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February 15, 2018

-VIA ELECTRONIC FILING-

Ms. Carlotta S. Stauffer
Commission Clerk
Florida Public Service Commission
2540 Shumard Oak Blvd.
Tallahassee, FL 32399-0850

REDACTED

**RE: Docket No.: 20180000
Florida Power & Light Company's December 2017 Earnings Surveillance Report**

Dear Ms. Stauffer:

I enclose for filing in the above docket Florida Power & Light Company's ("FPL") Request for Confidential Classification of Certain Information Contained in the Supplemental Earnings Surveillance Report filed February 15, 2018. The request includes Exhibits A, B (two copies), C and D.

Exhibit A consists of the confidential documents, and all the information that FPL asserts is entitled to confidential treatment has been highlighted. Exhibit B is an edited version of Exhibit A, in which the information FPL asserts is confidential has been redacted. Exhibit C is a justification table in support of FPL's Request for Confidential Classification. Exhibit D contains the declarations in support of FPL's Request for Confidential Classification.

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

Sincerely,

Kevin I.C. Donaldson
Fla. Bar No. 0833401

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- ENG
- GCL
- IDM
- CLK

Enclosures

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Undocketed Filing for 2018

Docket No: 20180000

Filed: February 15, 2018

**FLORIDA POWER AND LIGHT COMPANY'S
REQUEST FOR CONFIDENTIAL CLASSIFICATION OF CERTAIN INFORMATION
CONTAINED IN THE DECEMBER 2017 EARNINGS SURVEILLANCE REPORT**

Pursuant to Section 366.093, Florida Statutes ("Section 366.093"), and Rule 25-22.006, Florida Administrative Code, Florida Power & Light Company ("FPL") hereby requests confidential classification of certain information contained in the December 2017 Earnings Surveillance Report ("ESR") filed in this proceeding (referred to herein as the "Confidential Information"). In support of this request, FPL states as follows:

1. On February 15, 2018 FPL filed a supplement to its December 2017 Earning Surveillance Report. The Supplemental ESR Schedule "D" has certain portions of the attachments which contain confidential information.

2. The following exhibits are included with this Request:

a. Exhibit A is a copy of the confidential material on which all of the information that FPL asserts is entitled to confidential treatment has been highlighted.

b. Exhibit B is a copy of the confidential material on which all information that FPL asserts is entitled to confidential treatment has been redacted.

c. Exhibit C is a table that identifies by column and line the information for which confidential treatment is sought and references the specific statutory bases for the claim of confidentiality. Exhibit C also identifies the declarant who support the requested classification.

d. Exhibit D contains the declaration of Tiffany Cohen in support of this request.

3. 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, 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.

4. As described in the declaration in Exhibit D, some of the Confidential Information contains contractual data between FPL and the customer(s) concerning terms of a Contract Service Agreement which are competitive in nature. This information is protected by Section 366.093(3)(d)(e), Fla. Stat.

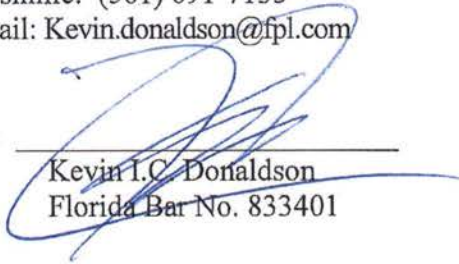
5. Upon a finding by the Commission that the Confidential Information is proprietary confidential business information, the information should not be declassified for a period of at least eighteen (18) months and should be returned to FPL as soon as the information is no longer necessary for the Commission 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 declaration included herewith, Florida Power & Light Company respectfully requests that its Request for Confidential Classification be granted.

Respectfully submitted.

Kevin I.C. Donaldson, Esq.
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By: _____

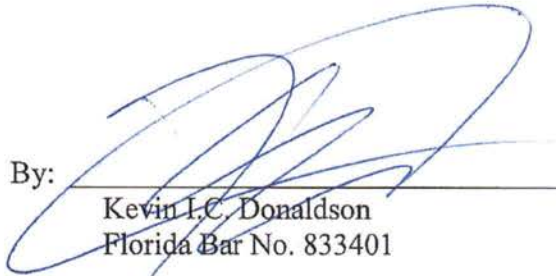

Kevin I.C. Donaldson
Florida Bar No. 833401

CERTIFICATE OF SERVICE
Docket 20180000

I HEREBY CERTIFY that a true and correct copy of the foregoing* has been furnished by electronic service this 15th day of February, 2018 to the following:

Suzanne Brownless, Esq.
Office of General Counsel
Florida Public Service Commission
2540 Shumard Oak Blvd.
Tallahassee, FL 32399-0850
sbrownle@psc.state.fl.us

By: _____


Kevin L.C. Donaldson
Florida Bar No. 833401

* The exhibits to this Request are not included with the service copies, but copies of Exhibits B, C and D are available upon request.

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EXHIBIT B

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FLORIDA POWER & LIGHT COMPANY
AND SUBSIDIARIES
SUPPLEMENTAL EARNINGS SURVEILLANCE INFORMATION
COMMERCIAL/INDUSTRIAL SERVICE RIDER
DECEMBER, 2017

SCHEDULE D: PAGE 1 OF 1

CONFIDENTIAL

CSA-1

The information below is presented to comply with Order No. PSC-14-0197-PAA-EI, Docket No. 140048-EI. This supplemental information is to be treated as confidential. The total difference for all executed Contract Service Arrangements (CSAs) between the calendar year 2017 revenues that would have been received under the otherwise applicable tariff rate(s) and the CISR rate is [REDACTED] ⁽¹⁾

Footnotes:

(1) Please note that, but for the Commercial Industrial Service Rider, FPL would not serve this load and would receive no revenues for it.

EXHIBIT C

EXHIBIT C

COMPANY: Florida Power & Light Company
TITLE: Florida Power & Light's Earnings Surveillance Report
DOCKET NO.: Undocketed
DATE: February 15, 2018

Description	No. of Pages	Conf. Y/N	Line / Column	Florida Statute 366.093(3) Subsection	Declarant
Earnings Surveillance Report (Schedule D)	26	N Y N	Pages: 1-24 Page 25, Line17a Page. 26	(d), (e)	Tiffany Cohen

EXHIBIT D

EXHIBIT D

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Florida Power & Light (FPL)
Monthly Earning Surveillance Report (ESR)

Docket No.: Undocketed

STATE OF FLORIDA

COUNTY OF PALM BEACH

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WRITTEN DECLARATION OF **TIFFANY COHEN**


1. My name is Tiffany Cohen. I am currently employed by Florida Power & Light Company ("FPL") as Director of Rates and Tariffs. I have personal knowledge of the matters stated in this written declaration.

2. I have reviewed the documents and information included in FPL's Request for Confidential Classification filed this date, for which I am listed as the declarant. The documents that I have reviewed and which are asserted by FPL to be proprietary confidential business information contain contractual data between FPL and the customer concerning the terms of the Contract Service Agreement. The confidential information relates to competitive interests, the disclosure of which would impair the competitive business of the provider of the information.

3. To the best of my knowledge, FPL has maintained the confidentiality of this information.

4. Consistent with the provisions of the Florida Administrative Code, such materials should remain confidential for a period of 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.

5. 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.



Tiffany Cohen

Date: 2/15/18