



Maria Jose Moncada
Senior Attorney
Florida Power & Light Company
700 Universe Boulevard
Juno Beach, FL 33408-0420
(561) 304-5795
(561) 691-7135 (Facsimile)
E-mail: maria.moncada@fpl.com

August 16, 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

RECEIVED-FPSC
2019 AUG 16 PM 12:33
COMMISSION
CLERK

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 the Office of Public Counsel's Fourth Set of Interrogatories, No. 22. 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 a declaration in support of FPL's request.

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

- COM _____
- AFD _____
- APA _____
- ECO _____
- ENG 1 Exh B
- GCL _____
- IDM _____
- CLK _____

Sincerely,

Maria J. Moncada

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: August 16, 2019

FLORIDA POWER & LIGHT COMPANY'S REQUEST FOR CONFIDENTIAL CLASSIFICATION OF INFORMATION PROVIDED IN RESPONSE TO OPC'S FOURTH SET OF INTERROGATORIES (No. 22)

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 the Office of Public Counsel's ("OPC") Fourth Set of Interrogatories, No. 22 (the "Confidential Documents"). In support of this Request, FPL states as follows:

1. FPL served its responses to OPC's Fourth Set of Interrogatories, Nos. 19-22, on August 15, 2019. This Request is being filed contemporaneously with service of those responses in order to request confidential classification of certain information contained in its response to No. 22, consistent with Rule 25-22.006, Florida Administrative Code.

2. The following exhibits are attached to and made a part of this Request:

- a. Exhibit A consists of a copy of the Confidential Documents 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 Documents 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 references the specific statutory basis for the claim of confidentiality and identifies the Declarant who supports the requested classification.
- d. Exhibit D is the declaration of Brandon Stankiewicz 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 described in the declaration in Exhibit D, some of the Confidential Information contains information regarding security measures, systems or procedures. This information is protected by Section 366.093(3)(c), Fla. Stat.

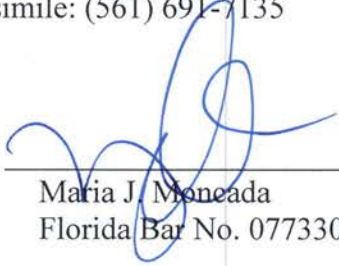
5. Upon a finding by the Commission that the information contained in the Confidential Documents is proprietary and confidential business information, the information should not be declassified for at least eighteen (18) month period and should be returned to FPL as soon as it is no longer necessary 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 16th day of August 2019.

Maria J. Moncada
Senior Attorney
Maria.moncada@fpl.com
Florida Power & Light Company
700 Universe Boulevard
Juno Beach, FL 33408
Telephone: (561) 304-5795
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 16th day of August 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

Richard A. Zambo
Richard A. Zambo, P.A.
Fla. Bar No. 312525
2336 S.E. Ocean Boulevard, #309
Stuart, Florida 34966
(772) 225-5400
richzambo@aol.com

Marsha E. Rule
Rutledge Ecenia, P.A.
Fla. Bar No. 0302066
119 South Monroe Street, Suite 202
Tallahassee, Florida 32301
(850) 681-6788
marsha@rutledge-ecenia.com
Attorneys for Vote Solar

J.R. Kelly
Stephanie Morse
Office of Public Counsel
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

Jon C. Moyle, Jr.
Karen A. Putnal
Ian E. Waldick
Moyle Law Firm, PA
118 North Gadsden Street
Tallahassee FL 32301
(850) 681-3828
jmoyle@moylelaw.com
mqualls@moylelaw.com
kputnal@moylelaw.com
iwaldick@moylelaw.com
Attorneys for Florida Industrial Power Users Group

George Cavros
120 E. Oakland Park Blvd., Suite 105
Fort Lauderdale FL 33334
(954) 295-5714
(866) 924-2824
george@cavros-law.com
Attorney for Southern Alliance for Clean Energy

Stephanie U. Eaton
Carrie Harris Grundmann
Spilman Thomas & Battle, PLLC
110 Oakwood Drive, Suite 500
Winston-Salem, NC 27103
(336) 631-1062
seaton@spilmanlaw.com
cgrundmann@spilmanlaw.com

Derrick Price Williamson
Spilman Thomas & Battle, PLLC
1100 Bent Creek Boulevard, Suite 101
Mechanicsburg, PA 17050
(717) 795-2741
dwilliamson@spilmanlaw.com
Attorneys for Walmart, Inc.

By: _____



Maria J. Moncada
Fla. Bar No. 0773301

EXHIBIT B

REDACTED

EXHIBIT B

**FPL's Responses to
OPC's Fourth Set of Interrogatories,
No. 22, Attachment No. 1
(Bates No. 000026)
is confidential in its entirety**

EXHIBIT B

**FPL's Responses to
OPC's Fourth Set of Interrogatories,
No. 22, Attachment No. 2
(Bates No. 000027)
is confidential in its entirety**

EXHIBIT B

**FPL's Responses to
OPC's Fourth Set of Interrogatories,
No. 22, Attachment No. 3
(Bates No. 000028)
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 OPC's Fourth Set of Interrogatories, No. 22
DATE: August 16, 2019

OPC's 4th Set of INTs	Description	Line No./ Col. No.	Florida Statute 366.093(3) Subsection	Declarant
Interrogatory No. 22	Supplemental Map 1	ALL	(c)	B. Stankiewicz
	Supplemental Map 2	ALL	(c)	B. Stankiewicz
	FPL Solar Energy Center Location	ALL	(c)	B. Stankiewicz

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 BRANDON STANKIEWICZ

1. My name is Brandon Stankiewicz. I am currently employed by Florida Power & Light Company ("FPL") as a Director of Development. I have personal knowledge of the matters stated in this declaration.

2. I have reviewed the documents 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 documents that I have reviewed and which are asserted by FPL to be proprietary confidential business information contain or constitute information concerning the location of Critical Electric Infrastructure Information ("CEII"). The Federal Energy Regulatory Commission considers assets of the bulk power system to be CEII if the incapacity or destruction of which would negatively affect national security, economic security, public health or safety, or a combination of such matters. 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.



Brandon Stankiewicz

Date: 8-15-2019