

Kenneth M. Rubin, Esq. Assistant General Counsel Florida Power & Light Company 700 Universe Boulevard Juno Beach, Florida 33408 Telephone: (561) 691-2512 Fax: (561) 691-7135

## -VIA HAND DELIVERY-

May 24, 2019

Adam Teitzman, Commission Clerk
Division of the Commission Clerk & Administrative Services
Florida Public Service Commission
2540 Shumard Oak Boulevard
Tallahassee, Florida 32399-0850

auest Confidential

Re: Docket 20180049-EI – FPL's Notice of Intent to Request Confidential Classification

Dear Mr. Teitzman:

cc:

Enclosed for filing on behalf of Florida Power & Light Company is the Notice of Intent to Request Confidential Classification of the responses to certain discovery propounded by the Office of Public Counsel that have been requested by Florida Public Service Commission Staff.

The confidential documents are identified in the Notice of Intent and are included on compact discs marked "Confidential," enclosed with this filing.

If there are any questions regarding this filing, please contact me at (561) 691-2512.

Sincerely,

s/ Kenneth M. Rubin
Kenneth M. Rubin

Counsel for parties of record (w/o encl.)

## 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: May 24, 2019

## FLORIDA POWER & LIGHT COMPANY'S NOTICE OF INTENT TO REQUEST CONFIDENTIAL CLASSIFICATION

Pursuant to Florida Administrative Code Rule 25-22.006(3)(a), Florida Power & Light Company ("FPL") files this Notice of Intent to Request Confidential Classification ("Notice"). This Notice relates to confidential documents to be provided by FPL to the Legal Staff of the Florida Public Service Commission ("Commission"). The confidential documents requested by Legal Staff were previously produced in response to discovery propounded in this case and were designated by FPL as confidential. The confidential documents are identified as follows:

FPL's response to OPC's 1st Interrogatories 20, 21, 24, 27

FPL's response to OPC's 2<sup>nd</sup> Interrogatories 44

FPL's response to OPC's 3<sup>rd</sup> Interrogatories 76, 83, 84

FPL's response to OPC's 5<sup>th</sup> Interrogatories 127

FPL's response to OPC's 6<sup>th</sup> Interrogatories 129

FPL's response to OPC's 7<sup>th</sup> Interrogatories 150

FPL's response to OPC's 8th Interrogatories 154, 156, 159, 174

FPL's response to OPC's 11th Interrogatories 188

FPL's response to OPC's 12th Interrogatories 213

FPL's response to OPC's 1st Request for Production of Documents 3, 6, 7, 8, 9, 10

FPL's response to OPC's 2<sup>nd</sup> Request for Production of Documents 12, 14, 15, 16

FPL's response to OPC's 3<sup>rd</sup> Request for Production of Documents 17, 18, 19, 20, 21, 22,

23, 23, 24, 25, 26

FPL's response to OPC's 5th Request for Production of Documents 28, 29, 30, 31

FPL's response to OPC's 6<sup>th</sup> Request for Production of Documents 32

FPL's response to OPC's 7<sup>th</sup> Request for Production of Documents 35

FPL's response to OPC's 8th Request for Production of Documents 36, 37, 38, 39

FPL's response to OPC's 9th Request for Production of Documents 41

A copy of FPL's confidential responses listed above are contained on the compact discs enclosed in the attached envelope labeled "CONFIDENTIAL." FPL is filing this Notice of Intent to preserve the confidentiality of said documents which include but are not limited to invoices,

contracts, and/or materials related to vendors that provided services in connection with FPL's Hurricane Irma storm restoration efforts.

The materials that FPL is providing to Commission Legal Staff include confidential information protected from public disclosure by Florida law, including but not limited to Rule 25-22.006, F.A.C. and Section 366.093, Florida Statutes. Pursuant to Rule 25-22.006(3)(a) and (d), FPL requests confidential handling of these confidential documents. FPL will file its Requests for Confidential Classification specifying the documents which FPL asserts is entitled to confidential treatment within 21 days, as provided by Rule 25-22.006, F.A.C.

Respectfully submitted this 24th day of May, 2019.

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By: s/ Kenneth M. Rubin
Kenneth M. Rubin
Florida Bar No. 0349038

## **CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that a true and correct copy of the foregoing has been furnished

by electronic service on this 24th day of May, 2019 to the following:

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

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By: s/Kenneth M. Rubin

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