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May 17, 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

Re: **Docket No. 20190061-EI**

REDACTED

Dear Mr. Teitzman:

I enclose for filing in the above docket Florida Power & Light Company's ("FPL's") Request for Confidential Classification of Information Provided in Response to Staff's First Data Request No. 34. 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.

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

Sincerely,

Maria Moncada

COMMISSION
CLERK

2019 MAY 17 PM 1:04

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ENG I Exh B
GCL _____
IDM _____
CLK Enclosure

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

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Petition for approval of FPL SolarTogether program and tariff, by Florida Power & Light Company

Docket No: 20190061-EI

Date: May 17, 2019

FLORIDA POWER AND LIGHT COMPANY'S REQUEST FOR CONFIDENTIAL CLASSIFICATION OF INFORMATION PROVIDED IN RESPONSE TO STAFF'S FIRST DATA REQUEST

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 provided in response to Staff's First Data Request (the "Confidential Data Response"). In support of this request, FPL states as follows:

1. FPL served its responses to Staff's First Data Request No. 34 on May 17, 2019. This request is being filed contemporaneously with service of the responses to Staff's Data Request in order to request confidential classification of the Confidential Data Response No. 34 consistent with Rule 25-22.006, Florida Administrative Code.

2. The following exhibits are made a part of this request:

- a. Exhibit A consists of a copy of the Confidential Data Response on which all information that FPL asserts is entitled to confidential treatment is highlighted.
- b. Exhibit B consists of an edited version of the Confidential Data Response on which all information that FPL asserts is entitled to confidential treatment is redacted.
- c. Exhibit C is a table that identifies the information highlighted in Exhibit A and a brief description of the Confidential Data Response. Exhibit C also

references the specific statutory bases for the claim of confidentiality and identifies the Declarant who supports the requested classification.

d. Exhibit D is the declaration of Juan E. Enjamio in support of this Request.

3. FPL submits that the highlighted information in Exhibit A is proprietary and confidential business information, 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 the description included in Exhibit C and the declaration included as Exhibit D indicate, the Confidential Data Responses relate to the competitive interests of FPL and its vendors, the disclosure of which would impair their competitive interests. This information is protected by Section 366.093(3)(e), Fla. Stat.

5. Upon a finding by the Commission that the Confidential Data Response is proprietary and confidential business information, the information should not be declassified for at least 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 Request for Confidential Classification be granted.

Respectfully submitted this 17th day of May 2019.

Maria J. Moncada
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Facsimile: (561) 691-7135

By: 

Maria J. Moncada
Florida Bar No. 0773301

CERTIFICATE OF SERVICE
Docket No. 20190061-EI

I HEREBY CERTIFY that a true and correct copy of the foregoing has been furnished by electronic service on this 17th day of May 2019 to the following:

Walter Trierweiler
Office of the General Counsel
Florida Public Service Commission
2540 Shumard Oak Blvd.
Tallahassee, Florida 32399-0850
wtrierwe@psc.state.fl.us

Office of Public Counsel
J.R. Kelly
Stephanie Morse
c/o The Florida Legislature
111 W. Madison Street, Room 812
Tallahassee FL 32399
(850) 488-9330
kelly.jr@leg.state.fl.us
morse.stephanie@leg.state.fl.us

By: _____


Maria J. Moncada
Florida Bar No. 0773301

EXHIBIT B

REDACTED

EXHIBIT B

**Staff's 1st Data Request No. 34 – Attachment No. 1
Is confidential in its entirety**

EXHIBIT C

JUSTIFICATION TABLE

EXHIBIT C

COMPANY: Florida Power & Light Company
TITLE: List of Confidential Documents
DOCKET NO.: 20190061-EI
DOCKET TITLE: FPL Petition for approval of FPL SolarTogether Program and Tariff
SUBJECT: FPL's Responses to Staff's 1st Data Request, No. 34
DATE: May 17, 2019

Staff's 1st Data Request	Description	Line No./ Col. No.	Florida Statute 366.093(3) Subsection	Declarant
DR No. 34	On CD File name: 20190061- Staff's 1st DR No. 34 – Attachment No. 1 CONFIDENTIAL	ALL	(e)	J. Enjamio

EXHIBIT D

DECLARATIONS

EXHIBIT D

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Petition by Florida Power & Light
Company for Approval of FPL
SolarTogether Program and Tariff

Docket No: 20190061-EI

DECLARATION OF JUAN E. ENJAMIO

1. My name is Juan E. Enjamio. I am currently employed by Florida Power & Light Company ("FPL") as Manager of Analytics in the Finance Department. I have personal knowledge of the matters stated in this declaration.

2. I have reviewed the document and information included in Exhibit A to FPL's Request for Confidential Classification, for which I am listed as the declarant on Exhibit C. The document that I have reviewed and which is asserted by FPL to be proprietary confidential business information contain or constitute information concerning contractual data and competitive interests,. Specifically, the information consists of FPL's long term fuel price forecast which shows projections of commodity, transportation, and delivered fuel prices, which is developed by a third party vendor and which FPL is contractually obligated to maintain as confidential. Disclosure of the proprietary forecast would impair the vendor's competitive interests and would be a contractual breach on the part of FPL. To the best of my knowledge, FPL has maintained the confidentiality of this information.

3. 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.

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.



Juan E. Enjamio

Date: May 16, 2019