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June 14, 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

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COMMISSION CLERK

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 fourth supplemental response to Office of Public Counsel's ("OPC") First Request for Production of Documents No. 36. 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. Exhibit A is submitted for filing in an envelope marked "EXHIBIT A" - CONFIDENTIAL. Documents in Exhibit A are voluminous and confidential in their entirety, and they are being provided electronically on a 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 1 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: June 14, 2021

**FLORIDA POWER & LIGHT COMPANY'S REQUEST FOR CONFIDENTIAL
CLASSIFICATION OF CERTAIN INFORMATION PROVIDED IN ITS FOURTH
SUPPLEMENTAL RESPONSE TO THE OFFICE OF PUBLIC COUNSEL'S
FIRST REQUEST FOR PRODUCTION OF DOCUMENTS, NO. 36**

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 fourth supplemental response to the Office of Public Counsel's ("OPC") First Request for Production of Documents, No. 36 (the "Confidential Information"). In support of its Request, FPL states as follows:

1. FPL served its fourth supplemental response to OPC's First Request for Production of Documents, No. 36 on June 14, 2021. This request is being filed contemporaneously with service of those responses to request confidential classification of certain information contained in its fourth supplemental response to OPC's First Request for Production of Documents No. 36, 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 responses are voluminous, and they are being provided electronically on disc.

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. The documents are confidential in their entirety, and 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 the provider of the information. Specifically, some information contains modeling software that is proprietary to a third-party vendor and cannot be accessed without a subscription. 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 14th day of June 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 OPC's First Request for Production of Documents No. 36, Fourth Supplemental, Bates Nos. 064571-064611, 064617-064620, 064780-064781 & 064827 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: June 14, 2021

Int/POD No.	Begin Bates Number	End Bates Number	Description	No. of Pages	Confidential	Line/Col	Florida Statute 366.093 (3) Subsection	Declarant
Fourth Supplemental response to OPC'S 1st Request for Production of Documents, No. 36	064617	064620	2019 Battery Duration Results	4	Y	All	(e)	Steve Sim
Fourth Supplemental response to OPC'S 1st Request for Production of Documents, No. 36	064781	064781	2020 Strategy Base Case - 2022 and 2023 Solar Backup	N/A	Y	All	(e)	Steve Sim

Int/POD No.	Begin Bates Number	End Bates Number	Description	No. of Pages	Confidential	Line/Col	Florida Statute 366.093 (3) Subsection	Declarant
Fourth Supplemental response to OPC'S 1st Request for Production of Documents, No. 36	064780	064780	2021 TYSP Base Case Updated 12 11 2020 Archive 2024-2025 Solar Backup	N/A	Y	All	(e)	Steve Sim
Fourth Supplemental response to OPC'S 1st Request for Production of Documents, No. 36	064571	064597	Current Gulf Stand Alone Battery Duration Calculator	27	Y	All	(e)	Steve Sim
Fourth Supplemental response to OPC'S 1st Request for Production of Documents, No. 36	064598	064611	Initial Gulf Stand Alone FCV Battery FCV Duration Calculation	14	Y	All	(e)	Steve Sim

Int/POD No.	Begin Bates Number	End Bates Number	Description	No. of Pages	Confidential	Line/Col	Florida Statute 366.093 (3) Subsection	Declarant
Fourth Supplemental response to OPC'S 1st Request for Production of Documents, No. 36	064827	064827	OutputDB_2020_Strategy_7_27_2020_2022_and 2023_Solar_Backup	N/A	Y	All	(e)	Steve 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 STEVE SIM

1. My name is Steve 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 Fourth Supplemental Response to OPC's First Request for Production of Documents No. 36. 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 software that is proprietary to a third party vendor who provides it to FPL as part of a subscription service. 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.



Steve Sim

Date: _____

6/11/2021