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July 11, 2016

VIA HAND DELIVERY

Ms. Carlotta S. Stauffer
Division of the Commission Clerk and Administrative Services
Florida Public Service Commission
2540 Shumard Oak Blvd.
Tallahassee, FL 32399-0850

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COMMISSION CLERK

Re: Docket Nos. 160021-EI, 160061-EI, 160062-EI, 160088-EI

Dear Ms. Stauffer:

I enclose for filing in the above dockets Florida Power & Light Company's ("FPL's") Fourth Request for Confidential Classification of information provided in response to discovery. The request includes Exhibits A, B (two copies), C and D.

Exhibit A consists of the confidential documents, and is provided on a CD pursuant to a request by the Florida Public Service Commission Staff. Exhibit B consists of cover pages identifying the confidential pages of Exhibit A. 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.

Please contact me if you or your Staff has any questions regarding this filing.

Sincerely,

Maria J. Moncada

REDACTED

COM _____

AFD 1 redacted only

APA _____ Enclosure

ECO _____

ENG _____ cc: Counsel for Parties of Record (w/ copy of FPL's Request for Confidential Classification)

GCL _____

IDM _____

TEL _____

CLK _____

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Petition for rate increase by Florida Power & Light Company	Docket No. 160021-EI
In re: Petition for approval of 2016-2018 storm hardening plan, by Florida Power & Light Company	Docket No. 160061-EI
In re: 2016 depreciation and dismantlement study by Florida Power & Light Company	Docket No. 160062-EI
In re: Petition for limited proceeding to modify and continue incentive mechanism by Florida Power & Light Company	Docket No. 160088-EI Filed: July 11, 2016

**FLORIDA POWER & LIGHT COMPANY'S
FOURTH REQUEST FOR CONFIDENTIAL CLASSIFICATION
OF INFORMATION PROVIDED IN RESPONSE TO DISCOVERY**

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 discovery requests ("Confidential Discovery Responses") propounded by Office of Public Counsel ("OPC"). In support of its Request, FPL states as follows:

1. On July 7, 2016, the Florida Public Commission Staff requested that FPL provide an electronic copy of a file that was produced as part of FPL's response to OPC's First Request for Production of Documents (No. 2). Specifically, Staff requested the file entitled "*100 percent CONFIDENTIAL – Exhs. JJR-3,4,6,7,8,9.xls*." ("Confidential Discovery Response").

2. 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 in Microsoft Excel format provided on a disc. The file is confidential in its entirety.

b. Exhibit B consists of cover pages identifying the confidential pages of Exhibit A.

c. Exhibit C is a table containing an identification of the file provided in Exhibit A. Exhibit C also references the specific statutory bases for the claim of confidentiality and identifies the declarant who supports of the requested classification.

d. Exhibit D contains the declaration of Mark Catrell in support of this Request.

3. 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 determined 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.

4. As described more fully in the declaration included as Exhibit D, the Confidential Discovery Response provided by FPL relate to competitive interests, the disclosure of which would impair the competitive business of the provider of the information, Concentric Energy Advisors. This information is protected by Section 366.093(3)(e), Fla. Stat.

5. 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 declarations included herewith, Florida Power & Light Company respectfully requests that its Request for Confidential Classification be granted.

Respectfully submitted,

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By: _____


Maria J. Moncada
Florida Bar No. 0773301

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing Request for Confidential Classification has been furnished by electronic mail this 11th day of July 2016 to the following parties:

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By: 

Maria J. Moncada
Florida Bar No. 0773301

* 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 A

CONFIDENTIAL

FILED UNDER SEPARATE COVER

CONFIDENTIAL

EXHIBIT B

REDACTED COPIES

**FPL's response to
OPC's 1st Request for Production No. 2
Bates No. OPC 014513
is confidential in its entirety**

**FPL's response to
OPC's 1st Request for Production No. 2
Bates No. OPC 014514
is confidential in its entirety**

**FPL's response to
OPC's 1st Request for Production No. 2
Bates No. OPC 014515
is confidential in its entirety**

**FPL's response to
OPC's 1st Request for Production No. 2
Bates No. OPC 014516
is confidential in its entirety**

**FPL's response to
OPC's 1st Request for Production No. 2
Bates No. OPC 014517
is confidential in its entirety**

**FPL's response to
OPC's 1st Request for Production No. 2
Bates No. OPC 014518
is confidential in its entirety**

**FPL's response to
OPC's 1st Request for Production No. 2
Bates No. OPC 014519
is confidential in its entirety**

**FPL's response to
OPC's 1st Request for Production No. 2
Bates No. OPC 014520
is confidential in its entirety**

**FPL's response to
OPC's 1st Request for Production No. 2
Bates Nos. OPC 014521-014528
are confidential in their entirety**

**FPL's response to
OPC's 1st Request for Production No. 2
Bates Nos. OPC 014529-014552
are confidential in their entirety**

**FPL's response to
OPC's 1st Request for Production No. 2
Bates No. OPC 014553
is confidential in its entirety**

**FPL's response to
OPC's 1st Request for Production No. 2
Bates No. OPC 014554
is confidential in its entirety**

**FPL's response to
OPC's 1st Request for Production No. 2
Bates No. OPC 014555
is confidential in its entirety**

EXHIBIT C

JUSTIFICATION TABLE

EXHIBIT C

COMPANY: Florida Power & Light Company
TITLE: List of Confidential Documents
DOCKET NO: 160021-EI
DOCKET TITLE: Petition for Increase in Rates by Florida Power & Light Company
DATE: July 11, 2016

Discovery Set	Item No.	Bates Number	Conf. Y/N	Line/Column	Florida Statute 366.093(3) Subsection	Declarant
OPC First Request for Production	2 File Name: <i>100 percent CONFIDENTIAL</i> – Exhs. JJR-3,4,6,7,8,9.xls (provided on a CD)	OPC 014513	Y	ALL	(e)	Mark Catrell
		OPC 014514				
		OPC 014515				
		OPC 014516				
		OPC 014517				
		OPC 014518				
		OPC 014519				
		OPC 014520				
		OPC 014521-014528				
		OPC 014529-014552				
		OPC 014553				
		OPC 014554				
		OPC 014555				

EXHIBIT D

DECLARATION

