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September 19, 2019

VIA HAND DELIVERY

Adam Teitzman
Commission Clerk
Florida Public Service Commission
2540 Shumard Oak Blvd.
Tallahassee, FL 32399-0850

REDACTED

RECEIVED-FPSC
2019 SEP 19 PM 2:14
COMMISSION
CLERK

Re: Docket No. 20190001-EI

Dear Mr. Teitzman:

I enclose for filing in the above docket Florida Power & Light Company's ("FPL") Request for Confidential Classification of Information Provided in Response to Staff of the Florida Public Service Commission's Sixth Set of Interrogatories (No. 50). The request includes Exhibits A, B (two copies), C and D.

Exhibit A consists of a compact disc containing the confidential documents, and FPL asserts that all the information contained in the documents on the compact disc is entitled to confidential treatment and has been labeled as confidential. Exhibit B is a cover page identifying that the documents are confidential in their entirety. Exhibit C is a justification table in support of FPL's Request for Confidential Classification. Exhibit D is the declaration in support of FPL's request.

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

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

Sincerely,

For Maria Jose 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: Fuel and purchase power cost recovery
clause with generating performance incentive
factor

Docket No: 20190001-EI

Date: September 19, 2019

**FLORIDA POWER & LIGHT COMPANY'S REQUEST
FOR CONFIDENTIAL CLASSIFICATION OF INFORMATION
PROVIDED IN RESPONSE TO THE STAFF OF THE FLORIDA PUBLIC
SERVICE COMMISSION'S SIXTH SET OF INTERROGATORIES (No. 50)**

Pursuant to Section 366.093, Florida Statutes, and Rule 25-22.006, Florida Administrative Code, Florida Power & Light Company ("FPL") requests confidential classification of certain information provided in response to the Staff of the Florida Public Service Commission's ("Staff") Sixth Set of Interrogatories (No. 50) ("Confidential Discovery Response"). In support of its Request, FPL states as follows:

1. On August 26, 2019, Staff served its Sixth Set of Interrogatories (Nos. 43-54) on FPL. FPL's Response to Staff's Sixth Set of Interrogatories (No. 50) contains information of a confidential nature within the meaning of Section 366.093(3), Florida Statutes.

2. FPL served its responses to Staff's Sixth Set of Interrogatories (Nos. 43-54) on September 16, 2019. This request is being made in order to request confidential classification of the Confidential Discovery Responses consistent with Rule 25-22.006, Florida Administrative Code.

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

a. Exhibit A consists of a compact disc containing the Confidential Discovery Response, and FPL asserts all the information in the files on the compact disc is entitled to confidential treatment and is labeled as confidential.

b. Exhibit B consists of a cover page identifying that the Confidential Discovery Response is confidential in its entirety.

c. Exhibit C is a table containing a page-and-line identification of the Confidential Information 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 supports the requested classification.

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

4. FPL submits that the entire Confidential Discovery Response 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.

5. As the descriptions included in Exhibit C and the declaration included in Exhibit D indicate, the Confidential Discovery Responses provided by FPL contains information concerning bids or other contractual data, the disclosure of which would impair the efforts of FPL to contract for goods and services on favorable terms. This information is protected by Section 366.093(3)(d), Fla. Stat.

6. Additionally, this information relates 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.

7. Upon a finding by the Commission that the Confidential Information remains proprietary and confidential business information, the information should not be declassified for at least an additional 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 attached materials, Florida Power & Light Company respectfully requests that its Request for Confidential Classification be granted.

Respectfully submitted,

Maria J. Moncada
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Email: maria.moncada@fpl.com

By: 

For Maria J. Moncada
Florida Bar No. 773301

CERTIFICATE OF SERVICE
Docket No. 20190001-EI

I **HEREBY CERTIFY** that a true and correct copy of FPL's Request for Confidential Classification* has been furnished by electronic service this 19th day of September 2019 to the following:

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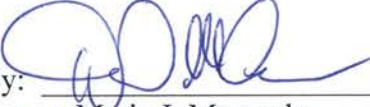
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Users Group**

By: 
Maria J. Moncada
Florida Bar No. 773301

* The exhibits to this Request are not included with the service copies. Exhibit B was served with FPL's Response to Staff's Sixth Set of Interrogatories, No. 50. Copies of Exhibits C and D are available upon request.

EXHIBIT B

**Florida Power & Light Company
Docket No. 20190001-EI
Staff's 6th Set of Interrogatories
Interrogatory No. 50**

Confidential Attachments VI - IX for sub-part g to Staff's Sixth Set of Interrogatories No. 50 are confidential in their entirety.

EXHIBIT C

JUSTIFICATION TABLE

EXHIBIT C

COMPANY: Florida Power & Light Company
TITLE: List of Confidential Documents
DOCKET NO.: 20190001-EI
DOCKET TITLE: Fuel and Purchased Power Cost Recovery Clause with Generating Performance Incentive Factor
SUBJECT: FPL's Response to Staff's Sixth Set of Interrogatories (No. 50)
DATE: September 19, 2019

Staff's 6th Set (Int. No. 50)	Pg Nos.	Description	Line No./ Col. No.	Florida Statute 366.093(3) Subsection	Declarant
Attachment VI	1 - 201	Economic Decision Making Model 100 MW CT - Prorated from 469 MW CT	ALL	(d), (e)	J. Enjamio
Attachment VII	1 - 5	469 MW CT (in-service year = 2023) 100 MW CT (in-service year = 2023)	ALL	(d), (e)	J. Enjamio
Attachment VIII	1 - 152	Economic Decision Making Model 100 MW CT - Prorated from 469 MW CT	ALL	(d), (e)	J. Enjamio
Attachment IX	1 - 3	Revenue Requirements Calculation for Capital Replacement Costs	ALL	(d), (e)	J. Enjamio

EXHIBIT D

DECLARATIONS

EXHIBIT D

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Fuel and purchased power cost recovery
clause with generation performance incentive
factor

Docket No: 20190001-EI

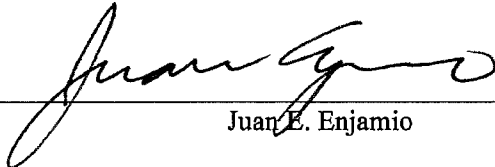
DECLARATION OF JUAN E. ENJAMIO

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 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 contractual data and competitive interests. Specifically, the information in the documents consists of projected capital costs of equipment and FPL's economic decision model that is considered proprietary by FPL. Disclosure of this proprietary information would impair the efforts of FPL or its vendors to contract for goods and services on favorable terms. 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: Sept. 16, 2019