Service Commission's ("Staff") Seventh Set of Interrogatories, No. 28. The request includes Exhibits A, B (two copies), C, and D.

Exhibit A consists of the confidential documents with all the information that FPL asserts is entitled to confidential treatment highlighted in yellow. Exhibit B is an edited version of Exhibit A, in which the information FPL asserts is confidential has been redacted. Exhibit C is a justification table in support of FPL's Request for Confidential Classification. Exhibit D contains declarations in support of FPL's request.

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

Sincerely,

William P. Cox

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 25, 2023

**FLORIDA POWER & LIGHT COMPANY'S REQUEST FOR CONFIDENTIAL
CLASSIFICATION OF INFORMATION PROVIDED IN RESPONSE TO
THE STAFF OF FLORIDA PUBLIC SERVICE COMMISSION'S
SEVENTH SET OF INTERROGATORIES (No. 28)**

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 Staff of the Florida Public Service Commission's ("Staff") Seventh Set of Interrogatories (No. 28) (the "Confidential Documents"). In support of this Request, FPL states as follows:

1. On July 27, 2023, Staff served its Seventh Set of Interrogatories on FPL. FPL's Response to Staff's Seventh Set of Interrogatories, No. 28, contains information of a confidential nature within the meaning of Section 366.093(3), Florida Statutes.

2. FPL served its response to 's Staff's Seventh Set of Interrogatories, No. 28 on August 25, 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 wherein all the information that FPL asserts is entitled to confidential treatment is highlighted in yellow.
- a. Exhibit B is an edited version of Exhibit A, on which all the information FPL asserts is entitled to confidential treatment has been redacted.

- b. Exhibit C is a table that identifies the confidential information in Exhibit A and references the specific statutory basis for the claim of confidentiality and identifies the declarant who supports the requested classification.
- c. Exhibit D consists of the declaration of Andrew Whitley 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, 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 that relate to the competitive interests of FPL, and if made public, would impair the competitive business of FPL. Specifically, the information contains financial assumptions of the resource options used in the analysis. This information is protected by Sections 366.093(3)(e), F.S.

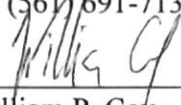
6. Upon a finding by the Commission that the information contained in the Confidential Documents is proprietary and confidential business information, the information should not be declassified for at least eighteen (18) months and should be returned to FPL as soon as it is no longer necessary for the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

William P. Cox, Esq.
Senior Counsel
Florida Power & Light Company
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Juno Beach, FL 33408
Telephone: (561) 304-5662
Facsimile: (561) 691-7135

By: _____


William P. Cox
Florida Bar No. 0093531

CERTIFICATE OF SERVICE
Docket 20230001-EI

I HEREBY CERTIFY that a true and correct copy of the foregoing has been furnished by electronic delivery on this 25th day of August 2023 to the following:

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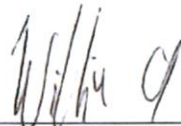
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By: 

William P. Cox
Florida Bar No. 0093531

EXHIBIT B

REDACTED

Redacted

**New Unit Options
Technical and Financial Parameters**

	A	B	C	D
	Combined Cycle	Combustion Turbine	Battery Storage	Combined Cycle Filler
Technical:				
Summer Nameplate Capacity (MW)	1,991	469	100	660
Winter Nameplate Capacity (MW)	1,993	475	100	661
Heat Rate, Full Load (Btu/kWh)	5,954	9,986	N/A	~7,050
Round-Trip Efficiency (%)	N/A	N/A	90%	N/A
Earliest Available In-Service Year	2028	2026	2025	2033
Last Available In-Service Year	2032	2032	2032	2059
Amount Allowed Per Year in model	1	2	30	Unlimited
Amount Allowed In Total in model	1	2	240	Unlimited

Financial:

1	Installed Capital Cost, 2025 (\$/kW)
2	Installed Capital Cost, 2026 (\$/kW)
3	Installed Capital Cost, 2027 (\$/kW)
4	Installed Capital Cost, 2028 (\$/kW)
5	Installed Capital Cost, 2029 (\$/kW)
6	Installed Capital Cost, 2030 (\$/kW)
7	Installed Capital Cost, 2031 (\$/kW)
8	Installed Capital Cost, 2032 (\$/kW)
9	Installed Capital Cost, 2033 (\$/kW)
10	Fixed O&M and Capital Repl. Costs*
11	Variable O&M (\$/MWh)



* Fixed O&M and Capital Repl. Costs are levelized over the life of the unit

EXHIBIT C

JUSTIFICATION TABLE

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 Responses to Staff's Seventh Set of Interrogatories, (No. 28)
DATE: August 25, 2023

Item No.	Description	Line No./ Col. No.	Florida Statute 366.093(3) Subsection	Declarant
Staff 7th INT, No. 28	New unit options – Technical and Financial Parameters	Cols. A-D, Rows 1-11	(e)	Andrew Whitley

EXHIBIT D

DECLARATIONS

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 ANDREW W. WHITLEY

1. My name is Andrew W. Whitley. I am currently employed by Florida Power & Light Company ("FPL") as Engineering Manager, Resources Planning. 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 Staff's Seventh Set of Interrogatories, No. 28 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, the disclosure of which would impair FPL's competitive business (Section 366.093(3)(e), F.S.). Specifically, the information contains financial assumptions of the resource options used in the analysis. 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.



Andrew W. Whitley

Date: 08/22/2023