

State of Florida



# Public Service Commission

CAPITAL CIRCLE OFFICE CENTER • 2540 SHUMARD OAK BOULEVARD  
TALLAHASSEE, FLORIDA 32399-0850

**-M-E-M-O-R-A-N-D-U-M-**

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**DATE:** September 10, 2021  
**TO:** Suzanne S. Brownless, Special Counsel, Office of the General Counsel  
**FROM:** Jefferson Doehling, Engineering Specialist II, Division of Engineering  
**RE:** CONFIDENTIALITY OF CERTAIN INFORMATION

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JD*

DOCKET NOS: 20210015-EI DOCUMENT NO: 09728-2021

DESCRIPTION: FPL (Moncada) - (CONFIDENTIAL) Certain information provided in response to FL Rising, LULAC, and ECOSWF's 4th request for PODs (Nos. 37 and 38).

SOURCE: Florida Power & Light

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Pursuant to Section 366.093, Florida Statutes (F.S.), and Rule 25-22.006, Florida Administrative Code, Florida Power & Light Company (FPL) requests confidential classification of information contained in its response to Florida Rising, the League of United Latin American Citizens, and the Environmental Confederation of Southwest Florida's (Parties) Fourth Request for Production of Documents (POD), Nos. 37 and 38. FPL requests confidentiality of the entirety of POD No. 37 under Section 366.093(3)(e), F.S.: "[I]nformation relating to competitive interests, the disclosure of which would impair the competitive business of the provider of the information." In addition, FPL requests confidentiality of highlighted portions of its response to POD No. 38 under Section 366.093(3)(d), F.S.: "[i]nformation concerning bids or other contractual data, the disclosure of which would impair the efforts of the public utility or its affiliates to contract for goods or services on favorable terms," and Section 366.093(3)(e), F.S.

Staff has reviewed FPL's confidential responses to the Parties Fourth Request for PODs, Nos. 37 and 38. Specifically, the response to POD No. 37 contains proprietary third party cost-effectiveness models pertaining to FPL's SolarTogether program; the disclosure of which would impair the competitive business of the provider of the information. The response to POD No. 38 contains bid information for FPL's Residential Electric Vehicle Charging Services Rider Pilot; the disclosure of which would impair the efforts of the public utility to contract for goods or services on favorable terms. Therefore, staff recommends that the information pertaining to POD Nos. 37 and 38 meets the criteria for confidential classification pursuant to Sections 366.093(3)(d) and (e), F.S.

cc: Office of Commission Clerk



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**-M-E-M-O-R-A-N-D-U-M-**

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**DATE:** August 27, 2021

**TO:** Division of Accounting and Finance, Office of Primary Responsibility

**FROM:** OFFICE OF COMMISSION CLERK

**RE:** CONFIDENTIALITY OF CERTAIN INFORMATION

DOCKET NOS: 20210015-EI DOCUMENT NO: 09728-2021

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The above confidential material was filed along with a request for confidential classification. Please complete the following form by checking all applicable information and forward it to the attorney assigned to the docket, along with a brief memorandum supporting your recommendation.

- The document(s) is (are), in fact, what the utility asserts it (them) to be.
- The utility has provided enough details to perform a reasoned analysis of its request.
- The material has been received incident to an inquiry.
- The material is confidential business information because it includes:
  - (a) Trade secrets;
  - (b) Internal auditing controls and reports of internal auditors;
  - (c) Security measures, systems, or procedures;
  - (d) Information concerning bids or other contractual data, the disclosure of which would impair the efforts of the public utility or its affiliates to contract for goods or services on favorable terms;
  - (e) Information relating to competitive interests, the disclosure of which would impair the competitive business of the provider of information;
  - (f) Employee personnel information unrelated to compensation, duties, qualifications, or responsibilities;
- The material appears to be confidential in nature and harm to the company or its ratepayers will result from public disclosure.
- The material appears not to be confidential in nature.
- The material is a periodic or recurring filing and each filing contains confidential information.

This response was prepared by Jefferson Doehling on September 9, 2021, a copy of which has been sent to the Office of Commission Clerk and the Office of General Counsel.