

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: February 12, 2018

FLORIDA POWER & LIGHT COMPANY'S FIRST REQUEST FOR EXTENSION OF CONFIDENTIAL CLASSIFICATION

Pursuant to Section 366.093, Florida Statutes (“Section 366.093”), and Rule 25-22.006, Florida Administrative Code, Florida Power & Light Company (“FPL”) hereby submits its First Request for Extension of Confidential Classification of information provided in response to AARP’s First Request for Production of Documents (No. 36), Florida Industrial Power Users Group’s Second Request for Production of Documents (No. 27), Office of Public Counsel’s (“OPC”) Eleventh Request for Production of Documents (No. 127), South Florida Hospital and Healthcare’s (“SFHHA”) Fourth Request for Production of Documents (No. 104, and SFHHA’s Seventh Request for Production of Documents (Nos. 144, 148 and 158) (“Confidential Discovery Responses”). In support of this request, FPL states as follows:

1. On July 22, 2016, FPL filed a Request for Confidential Classification of the Confidential Information, which included Exhibits A, B, C and D (“July 22, 2016 Request”). Document Nos. 05505-16, 05506-16. By Order No. PSC-16-0327-CFO-EI, dated August 11, 2016 (“Order 0327”), the Commission granted FPL’s July 22, 2016 Request. FPL adopts and incorporates by reference the July 22, 2016 and Order 0327.

2. The period of confidential treatment granted by Order 0327 will soon expire. The Confidential Discovery Responses that were the subject of FPL's July 22, 2016 Request and Order 0327 warrant 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 and B to the July 22, 2016 Request remain confidential. Accordingly, those exhibits will not be reproduced or reattached here. Regarding First Revised Exhibit C, all of the information listed in the July 22, 2016 Request remains confidential; the Exhibit is revised only to identify Charles Rote and Alex Zappani as new declarants.

4. Also included is First Revised Exhibit D, which consists of the declarations of Dave Bromley, Sam Forrest, Kimberly Herron, Sean Miller, Charles Rote and Alex Zappani in support of this Request.

5. The Confidential Discovery Responses are intended to be and have 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, 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 more fully in the declarations included as First Revised Exhibit D, certain Confidential Discovery Responses provided by FPL contain information bids or other contractual data, the disclosure of which would impair the efforts of FPL or its vendors to

contract for goods or services on favorable terms. This information is protected by Section 366.093(3)(d), Fla. Stat.

7. Also, certain information relates to competitive interests, the disclosure of which would impair the competitive business of the provider of the information. This information is protected by Section 366.093(3)(e), Fla. Stat.

8. 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 foregoing reasons, as more fully set forth in the supporting materials and declarations, Florida Power & Light Company respectfully requests that its First Request for Extension of Confidential Classification be granted.

Respectfully submitted,

John T. Butler
Assistant General Counsel - Regulatory
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By: s/ Maria J. Moncada
Maria J. Moncada
Florida Bar No. 0773301

CERTIFICATE OF SERVICE
Docket No. 20160021-EI

I **HEREBY CERTIFY** that a true and correct copy of the foregoing First Request for Extension of Confidential Classification has been furnished by electronic mail this 12th day of February 2018 to the following parties:

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By: s/ Maria J. Moncada
Maria J. Moncada
Florida Bar No. 0773301

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FIRST REVISED EXHIBIT C

EXHIBIT C

COMPANY: Florida Power & Light Company
TITLE: List of Confidential Documents
DOCKET NO: 20160021-EI
DOCKET TITLE: Petition for Increase in Rates by Florida Power & Light Company
DATE: February 12, 2018

Bold denotes a new declarant.

Discovery Set	Item No.	Conf. Y/N	Bates Number	Line / Column	Florida Statute 366.093(3) Subsection	Declarant
AARP First Request for Production	36	Y	AARP 003468-003474	Cols. C, E-H, Lns. 1-500 Cols. D-H, Ln. 502	(e)	Alex Zappani
			AARP 003475-003484	Cols. C, E-I, Lns. 503-1297 Cols. D-I, Ln. 1299		
			AARP 003485-003491	Cols. C, E-H, Lns. 1300-1794 Cols. D-H, Ln. 1796		
			AARP 003525-003534	Cols. C, E-H, Lns. 1-375 Cols. D-H, Ln. 377 Cols. D-E, Ln. 378		
			AARP 003535-003546	Cols. C, E-H Lns. 379-1173 Cols. D-H, Ln. 1175		
			AARP 003547-003554	Cols. C, E-H Lns. 1176-1670 Cols. D-H, Ln. 1672 Cols. D-E, Ln. 1673		
			AARP 003555-003575	Cols. C, E-H Lns. 1-1041 Cols. D-H, Ln. 1043		

Discovery Set	Item No.	Conf. Y/N	Bates Number	Line / Column	Florida Statute 366.093(3) Subsection	Declarant
AARP First Request for Production	36	Y	AARP 003576-003587	Cols. C, E-H Lns. 1044-1838 Cols. D-H, Ln. 1840	(e)	Alex Zappani
			AARP 003588-003596	Cols. C, E-H Lns. 1842-2336 Cols. D-H, Ln. 2338		
FIPUG Second Request for Production	27* INT 37	Y	FIPUG 000804	Lns. 16a, 16b, 17a, 17b	(e)	Sean Miller
		N	FIPUG 000805			
		Y	FIPUG 000806	Lns. 7a, 7b, 7c, 12a, 12b, 12c, 13a, 17a, 17b, 17c, 18a	(e)	Sean Miller
		Y	FIPUG 000807	Lns. 7a, 7b, 7c, 8a, 12a, 12b, 12c, 13a, 17a, 17b, 17c, 18a	(e)	Sean Miller
		Y	FIPUG 000808	Lns. 7a, 7b, 7c	(e)	Sean Miller
FIPUG Second Request for Production	27* INT 57	Y	FIPUG 000132-000173	ALL	(d), (e)	Kimberly Herron
			FIPUG 000174-000177			
			FIPUG 000178-000180			
			FIPUG 000181-000308			
			FIPUG 000309-000311			
			FIPUG 000321-000326			
			FIPUG 000327-000606			
			FIPUG 000607-000609			
			FIPUG 000610-000612			

*FIPUG's Second Request for Production of Documents, No. 27 requested documents identified in FPL's answers to FIPUG's Second Set of Interrogatories, Nos. 34-62. Bates nos. FIPUG 000804-808 were identified in FPL's answer to FIPUG's Interrogatory No. 37.

* Bates nos. FIPUG 000132-320 were identified in FPL's answer to FIPUG Interrogatory No. 57.

Discovery Set	Item No.	Conf. Y/N	Bates Number	Line / Column	Florida Statute 366.093(3) Subsection	Declarant	
FIPUG Second Request for Production	27* INT 5	Y	FIPUG 000613-000615	ALL	(d), (e)	Kimberly Herron	
			FIPUG 000616-000618				
			FIPUG 000619-000621				
			FIPUG 000622-000715				
			FIPUG 000716-000718				
			FIPUG 000719-000721				
	27* INT 57 on CD	Y	FIPUG 000312-000314	ALL	(d), (e)	Kimberly Herron	
			FIPUG 000315-000317				
			FIPUG 000318-000320				
	OPC Eleventh Request for Production	127	Y	OPC 027898-027907	ALL	(d), (e)	Sam Forrest
				OPC 027908-027909			
				OPC 027910-027911			
OPC 027912-027915							
OPC 027916-027919							
OPC 027920-027923							
OPC 027924-027926							
OPC 027927							
OPC 027928							
OPC 027929							
OPC 027930							
OPC 027931							
OPC 027932-027939							
OPC 027940-027947							
OPC 027948-027955							
OPC 027956-027961							
OPC 027962-027969							
OPC 027970-027977							

Discovery Set	Item No.	Conf. Y/N	Bates Number	Line / Column	Florida Statute 366.093(3) Subsection	Declarant
OPC Eleventh Request for Production	127	Y	OPC 027978-027984	ALL	(d), (e)	Sam Forrest
			OPC 027985-027992			
			OPC 027993-028000			
			OPC 028001-028007			
			OPC 028008-028015			
			OPC 028016-028023			
			OPC 028024-028030			
			OPC 028031-028038			
			OPC 028039-028046			
			OPC 028047-028054			
			OPC 028055-028062			
			OPC 028063-028070			
			OPC 028071-028078			
			OPC 028079-028085			
			OPC 028086-028093			
			OPC 028094-028101			
			OPC 028102-028109			
			OPC 028110-028117			
			OPC 028118-028124			
			OPC 028125-028132			
			OPC 028133-028140			
			OPC 028141-028147			
			OPC 028148-028155			
OPC 028156-028163						
OPC 028164-028170						
OPC 028171-028178						
OPC 028179-028186						

Discovery Set	Item No.	Conf. Y/N	Bates Number	Line / Column	Florida Statute 366.093(3) Subsection	Declarant
OPC Eleventh Request for Production	127	Y	OPC 028187-028188	ALL	(d), (e)	Sam Forrest
SFHHA Fourth Request of Production	104	Y	SFHHA 005387-005418	ALL	(d)	Dave Bromley
SFHHA Seventh Request of Production	144	N	SFHHA 007915			
		Y	SFHHA 007916	Lns. 5a, 6a, 11a, 12a	(e)	Charles Rote
SFHHA Seventh Request of Production	148	N	SFHHA 008346			
		Y	SFHHA 008347	Lns. 2-6	(e)	Sean Miller
		Y	SFHHA 008348	Col. E-F, Ln. 3 Lns. 6a, 7a, 8a, 9a, 10a, 11a 12a, 13a, 14a, 15, 16a, 17a, 18a	(e)	Sean Miller
		N	SFHHA 008349-008353			
		Y	SFHHA 008354	Col. F-G, Ln. 6 Lns. 22a, 23	(e)	Sean Miller
		N	SFHHA 008355-008360			
		Y	SFHHA 008361	Ln. 5a	(e)	Sean Miller
		Y	SFHHA 008362	Col. E-F, Ln. 3 Ln. 4, 7a, 8a, 10a, 11a, 12a	(e)	Sean Miller
		N	SFHHA 008363			
SFHHA Seventh Request of Production	158	N	SFHHA 007932-007936			
		Y	SFHHA 007937	Col. F-G, Ln. 6 Lns. 22a, 23	(e)	Sean Miller
		N	SFHHA 007938-007943			

Discovery Set	Item No.	Conf. Y/N	Bates Number	Line / Column	Florida Statute 366.093(3) Subsection	Declarant
SFHHA Seventh Request of Production	158	Y	SFHHA 007944	Ln. 5a	(e)	Sean Miller
		Y	SFHHA 007945	Col. E-F, Ln. 3 Ln. 4, 7a, 8a, 10a, 11a, 12a	(e)	Sean Miller
		N	SFHHA 007946			

FIRST REVISED EXHIBIT D

EXHIBIT D

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Petition for rate increase by Florida
Power & Light Company.

Docket No: 160021-EI

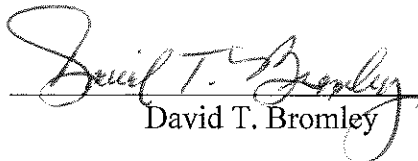
STATE OF FLORIDA)
)
COUNTY OF PALM BEACH) **WRITTEN DECLARATION OF**
) **DAVID T. BROMLEY**

1. My name is David T. Bromley. I am currently employed by Florida Power & Light Company ("FPL") as Manger, Regulatory Services. My business address is 7200 N.W. 4th Street, Plantation, Florida 33417. I have personal knowledge of the matters stated in this written declaration.

2. I have reviewed the document and information included in Exhibit A to FPL's Request for Confidential Classification filed this date, for which I am listed as the declarant on Exhibit C. The document contains information concerning contractual data, the disclosure of which would impair the efforts of the public utility or its affiliates to contract for goods and services on favorable terms. Specifically, the information contains information provided by aa third party which benchmarks FPL's performance against other. FPL is contractually required to maintain this information as confidential. 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-16-0327-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.



David T. Bromley

Date: JANUARY 17, 2018

EXHIBIT D

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Petition for rate increase by Florida
Power & Light Company

Docket No: 160021-EI

STATE OF FLORIDA)
)
COUNTY OF PALM BEACH) **DECLARATION OF SAM FORREST**

1. My name is Sam Forrest. I am currently employed by Florida Power & Light Company ("FPL") as Vice President of the Energy Marketing and Trading Business Unit. I have personal knowledge of the matters stated in this written declaration.

2. I have reviewed the documents and information included in Exhibit A to FPL's Request for Confidential Classification. The documents and materials in Exhibit A which are asserted by FPL to be proprietary confidential business information relating to competitive interests contain financial details related to FPL's asset optimization activities for natural gas and electric transmission. The disclosure of this information would impair FPL's ability to execute transactions for natural gas commodity sales, natural gas storage, natural gas transportation, wholesale purchases and sales, and electricity transmission on favorable terms for the benefit of its customers, would impair the competitive interests of FPL and its vendors, and would place FPL at a competitive disadvantage when coupled with other information that is publicly available. The information provided by FPL also contains or constitutes contractual data, the disclosure of which would impair the efforts of FPL to contract for goods or services on favorable terms. 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-16-0327-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, the materials 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.



SAM FORREST

Date: 1/25/18

EXHIBIT D

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Petition for base rate increase by Florida
Power & Light Company

Docket No: 160021-EI

STATE OF FLORIDA)
)
COUNTY OF PALM BEACH)

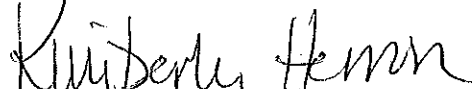
DECLARATION OF KIMBERLY HERRON

1. My name is Kimberly Herron. I am currently employed by Florida Power & Light Company ("FPL") as Sr. Sourcing Manager, Integrated Supply Chain Compliance. I have personal knowledge of the matters stated in this written declaration.

2. I have reviewed the documents and information included in Exhibit A to FPL's Request for Confidential Classification filed this date, for which I am listed as the declarant on Exhibit C. The documents that I have reviewed and which are asserted by FPL to be proprietary confidential business information contain or constitute contractual bid data and non-disclosure agreements. Disclosure of this information would impair the efforts of FPL to contract for these services on favorable terms for the benefit of its customers in the future and would impair the competitive interests of the vendor. The information also relates to competitive interests, the disclosure of which would impair the competitive business of the provider of the information. Specifically the documents include proposals for engineering, procurement and construction of solar projects. 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-16-0327-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.



KIMBERLY HERRON

Date: 1/18/18

EXHIBIT D

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Petition for base rate increase by
Florida Power & Light Company

Docket No: 160021-EI

STATE OF FLORIDA)
)
COUNTY OF PALM BEACH)

WRITTEN DECLARATION OF SEAN MILLER

1. My name is Sean Miller. I am currently employed by Florida Power & Light Company (“FPL”) as Senior Director for Project Development. I have personal knowledge of the matters stated in this written declaration.

2. I have reviewed the documents and information included in Exhibit A to FPL’s Request for Confidential Classification filed this date, for which I am listed as the declarant on Exhibit C. The documents that I have reviewed and which are asserted by FPL to be proprietary confidential business information contain or constitute information relating to competitive interests. Specifically, the documents contain project updates and financial data. The public disclosure of such information would impair the competitive business of the provider of the information. 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-16-0327-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.



SEAN MILLER

Date: 2/1/2018

EXHIBIT D

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Petition for rate increase by Florida
Power & Light Company.

Docket No: 160021-EI

STATE OF FLORIDA)
)
COUNTY OF PALM BEACH) **WRITTEN DECLARATION OF**
) **CHARLES ROTE**

1. My name is Charles Rote. I am currently employed by Florida Power & Light Company (“FPL”) as Business Service Manager, Power Generation Division. I have personal knowledge of the matters stated in this written declaration.

2. I have reviewed the documents included in FPL’s Request for Confidential Classification for which I am identified as a declarant. The documents or materials that I have reviewed are asserted by FPL to contain information concerning contractual data, the disclosure of which would impair the efforts of the FPL or its affiliates to contract for goods and services on favorable terms. The information also relates to competitive interests, the disclosure of which would impair the competitive business of the provider of the information. Specifically, the documents contain information related to future expected capacity, heat rate, and maintenance / replacement intervals for equipment purchased from third party vendors. The designated information is proprietary to the vendors. Public disclosure of this information would negatively impair the vendor’s competitive business. In addition, public disclosure would put FPL at a competitive disadvantage because it would negatively impact our ability to negotiate with vendors in the future, to the detriment of customers. 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-16-0327-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.

Charles Rote

Charles Rote

Date: 2/2/2028

EXHIBIT D

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Petition for rate increase by Florida
Power & Light Company.

Docket No: 160021-EI

STATE OF FLORIDA)
)
COUNTY OF PALM BEACH)

WRITTEN DECLARATION OF ALEX ZAPPANI

1. My name is Alex Zappani. I am currently employed by Florida Power & Light Company (“FPL”) as Director of Special Projects. I have personal knowledge of the matters stated in this written declaration.

2. I have reviewed the document and information included in Exhibit A to FPL’s Request for Confidential Classification filed this date, for which I am listed as the declarant on Exhibit C. The documents that I have reviewed and which are asserted by FPL to be proprietary confidential business information contain or constitute information relating to competitive interests. Specifically, the documents contain ideas generated during Project Momentum to reduce costs and increase efficiency. The public disclosure of such information would put FPL in a competitive disadvantage in the future. 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-16-0327-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.



ALEX ZAPPANI

Date: 2/2/2018