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May 25, 2022

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

REDACTED

RECEIVED-FPSC
2022 MAY 25 PM 3:45
COMMISSION
CLERK

Re: Docket No. 20220001-EI

Dear Mr. Teitzman:

I enclose for filing in the above docket Florida Power & Light Company's ("FPL") Request for Confidential Classification of Materials Provided Pursuant to Audit No. 2022-003-4-2. The request includes Exhibits A, B (two copies), C and D.

Exhibit A consists of the confidential documents, and all the information that FPL asserts is entitled to confidential treatment has been highlighted. Exhibit B is an edited version of Exhibit A, in which the information FPL asserts is confidential has been redacted. Exhibit C and Exhibit D are a justification table and declaration, respectively, in support of FPL's Request.

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

- COM
- AFD** *I redacted Exh "B"*
- APA
- ECO
- ENG
- GCL
- IDM Enclosure
- CLK cc: Counsel for Parties of Record (w/ copy of FPL's Request for Confidential Classification)

Sincerely,

David M. Lee

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Fuel and purchase power cost recovery
clause with generating performance incentive
factor

Docket No: 20220001-EI

Date: May 25, 2022

**FLORIDA POWER & LIGHT COMPANY'S
REQUEST FOR CONFIDENTIAL CLASSIFICATION OF
MATERIALS PROVIDED PURSUANT TO AUDIT NO. 2022-003-4-2**

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 material provided to the Staff of the Florida Public Service Commission (“Staff”) pursuant to Audit Control No. 2022-003-4-2 (“the Audit”). In support of this request, FPL states as follows:

1. During the Audit, FPL provided Staff with various confidential documents. By letter dated May 4, 2022 Staff indicated its intent to retain certain confidential documents provided by FPL to Staff as audit work papers. Pursuant to Rule 25-22.006(3)(a), FPL was given 21 days from the date of the letter to file a formal request for confidential classification with respect to the work papers. Accordingly, FPL files this Request for Confidential Classification to maintain continued confidential handling of the confidential work papers.

2. The following exhibits are included with and made a part of this request:

a. Exhibit A consists of a copy the confidential documents, on which all information that is entitled to confidential treatment under Florida law has been highlighted.

b. Exhibit B consists of two copies of the confidential documents, on which all the information that is entitled to confidential treatment under Florida law has been redacted. For the documents that are confidential in their entirety, FPL has included only identifying cover pages in Exhibit B.

c. Exhibit C is a table containing an identification of the information highlighted in Exhibit A by page and line. Exhibit C also references the specific statutory bases for the claim of confidentiality and identifies the declarant who supports the requested classification.

d. Exhibit D is the declaration Gerard J. Yupp in support of this Request.

3. 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 information is entitled to confidential treatment and is 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 more fully in the declaration included as Exhibit D, certain documents contain information concerning bids, pricing information or other contractual data, the disclosure of which would impair the efforts of FPL to contract for goods or services on favorable terms. This information is protected by Section 366.093(3)(d), Fla. Stat.

5. Also, certain information contains information that if disclosed would impair the efforts of FPL to contract for energy and capacity-related goods or services on favorable terms for the benefit of its customers and would impair the competitive interests of FPL and its vendors. This information is protected by Section 366.093(3)(e), Fla. Stat.

6. Upon a finding by the Commission that the information highlighted in Exhibit A, and referenced in Exhibit C, 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 § 366.093(4), Fla. Stat.

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,

Maria Jose Moncada
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Senior Attorney
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david.lee@fpl.com

By: _____



David M. Lee
Florida Bar No. 103152

CERTIFICATE OF SERVICE
Docket No. 20220001-EI

I **HEREBY CERTIFY** that a true and correct copy of the foregoing Request for Confidential Classification* has been furnished by electronic mail on this 25th day of May 2022 to the following:

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2540 Shumard Oak Blvd.
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Springs**

By: 

David M. Lee
Florida Bar No. 103152

* The exhibits to this Request are not included with the service copies, but copies of Exhibits B, C and D are available upon request.

Docket No. 20220001-EI

EXHIBIT “B”

**FPL’s MATERIALS PROVIDED PURSUANT
TO AUDIT NO. 2022-003-4-2**

Florida Power & Light
 Capacity Cost Recovery Audit
 Dkt# 20220001-E1, ACN 2022-003-4-2
 TYE 1/1/2021 - 12/31/2021

9/3/22

Title Transmission Rev.

You are not authorized to edit this deal

1 [Status: Saved-Locked-Confirmed-Confirmed-Invoiced] [Prod/Inst] XXXXXXXXXX

2 Number 1021161 **B** Ticket **C**

Trade Date XXXXXXXXXX Trader XXXXXXXXXX

Direction XXXXXXXXXX Term XXXXXXXXXX

3 Start Date XXXXXXXXXX End Date XXXXXXXXXX

ISO XXXXXXXXXX

Product XXXXXXXXXX

4 Counterparty XXXXXXXXXX

Contract XXXXXXXXXX

Portfolio XXXXXXXXXX

Agree For XXXXXXXXXX

Strategy XXXXXXXXXX

Contact XXXXXXXXXX

Exec Method XXXXXXXXXX

Currency XXXXXXXXXX

Heat Rate XXXXXXXXXX

Year	Start Date	End Date	Volume	Unit	Charge Period	Subtotal	Volume	Charge	Charge	Charge Type	Charge Formula	Heat Rate	Adj
[REDACTED]													
Totals							215	1,251,250					

bp 45-1.1

Broker/Commission Product Notes Back to Back Deals Exercises

Header Fee Cur Fee

SOURCE:
DR 12

CONFIDENTIAL

45-3

REDACTED VERSION OF CONFIDENTIAL DOCUMENTS

Capacity Audit Workpaper Number 46-2

[Page 1]

Purchased Power

REDACTED VERSION OF CONFIDENTIAL DOCUMENTS

Capacity Audit Workpaper Number 46-2.1

[Page 1]

Purchased Power

REDACTED VERSION OF CONFIDENTIAL DOCUMENTS

Capacity Audit Workpaper Number 46-2.2

[Page 1]

Purchased Power

Qualifying Facility Monthly Billing Statement

*9/6
3/22*

QF ID: 4567

Facility Name:

BROWARD RESOURCE RECOVERY SOUTH

Region:

Southeast

Billing Month:

April, 2021

Number of Hours in Month:

720

Number of Peak Hours in Month:

198

Committed Capacity:

3.50 MW

Florida Power & Light
Capacity Cost Recovery Audit
Dkt# 20220001-EL, ACN 2022-003-4-2
TYE 1/1/2021 - 12/31/2021

Title

QF

Energy Received, All Hours:

1
2



Energy Received, All Peak Hours:

3
4

Sales (Wheeled):

5

Net Energy Received, All Hours:

5,139.866 MWH

Maximum Hourly Energy:

6

Committed Capacity:

7

Monthly Billing Capacity Factor:

8

Monthly Peak Capacity Factor:

9

Annual Capacity Factor:

10

Annual Peak Capacity Factor:

11

Billing Capacity Factor:

12

Monthly Energy Payment:

(As Available)	('91)	Total
----------------	-------	-------

\$43,836.72	\$43,837.32	= \$87,674.04
+		

Monthly Capacity Payment:

\$122,325.00	\$122,325.00
=	

ap46

SOURCE:

DR9

CONFIDENTIAL

Execution Date/Time: 05/18/21 at 10:45:15

Invoice ID: All

46-3

Florida Power & Light
Capacity Cost Recovery Audit
Dkt# 20220001-EI, ACN 2022-003-4-2
TYE 1/1/2021 - 12/31/2021

gl
3/22

Title QF

Florida Power & Light Company

gl
3/22

Billing Statement
For Purchased Power From
Wheelabrator South Broward
For Transaction Period:
April 1, 2021 through April 30, 2021

A		B
QF ID	GENERATION	AMOUNT
1 4567	[REDACTED]	[REDACTED]
2 Apr 2021	[REDACTED]	[REDACTED]
	5139.8660 MWH	
	ENERGY PAYMENT BRS	\$87,674.04
	VARIABLE O&M - PER FPSC ORDER DATED JANUARY 1, 2021	\$36.42
	Monthly Capacity Payment	\$122,325.00
	CUSTOMER CHARGE	(\$1,912.71)
	Amount Previously Billed
	Total Due \$208,122.75

wp46
wp46-3

Execution Date/Time : 05/18/21 at 10:45:15

Invoice ID: All

SOURCE:

DR 9

CONFIDENTIAL

116-3.1

REDACTED VERSION OF CONFIDENTIAL DOCUMENTS

Capacity Audit Workpaper Number 46-3.2

[Page 1]

Purchased Power

EXHIBIT C

COMPANY: Florida Power & Light Company
TITLE: List of Confidential Workpapers
AUDIT: FPL, Capacity Audit
AUDIT CONTROL NO: 2022-003-4-2
DOCKET NO: 20220001-EI
DATE: May 25, 2021

Workpaper No.	Description	No. of Pages	Conf Y/N	Column No./Line No.	Florida Statute 366.093 (3) Subsection	Declarant
7-1.1	Analytical Review	1	N			
45-1	Transmission Revenues	1	N			
45-1.1	Transmission Revenues	1	N			
45-2	Transmission Revenues	1	N			
45-2.1	Transmission Revenues	1	N			
45-2.2	Transmission Revenues	1	N			
45-3	Transmission Revenues	1	Y	Col. A, Line 1 Col. B, Lns. 2-4 Col. C, Line 3 Cols. D - N	(d)	G. Yupp
46	Purchased Power	1	N			
46.1	Purchased Power	1	N			
46.2	Purchased Power	1	N			
46.3	Purchased Power	1	N			
46-1	Purchased Power	1	N			
46-2	Purchased Power	1	Y	ALL	(d)	G. Yupp
46-2.1	Purchased Power	1	Y	ALL	(d)	G. Yupp
46-2.2	Purchased Power	1	Y	ALL	(d)	G. Yupp
46-3	Purchased Power	1	Y	Lns. 1 – 12	(d), (e)	G. Yupp
46-3.1	Purchased Power	1	Y	Cols. A - B, Lns. 1-2	(d)	G. Yupp
46-3.2	Purchased Power	1	Y	ALL	(d)	G. Yupp

EXHIBIT D

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Fuel and Purchase Power Cost Recovery
Clause with Generating Performance Incentive
Factor

Docket No. 20220001-EI

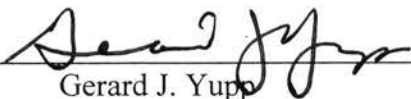
DECLARATION OF GERARD J. YUPP

1. My name is Gerard J. Yupp. I am currently employed by Florida Power & Light Company ("FPL") as Senior Director of Wholesale Operations in the Energy Marketing and Trading business unit. I have personal knowledge of the matters stated in this declaration.

2. I have reviewed Exhibit C and the documents that are included in Exhibit A to FPL's Request for Confidential Classification of Information Obtained in Connection with Audit No. 2022-003-4-2 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 or constitute data such as pricing and other terms, payment records, and vendor and supplier rates. The disclosure of this information would impair the efforts of FPL to contract for energy and capacity-related goods or services on favorable terms for the benefit of its customers and would impair the competitive interests of FPL and its vendors. Certain information in these documents and materials would also place FPL at a disadvantage when coupled with other information that is publicly available. 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 least 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.


Gerard J. Yupp

Date: 5/20/22