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November 25, 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

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COMMISSION  
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**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 the Response to the Office of Public Counsel's Seventh Request for Production of Documents, No. 17 – Second Supplemental. The request includes Exhibits A, B (two copies), C and D.

Exhibit A consists of the confidential documents, which is confidential in its entirety. Exhibit B is an edited version of Exhibit A, consisting of an identifying cover page. 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,

*William P. Cox for William P. Cox*

William P. Cox  
Florida Bar No. 0093531

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: November 25, 2019

**FLORIDA POWER & LIGHT COMPANY'S  
REQUEST FOR CONFIDENTIAL CLASSIFICATION  
OF INFORMATION PROVIDED IN RESPONSE TO THE  
OFFICE OF PUBLIC COUNSEL'S SEVENTH REQUEST FOR  
PRODUCTION OF DOCUMENTS (No. 17) – SECOND SUPPLEMENTAL**

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 Seventh Request for Production of Documents, No. 17 - Second Supplemental (collectively, the “Confidential Documents”). In support of this Request, FPL states as follows:

1. FPL served its responses to the Office of Public Counsel’s Seventh Request for Production of Documents, No 17 - Second Supplemental on November 25, 2019. This Request is being filed in order to request confidential classification of certain information contained in its response to Request, No. 17, 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 cover pages with Bates numbers of the Confidential Documents in which all information that FPL asserts is entitled to confidential treatment in its entirety.

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 Ronald Reagan in support of this Request.

3. As described in the declaration in Exhibit D, certain information in these documents concerns bid summaries and price justifications, the disclosure of which would impair the efforts of FPL to contract for goods or services on favorable terms. Specifically, the material consists of customer-specific proposals for engineering, procurement, and construction agreements and bid pricing. This information is protected by Section 366.093(3)(d), Fla. Stat.

4. Also, the documents contain information relating to competitive interests, such as purchase and sales agreements, the disclosure of which would impair the competitive business of the provider of the information. 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 an 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 25th day of November 2019.

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By:  *For William P. Cox*  
William P. Cox  
Florida Bar No. 0093531



**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 25th day of November 2019 to the following:

Walter Trierweiler  
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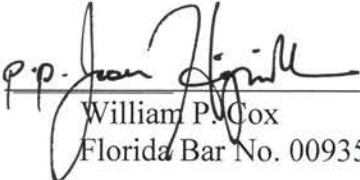
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By:  for William P. Cox  
William P. Cox  
Florida Bar No. 0093531

# **EXHIBIT B**

**REDACTED**

**FPL's response to  
OPC's Seventh Request for Production of  
Documents – Second Supplemental**

**No. 17**

**Bates Nos. 009348 – 009359**

**is confidential in its entirety**



**EXHIBIT B**

**REDACTED**

**FPL's response to  
OPC's Seventh Request for Production of  
Documents – Second Supplemental**

**No. 17**

**Bates Nos. 009348 – 009359**

**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 the Office of Public Counsel's Seventh Request for Production of Documents, Request No. 17 – Second Supplemental  
**DATE:** November 25, 2019

Set	Bates Number	Description	Line No./ Col. No.	Florida Statute 366.093(3) Subsection	Declarant
Office of the Public Counsel's 7 <sup>th</sup> Request for POD No. 17 – Second Supplemental	FPL 009348-009359	Bid Summary and Price Justification for Solar Energy Centers: Egret, Magnolia, Nassau, Lakeside, Trailside, and Union Springs	All	(d) (e)	Ronald Reagan

**EXHIBIT D**

**DECLARATION**

**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 RONALD REAGAN**

1. My name is Ronald Reagan. I am currently employed by Florida Power & Light Company ("FPL") as the Vice President of Engineering and Construction. 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 bids or other contractual data, the disclosure of which would impair the efforts of FPL to contract for goods or services on favorable terms. Specifically, the material consists of customer-specific proposals for engineering, procurement, and construction agreements and bid pricing. The documents also contain or constitute information relating to competitive interests, the disclosure of which would impair the competitive business of the provider of the information. 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.

  
\_\_\_\_\_  
Ronald Reagan

Date: 11/22/19