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September 12, 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 SEP 12 PM 3:14
COMMISSION CLERK

Re: Docket No. 20190061-EI

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 Vote Solar's First Request for Production of Documents, No. 1. 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.

Sincerely,

Maria Jose Moncada

REDACTED

COM _____
AFD _____
APA _____
ECO _____
ENG _____
GCL _____
IDM _____
CLK _____

Enclosure

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

* 1 copy of redacted only

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: September 12, 2019

**FLORIDA POWER & LIGHT COMPANY'S
REQUEST FOR CONFIDENTIAL CLASSIFICATION
OF INFORMATION PROVIDED IN RESPONSE TO VOTE
SOLAR'S FIRST REQUEST FOR PRODUCTION OF DOCUMENTS (No. 1)**

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 Vote Solar's First Request for Production of Documents, No. 1 (collectively, the "Confidential Documents"). In support of this Request, FPL states as follows:

1. FPL served its response to Vote Solar's First Request for Production of Documents, No. 1 on September 6, 2019. This Request is being filed in order to request confidential classification of certain information contained in its response to Vote Solar's Request No. 1, 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 Discovery Responses on which all information that FPL asserts is entitled to confidential treatment is redacted. Where the documents are confidential in their entirety, Exhibit B consists of identifying cover pages.

- 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 consists of the declaration of Jose Chacon in support of this Request.

3. FPL submits that the highlighted information in Exhibit A is proprietary confidential business information within the meaning of Section 366.093(3), Florida Statutes. 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 determined 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, the confidential business information contains information relating to competitive interest. Specifically, the documents consist of research performed by a third party in a competitive industry, which reveals the methodologies and modeling developed by the third party. The disclosure of which would impair the competitive interests of FPL vendors. This information is protected by Section 366.093(3)(e), 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 12th day of September 2019.

Maria Jose Moncada
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700 Universe Boulevard
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By: _____



Maria Jose 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 12th day of September 2019 to the following:

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Maria Jose Moncada
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EXHIBIT B

REDACTED

**FPL's responses to
Vote Solar's First Request for Production
of Documents**

**Request No. 1
Bates No. 001030 – 001058**

is confidential in its entirety

**FPL's responses to
Vote Solar's First Request for Production
of Documents**

**Request No. 1
Bates No. 001059 – 001066**

is confidential in its entirety

**FPL's responses to
Vote Solar's First Request for Production
of Documents**

**Request No. 1
Bates No. 001067 – 001069**

is confidential in its entirety

**FPL's responses to
Vote Solar's First Request for Production
of Documents**

**Request No. 1
Bates No. 001070 – 001154**

is confidential in its entirety

**FPL's responses to
Vote Solar's First Request for Production
of Documents**

**Request No. 1
Bates No. 001155 – 001181**

is confidential in its entirety

**FPL's responses to
Vote Solar's First Request for Production
of Documents**

**Request No. 1
Bates No. 001182 – 001233**

is confidential in its entirety

**FPL's responses to
Vote Solar's First Request for Production
of Documents**

**Request No. 1
Bates No. 001234 – 001246**

is confidential in its entirety

**FPL's responses to
Vote Solar's First Request for Production
of Documents**

**Request No. 1
Bates No. 001247 – 001345**

is confidential in its entirety

**FPL's responses to
Vote Solar's First Request for Production
of Documents**

**Request No. 1
Bates No. 001346 – 001378**

is confidential in its entirety

**FPL's responses to
Vote Solar's First Request for Production
of Documents**

**Request No. 1
Bates No. 001379 – 001404**

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 Response to Vote Solar's First Request for Production of Documents, Request No. 1
DATE: September 12, 2019

Discovery Set	Description	Bates Number	Line No./ Col. No.	Florida Statute 366.093(3) Subsection	Declarant
FPL's Response to Vote Solar's First Request for Production of Documents No. 1	10_Burke_FPLShared Solar_FocusGroups_Report_03092016-CONFIDENTIAL	FPL 001030-001058	All	(e)	Jose Chacon
	11_Focus Group Screener Guide-CONFIDENTIAL	FPL 001059-001066	All	(e)	
	12_Focus Group Discussion Guide-CONFIDENTIAL	FPL 001067-001069	All	(e)	
	20_Burke_FPLShared Solar_ConjointReport_07062016-CONFIDENTIAL	FPL 001070-001154	All	(e)	
	21_ConjointSurvey-CONFIDENTIAL	FPL 001155-001181	All	(e)	
	30_Burke_FPLShared Solar_Offset-PricePointReport_09162016-CONFIDENTIAL	FPL 001182-001233	All	(e)	
	31_Burke_Offset-PricePointSurvey-CONFIDENTIAL	FPL 001234-001246	All	(e)	
	32_Burke_DataOffset-PricePoint-CONFIDENTIAL	FPL 001247-001345	All	(e)	
	40_MSI_FPL SharedSolar_SolarBundle-DCMReport_08282017 - CONFIDENTIAL	FPL 001346-001378	All	(e)	
	41 Solar Bundle DCM Questionnaire-CONFIDENTIAL	FPL 001379-001404	All	(e)	

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

STATE OF FLORIDA)
)
PALM BEACH DADE COUNTY)

**WRITTEN DECLARATION OF
JOSE CHACON**

1. My name is Jose Chacon. I am currently employed by Florida Power & Light Company ("FPL") as the Senior Director of Communications. 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 that are included in FPL's Request for Confidential Classification regarding Vote Solar's First Set of Production of Documents No. 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, which contains or constitutes information related to competitive interests. Specifically, the documents consist of research performed by a third party in a competitive industry, which reveals the methodologies and modeling developed by the third party. The disclosure of which would impair the competitive interests of FPL's vendor. To the best of my knowledge, FPL has maintained the confidentiality of these documents and materials.

3. Consistent with the provisions of the Florida Administrative Code, such materials should remain confidential for a period of at least an additional eighteen months (18) 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.


Jose Chacon

Date: 9/9/19