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May 17, 2021

VIA HAND DELIVERY

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

Re: Docket No. 20210015-EI

REDACTED

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 ("Florida Rising") First Request for Production of Documents, Nos. 4 and 18. 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. The documents in Exhibit A are confidential in their entirety. Therefore, FPL has included only an identifying cover page for 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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2021 MAY 17 PM 3:50
COMMISSION CLERK

- COM _____
- AFD 1 Exh B
- APA _____
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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: May 17, 2021

**FLORIDA POWER & LIGHT COMPANY'S REQUEST FOR CONFIDENTIAL
CLASSIFICATION OF CERTAIN INFORMATION PROVIDED IN ITS
RESPONSES TO FLORIDA RISING'S, LEAGUE OF UNITED LATIN
AMERICAN CITIZENS', AND ENVIRONMENTAL CONFEDERATION
OF SOUTHWEST FLORIDA'S FIRST REQUEST FOR
PRODUCTION OF DOCUMENTS, Nos. 4 AND 18**

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 supplemental responses to Florida Rising's, League of United Latin American Citizens', and Environmental Confederation of Southwest Florida's ("Florida Rising") First Request for Production of Documents, Nos. 4 and 18 (the "Confidential Information"). In support of its Request, FPL states as follows:

1. FPL served its responses to Florida Rising's First Request for Production of Documents ("POD") on May 17, 2021. This request is being filed contemporaneously with service of those responses to request confidential classification of certain information contained in its response to Florida Rising's Request for Production of Documents Nos. 4 and 18, 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. The documents in Exhibit A are confidential in their entirety.

b. As FPL asserts the information in Exhibit A is confidential in its entirety, Exhibit B consists of only a identifying cover pages.

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, and information concerning bids or other contractual data, the disclosure of which would impair the efforts of FPL to contract for goods or services on favorable terms. Specifically, some information contains data related to projected system loads and pricing information relating to the purchase of solar panels. This information is protected by Sections 366.093(3) (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 17th day of May 2021 to the following parties:

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Shaw Stiller
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**Attorneys for Florida Rising, Inc.
League of United Latin American Citizens of
Florida
Environmental Confederation of Southwest
Florida, Inc.**

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

All documents included in FPL's Response to LULAC's 1st Request for Production of Documents, No. 4, Bates Nos. 060630-060912 are confidential in their entirety and are being provided in electronic format on a disk.

All documents included in FPL's Response to LULAC's 1st Request for Production of Documents, No. 18, Bates Nos. 026780-026791 are confidential in their entirety and are being provided in electronic format on a disk.

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: May 17, 2021

Int/POD No.	Begin Bates Number	End Bates Number	Description	No. of Pages	Confidential	Line/Col	Florida Statute 366.093 (3) Subsection	Declarant
LULAC 1 st Request for Production of Documents, No. 4			FPL Shared Solar Conjoint Report	85	Y	All	(d)(e)	Matthew Valle
LULAC 1 st Request for Production of Documents, No. 4			FPL Shareholder Offset Price Report	52	Y	All	(d)(e)	Matthew Valle
LULAC 1 st Request for Production of Documents, No. 4			Burke Data Offset Price Point	99	Y	All	(d)(e)	Matthew Valle
LULAC 1 st Request for Production of Documents, No. 4			FPL Shared Solar DCM Report	33	Y	All	(d)(e)	Matthew Valle

Int/POD No.	Begin Bates Number	End Bates Number	Description	No. of Pages	Confidential	Line/Col	Florida Statute 366.093 (3) Subsection	Declarant
LULAC 1 st Request for Production of Documents, No. 4			2020 BPO Profiling Matrix	12	Y	All	(d)	Christopher Chapel
LULAC 1 st Request for Production of Documents, No. 4			Gulf Power Brand Research Report	1	Y	All	(d)	Christopher Chapel
LULAC 1 st Request for Production of Documents, No. 4			FPL Brand Research Report	1	Y	All	(d)	Christopher Chapel
LULAC 1 st Request for Production of Documents, No. 18	026780	026780	2021 Ten-Year Site Plan Projectons	N/A	Y	All	(e)	Steven Sim
LULAC 1 st Request for Production of Documents, No. 18	026781	026781	2021 Ten-Year Site Plan Projectons	N/A	Y	All	(e)	Steven Sim

Int/POD No.	Begin Bates Number	End Bates Number	Description	No. of Pages	Confidential	Line/Col	Florida Statute 366.093 (3) Subsection	Declarant
LULAC 1 st Request for Production of Documents, No. 18	026782	026782	2021 Ten-Year Site Plan Projectons	N/A	Y	All	(e)	Steven Sim
LULAC 1 st Request for Production of Documents, No. 18	026783	026783	2021 Ten-Year Site Plan Projectons	N/A	Y	All	(e)	Steven Sim
LULAC 1 st Request for Production of Documents, No. 18	026784	026784	2021 Ten-Year Site Plan Projectons	N/A	Y	All	(e)	Steven Sim
LULAC 1 st Request for Production of Documents, No. 18	026785	026785	2021 Ten-Year Site Plan Projectons	N/A	Y	All	(e)	Steven Sim
LULAC 1 st Request for Production of Documents, No. 18	026786	026786	2021 Ten-Year Site Plan Projectons	N/A	Y	All	(e)	Steven Sim

Int/POD No.	Begin Bates Number	End Bates Number	Description	No. of Pages	Confidential	Line/Col	Florida Statute 366.093 (3) Subsection	Declarant
LULAC 1 st Request for Production of Documents, No. 18	026787	026787	2021 Ten-Year Site Plan Projectons	N/A	Y	All	(e)	Steven Sim
LULAC 1 st Request for Production of Documents, No. 18	026788	026788	2021 Ten-Year Site Plan Projectons	N/A	Y	All	(e)	Steven Sim
LULAC 1 st Request for Production of Documents, No. 18	026789	026789	2021 Ten-Year Site Plan Projectons	N/A	Y	All	(e)	Steven Sim
LULAC 1 st Request for Production of Documents, No. 18	026790	026790	2021 Ten-Year Site Plan Projectons	N/A	Y	All	(e)	Steven Sim
LULAC 1 st Request for Production of Documents, No. 18	026791	026791	2021 Ten-Year Site Plan Projectons	N/A	Y	All	(e)	Steven Sim

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 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 LULAC’s First Request for Production of Documents No. 4. The documents or materials that I have reviewed and which are proprietary confidential business information concerning bids or other contractual data the disclosure of which would impair the efforts of FPL to contract for goods or services on favorable terms and information relating to competitive interests, the disclosure of which would impair the competitive business of the provider of the information. Specifically, the information contains pricing information related to the purchase of solar panels, and information from customer surveys. 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.



Christopher Chapel

Date: 5.14.21

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: 20210015-EI

DECLARATION OF MATTHEW VALLE

1. My name is Matthew Valle. I am currently employed by Florida Power & Light Company ("FPL") as Vice President of Development. 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 my response League of United Latin American Citizens' First Request for Production of Documents, No. 4. The documents or materials that I have reviewed and which are proprietary confidential business information concerning bids or other contractual data the disclosure of which would impair the efforts of FPL to contract for goods or services on favorable terms. Specifically, the information contains pricing information related to the purchase of solar panels. 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.



Matthew Valle

Date: _____

5/17/21

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: 20210015-EI

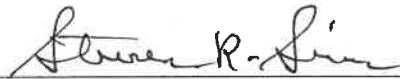
DECLARATION OF STEVEN R. SIM

1. My name is Steven R. Sim. I am currently employed by Florida Power & Light Company ("FPL") as Director of Integrated Resource Planning. 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 LULAC's First Request for Production of Documents No. 18. 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 contains projected system peak loads. 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.



Steven R. Sim

Date: 5/17/2021