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March 8, 2021

VIA HAND DELIVERY

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

Re: Docket No. 20210001-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 First Request for Production of Documents (No. 2). 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 is the declaration in support of FPL's request.

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

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

Sincerely,

/s/David M. Lee
David M. Lee

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2021 MAR -8 PM 1:56
COMMISSION CLERK

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: 20210001-EI

Date: March 8, 2021

**FLORIDA POWER & LIGHT COMPANY'S REQUEST
FOR CONFIDENTIAL CLASSIFICATION OF INFORMATION
PROVIDED IN RESPONSE TO THE OFFICE OF PUBLIC
COUNSEL'S FIRST REQUEST FOR PRODUCTION OF DOCUMENTS (NO. 2)**

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 Office of Public Counsel ("OPC") First Request for Production of Documents (No. 2) ("Confidential Discovery Response"). In support of its Request, FPL states as follows:

1. On January 21, 2021, OPC served its First Request for Production of Documents (Nos. 1-10) on FPL. FPL's Response to OPC's First Request for Production of Documents (No. 2) contains information of a confidential nature within the meaning of Section 366.093(3), Florida Statutes.

2. FPL served its responses to OPC's First Request for Production of Documents (Nos. 1-10) on March 8, 2021. This request is being filed contemporaneously with the service of the responses to OPC's discovery 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 copy of the Confidential Discovery Response 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 Response on which all information that FPL asserts is entitled to confidential treatment is redacted.

c. Exhibit C is a table containing a page-and-line identification of the information highlighted 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 Lisa Fuca in support of this Request.

4. 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.

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 relating to competitive interests, the disclosure of which would impair the competitive business of FPL and its vendors. This information is protected by Section 366.093(3)(e), Fla. Stat.

6. 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 materials and declaration included herewith, Florida Power & Light Company respectfully requests that its Request for Confidential Classification be granted.

Respectfully submitted,

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By: /s/ David M. Lee
David M. Lee
Florida Bar No. 103152

CERTIFICATE OF SERVICE

Docket No. 20210001-EI

I **HEREBY CERTIFY** that a true and correct copy of FPL's Request for Confidential Classification* has been furnished by electronic service this 8th day of March 2021 to the following:

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Chemicals, Inc. d/b/a PCS Phosphate -
White Springs**

By: /s/ David M. Lee
David M. Lee
Florida Bar No. 103152

* The exhibits to this Request are not included with the service copies. Exhibit B was served with FPL's Response to OPC's First Request for Production of Documents, No. 2. Copies of Exhibits C and D are available upon request.

EXHIBIT B

REDACTED

REDACTED VERSION OF CONFIDENTIAL DOCUMENTS

OPC's First Request for Production of Documents (No. 2)

[Bates Nos. FCR-21-000001 through FCR-21-000300]

and

[Bates Nos. FCR-21-004003 through FCR-21-004127]

EXHIBIT C

JUSTIFICATION TABLE

EXHIBIT C

COMPANY: Florida Power & Light Company
TITLE: List of Confidential Documents
DOCKET NO.: 20210001-EI
DOCKET TITLE: Fuel and Purchased Power Cost Recovery Clause with Generating Performance Incentive Factor
SUBJECT: FPL's Response to OPC's First Request for Production (No. 2)
DATE: March 8, 2021

OPC's First POD's	Bates Nos.	Description	Line No./ Col. No.	Florida Statute 366.093(3) Subsection	Declarant
Request No. 2	FCR-21-000001 through FCR-21-000008	Electric Rotating Stator Generator with Permanent Magnets and Fixed Rotor with Concentrated Windings: Analysis and Study on its Magnetic Circuit	ALL	(e)	L. Fuca
	FCR-21-000009 through FCR-21-000017	7/15/20 ElectroMechanical Engineering Associates, Inc. Review of Analysis of TP 4 PMG Failure Rev 0	ALL		
	FCR-21-000018 through FCR-21-000028	7/15/20 ElectroMechanical Engineering Associates, Inc. Review of Analysis of TP 4 PMG Failure Rev 1	ALL		
	FCR-21-000029 through FCR-21-000057	INPO July 2004 Topical Report TR4-38	ALL		
	FCR-21-000058 through FCR-21-000110	INPO August 2005 Topical Report TR5-48	ALL		
	FCR-21-000111 through FCR-21-000288	EPRI December 2002 Final Report	ALL		
	FCR-21-000289 through FCR-21-000300	12/3/1998 presentation at EPRI - PM and overhaul experience – brushless exciter EPRI report	ALL		
	FCR-21-004003 through FCR-21-004009	Siemen's General Inspection Report	ALL		
	FCR-21-004010 through FCR-21-004127	Siemen's General Inspection / Generator Rotor Bore Inspection Report	ALL		

EXHIBIT D

DECLARATIONS

EXHIBIT D

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Fuel and Purchase Power Cost Recovery
Clause with Generating Performance Incentive
Factor

Docket No: 20210001-EI

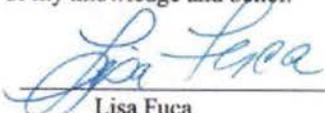
DECLARATION OF LISA FUCA

1. My name is Lisa Fuca. I am currently employed by Florida Power & Light Company ("FPL") as Principal Business Analyst, Nuclear Business Operations. I have personal knowledge of the matters stated in this written declaration.

2. I have reviewed the documents and information included in Exhibit A to FPL's Request for Confidential Classification. The documents and materials in Exhibit A which are asserted by FPL to be proprietary confidential business relate to competitive interests of third parties. Specifically, the confidential documents contain information provided pursuant to FPL's contracts that prohibit FPL from disclosing the subject data. Disclosure of this information would impair FPL's efforts to contract with third parties for their services on favorable terms in the future, to the detriment of FPL's customers. 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.



Lisa Fuca

Date: 2/18/2021