

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 20, 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 the Staff of the Florida Public Service Commission’s Thirty Second Set of Interrogatories (No. 401) (“Confidential Discovery Response”). In support of this request, FPL states as follows:

1. On August 17 2016, FPL filed a Request for Confidential Classification of the Confidential Information, which included Exhibits A, B, C and D [Document Nos. 06787-16 and 06791-16] (“August 17, 2016 Request”). By Order No. PSC-16-0345-CFO-EI, dated August 22, 2016 (“Order 0345”), the Commission granted FPL’s August 17, 2016 Request. FPL adopts and incorporates by reference the August 17, 2016 Request and Order 0345.

2. The period of confidential treatment granted by Order 0345 will soon expire. The Confidential Discovery Response that was the subject of FPL’s August 17, 2016 Request and Order 0345 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 August 17, 2016 Request remain confidential. Accordingly, those exhibits will not be reproduced or reattached here.

4. Included in support of this Request is First Revised Exhibit D, the declaration of Sam Forrest.

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 declaration included as First Revised Exhibit D, the Confidential Discovery Response provided by FPL relates to information concerning bids or other contractual data, the disclosure of which would impair the efforts of FPL to contract for goods or services on favorable terms. This information is protected by Section 366.093(3)(d), Fla. Stat.

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

Respectfully submitted,

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

CERTIFICATE OF SERVICE
Docket No. 160021-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 20th of February 2018 to the following parties:

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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)

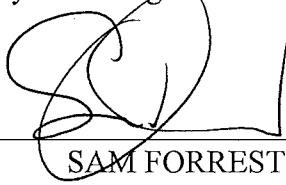
DECLARATION OF SAM FORREST

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 storage. The disclosure of this information would impair FPL's ability to execute transactions for natural gas storage 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-16-0345-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: 2/2/18