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August 22, 2022

**-VIA HAND DELIVERY-**

Adam Teitzman  
Commission Clerk  
Florida Public Service Commission  
2540 Shumard Oak Boulevard  
Tallahassee, Florida 32399-0850

**REDACTED**

RECEIVED-FPSC  
2022 AUG 22 PM 2:00  
COMMISSION CLERK

**RE: Docket 20220000-OT (Undocketed filings for 2022)  
Florida Power & Light Company 2022-2031 Ten-Year Power Plant Site Plan**

Dear Mr. Teitzman:

I enclose for filing in the above docket Florida Power & Light Company's ("FPL") Request for Confidential Classification of Information Provided in Response to Staff's Fifth Data Request (No. 1). 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 is a justification table in support of FPL's Request for Confidential Classification. Exhibit D contains the declaration in support of FPL's request.

If there are any questions regarding this transmittal, please contact me at (561)304-5662.

Sincerely,

/s/ William P. Cox  
William P. Cox  
Senior Attorney  
Fla. Bar No. 0093531

COM \_\_\_  
AFD \_\_\_  
APA \_\_\_  
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CLK \_\_\_

Enclosure  
cc: Donald Phillips, Division of Engineering

**BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION**

In re: Florida Power & Light Company's  
2022-2031 Ten Year Power Plant Site Plan

Docket No. 20220000-OT

Filed: August 22, 2022

**FLORIDA POWER & LIGHT COMPANY'S  
REQUEST FOR CONFIDENTIAL CLASSIFICATION  
OF INFORMATION PROVIDED IN RESPONSE TO  
STAFF OF THE FLORIDA PUBLIC SERVICE COMMISSION'S FIFTH  
DATA REQUEST (NO. 1)**

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 response to the Staff of the Florida Public Service Commission's ("Staff") Fifth Data Request (No. 1) ("Confidential Discovery Response"). In support of its Request, FPL states as follows:

1. On August 9, 2022, Staff served its Fifth Data Request on FPL. FPL's Response to Staff's Fifth Data Request (No. 1) contains information of a confidential nature within the meaning of Section 366.093(3), Florida Statutes.

2. FPL served its responses to Staff's Fifth Data Request on August 22, 2022. This request is being filed contemporaneously with the service of the response to Staff's discovery in order to request confidential classification of the Confidential Discovery Response consistent with Rule 25-22.006, Florida Administrative Code.

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

a. Exhibit A consists of a copy of the Confidential Discovery Response on which all information that FPL asserts is entitled to confidential treatment is highlighted.

b. Exhibit B consists of an edited version of the Confidential Discovery Response on which all information that FPL asserts is entitled to confidential treatment is redacted.

c. Exhibit C is a table containing a page-and-line identification of the information highlighted in Exhibit A and a brief description of the Confidential Information. Exhibit C also references the specific statutory bases for the claim of confidentiality and identifies the declarants who support the requested classification.

d. Exhibit D contains 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 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.

5. Certain information relates to the competitive interests of FPL and its vendors, the disclosure of which would impair their competitive interests. Specifically, the information relates to capacity factors and financial data associated with particular generation units. This information is protected by Section 366.093(3)(e), Fla. Stat.

6. Upon a finding by the Commission that the Confidential Information remains proprietary and confidential business information, the information should not be declassified for at least an additional eighteen (18) month period and should be returned to FPL as soon as it 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 and affidavits included herewith, Florida Power & Light Company respectfully requests that its Request for Confidential Classification be granted.

Respectfully submitted,

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

By: /s/ William P. Cox  
William P. Cox  
Fla. Bar No. 0093531

**CERTIFICATE OF SERVICE**  
**Docket No. 20220000-OT**

**I HEREBY CERTIFY** that a true and correct copy of the foregoing Request for Confidential Classification\* has been furnished by electronic service this 22<sup>nd</sup> day of August 2022 to the following:

Donald Phillips  
Division of Engineering  
Florida Public Service Commission  
2540 Shumard Oak Blvd.  
Tallahassee, FL 32399

By: /s/ William P. Cox  
William P. Cox  
Florida Bar No. 0093531

\* 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**

	A	B	C	D	E	F	G	H	I	J
1	Florida Power & Light Company		FPL 000033							
2	Docket No. 20220000-OT		20220000-OT							
3	Ten-Year Site Plan									
4	Staff's Fifth Data Request									
5	Request No. 1									
6	Attachment 1 of 1									
7	Tab 1 of 1									
8										
9										
10										
11	Site Name	In-Service Date	Capacity Factor:	Total Installed Cost (\$/kW):	Direct Construction Cost (\$/kW):	AFUDC Amount (\$/kW):	Escalation (\$/kW):	Fixed O&M (\$/kW-Yr.):	Variable O&M (\$/MWH):	K Factor:
12	Wild Azalea Solar Energy Center	2023	27.3%				**			
13	Chautauqua Solar Energy Center	2023	27.2%				**			
14	Shirer Branch Solar Energy Center	2023	27.2%				**			
15	Saw Palmetto Solar Energy Center	2023	27.3%				**			
16	Cypress Pond Solar Energy Center	2023	26.8%				**			
17	Etonia Creek Solar Energy Center	2023	26.4%				**			
18	Terrill Creek Solar Energy Center	2024	27.9%				**			
19	Silver Palm Solar Energy Center	2024	25.3%				**			
20	Ibis Solar Energy Center	2024	25.5%				**			
21	Woodyard Solar Energy Center	2024	25.7%				**			
22	Beautyberry Solar Energy Center	2024	25.1%				**			
23	Turnpike Solar Energy Center	2024	25.2%				**			
24	Monarch Solar Energy Center	2024	25.4%				**			
25	Caloosahatchee Solar Energy Center	2024	25.8%				**			
26	White Tail Solar Energy Center	2024	25.3%				**			
27	Prairie Creek Solar Energy Center	2024	29.6%				**			
28	Pineapple Solar Energy Center	2024	25.3%				**			
29	Canoe Solar Energy Center	2024	27.5%				**			
30	Sparkleberry Solar Energy Center	2024	24.5%				**			
31	Sambucus Solar Energy Center	2024	29.2%				**			
32	Three Creeks Solar Energy Center	2024	29.4%				**			
33	Thomas Creek Solar Energy Center	2024	27.5%				**			
34	Big Juniper Creek Solar Energy Center	2024	27.5%				**			
35	Wild Quail Solar Energy Center	2024	27.7%				**			
36	Pecan Tree Solar Energy Center	2024	28.1%				**			
37	Unsitd Solar PV	2025	25.5%				**			
38	Unsitd Solar PV	2026	25.5%				**			
39	Unsitd Solar PV	2027	25.5%				**			
40	Unsitd Solar PV	2028	25.5%				**			
41	Unsitd Solar PV	2029	25.5%				**			
42	Unsitd Battery Storage	2029	*				**			
43	Unsitd Solar PV	2030	25.5%				**			
44	Unsitd Battery Storage	2030	*				**			
45	Unsitd Solar PV	2031	25.5%				**			
46	Unsitd Battery Storage	2031	*				**			
47										
48	All sites shown are based on FPL's Business As Usual Plan									
49	All costs are in nominal dollars of the in-service year of the unit									
50	All costs are preliminary in nature, are based on available information at the time the TYSP was developed, and are subject to change									
51	* Battery storage is charged and discharged based on system economics and does not have a typical capacity factor									
52	** The Escalation (\$/kW) is accounted for in the Direct Construction Cost.									

# **EXHIBIT C**

## **JUSTIFICATION TABLE**



**EXHIBIT C**

**COMPANY:** Florida Power & Light Company  
**TITLE:** List of Confidential Documents  
**DOCKET NO:** 20220000-EI  
**DOCKET TITLE:** 2022-2031 Ten-Year Site Plan  
**DATE:** August 22, 2022

<b>Set</b>	<b>Data Request</b>	<b>Conf. Y/N</b>	<b>Line/Column</b>	<b>Florida Statute 366.093(3) Subsection</b>	<b>Declarant</b>
Staff's 5th Set of Data Requests	DR 5, Att. 1	Y	Columns D-F, Rows 12-46; and Columns H-J, Rows 12- 46	(e)	Andrew W. Whitley

# **EXHIBIT D**

# **DECLARATIONS**

**EXHIBIT D**

**BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION**

In re: Florida Power & Light Company's 2022-  
2031 Ten- Year Site Plan.

Docket No: 20220000-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 the documents referenced and incorporated in FPL's Request for Confidential Classification for which I am identified as a declarant. The documents contain information relating to competitive interests, the disclosure of which would impair the competitive business of the provider of the information (Section 366.093(3)(e), F.S.). Specifically, the information relates to capacity factors and financial data associated with particular generation units. 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: 8/17/2022