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June 29, 2020

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

REDACTED

**Re: Docket No. 2020 0172 -EI
Florida Power & Light Company's Request for Confidential Classification of
Information Provided in Support of Florida Power & Light Company's Notice
of Filing Confidential Supporting Materials in Support of its Petition for
Evaluation of Hurricane Dorian Storm Costs**

Dear Mr. Teitzman:

I enclose for filing in the above referenced docket Florida Power & Light Company's ("FPL") Request for Confidential Classification of Information ("Request") provided in support of FPL's Notice of Filing Confidential Supporting Materials in Support of its Petition for Evaluation of Hurricane Dorian Storm Costs ("Petition"). The documents for which the enclosed request seeks confidential protection are those specified in FPL's Notice of Filing, which, along with the Petition, is being filed contemporaneously with this Request.

The enclosed filing includes Exhibits A, B, C, and D. Exhibit A consists of the confidential documents, all of which are provided on a disc, and FPL asserts that all the information contained therein is entitled to confidential treatment. Exhibit B is an edited version of Exhibit A, consisting of an identifying cover page and redacted responses. Exhibit C is a justification table in support of FPL's Request for Confidential Classification. Exhibit D contains two declarations in support of FPL's filing.

Please contact me if you or your Staff has any questions regarding this filing at (561) 691-7255 or joel.baker@fpl.com.

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

1 Exh B

Sincerely,

s/Joel T. Baker
Joel T. Baker
Florida Bar No. 108202

COMMISSION
CLERK

2020 JUN 29 PM 4:47

RECEIVED-FPSC

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Evaluation of storm costs for Florida
Power & Light Company related to Hurricane
Dorian

Docket No: 2020 _____ -EI

Date: June 29, 2020

**FLORIDA POWER & LIGHT COMPANY'S REQUEST
FOR CONFIDENTIAL CLASSIFICATION OF INFORMATION
PROVIDED IN SUPPORT OF FLORIDA POWER & LIGHT COMPANY'S
NOTICE OF FILING CONFIDENTIAL SUPPORTING MATERIALS IN SUPPORT OF
ITS PETITION FOR EVALUATION OF HURRICANE DORIAN STORM COSTS**

Pursuant to Section 366.093, Florida Statutes ("Section 366.093"), and Rule 25-22.006, Florida Administrative Code ("Rule 25-22.006"), Florida Power & Light Company ("FPL") hereby files its Request for Confidential Classification ("RFCC") and requests confidential treatment of certain documents and information specified in FPL's Notice of Filing ("Notice"), which is being filed contemporaneously with this request in support of FPL's Petition for Evaluation of Hurricane Dorian Storm Costs:

1. This Request is being filed in accordance with Rule 25-22.006, in order to request confidential classification of certain information related to FPL's Hurricane Dorian costs. The materials identified in FPL's Notice and which are the subject of this RFCC are the categories of materials that would normally be produced in response to discovery requests, but which in this case are being provided contemporaneously with FPL's Petition for Evaluation of Hurricane Dorian Storm Costs in accordance with the Hurricane Irma Settlement Agreement approved by the Commission in Order No. PSC-2019-0319-S-EI. Specifically, FPL seeks confidential classification of the materials and information specified in the Notice, which are: (i) searchable spreadsheets that provide data documenting the receipt, review, adjustment where appropriate, and payment of FPL's Hurricane Dorian costs incurred for line contractors and vegetation contractors;

(ii) Hurricane Dorian contractor travel logs¹; and (iii) additional information identified in paragraph 16 of the Hurricane Irma Stipulation and Settlement (together, the “Confidential Documents”).

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, provided in electronic format on CDs, wherein all of the information contained is entitled to confidential treatment. Because the confidential materials are being provided in electronic format and are voluminous, and therefore cannot be readily highlighted, FPL has not highlighted the entirety of the information contained on the CDs, in accordance with Rule 25-22.006(4)(b).
- b. Exhibit B consists of summary page that identifies the Bates numbered pages associated with the Confidential Documents, which are entitled to confidential treatment in their entirety.
- c. Exhibit C is a table that identifies the information 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 declarations of David Hughes, Holly Long, and Clare Gerard in support of this RFCC.

¹ The term “travel log” refers to a compilation of data exported from REDi (FPL’s internal system used for managing resources working on storm restoration) together with information developed by the Cost Finalization Team.

3. FPL submits that the 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 declarations in Exhibit D, the confidential business information includes information relating to bids or other contractual data, the disclosure of which would impair the efforts of the public utility or its affiliates to contract for goods or services on favorable terms. This information is protected by Section 366.093(3)(d), Florida Statutes. The confidential business information further includes information relating to competitive interests, 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), Florida Statutes.

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* Section 366.093(4), Florida Statutes.

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. Additionally, FPL respectfully requests that the Commission, the Office of Public Counsel, and any other party subject to the public records law

treat the materials as confidential pending a formal ruling by the Commission or the return of the materials, consistent with Section 366.093(2).

Respectfully submitted this 29th day of June 2020.

Joel Baker
Principal Attorney
Florida Power & Light Company
700 Universe Boulevard
Juno Beach, FL 33408-0420
Phone: 561-691-7255
Fax: 561-691-7135
Email: joel.baker@fpl.com

By: s/Joel T. Baker
Joel T. Baker
Florida Bar No. 108

EXHIBIT A

CONFIDENTIAL

EXHIBIT B

REDACTED

**Confidential Information Provided in
Florida Power & Light Company's Notice
of Filing Confidential Supporting Materials
in Support of Its Petition for Evaluation of
Hurricane Dorian Storm Costs**

Bates Nos. 000001 - 000994

are confidential in their entirety

EXHIBIT C

JUSTIFICATION TABLE

EXHIBIT C

COMPANY: Florida Power & Light Company
TITLE: List of Confidential Documents
DOCKET NO.: 2020XXXX
DOCKET TITLE: Hurricane Dorian Cost Recovery
SUBJECT: Confidential Information Provided in Florida Power & Light Company's Notice of Filing Confidential Supporting Materials in Support of Its Petition for Evaluation of Hurricane Dorian Storm Costs
DATE: June 29, 2020

Set	Bates Number Start	Bates Number End	Description	Line No. / Col. No.	Florida Statute 3.66.093(3) Subsection	Declarant
NA	000001	000008	5 Star Electric LLC	All	(d), (e)	Holly Long
NA	000009	000019	ABC Professional Tree Services Inc	All	(d), (e)	Holly Long
NA	000020	000030	ACRT Inc	All	(d), (e)	Holly Long
NA	000031	000038	AMPP Construction Inc	All	(d), (e)	Holly Long
NA	000039	000046	Arc American Inc	All	(d), (e)	Holly Long
NA	000047	000055	Asplundh Construction LLC	All	(d), (e)	Holly Long
NA	000056	000066	Asplundh Tree Expert LLC_Embedded	All	(d), (e)	Holly Long
NA	000067	000077	Asplundh Tree Expert LLC_NonEmbedded	All	(d), (e)	Holly Long
NA	000078	000085	B & B Electrical & Utility Contract	All	(d), (e)	Holly Long
NA	000086	000093	BBC Electrical Services Inc	All	(d), (e)	Holly Long
NA	000094	000101	Blackout Power Energy Company	All	(d), (e)	Holly Long
NA	000102	000108	Bowlin Group LLC	All	(d), (e)	Holly Long

NA	000109	000119	Burford's Tree Inc	All	(d), (e)	Holly Long
NA	000120	000127	C C Power LLC	All	(d), (e)	Holly Long
NA	000128	000135	C W Wright Construction Co Inc	All	(d), (e)	Holly Long
NA	000136	000143	Carr & Duff Inc	All	(d), (e)	Holly Long
NA	000144	000151	Chain Electric Co Inc	All	(d), (e)	Holly Long
NA	000152	000159	Cianbro Corporation	All	(d), (e)	Holly Long
NA	000160	000169	CN Utility Consulting Inc	All	(d), (e)	Holly Long
NA	000170	000177	Concurrent Group LLC	All	(d), (e)	Holly Long
NA	000178	000185	D&D Power Inc	All	(d), (e)	Holly Long
NA	000186	000193	Danella Utility Construction Inc	All	(d), (e)	Holly Long
NA	000194	000204	Davey Resource Group Inc	All	(d), (e)	Holly Long
NA	000205	000215	Davis H. Elliot Construction	All	(d), (e)	Holly Long
NA	000216	000223	Dynamic Utility Solutions LLC	All	(d), (e)	Holly Long
NA	000224	000231	E J Electric T&D LLC	All	(d), (e)	Holly Long
NA	000232	000239	Edison Power Constructors Inc	All	(d), (e)	Holly Long
NA	000240	000247	Elecnor Hawkeye LLC	All	(d), (e)	Holly Long
NA	000248	000256	Grays Power Supply LLC	All	(d), (e)	Holly Long
NA	000257	000265	Great Southwestern Construction Inc	All	(d), (e)	Holly Long
NA	000266	000276	Halter Tree Service Inc	All	(d), (e)	Holly Long

NA	000277	000284	Harlan Electric Company	All	(d), (e)	Holly Long
NA	000285	000294	Haugland Energy Group LLC	All	(d), (e)	Holly Long
NA	000295	000302	Heart Utilities of Jacksonville Inc	All	(d), (e)	Holly Long
NA	000303	000310	Henkels & McCoy Inc	All	(d), (e)	Holly Long
NA	000311	000318	Hooper Corporation	All	(d), (e)	Holly Long
NA	000319	000326	Hydaker Wheatlake Company	All	(d), (e)	Holly Long
NA	000327	000335	Infratech Corporation	All	(d), (e)	Holly Long
NA	000336	000343	Intercon Construction Inc	All	(d), (e)	Holly Long
NA	000344	000351	Intren LLC	All	(d), (e)	Holly Long
NA	000352	000359	Irby Construction Company	All	(d), (e)	Holly Long
NA	000360	000367	J F Electric Inc	All	(d), (e)	Holly Long
NA	000368	000375	J Ranck Electric Inc	All	(d), (e)	Holly Long
NA	000376	000386	Jaflo Inc	All	(d), (e)	Holly Long
NA	000387	000394	JBL Electric Inc	All	(d), (e)	Holly Long
NA	000395	000402	JCR Construction Company Inc	All	(d), (e)	Holly Long
NA	000403	000411	Jordan High Voltage Inc	All	(d), (e)	Holly Long
NA	000412	000421	JW Didado Electric LLC	All	(d), (e)	Holly Long
NA	000422	000431	Kent Power Inc.	All	(d), (e)	Holly Long
NA	000432	000442	Lakeside Environmental Consultants (ECI)	All	(d), (e)	Holly Long

NA	000443	000450	Le Com Inc	All	(d), (e)	Holly Long
NA	000451	000458	Lee Electrical Construction Inc	All	(d), (e)	Holly Long
NA	000459	000469	Lewis Tree Service Inc- Embedded	All	(d), (e)	Holly Long
NA	000470	000480	Lewis Tree Service Inc-Non Embedded	All	(d), (e)	Holly Long
NA	000481	000488	Linetec Services LLC	All	(d), (e)	Holly Long
NA	000489	000496	M.J. Electric LLC	All	(d), (e)	Holly Long
NA	000497	000504	M10 Inc (Michels Corp)	All	(d), (e)	Holly Long
NA	000505	000512	Main Lite Electric Company Inc	All	(d), (e)	Holly Long
NA	000513	000520	MasTec North America Inc	All	(d), (e)	Holly Long
NA	000521	000528	Matrix North American Construction	All	(d), (e)	Holly Long
NA	000529	000537	MDR Construction Inc	All	(d), (e)	Holly Long
NA	000538	000547	Meade Inc	All	(d), (e)	Holly Long
NA	000548	000555	Midwest Powerline LLC	All	(d), (e)	Holly Long
NA	000556	000563	Mohawk Electric LLC	All	(d), (e)	Holly Long
NA	000564	000571	MP Systems Inc	All	(d), (e)	Holly Long
NA	000572	000579	Musgrove Construction Inc	All	(d), (e)	Holly Long
NA	000580	000588	Nelson Tree Services Inc	All	(d), (e)	Holly Long
NA	000589	000596	New River Electrical Corporation	All	(d), (e)	Holly Long
NA	000597	000607	Northeast Service Inc (Horton)	All	(d), (e)	Holly Long

NA	000608	000616	Northline Ventures Inc	All	(d), (e)	Holly Long
NA	000617	000623	Northstar Energy Solutions LLC (Can-Fer)	All	(d), (e)	Holly Long
NA	000624	000631	On Power Inc	All	(d), (e)	Holly Long
NA	000632	000639	Overhead Lines LLC	All	(d), (e)	Holly Long
NA	000640	000647	PAR Electrical Contractors Inc	All	(d), (e)	Holly Long
NA	000648	000658	Penn Line Service Inc	All	(d), (e)	Holly Long
NA	000659	000667	Pike Electric LLC	All	(d), (e)	Holly Long
NA	000668	000675	PMI Energy Solutions LLC	All	(d), (e)	Holly Long
NA	000676	000683	Power Line Services Inc	All	(d), (e)	Holly Long
NA	000684	000691	PowerGrid Services LLC	All	(d), (e)	Holly Long
NA	000692	000700	Powertown Line Construction LLC	All	(d), (e)	Holly Long
NA	000701	000708	Primoris T&D Services LLC (Willbros)	All	(d), (e)	Holly Long
NA	000709	000716	Quality Lines Inc	All	(d), (e)	Holly Long
NA	000717	000724	Richardson Wayland Electrical LLC	All	(d), (e)	Holly Long
NA	000725	000732	Riggs Distler and Company Inc	All	(d), (e)	Holly Long
NA	000733	000740	River City Construction Inc	All	(d), (e)	Holly Long
NA	000741	000751	ROWC LLC (Diamond D)	All	(d), (e)	Holly Long
NA	000752	000759	Service Electric Company	All	(d), (e)	Holly Long
NA	000760	000770	Solscales LLC	All	(d), (e)	Holly Long

NA	000771	000778	Southern Electric Corp of Mississip	All	(d), (e)	Holly Long
NA	000779	000786	SPE Utility Contractors LLC	All	(d), (e)	Holly Long
NA	000787	000794	State Electric Corporation	All	(d), (e)	Holly Long
NA	000795	000803	Stay Safe Solutions LLC	All	(d), (e)	Holly Long
NA	000804	000811	Thayer Power and Communication Line	All	(d), (e)	Holly Long
NA	000812	000822	The Davey Tree Expert Company	All	(d), (e)	Holly Long
NA	000823	000830	The Fishel Company	All	(d), (e)	Holly Long
NA	000831	000839	The L.E. Myers Co	All	(d), (e)	Holly Long
NA	000840	000846	The Robert Henry Corporation	All	(d), (e)	Holly Long
NA	000847	000854	Thompson Electric Inc	All	(d), (e)	Holly Long
NA	000855	000865	Townsend Tree Service Company Inc	All	(d), (e)	Holly Long
NA	000866	000876	Trees Inc	All	(d), (e)	Holly Long
NA	000877	000884	Utility Lines Construction Services	All	(d), (e)	Holly Long
NA	000885	000892	Valiant Power Group Inc	All	(d), (e)	Holly Long
NA	000893	000901	Volt Power LLC	All	(d), (e)	Holly Long
NA	000902	000912	W A Kendall and Company Inc	All	(d), (e)	Holly Long
NA	000913	000920	Wampole Miller LLC	All	(d), (e)	Holly Long
NA	000921	000928	Wilco Electrical LLC	All	(d), (e)	Holly Long
NA	000929	000937	William E. Groves Construction Inc	All	(d), (e)	Holly Long

NA	000938	000950	Wright Tree Service Inc	All	(d), (e)	Holly Long
NA	000951	000958	Xtreme Powerline Construction Inc	All	(d), (e)	Holly Long
NA	000959	000971	Xylem Inc	All	(d), (e)	Holly Long
NA	000972	000993	DH-1 Support File	All	(d), (e)	David Hughes
NA	[000994]	[000994]	Compilation of data exported from REDi (FPL's internal system used for managing resources working on storm restoration) together with information developed by the Cost Finalization Team.	All	(d), (e)	Clare Gerard

EXHIBIT D

DECLARATIONS

EXHIBIT D

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Evaluation of storm costs for
Florida Power & Light Company related to
Hurricane Dorian

Docket No: 2020____-EI

DECLARATION OF HOLLY LONG

1. My name is Holly Long. I am currently employed by Florida Power & Light Company as Director of Finance Operations. I have personal knowledge of the matters stated in this declaration.

2. I have reviewed the documents and information included in Exhibit A to Florida Power & Light Company's ("FPL's") Request for Confidential Classification, for which I am listed as the declarant on Exhibit C. The documents and files 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. Additionally, the documents and files that I have reviewed and which are asserted by FPL to be proprietary confidential business information 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.



Holly Long

Date: June 26, 2020

EXHIBIT D

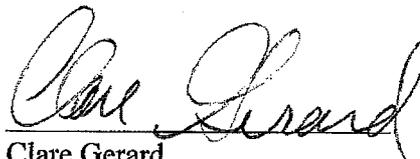
BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Evaluation of storm costs for
Florida Power & Light Company related to
Hurricane Dorian

Docket No: 2020 ____ -EI

DECLARATION OF CLARE GERARD

1. My name is Clare Gerard. I am currently employed by Florida Power & Light Company as Senior Director of Business Services – Power Distribution. I have personal knowledge of the matters stated in this declaration.
2. I have reviewed the documents and information included in Exhibit A to Florida Power & Light Company's ("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 competitive interests. Specifically, the information constitutes 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. 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.



Clare Gerard

Date: June 26, 2020

EXHIBIT D

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Evaluation of storm costs for
Florida Power & Light Company related to
Hurricane Dorian

Docket No: 2020 ____ -EI

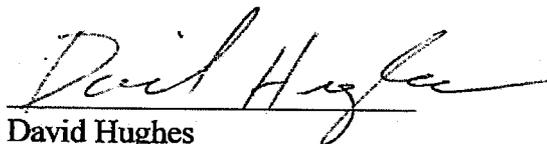
DECLARATION OF DAVID HUGHES

1. My name is David Hughes. I am currently employed by Florida Power & Light Company as Assistant Controller – Finance. I have personal knowledge of the matters stated in this declaration.

2. I have reviewed the documents and information included in Exhibit A to Florida Power & Light Company's ("FPL's") Request for Confidential Classification, for which I am listed as the declarant on Exhibit C. The documents and files 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. Additionally, the documents and files that I have reviewed and which are asserted by FPL to be proprietary confidential business information 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.



David Hughes

Date: June 26, 2020