

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Review of Storm Protection Plan,
pursuant to Rule 25-6.030, F.A.C., Florida
Power & Light Company

Docket No. 20220051-EI

Filed: October 20, 2023

**FLORIDA POWER & LIGHT COMPANY'S
FIRST REQUEST FOR EXTENSION OF CONFIDENTIAL CLASSIFICATION OF
CERTAIN INFORMATION PROVIDED IN ITS FIRST RESPONSE TO OFFICE OF
PUBLIC COUNSEL'S FIRST REQUEST FOR PRODUCTION OF DOCUMENTS, NO. 1**

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") First Request for Production of Documents No. 1 (the "Confidential Information"). In support of its Request, FPL states as follows:

1. On April 14, 2022, FPL filed a Request for Confidential Classification of the Confidential Information (Document No. 02426-2022). By Order No. PSC-2022-0148-CFO-EI issued April 21, 2022, the Commission granted FPL's April 14, 2022 Request for Confidential Classification. FPL herein adopts and incorporates by reference the April 14, 2022 Request for Confidential Classification and Order No. PSC-2022-0148-CFO-EI.

2. The period of confidential treatment granted by Order No. PSC-2022-0148-CFO-EI will expire on October 21, 2023. The Confidential Information that was the subject of FPL's April 14, 2022 Request and Order No. PSC-2022-0148-CFO-EI warrants continued treatment as proprietary and confidential business information within the meaning of Section 366.093(3). Accordingly, FPL hereby submits its First Request for Extension of Confidential Classification.

3. All of the information designated in Exhibits A, B and C to the April 14, 2022 Request remains confidential. Accordingly, those exhibits will not be reproduced or reattached here.

4. Attached hereto is the First Revised Exhibit D, which consists of the declaration of Francisco Prieto.

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, Florida Statutes, 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 stated in FPL's April 14, 2022 Request and as described in the declaration attached as First Revised Exhibit D, the Confidential Information includes proprietary security measures, systems, or procedures. This information is protected by Sections 366.093(3)(c), Florida Statutes.

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), Florida Statutes.

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,

By: *s/Christopher T. Wright*
Christopher T. Wright
Managing Attorney
Fla. Auth. House Counsel No. 1007055
Florida Power & Light Company
700 Universe Boulevard (LAW/JB)
Juno Beach, FL 33408-0420
Phone: 561-691-7144
Fax: 561-691-7135
Email: christopher.wright@fpl.com

FIRST REVISED EXHIBIT D

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Review of Storm Protection
Plan, pursuant to Rule 25-6.030,
F.A.C., Florida Power & Light
Company

Docket No. 20220051-EI

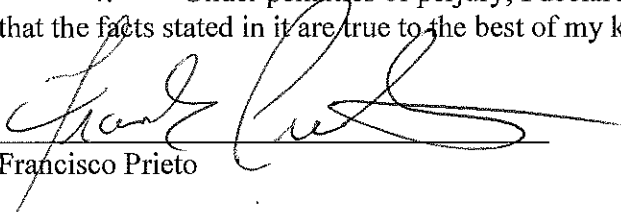
WRITTEN DECLARATION OF FRANCISCO PRIETO

1. My name is Francisco Prieto. I am currently employed by Florida Power & Light Company ("FPL") as Senior Director of System Operations, Transmission and Substations. I have personal knowledge of the matters stated in this written declaration.

2. I have reviewed the documents and information included in Exhibit A of FPL's April 14, 2022 Request for Confidential Classification. The documents and files that I have reviewed and which are asserted by FPL to be proprietary confidential business information contain or constitute information concerning security measures, systems, or procedures. To the best of my knowledge, FPL has maintained the confidentiality of this information.

3. Nothing has occurred since the issuance of Order No. PSC-2022-0148-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 Section 366.093, Florida Statutes, and Rule 25-22.006, 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.


Francisco Prieto

Date: 10/19/23

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing has been furnished by electronic mail to the following parties of record this 20th day of October 2023:

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| <p>Adria Harper, Esquire Jacob Imig, Esquire Samantha Cibula, Esquire Florida Public Service Commission 2540 Shumard Oak Boulevard Tallahassee, FL 32399 aharper@psc.state.fl.us jimig@psc.state.fl.us scibula@psc.state.fl.us <i>For Commission Staff</i></p> | <p>Office of Public Counsel c/o The Florida Legislature 111 West Madison Street, Room 812 Tallahassee, FL 32399-1400 rehwinkel.charles@leg.state.fl.us wessling.mary@leg.state.fl.us christensen.patty@leg.state.fl.us <i>For Office of Public Counsel</i></p> |
| <p>Stephanie U. Eaton SPILMAN THOMAS & BATTLE, PLLC 110 Oakwood Drive, Suite 500 Winston-Salem, NC 27103 seaton@spilmanlaw.com</p> <p>Derrick Price Williamson Steven W. Lee SPILMAN THOMAS & BATTLE, PLLC 1100 Bent Creek Boulevard, Suite 101 Mechanicsburg, PA 17050 dwilliamson@spilmanlaw.com slee@spilmanlaw.com <i>For Walmart Inc.</i></p> | <p>Dianne M. Triplett Deputy General Counsel Duke Energy Florida, LLC 299 First Avenue North St. Petersburg, FL 33701 Dianne.Triplett@Duke-Energy.com</p> <p>Matthew R. Bernier Robert L. Pickels Stephanie A. Cuello 106 E. College Avenue, Suite 800 Tallahassee FL 32301 FLRegulatoryLegal@duke-energy.com matthew.bernier@duke-energy.com robert.pickels@duke-energy.com stephanie.cuello@duke-energy.com <i>For Duke Energy Florida, LLC</i></p> |
| <p>Beth Keating Gunster, Yoakley & Stewart, P.A. 215 South Monroe St., Suite 601 Tallahassee, FL 32301 BKeating@gunster.com</p> <p>Mr. Mike Cassel 208 Wildlight Ave. Yulee FL 32097 mcassel@fpuc.com <i>For Florida Public Utilities Company</i></p> | <p>J. Jeffrey Wahlen Malcolm M. Means Ausley McMullen Post Office Box 391 Tallahassee, Florida 32302 jwahlen@ausley.com mmeans@ausley.com</p> <p>Ms. Paula K. Brown Regulatory Affairs P. O. Box 111 Tampa FL 33601-0111 regdept@tecoenergy.com <i>For Tampa Electric Company</i></p> |

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| <p>George Cavros 120 E. Oakland Park Blvd., Suite 105 Fort Lauderdale, FL 33334 george@cavros-law.com <i>For Southern Alliance for Clean Energy</i></p> | <p>Jon C. Moyle, Jr. Karen A. Putnal Moyle Law Firm, P.A. 118 North Gadsden Street Tallahassee, Florida 32301 jmoyle@moylelaw.com kputnal@moylelaw.com mqualls@moylelaw.com <i>For Florida Industrial Power Users Group</i></p> |
| <p>James W. Brew/Laura Wynn Baker c/o Stone Law Firm 1025 Thomas Jefferson St., NW, Eighth Floor, West Tower Washington DC 20007 jbrew@smxblaw.com lwb@smxblaw.com <i>For PSC Phosphate – White Springs</i></p> | |

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

Attorney for Florida Power & Light Company