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March 15, 2023

VIA ELECTRONIC FILING

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

Re: Docket No. 20210015-EI
In re: Petition by Florida Power & Light Company for
Rate Unification and for Base Rate Increase

Dear Mr. Teitzman:

Enclosed for filing in the above-referenced docket, please find Florida Power & Light Company's First Request for Extension of Confidential Classification of Document No. 09728-2021.

If you or your staff have any question regarding this filing, please contact me at (561) 691-7144.

Respectfully submitted,

By: s/Christopher T. Wright
Christopher T. Wright
Fla. Auth. House Counsel No. 1007055

Enclosures

cc: Certificate of Service

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: March 15, 2023

**FLORIDA POWER & LIGHT COMPANY'S
FIRST REQUEST FOR EXTENSION OF CONFIDENTIAL CLASSIFICATION OF
CERTAIN INFORMATION PROVIDED IN ITS RESPONSES TO LULAC'S
FOURTH REQUEST FOR PRODUCTION OF DOCUMENTS NOS. 38 AND 39.**

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 for certain information provided in its responses to Florida Rising, League of United Latin American Citizens and Environmental Confederation of Southwest Florida's (collectively, "LULAC") Fourth Request for Production of Documents Nos. 38 and 39 (the "Confidential Information"). In support of its Request, FPL states as follows:

1. On August 25, 2021, FPL filed a Request for Confidential Classification of the Confidential Information (Document No. 09728-2021). By Order No. PSC-2021-0348-CFO-EI issued September 15, 2021, the Commission granted FPL's August 25, 2021 Request for Confidential Classification. FPL herein adopts and incorporates by reference the August 25, 2021 Request for Confidential Classification and Order No. PSC-2021-0348-CFO-EI.

2. The period of confidential treatment granted by Order No. PSC-2021-0348-CFO-EI will expire on March 15, 2023. The Confidential Information that was the subject of FPL's August 25, 2021 Request and Order No. PSC-2021-0348-CFO-EI warrants continued treatment as proprietary and confidential business information within the meaning of Section 366.093(3). Accordingly, FPL hereby submits this First Request for Extension of Confidential Classification.

3. All of the information designated in Exhibits A and B to the August 25, 2021 Request remains confidential. Accordingly, those exhibits will not be reproduced or reattached here.

4. Regarding First Revised Exhibit C, all of the information listed in the August 25, 2021 Request remains confidential; the Exhibit is revised only to identify Andrew Whitley and Timothy Oliver as new declarants, who are sponsoring information that was previously sponsored by Steve Sim and Matt Valle, respectively.

5. Also included is First Revised Exhibit D, which consists of the declarations of Andrew Whitley and Timothy Oliver.

6. 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.

7. As stated in FPL's August 25, 2021 Request and as described in the declarations included as First Revised Exhibit D, the Confidential Information consists of information competitive business information the disclosure of which would impair the competitive business of the provider of the information, as well as information concerning contractual data, the disclosure of which would impair the efforts of FPL to contract for goods or services on favorable terms. Specifically, the materials contain information regarding software that is provided to FPL as part of a subscription service, and such software is proprietary to a third-party vendor; the

materials also contain pricing and cost data related to electric vehicle charging that can be used to derive vendor product bid pricing. To the best of my knowledge, FPL has maintained the confidentiality of these documents and materials. This information is protected by Sections 366.093(3)(d) and (e), Fla. Stat.

8. 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, FPL respectfully requests that its First Request for Extension of Confidential Classification be granted.

Respectfully submitted,

FLORIDA POWER & LIGHT COMPANY

By: *s/ Christopher T. Wright*
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Phone: 561-691-7144
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Email: christopher.wright@fpl.com

CERTIFICATE OF SERVICE
20210015-EI

I HEREBY CERTIFY that a true and correct copy of the foregoing has been furnished by electronic mail this 15th day of March 2023 to the following parties:

Suzanne Brownless
Bianca Lherisson
Shaw Stiller
Florida Public Service Commission
Office of the General Counsel
2540 Shumard Oak Boulevard
Tallahassee, Florida 32399-0850
sbrownle@psc.state.fl.us
blheriss@psc.state.fl.us
sstiller@psc.state.fl.us

By: *s/Christopher T. Wright* _____

Christopher T. Wright

Fla. Auth. House Counsel No. 1007055

FIRST REVISED EXHIBIT C

COMPANY: Florida Power & Light Company
TITLE: Petition by Florida Power & Light Company for Base Rate Increase and Rate Unification Company
DOCKET NO.: 20210015-EI
DATE: March 15, 2023

Bold indicates a new declarant.

Int/POD No.	Begin Bates Number	End Bates Number	Description	Confidential	Page No.	Line/Col	Florida Statute 366.093 (3) Subsection	Declarant
LULAC 4 th POD, No. 37	070629	070629	AURORA SolarTogether Phase 2 RATE CASE_CONFIDENTIAL_Archive (Bates 070629)	Y	All	All	(e)	Andrew Whitley
LULAC 4 th POD, No. 37	070630	070630	OutputDB_AURORA_with_SolarTogether_Phase 2_CONFIDENTIAL (Bates 070630)	Y	All	All	(e)	Andrew Whitley
LULAC 4 th POD, No. 37	070631	070631	OutputDB_AURORA_without_SolarTogether_Phase2_CONFIDENTIAL (Bates 070631)	Y	All	All	(e)	Andrew Whitley
LULAC 4 th POD, No. 38	070673	070673	Residential EV CPVRR	Y	All	All	(d) (e)	Timothy Oliver

FIRST REVISED 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 TIMOTHY OLIVER

1. My name is Timothy Oliver. I am currently employed by Florida Power & Light Company (“FPL”) as Vice-President, Development. I have personal knowledge of the matters stated in this written declaration.

2. I have reviewed the documents referenced and incorporated in FPL’s First Request for Extension of Confidential Classification of certain information provided in its response to Florida Rising’s, the League of United Latin American Citizens’, and the Environmental Confederation of Southwest Florida’s Fourth Request for Production of Documents, No. 38. The documents or materials that I have reviewed and which are asserted by FPL to be proprietary confidential business information contain information relating to competitive interests, the disclosure of which would impair the competitive business of the provider of the information, as well as FPL’s ability to contract for goods or services on favorable terms. Specifically, the information contains pricing and cost data related to electric vehicle charging that can be used to derive vendor product bid pricing. To the best of my knowledge, FPL has maintained the confidentiality of these documents and materials.

3. Confidential treatment of the above-described information was granted by Commission Order No. PSC-2021-0348-CFO-EI issued September 15, 2021. Nothing has occurred since that time to change the confidential nature of this information and, as such, these 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 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.



Timothy Oliver

Date: 3/14/23

FIRST REVISED 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 ANDREW WHITLEY

1. My name is Andrew Whitley. I am currently employed by Florida Power & Light Company (“FPL”) as Engineering Manager, 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 First Request for Extension of Confidential Classification of certain information provided in its response to Florida Rising’s, the League of United Latin American Citizens’, and the Environmental Confederation of Southwest Florida’s Fourth Request for Production of Documents, No. 37. 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 materials contain information regarding software that is provided to FPL as part of a subscription service, and such software is proprietary to a third party vendor. To the best of my knowledge, FPL has maintained the confidentiality of these documents and materials.

3. Confidential treatment of the above-described information was granted by Commission Order No. PSC-2021-0348-CFO-EI issued September 15, 2021. Nothing has occurred since that time to change the confidential nature of this information and, as such, these 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 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 Whitley

Date: 3/13/2023