

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Petition by Florida Power & Light
Company for Base Rate Increase and Rate
Unification

Docket No. 20210015-EI

Filed: January 30, 2023

**FLORIDA POWER & LIGHT COMPANY'S FIRST REQUEST FOR EXTENSION OF
CONFIDENTIAL CLASSIFICATION OF CERTAIN INFORMATION PROVIDED IN
ITS RESPONSES TO OPC'S ELEVENTH REQUEST FOR PRODUCTION OF
DOCUMENTS AND THIRTEENTH SET OF INTERROGATORIES**

Pursuant to Section 366.093, Florida Statutes, and Rule 25-22.006, Florida Administrative Code, Florida Power & Light Company ("FPL") hereby submits its First Request for Extension of Confidential Classification of certain information provided in its responses to Office of Public Counsel's (OPC) Eleventh Request for Production of Documents, Nos. 128 and 129, and Thirteenth Set of Interrogatories No. 236 (the "Confidential Information"). In support of its Request, FPL states as follows:

1. On June 14, 2021, FPL filed a Request for Confidential Classification of the Confidential Information, which included Exhibits A, B, C, and D ("June 14, 2021 Request"). Document No. 04826-2021. By Order No. PSC-2021-0279-CFO-EI, dated July 29, 2021 ("Order 0279"), the Commission granted FPL's June 14, 2021 Request. FPL adopts and incorporates by reference the June 14, 2021 Request and Order 0279.

2. The period of confidential treatment granted by Order 0279 will soon expire. The Confidential Information that was the subject of FPL's June 14, 2021 Request and Order 0279 warrants continued treatment as proprietary and confidential business information within the meaning of Section 366.903(3). Accordingly, FPL hereby submits its First Request for Extension of Confidential Classification.

3. All of the information designated in Exhibits A and B to the June 14, 2021 Request remains confidential. Accordingly, those exhibits will not be reproduced or reattached here.

Regarding First Revised Exhibit C, all of the information listed in the June 14, 2021 Request remains confidential; Exhibit C is revised only to identify Johanna Molina-Parks as a new declarant who is supporting the documents that were previously supported by Meredith Quick.

4. Also included is First Revised Exhibit D, which consists of the declarations of Johana Molina-Parks and Keith Ferguson in support of this Request.

5. 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.

6. As described in the declarations included as Exhibit D, the Confidential Information consists bids or other contractual data, the disclosure of which would impair the efforts of FPL to contract for goods or services on favorable terms as well as Information relating to competitive interests, the disclosure of which would impair the competitive business of the provider of the information. Specifically, some information pertains to insurance contracts and pricing, and projected insurance costs. This information is protected by Section 366.093(3) (d) and (e), Fla. Stat.

7. 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* § 366.093(4), Fla. Stat.

WHEREFORE, for the above and foregoing reasons, as more fully set forth in the supporting materials and declarations, FPL respectfully requests that its First Request for Extension of Confidential Classification be granted.

Respectfully submitted,

FLORIDA POWER & LIGHT COMPANY

By: /s/ Maria Jose Moncada

Maria Jose Moncada
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Florida Power & Light Company
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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 30th day of January 2023 to the following parties:

Suzanne Brownless
Shaw Stiller
Florida Public Service Commission
Office of the General Counsel
2540 Shumard Oak Boulevard
Tallahassee, Florida 32399-0850
sbrownle@psc.state.fl.us
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By: s/Maria Jose Moncada
Maria Jose Moncada
Florida Bar No. 0773301

Docket No. 20210015-EI

FIRST REVISED EXHIBIT “C”

EXHIBIT C

COMPANY: Florida Power & Light Company
TITLE: Petition by Florida Power & Light Company for Base Rate Increase and Rate Unification
DOCKET NO.: 20210015-EI
DATE: January 30, 2021

*** Bold denotes revision to reflect a new declarant**

Int/POD No.	Begin Bates Number	End Bates Number	Description	No. of Pages	Line/Column	Florida Statute 366.093 (3) Subsection	Declarant
OPC'S 13 th Set of Interrogatories, No. 236	064778	064778	FPL Property Insurance Data	1	Lines 14-16, 19-22, 25, 28-29 / Cols. I-M	(d), (e)	Keith Ferguson and Johanna Molina-Parks
OPC'S 13 th Set of Interrogatories, No. 236	064779	064779	Gulf Property Insurance Data	1	Lines 10-12, 15-18, 21 & 24 / Col. H	(d), (e)	Keith Ferguson and Johanna Molina-Parks
OPC 11 th POD, No. 128	066475	066475	9-WCC-2012 Renewal 2017 endt 7 CONFIDENTIAL.pdf	1	All	(d), (e)	Johanna Molina-Parks
OPC 11 th POD, No. 128	066476	066483	2018 - 2019 Palms Excess Liability Policy PALMS-XSL-2018 CONFIDENTIAL_Redacted.pdf	8	All	(d), (e)	Johanna Molina-Parks
OPC 11 th POD, No. 128	066484	066516	2018 Palms BAR Policy 30 32-BAR-2018 -signed CONFIDENTIAL_Redacted Applied_Redacted.pdf	33	All	(d), (e)	Johanna Molina-Parks
OPC 11 th POD, No. 128	066517	066521	2019 - 2020 Palms Employee WC 15-WC-2019 CONFIDENTIAL.pdf	5	All	(d), (e)	Johanna Molina-Parks
OPC 11 th POD, No. 128	066522	066526	2019 - 2020 Palms FPL Contractor Wrap Up 9-WCC-2019 CONFIDENTIAL.pdf	5	All	(d), (e)	Johanna Molina-Parks
OPC 11 th POD, No. 128	066527	066531	2019 - 2020 Palms Property Excess Policy 19-PDXS-2019 CONFIDENTIAL.pdf	5	All	(d), (e)	Johanna Molina-Parks
OPC 11 th POD, No. 128	066532	066566	2019-2020 Palms BAR Policy 30 32-BAR-2019 CONFIDENTIAL_Redacted.pdf	35	All	(d), (e)	Johanna Molina-Parks
OPC 11 th POD, No. 128	066567	066571	2019-2020 Palms FPL Auto 20-AL-2019 CONFIDENTIAL.pdf	5	All	(d), (e)	Johanna Molina-Parks

Int/POD No.	Begin Bates Number	End Bates Number	Description	No. of Pages	Line/Col	Florida Statute 366.093 (3) Subsection	Declarant
OPC 11 th POD, No. 128	066572	066605	BAR Policy 30 32-BAR-2017_AKB Updates (002)_Redacted.pdf	34	All	(d), (e)	Johanna Molina-Parks
OPC 11 th POD, No. 128	066606	066658	Crime Insurance Policy (2021-22) - Executed CONFIDENTIAL.pdf	53	All	(d), (e)	Johanna Molina-Parks
OPC 11 th POD, No. 128	066659	066680	Fiduciary Insurance Policy (2021-22) - Executed CONFIDENTIAL.pdf	22	All	(d), (e)	Johanna Molina-Parks
OPC 11 th POD, No. 128	066681	066681	Fleet Policy FLTAL2004 Endt 17 Rnl 17 CONFIDENTIAL.pdf	1	All	(d), (e)	Johanna Molina-Parks
OPC 11 th POD, No. 128	066682	066788	Palms - NEE - FL Property - Final 43-PD-2020-FL CONFIDENTIAL_Redacted.pdf	107	All	(d), (e)	Johanna Molina-Parks
OPC 11 th POD, No. 128	066789	066793	Palms 15-WC-2017 CONFIDENTIAL.pdf	5	All	(d), (e)	Johanna Molina-Parks
OPC 11 th POD, No. 128	066794	066798	Palms 20-AL-2021 Policy CONFIDENTIAL.pdf	5	All	(d), (e)	Johanna Molina-Parks
OPC 11 th POD, No. 128	066799	066804	Palms 37-BAR-2017 (Okeechobee BAR) CONFIDENTIAL.pdf	6	All	(d), (e)	Johanna Molina-Parks
OPC 11 th POD, No. 128	066805	066852	Palms 44-BAR-2020 50-per QS - (Final) CONFIDENTIAL_Redacted.pdf	48	All	(d), (e)	Johanna Molina-Parks
OPC 11 th POD, No. 128	066853	066857	Palms Auto Policy NO. 20-AL-2020 CONFIDENTIAL.pdf	5	All	(d), (e)	Johanna Molina-Parks
OPC 11 th POD, No. 128	066858	066910	Palms Crime Policy -40-CRI-2020 pdf 3-30-2020 CONFIDENTIAL.pdf	53	All	(d), (e)	Johanna Molina-Parks
OPC 11 th POD, No. 128	066911	066915	Palms D&O Insurance (Policy 2021-22) - Executed CONFIDENTIAL.pdf	5	All	(d), (e)	Johanna Molina-Parks
OPC 11 th POD, No. 128	066916	066921	Palms D&O Policy (2020-21) CONFIDENTIAL.pdf	6	All	(d), (e)	Johanna Molina-Parks
OPC 11 th POD, No. 128	066922	066926	Palms Employee WC 15-WC-2018 CONFIDENTIAL.pdf	5	All	(d), (e)	Johanna Molina-Parks
OPC 11 th POD, No. 128	066927	066931	Palms Employee WC Policy - 15-WCE-2020 CONFIDENTIAL.pdf	5	All	(d), (e)	Johanna Molina-Parks
OPC 11 th POD, No. 128	066932	066939	Palms EXCESS LIABILITY Policy 38-XSL-2020 CONFIDENTIAL_Redacted.pdf	8	All	(d), (e)	Johanna Molina-Parks

Int/POD No.	Begin Bates Number	End Bates Number	Description	No. of Pages	Line/Col	Florida Statute 366.093 (3) Subsection	Declarant
OPC 11 th POD, No. 128	066940	066943	Palms Excess Liability Policy - XLS2-2020 CONFIDENTIAL.pdf	4	All	(d), (e)	Johanna Molina-Parks
OPC 11 th POD, No. 128	066944	066965	Palms Fiduciary Policy 41-FID-2020 pdf 03-30_2020 CONFIDENTIAL.pdf	22	All	(d), (e)	Johanna Molina-Parks
OPC 11 th POD, No. 128	066966	066970	Palms FPL Auto 20-AL-2018 CONFIDENTIAL.pdf	5	All	(d), (e)	Johanna Molina-Parks
OPC 11 th POD, No. 128	066971	066975	Palms FPL Contractor Wrap Up 9-WCC-2018 CONFIDENTIAL.pdf	5	All	(d), (e)	Johanna Molina-Parks
OPC 11 th POD, No. 128	066976	066980	Palms FPL Contractor Wrap Up Policy 9-WCC-2021 2-18-2021 CONFIDENTIAL.pdf	5	All	(d), (e)	Johanna Molina-Parks
OPC 11 th POD, No. 128	066981	066986	Palms NO-39BAR-2019 Builders Risk Policy CONFIDENTIAL.pdf	6	All	(d), (e)	Johanna Molina-Parks
OPC 11 th POD, No. 128	066987	066991	Palms POLICY NO. 9-WCC-2020 CONFIDENTIAL.pdf	5	All	(d), (e)	Johanna Molina-Parks
OPC 11 th POD, No. 128	066992	066996	Palms Property Excess Policy 19-PDXS-2017 CONFIDENTIAL.pdf	5	All	(d), (e)	Johanna Molina-Parks
OPC 11 th POD, No. 128	066997	067001	Palms Property Excess Policy 19-PDXS-2018 -signed CONFIDENTIAL.pdf	5	All	(d), (e)	Johanna Molina-Parks
OPC 11 th POD, No. 128	067002	067009	Palms XSL-2019 Excess Liability_AKB Updates_Redacted.pdf	8	All	(d), (e)	Johanna Molina-Parks
OPC 11 th POD, No. 129	066344	066345	FPL-2017_Palms CWCI_Redacted.pdf	2	All	(d), (e)	Keith Ferguson and Johanna Molina-Parks
OPC 11 th POD, No. 129	066346	066346	FPL-2017_Palms CWCI_Redacted.pdf	1	All	(d), (e)	Keith Ferguson and Johanna Molina-Parks
OPC 11 th POD, No. 129	066347	066347	FPL-2017_Palms Excess_Redacted.pdf	1	All	(d), (e)	Keith Ferguson and Johanna Molina-Parks
OPC 11 th POD, No. 129	066348	066348	FPL-2017_Palms Fleet_Redacted.pdf	1	All	(d), (e)	Keith Ferguson and Johanna Molina-Parks
OPC 11 th POD, No. 129	066349	066349	FPL-2017_Palms Refund Engineering (no redactions).pdf	1	All	(d), (e)	Keith Ferguson and Johanna Molina-Parks

Int/POD No.	Begin Bates Number	End Bates Number	Description	No. of Pages	Line/Col	Florida Statute 366.093 (3) Subsection	Declarant
OPC 11 th POD, No. 129	066350	066350	FPL-2017_Palms Risk_Redacted.pdf	1	All	(d), (e)	Keith Ferguson and Johanna Molina-Parks
OPC 11 th POD, No. 129	066351	066351	FPL-2017_Palms Solar_Redacted.pdf	1	All	(d), (e)	Keith Ferguson and Johanna Molina-Parks
OPC 11 th POD, No. 129	066352	066352	FPL-2017_Palms Solar_Redacted.pdf	1	All	(d), (e)	Keith Ferguson and Johanna Molina-Parks
OPC 11 th POD, No. 129	066353	066353	FPL-2017_Palms Solar_Redacted.pdf	1	All	(d), (e)	Keith Ferguson and Johanna Molina-Parks
OPC 11 th POD, No. 129	066354	066354	FPL-2017_Palms Solar_Redacted.pdf	1	All	(d), (e)	Keith Ferguson and Johanna Molina-Parks
OPC 11 th POD, No. 129	066355	066355	FPL-2017_Palms Solar_Redacted.pdf	1	All	(d), (e)	Keith Ferguson and Johanna Molina-Parks
OPC 11 th POD, No. 129	066356	066356	FPL-2017_Palms Solar_Redacted.pdf	1	All	(d), (e)	Keith Ferguson and Johanna Molina-Parks
OPC 11 th POD, No. 129	066357	066357	FPL-2017_Palms Solar_Redacted.pdf	1	All	(d), (e)	Keith Ferguson and Johanna Molina-Parks
OPC 11 th POD, No. 129	066358	066358	FPL-2017_Palms Solar_Redacted.pdf	1	All	(d), (e)	Keith Ferguson and Johanna Molina-Parks
OPC 11 th POD, No. 129	066359	066359	FPL-2017_Palms Solar_Redacted.pdf	1	All	(d), (e)	Keith Ferguson and Johanna Molina-Parks
OPC 11 th POD, No. 129	066360	066360	FPL-2017_Palms Solar_Redacted.pdf	1	All	(d), (e)	Keith Ferguson and Johanna Molina-Parks
OPC 11 th POD, No. 129	066361	066361	FPL-2017_Palms Solar_Redacted.pdf	1	All	(d), (e)	Keith Ferguson and Johanna Molina-Parks

Int/POD No.	Begin Bates Number	End Bates Number	Description	No. of Pages	Line/Col	Florida Statute 366.093 (3) Subsection	Declarant
OPC 11 th POD, No. 129	066362	066362	FPL-2018_Palms CWCI_Redacted.pdf	1	All	(d), (e)	Keith Ferguson and Johanna Molina-Parks
OPC 11 th POD, No. 129	066365	066367	FPL-2018_Palms CWCI_Redacted.pdf	3	All	(d), (e)	Keith Ferguson and Johanna Molina-Parks
OPC 11 th POD, No. 129	066368	066369	FPL-2018_Palms Excess_Redacted.pdf	2	All	(d), (e)	Keith Ferguson and Johanna Molina-Parks
OPC 11 th POD, No. 129	066370	066371	FPL-2018_Palms Excess_Redacted.pdf	2	All	(d), (e)	Keith Ferguson and Johanna Molina-Parks
OPC 11 th POD, No. 129	066372	066373	FPL-2018_Palms Excess Redacted.pdf	2	All	(d), (e)	Keith Ferguson and Johanna Molina-Parks
OPC 11 th POD, No. 129	066374	066374	FPL-2018_Palms Excess_Redacted.pdf	1	All	(d), (e)	Keith Ferguson and Johanna Molina-Parks
OPC 11 th POD, No. 129	066375	066375	FPL-2018_Palms Excess_Redacted.pdf	1	All	(d), (e)	Keith Ferguson and Johanna Molina-Parks
OPC 11 th POD, No. 129	066376	066376	FPL-2018_Palms Excess_Redacted.pdf	1	All	(d), (e)	Keith Ferguson and Johanna Molina-Parks
OPC 11 th POD, No. 129	066377	066377	FPL-2018_Palms Fleet_(true-up pmt)_Redacted.pdf	1	All	(d), (e)	Keith Ferguson and Johanna Molina-Parks
OPC 11 th POD, No. 129	066378	066378	FPL-2018_Palms Fleet_(inital pmt)_Redacted.pdf	1	All	(d), (e)	Keith Ferguson and Johanna Molina-Parks
OPC 11 th POD, No. 129	066379	066379	FPL-2018_Palms FPLES_Redacted.pdf	1	All	(d), (e)	Keith Ferguson and Johanna Molina-Parks
OPC 11 th POD, No. 129	066380	066380	FPL-2018_Palms Refund Engineering (no redactions).pdf	1	All	(d), (e)	Keith Ferguson and Johanna Molina-Parks

Int/POD No.	Begin Bates Number	End Bates Number	Description	No. of Pages	Line/Col	Florida Statute 366.093 (3) Subsection	Declarant
OPC 11 th POD, No. 129	066343	066343	FPL-2018_Palms Risk_Redacted.pdf	1	All	(d), (e)	Keith Ferguson and Johanna Molina-Parks
OPC 11 th POD, No. 129	066381	066381	FPL-2018_Palms Risk_Redacted.pdf	1	All	(d), (e)	Keith Ferguson and Johanna Molina-Parks
OPC 11 th POD, No. 129	066382	066383	FPL-2019_Palms CWCI_Redacted.pdf	2	All	(d), (e)	Keith Ferguson and Johanna Molina-Parks
OPC 11 th POD, No. 129	066384	066385	FPL-2019_Palms CWCI_Redacted.pdf	2	All	(d), (e)	Keith Ferguson and Johanna Molina-Parks
OPC 11 th POD, No. 129	064859	064862	FPL-2019_Palms Excess_Redacted.pdf	4	All	(d), (e)	Keith Ferguson and Johanna Molina-Parks
OPC 11 th POD, No. 129	066386	066387	FPL-2019_Palms Excess_Redacted.pdf	2	All	(d), (e)	Keith Ferguson and Johanna Molina-Parks
OPC 11 th POD, No. 129	064863	064863	FPL-2019_Palms Fleet_ (initial pmt)_Redacted.pdf	1	All	(d), (e)	Keith Ferguson and Johanna Molina-Parks
OPC 11 th POD, No. 129	066388	066388	FPL-2019_Palms Refund Engineering Redacted.pdf	1	All	(d), (e)	Keith Ferguson and Johanna Molina-Parks
OPC 11 th POD, No. 129	064855	064858	FPL-2019_Palms Risk_Redacted.pdf	4	All	(d), (e)	Keith Ferguson and Johanna Molina-Parks
OPC 11 th POD, No. 129	066389	066390	FPL-2019_Palms Risk_Redacted.pdf	2	All	(d), (e)	Keith Ferguson and Johanna Molina-Parks
OPC 11 th POD, No. 129	066391	066393	FPL-2019_Palms Risk_Redacted.pdf	3	All	(d), (e)	Keith Ferguson and Johanna Molina-Parks
OPC 11 th POD, No. 129	066394	066395	FPL-2019_Palms Risk_Redacted.pdf	2	All	(d), (e)	Keith Ferguson and Johanna Molina-Parks

Int/POD No.	Begin Bates Number	End Bates Number	Description	No. of Pages	Line/Col	Florida Statute 366.093 (3) Subsection	Declarant
OPC 11 th POD, No. 129	066396	066399	FPL-2020_Palms All Risk_Redacted.pdf	4	All	(d), (e)	Keith Ferguson and Johanna Molina-Parks
OPC 11 th POD, No. 129	066400	066402	FPL-2020_Palms Builder All Risk_Redacted.pdf	3	All	(d), (e)	Keith Ferguson and Johanna Molina-Parks
OPC 11 th POD, No. 129	066403	066406	FPL-2020_Palms Crime_Redacted.pdf	4	All	(d), (e)	Keith Ferguson and Johanna Molina-Parks
OPC 11 th POD, No. 129	066407	066410	FPL-2020_Palms CWCI_Redacted.pdf	4	All	(d), (e)	Keith Ferguson and Johanna Molina-Parks
OPC 11 th POD, No. 129	066411	066414	FPL-2020_Palms CWCI_Redacted.pdf	4	All	(d), (e)	Keith Ferguson and Johanna Molina-Parks
OPC 11 th POD, No. 129	066415	066418	FPL-2020_Palms D&O_Redacted.pdf	4	All	(d), (e)	Keith Ferguson and Johanna Molina-Parks
OPC 11 th POD, No. 129	066419	066421	FPL-2020_Palms Excess_Redacted.pdf	3	All	(d), (e)	Keith Ferguson and Johanna Molina-Parks
OPC 11 th POD, No. 129	066422	066423	FPL-2020_Palms Excess_Redacted.pdf	2	All	(d), (e)	Keith Ferguson and Johanna Molina-Parks
OPC 11 th POD, No. 129	066424	066425	FPL-2020_Palms Excess_Redacted.pdf	2	All	(d), (e)	Keith Ferguson and Johanna Molina-Parks
OPC 11 th POD, No. 129	066426	066434	FPL-2020_Palms Fiduciary_Redacted.pdf	9	All	(d), (e)	Keith Ferguson and Johanna Molina-Parks
OPC 11 th POD, No. 129	066435	066436	FPL-2020_Palms Fleet_Redacted.pdf	2	All	(d), (e)	Keith Ferguson and Johanna Molina-Parks
OPC 11 th POD, No. 129	066437	066438	FPL-2020_Palms Risk_Redacted.pdf	2	All	(d), (e)	Keith Ferguson and Johanna Molina-Parks

Int/POD No.	Begin Bates Number	End Bates Number	Description	No. of Pages	Line/Col	Florida Statute 366.093 (3) Subsection	Declarant
OPC 11 th POD, No. 129	066439	066440	FPL-2020_Palms Risk_Redacted.pdf	2	All	(d), (e)	Keith Ferguson and Johanna Molina-Parks
OPC 11 th POD, No. 129	066441	066442	Gulf-2019_Palms Builders_Redacted.pdf	2	All	(d), (e)	Keith Ferguson and Johanna Molina-Parks
OPC 11 th POD, No. 129	066443	066446	Gulf-2019_Palms CWCI_Redacted.pdf	4	All	(d), (e)	Keith Ferguson and Johanna Molina-Parks
OPC 11 th POD, No. 129	066447	066449	Gulf-2019_Palms Excess_Redacted.pdf	3	All	(d), (e)	Keith Ferguson and Johanna Molina-Parks
OPC 11 th POD, No. 129	066450	066451	Gulf-2019_Palms Excess_Redacted.pdf	2	All	(d), (e)	Keith Ferguson and Johanna Molina-Parks
OPC 11 th POD, No. 129	066452	066453	Gulf-2019_Palms Excess_Redacted.pdf	2	All	(d), (e)	Keith Ferguson and Johanna Molina-Parks
OPC 11 th POD, No. 129	066454	066454	Gulf-2019_Palms Fleet_Redacted.pdf	1	All	(d), (e)	Keith Ferguson and Johanna Molina-Parks
OPC 11 th POD, No. 129	066455	066457	Gulf-2020_Palms All Risk_Redacted.pdf	3	All	(d), (e)	Keith Ferguson and Johanna Molina-Parks
OPC 11 th POD, No. 129	066458	066460	Gulf-2020_Palms All Risk_Redacted.pdf	3	All	(d), (e)	Keith Ferguson and Johanna Molina-Parks
OPC 11 th POD, No. 129	066461	066464	Gulf-2020_Palms CWCI_Redacted.pdf	4	All	(d), (e)	Keith Ferguson and Johanna Molina-Parks
OPC 11 th POD, No. 129	066465	066466	Gulf-2020_Palms Excess_Redacted.pdf	2	All	(d), (e)	Keith Ferguson and Johanna Molina-Parks
OPC 11 th POD, No. 129	066467	066468	Gulf-2020_Palms Fleet_Redacted.pdf	2	All	(d), (e)	Keith Ferguson and Johanna Molina-Parks

Int/POD No.	Begin Bates Number	End Bates Number	Description	No. of Pages	Line/Column	Florida Statute 366.093 (3) Subsection	Declarant
OPC 11 th POD, No. 129	066469	066474	Gulf-2021_Palms Reimbursement_Redacted.pdf	6	All	(d), (e)	Keith Ferguson and Johanna Molina-Parks

Docket No. 20210015-EI

FIRST REVISED EXHIBIT “D”

FIRST REVISED EXHIBIT D

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Petition by Florida Power & Light
Company for Base Rate Increase and Rate
Unification

Docket No: 20210015-EI

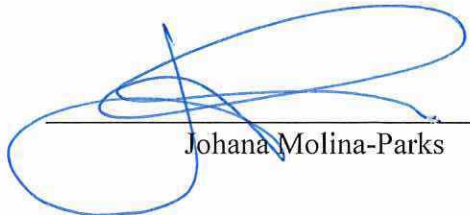
DECLARATION OF JOHANA MOLINA-PARKS

1. My name is Johana Molina-Parks. I am currently employed by Florida Power & Light Company (“FPL”) as Director, Risk Management. 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 OPC’s Thirteenth Set of Interrogatories, No. 236, and Eleventh Request for Production of Documents, Nos. 128 and 129. The documents or materials that I have reviewed and which are asserted by FPL to be 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 insurance costs and projected insurance costs. To the best of my knowledge, FPL has maintained the confidentiality of these documents and materials.

3. Nothing has occurred since the issuance of Order No. PSC-2021-0279-CFO-EI to render the designated information stale or public, such that continued confidential treatment would not be appropriate. Therefore, consistent with the provisions of the Florida Administrative Code, such materials should remain confidential for a period of at least an additional 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.



Johana Molina-Parks

Date: 1-27-23

FIRST REVISED EXHIBIT D

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Petition by Florida Power & Light
Company for Base Rate Increase and Rate
Unification

Docket No: 20210015-EI

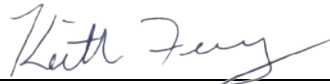
DECLARATION OF KEITH FERGUSON

1. My name is Keith Ferguson. I am currently employed by Florida Power & Light Company (“FPL”) as Vice President, Accounting and Controller. 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 OPC’s Thirteenth Set of Interrogatories No. 236, and Eleventh Request for Production of Documents, No. 129. The documents or materials that I have reviewed and which are asserted by FPL to be proprietary confidential business information contain 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. Specifically, the information contains insurance costs and projected insurance costs. To the best of my knowledge, FPL has maintained the confidentiality of these documents and materials.

3. Nothing has occurred since the issuance of Order No. PSC-2021-0279-CFO-EI to render the designated information stale or public, such that continued confidential treatment would not be appropriate. Therefore, consistent with the provisions of the Florida Administrative Code, such materials should remain confidential for a period of at least an additional 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 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.



Keith Ferguson

Date: 1/27/2023