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March 29, 2019

VIA HAND DELIVERY

Mr. Adam Teitzman
Division of the Commission Clerk and Administrative Services
Florida Public Service Commission
2540 Shumard Oak Blvd.
Tallahassee, FL 32399-0850

REDACTED

RECEIVED-FPSC
2019 MAR 29 AM 10:54
COMMISSION
CLERK

Re: Docket No. 20180049-EI

Dear Ms. Stauffer:

I enclose for filing in the above docket Florida Power & Light Company's ("FPL") Request for Confidential Classification. The request includes Exhibits A, B (two copies), C and D.

Exhibit A consists of a listing of the confidential documents, and all the information that FPL asserts is entitled to confidential treatment has been highlighted. Exhibit B is a listing of all the confidential information contained in Exhibit A. 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.

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

AFD 1 Exh B

APA ___

ECO ___

ENG ___

GCL ___

IDM ___

CLK Enclosure

Sincerely,

Kenneth M. Rubin

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

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Evaluation of storm restoration costs
for Florida Power & Light Company related
to Hurricane Irma.

Docket No: 20180049-EI

Date: March 29, 2019

**FLORIDA POWER & LIGHT COMPANY'S
REQUEST FOR CONFIDENTIAL CLASSIFICATION**

Pursuant to Section 366.093, Florida Statutes ("Fla. Stat."), and Rule 25-22.006, Florida Administrative Code ("F.A.C."), Florida Power & Light Company ("FPL") requests confidential classification of information provided by FPL to the Legal Staff of the Florida Public Service Commission ("Commission"). In support of this request, FPL states as follows:

1. FPL provided the confidential documents to the Legal Staff of the Commission which FPL had previously provided to the Commission's Audit Staff.

2. As a result, prior to the time that FPL provided the confidential documents to the Legal Staff, FPL filed and served its Notice of Intent to Request Confidential Classification (the "Notice"), indicating FPL's intent to seek confidential treatment of the information provided. The Notice was filed March 12, 2019, and is identified as Commission Document No. 03032-2019. In the Notice, FPL stated that it would file its Request for Confidential Classification ("RFCC") specifying those responses which FPL asserts is entitled to confidential treatment within 21 days, as provided by Rule 25-22.006, F.A.C.

3. The following exhibits are included with and made a part of this request:

a. Exhibit A consists of 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 consists of 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 containing an identification of the information highlighted in Exhibit A and a brief description of the confidential information. Exhibit C also references the specific statutory bases for the claim of confidentiality and identifies the declarant who support the requested classification.

d. Exhibit D contains the declarations of David T. Bromley and Kristina K. Watren in support of this Request.

4. FPL submits that the information contained within the portions of the response highlighted in Exhibit A, is proprietary confidential business information within the meaning of Section 366.093(3), Fla. Stat. 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 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.

5. As described more fully in the declarations included as Exhibit D, the confidential information concerns bids or other contractual data, the disclosure of which would impair the efforts of FPL or its affiliates to contract for goods and services on favorable terms. This information is protected by Section 366.093(3)(d), Fla. Stat.

6. Also, certain information concerns FPL's competitive interests, the disclosure of which would impair the competitive business of FPL and its vendors. This information is protected by Section 366.093(3)(e), Fla. Stat.

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* § 399.093(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 Request for Confidential Classification be granted.

Respectfully submitted this 29th day of March 2019.

Kenneth M. Rubin
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By: 

Kenneth M. Rubin
Florida Bar No. 0349038

CERTIFICATE OF SERVICE

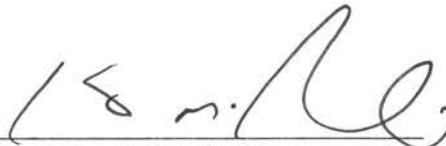
I **HEREBY CERTIFY** that a true and correct copy of the foregoing Request for Confidential Classification* has been furnished by electronic service on this 29th day of March 2019 to the following:

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Florida Industrial Power Users Group

By: 
Kenneth M. Rubin

* 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

EXHIBIT B

REDACTED COPIES

EXHIBIT B

**Hurricane Irma Audit Workpapers
Are confidential in its entirety**

EXHIBIT C

JUSTIFICATION TABLE

EXHIBIT C

COMPANY: Florida Power & Light Company
TITLE: List of Confidential Documents
DOCKET NO: 20180049-EI
DOCKET TITLE: Evaluation of storm restoration costs for Florida Power & Light Company related to Hurricane Irma
DATE: March 29, 2019

Description	Nos of Pages	Conf. Y/N	Line	Florida Statute 366.093(3) Subsection	Declarant
Nanny Poppinz Inc Invoice 503721375	3	y	All	(d) (e)	David T. Bromley
Nanny Poppinz Inc PO #2000252132	5	y	All	(d) (e)	Kristina K. Watren
Nanny Poppinz Inc Contract # 4600014089	5	Y	All	(d) (e)	Kristina K. Watren
ARC American Inc Invoice 5003717580	41	Y	All	(d) (e)	David T. Bromley
ARC American Inc PO 2000252593	2	Y	All	(d) (e)	Kristina K. Watren
ARC American Inc Contract 4600015538	8	Y	All	(d) (e)	Kristina K. Watren
Bartlett Tree Experts Invoice 5003817362	1	Y	All	(d) (e)	David T. Bromley
Bartlett Tree Experts PO 200261510	1	Y	All	(d) (e)	Kristina K. Watren
Bartlett Tree Experts Contracts 4600017410	4	Y	All	(d) (e)	Kristina K. Watren
Union Temporary Services, Inc Invoice 5003682126	4	Y	All	(d) (e)	David T. Bromley
Union Temporary Services, Inc Invoice 5003682126	10	Y	All	(d) (e)	David T. Bromley
Union Temporary Services, Inc Invoice 5003682126	3	Y	All	(d) (e)	David T. Bromley
Union Temporary Service, Inc. PO 2000235103	7	Y	All	(d) (e)	Kristina K. Watren
Special Response Corporation Invoice 5003724109	49	Y	All	(d) (e)	David T. Bromley
ABC Professional Tree Services, Inc. Invoice 5003963205	14	Y	All	(d) (e)	David T. Bromley
Inventory Transactions	9	Y	All	(d) (e)	Kristina K. Watren

EXHIBIT D

DECLARATION

EXHIBIT D

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Evaluation of storm restoration costs for Florida Power & Light Company related to Hurricane Irma.

Docket No. 20180049-EI

STATE OF FLORIDA)
)
PALM BEACH COUNTY)

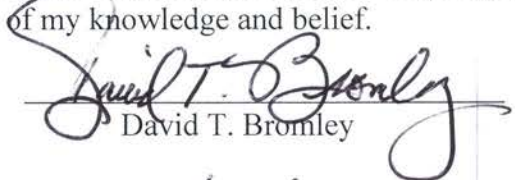
WRITTEN DECLARATION OF **David T. Bromley**

1. My name is David T. Bromley. I am currently employed by Florida Power & Light Company ("FPL") as Manager, Regulatory Services - Distribution. My business address is 7200 N.W. 4th Street, Plantation, Florida 33317. 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 Request for Confidential Classification regarding Audit No. 2018-278-1-1, for which I am listed as the declarant on Exhibit C. The documents or materials that I have reviewed and which are asserted by FPL to be proprietary confidential business information constitute contractual data and information related to competitive interests, the disclosure of which would impair the efforts of FPL to contract for goods and services on favorable terms. The documents or materials also contain or constitute information relating to competitive interests, the disclosure of which would impair FPL's competitive business. Specifically, the material consists of contractual terms related to the acquisition of storm restoration materials, supplies, equipment, and services. Disclosure of this information would also impair or negate the commercial interests of FPL's contractors, vendors, and suppliers as they negotiate with others for the services they provide. The disclosure of this information will also impact the efforts of FPL or its affiliates to contract for goods and services on favorable terms in the future, which in turn increases costs to FPL and its customers. To the best of my knowledge, FPL has maintained the confidentiality of these documents and information.

3. This information should be maintained as confidential for a period of not less than eighteen months. In addition, these 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.


David T. Bromley

Date: 3/26/19

EXHIBIT D

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Evaluation of storm restoration costs for Florida Power & Light Company related to Hurricane Irma.

Docket No. 20180049-EI

STATE OF FLORIDA)
)
PALM BEACH COUNTY)

WRITTEN DECLARATION OF Kristina K. Watren

1. My name is Kristina K. Watren. I am currently employed by Florida Power & Light Company ("FPL") as ISC Sourcing Manager - Compliance. My business address is 700 Universe Blvd., Juno Beach, Florida 33408. 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 Request for Confidential Classification regarding Audit No. 2018-278-1-1, for which I am listed as the declarant on Exhibit C. The documents or materials that I have reviewed and which are asserted by FPL to be proprietary confidential business information constitute contractual data and information related to competitive interests, the disclosure of which would impair the efforts of FPL to contract for goods and services on favorable terms. The documents or materials also contain or constitute information relating to competitive interests, the disclosure of which would impair FPL's competitive business. Specifically, the material consists of contractual terms related to the acquisition of storm restoration materials, supplies, equipment, and services. Disclosure of this information would also impair or negate the commercial interests of FPL's contractors, vendors, and suppliers as they negotiate with others for the services they provide. The disclosure of this information will also impact the efforts of FPL or its affiliates to contract for goods and services on favorable terms in the future, which in turn increases costs to FPL and its customers. To the best of my knowledge, FPL has maintained the confidentiality of these documents and information.

3. This information should be maintained as confidential for a period of not less than eighteen months. In addition, these 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.

[Handwritten signature of Kristina K. Watren]
Kristina K. Watren

Date: 3/27/19