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Admitted in Pennsylvania

March 17, 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**

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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. 08318-2021.

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 17, 2023

**FLORIDA POWER & LIGHT COMPANY'S  
FIRST REQUEST FOR EXTENSION OF CONFIDENTIAL CLASSIFICATION OF  
CERTAIN INFORMATION PROVIDED IN ITS RESPONSES TO LULAC'S  
THIRD REQUEST FOR PRODUCTION OF DOCUMENTS NO. 25.**

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") Third Request for Production of Documents No. 25 (the "Confidential Information"). In support of its Request, FPL states as follows:

1. On July 26, 2021, FPL filed a Request for Confidential Classification of the Confidential Information (Document No. 08318-2021). By Order No. PSC-2021-0366-CFO-EI issued September 17, 2021, the Commission granted FPL's July 26, 2021 Request for Confidential Classification. FPL herein adopts and incorporates by reference the July 26, 2021 Request for Confidential Classification and Order No. PSC-2021-0366-CFO-EI.

2. The period of confidential treatment granted by Order No. PSC-2021-0366-CFO-EI will expire on March 17, 2023. The Confidential Information that was the subject of FPL's July 26, 2021 Request and Order No. PSC-2021-0366-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 July 26, 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 July 26, 2021 Request remains confidential; the Exhibit is revised only to identify Scott Bores as a new declarant, who is sponsoring information that was previously sponsored by Robert Barrett.

5. Also included is First Revised Exhibit D, which consists of the declarations of Scott Bores, James Coyne, and John Reed.

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 July 26, 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. Specifically, some information contains data provided by a third-party vendor which is proprietary to the vendor, also some of the information contains financial forecasts and projected interest rates, and rating agency reports. This information is protected by Sections 366.093(3)(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* \_\_\_\_\_

Christopher T. Wright

Senior Counsel

Fla. Auth. House Counsel No. 1007055

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 17<sup>th</sup> day of March 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

sstiller@psc.state.fl.us

By: *s/Christopher T. Wright* \_\_\_\_\_

Christopher T. Wright

Fla. Auth. House Counsel No. 1007055

**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 17, 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 3 <sup>rd</sup> POD No. 25	068773	068777	LULAC POD 25 2021-2023 LTD Issuances CONFIDENTIAL	Y	All	All	(e)	<b>Scott Bores</b>
LULAC 3 <sup>rd</sup> POD No. 25	068650	068650	LULAC POD 25 NextEra Energy Inc NYSE NEE Credit Stats Direct Financials Capital Structure CONFIDENTIAL	Y	All	All	(e)	<b>Scott Bores</b>
LULAC 3 <sup>rd</sup> POD No. 25	068778	068791	LULAC POD 25 Exhibit SRB-12 - 2024 and 2025 Revenue Requirements CONFIDENTIAL	N	All	All	(e)	Scott Bores
LULAC 3 <sup>rd</sup> POD No. 25	068792	068794	LULAC POD 25 Exhibit SRB-12 - 2024 and 2025 Revenue Requirements CONFIDENTIAL	Y	All	All	(e)	Scott Bores

Int/POD No.	Begin Bates Number	End Bates Number	Description	Confidential	Page No.	Line/Col	Florida Statute 366.093 (3) Subsection	Declarant
LULAC 3 <sup>rd</sup> POD No. 25	068795	068795	LULAC POD 25 Exhibit SRB-12 - 2024 and 2025 Revenue Requirements_CONFIDENTIAL	N	All	All	(e)	Scott Bores
LULAC 3 <sup>rd</sup> POD No. 25	068651	068653	LULAC POD 25, Attachment 6_Risk Premium Analysis [CONFIDENTIAL]	Y	All	All	(e)	James Coyne
LULAC 3 <sup>rd</sup> POD No. 25	068654	068655	LULAC POD 25, Attachment 12_Authorized Electric ROEs CONFIDENTIAL	Y	All	All	(e)	James Coyne
LULAC 3 <sup>rd</sup> POD No. 25	068656	068656	LULAC POD 25, Attachment 13_Authorized Electric Equity Ratios [CONFIDENTIAL]	Y	All	All	(e)	James Coyne
LULAC 3 <sup>rd</sup> POD No. 25	068657	068707	LULAC POD 25, Attachment 15_FN 11_Moody's Utilities rating methodology 2017 [CONFIDENTIAL]	Y	All	All	(e)	James Coyne
LULAC 3 <sup>rd</sup> POD No. 25	068717	068751	LULAC POD 25 - Confidential Exhibit JJR-16 Workpaper	N	All	All	(e)	John Reed
LULAC 3 <sup>rd</sup> POD No. 25	068752	068752	LULAC POD 25 - Confidential Exhibit JJR-16 Workpaper	Y	All	All	(e)	John Reed
LULAC 3 <sup>rd</sup> POD No. 25	068753	068755	LULAC POD 25 - Confidential Exhibit JJR-16 Workpaper	N	All	All	(e)	John Reed

**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 SCOTT BORES**

1. My name is Scott Bores. I am currently employed by Florida Power & Light Company ("FPL") as Vice President, Finance. I have personal knowledge of the matters stated in this declaration.

2. I have reviewed the documents referenced and incorporated in FPL's First Request for Extension of Confidential Classification for certain information provided in its response to Florida Rising's, League Of United Latin American Citizens', and Environmental Confederation Of Southwest Florida's Third Request for Production of Documents No. 25. The documents or materials that I have reviewed and which are 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. Specifically, the information contains financial forecasts and projected interest rates, as well as information relating to rating agency reports. 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-2021-0366-CFO-EI issued September 17, 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.

  
\_\_\_\_\_  
Scott Bores

Date: 03/10/2023

**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 JAMES COYNE**

1. My name is James Coyne. I am employed by Concentric Energy Advisors, Inc. as a Senior Vice President. I have personal knowledge of the matters stated in this declaration.

2. I have reviewed the documents referenced and incorporated in FPL's First Request for Extension of Confidential Classification for certain information provided in its response to Florida Rising's, League Of United Latin American Citizens', and Environmental Confederation Of Southwest Florida's Third Request for Production of Documents No. 25. 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 information is data that is proprietary to a third party vendor who provided it to Concentric pursuant to a subscription agreement. 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-2021-0366-CFO-EI issued September 17, 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.

  
\_\_\_\_\_  
James Coyne

Date: March 13, 2023

**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

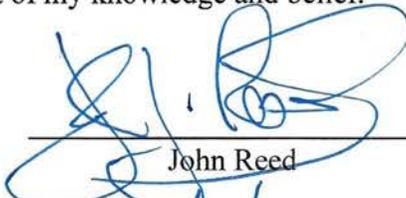
**DECLARATION OF JOHN REED**

1. My name is John Reed. I am the Chairman and Chief Executive Officer of Concentric Energy Advisors, Inc. I have personal knowledge of the matters stated in this declaration.

2. I have reviewed the documents referenced and incorporated in FPL's First Request for Extension of Confidential Classification for certain information provided in its response to Florida Rising's, League Of United Latin American Citizens', and Environmental Confederation Of Southwest Florida's Third Request for Production of Documents No. 25. 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 information is data that is proprietary to a third party vendor who provided it to Concentric pursuant to a subscription agreement. 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-2021-0366-CFO-EI issued September 17, 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.

  
\_\_\_\_\_  
John Reed  
Date: 3/13/2023