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May 10, 2021

VIA HAND DELIVERY

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

REDACTED

RECEIVED-FPSC
MAY 10 PM 3:15
COMMISSION
CLERK

Re: Docket No. 20210015-EI

Dear Mr. Teitzman:

I enclose for filing in the above docket Florida Power & Light Company's ("FPL") Request for Confidential Classification of Information contained in its response to Office of Public Counsel's ("OPC") First Request for Production of Documents No. 36, and OPC's Fifth Request for Production of Documents, No. 91. The request includes Exhibits A, B (two copies), C and D.

Exhibit A consists of the documents containing confidential information, which are on a disc due to volume, that is the subject of FPL's Request for Confidential Classification. Exhibit A is submitted for filing in an envelope marked "EXHIBIT A" – CONFIDENTIAL. Documents in Exhibit A are voluminous and confidential in their entirety, and they are being provided electronically on a disc. Exhibit B is an edited version of Exhibit A, in which the information FPL asserts is confidential has been redacted. For the documents that are confidential in their entirety, FPL has included only identifying cover pages in Exhibit B. Exhibit C is a justification table in support of FPL's Request for Confidential Classification. Exhibit D contains the declarations in support of FPL's Request. In accordance with Rule 25-22.006(3)(d), FPL requests confidential treatment of the information in Exhibit A pending disposition of FPL's Request for Confidential Classification.

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

- COM _____
- AFD** Eyh B
- APA _____
- ECO _____
- ENG _____
- GCL _____
- IDM _____
- CLK _____

Enclosure

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

Sincerely,

/s/ Maria Jose Moncada

Maria Jose Moncada
Senior Attorney
Fla. Bar No. 0773301

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Petition by Florida Power & Light
Company for Rate Unification and for Base
Rate Increase

Docket No. 20210015-EI

Filed: May 10, 2021

**FLORIDA POWER & LIGHT COMPANY'S REQUEST FOR CONFIDENTIAL
CLASSIFICATION OF CERTAIN INFORMATION PROVIDED IN ITS
RESPONSES TO OPC'S FIRST REQUEST FOR PRODUCTION OF DOCUMENTS,
No. 36 AND OPC'S FIFTH REQUEST FOR PRODUCTION OF DOCUMENTS, No. 91**

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 its supplemental responses to Office of Public Counsel's ("OPC") First Request for Production of Documents, No. 36 and OPC's Fifth Request for Production of Documents, No. 91 (the "Confidential Information"). In support of its Request, FPL states as follows:

1. FPL served its responses to OPC's First Request for Production of Documents, No. 36 and OPC's Fifth First Request for Production of Documents, No. 91 on May 10, 2021. This request is being filed contemporaneously with service of those responses to request confidential classification of certain information contained in its response to OPC's First Request for Production of Documents No. 36 and OPC's Fifth Request for Production of Documents, No. 91, consistent with Rule 25-22.006, Florida Administrative Code.

2. The following exhibits are included with and made a part of this request:

a. Exhibit A consists of a copy of the confidential material on which all the information that FPL asserts is entitled to confidential treatment has been highlighted. Both response are voluminous and they are being provided electronically on disc.

b. Exhibit B consists of a copy of the confidential documents, on which all the information that is entitled to confidential treatment under Florida law has been redacted. For the

documents that are confidential in their entirety, FPL has included only identifying cover pages in Exhibit B.

c. Exhibit C is a table that identifies by column and line the information for which confidential treatment is being sought and references the specific statutory basis for the claim of confidentiality. Exhibit C also identifies the declarants who support the requested classification.

d. Exhibit D contains the declarations of the individuals who support the requested classification.

3. The Confidential Information is intended to be and has been treated by FPL as private, its confidentiality has been maintained, and its disclosure would cause harm to FPL and its customers. Pursuant to Section 366.093, Fla. Stat., 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 included as Exhibit D, the Confidential Information consists of proprietary confidential business information, the disclosure of which would cause harm to FPL's customers and its business operations. Specifically, some information contains contractual data such as pricing information the disclosure of which would impair the efforts of FPL to contract for goods or services on favorable terms. This information is protected by Sections 366.093(3) (d), Fla. Stat.

5. Upon a finding by the Commission that the Confidential Information is proprietary confidential business information, the information should not be declassified for a period of at

least eighteen (18) months and should be returned to FPL as soon as the information is no longer necessary for the Commission to conduct its business. See § 399.093(4), Fla. Stat.

WHEREFORE, for the above and foregoing reasons, as more fully set forth in the supporting materials and declarations included herewith, FPL respectfully requests that its Request for Confidential Classification be granted.

Respectfully submitted,

FLORIDA POWER & LIGHT COMPANY

By: /s/ Maria Jose Moncada

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Authorized House Counsel No. 0062190

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CERTIFICATE OF SERVICE
20210015-EI

I HEREBY CERTIFY that a true and correct copy of the foregoing* has been furnished by electronic mail this 10th day May 2021 to the following parties:

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**Attorneys for Florida Rising, Inc.
League of United Latin American Citizens of
Florida
Environmental Confederation of Southwest
Florida, Inc.**

By: s/ Maria Jose Moncada
Maria Jose Moncada
Florida Bar No. 0773301

* The exhibits to this Request are not included with the service copies, but copies of Exhibits B, C and D are available upon request.

EXHIBIT B

REDACTED

FPL's Response to OPC's 1st Request for Production of Documents, No. 36, Bates Nos. 007267-012699 is confidential in its entirety

FPL's Response to OPC's 5th Request for Production of Documents, No. 91, Bates Nos. 046000-046990 is confidential in its entirety

EXHIBIT C

JUSTIFICATION TABLE

EXHIBIT C

COMPANY: Florida Power & Light Company
TITLE: Petition by Florida Power & Light Company for Base Rate Increase and Rate Unification Company
DOCKET NO.: 20210015-EI
DATE: May 10, 2021

Int/POD No.	Begin Bates Number	End Bates Number	Description	Confidential	Page Line/Col	Florida Statute 366.093 (3) Subsection	Declarant
OPC's 1 st Request for Production of Documents, No. 36	007267	007284	Babcock Preserve.xlsx	Y	All	(d)	Jeffrey Kopp
OPC's 1 st Request for Production of Documents, No. 36	007285	007302	Babcock Ranch.xlsx	Y	All	(d)	Jeffrey Kopp
OPC's 1 st Request for Production of Documents, No. 36	007303	007320	Barefoot Bay.xlsx	Y	All	(d)	Jeffrey Kopp
OPC's 1 st Request for Production of Documents, No. 36	007321	007338	Blue Cypress.xlsx	Y	All	(d)	Jeffrey Kopp

Int/POD No.	Begin Bates Number	End Bates Number	Description	Confidential	Page Line/Col	Florida Statute 366.093 (3) Subsection	Declarant
OPC's 1 st Request for Production of Documents, No. 36	007339	007356	Blue Heron.xlsx	Y	All	(d)	Jeffrey Kopp
OPC's 1 st Request for Production of Documents, No. 36	007357	007374	Blue Indigo.xlsx	Y	All	(d)	Jeffrey Kopp
OPC's 1 st Request for Production of Documents, No. 36	007375	007399	Cape Canaveral.xlsx	Y	All	(d)	Jeffrey Kopp
OPC's 1 st Request for Production of Documents, No. 36	007400	007417	Cattle Ranch.xlsx	Y	All	(d)	Jeffrey Kopp
OPC's 1 st Request for Production of Documents, No. 36	007418	007435	Citrus Solar.xlsx	Y	All	(d)	Jeffrey Kopp
OPC's 1 st Request for Production of Documents, No. 36	007436	007453	Coral Farms.xlsx	Y	All	(d)	Jeffrey Kopp

Int/POD No.	Begin Bates Number	End Bates Number	Description	Confidential	Page Line/Col	Florida Statute 366.093 (3) Subsection	Declarant
OPC's 1 st Request for Production of Documents, No. 36	007454	007480	Crist.xlsx	Y	All	(d)	Jeffrey Kopp
OPC's 1 st Request for Production of Documents, No. 36	012000	012025	Dania Beach.xlsx	Y	All	(d)	Jeffrey Kopp
OPC's 1 st Request for Production of Documents, No. 36	007481	007498	Desoto.xlsx	Y	All	(d)	Jeffrey Kopp
OPC's 1 st Request for Production of Documents, No. 36	012026	012042	Echo River.xlsx	Y	All	(d)	Jeffrey Kopp
OPC's 1 st Request for Production of Documents, No. 36	012043	012066	Ft. Myers.xlsx	Y	All	(d)	Jeffrey Kopp
OPC's 1 st Request for Production of Documents, No. 36	012607	012093	Gulf Daniel.xlsx	Y	All	(d)	Jeffrey Kopp

Int/POD No.	Begin Bates Number	End Bates Number	Description	Confidential	Page Line/Col	Florida Statute 366.093 (3) Subsection	Declarant
OPC's 1 st Request for Production of Documents, No. 36	012094	012111	Hammock.xlsx	Y	All	(d)	Jeffrey Kopp
OPC's 1 st Request for Production of Documents, No. 36	012112	012128	Hibiscus.xlsx	Y	All	(d)	Jeffrey Kopp
OPC's 1 st Request for Production of Documents, No. 36	012129	012146	Horizon.xlsx	Y	All	(d)	Jeffrey Kopp
OPC's 1 st Request for Production of Documents, No. 36	012147	012164	Indian River.xlsx	Y	All	(d)	Jeffrey Kopp
OPC's 1 st Request for Production of Documents, No. 36	012165	012181	Interstate.xlsx	Y	All	(d)	Jeffrey Kopp
OPC's 1 st Request for Production of Documents, No. 36	012182	012205	Lauderdale.xlsx	Y	All	(d)	Jeffrey Kopp

Int/POD No.	Begin Bates Number	End Bates Number	Description	Confidential	Page Line/Col	Florida Statute 366.093 (3) Subsection	Declarant
OPC's 1 st Request for Production of Documents, No. 36	012206	012223	Loggerhead.xlsx	Y	All	(d)	Jeffrey Kopp
OPC's 1 st Request for Production of Documents, No. 36	012245	012262	Manatee.xlsx	Y	All	(d)	Jeffrey Kopp
OPC's 1 st Request for Production of Documents, No. 36	012224	012244	Manatee Battery.xlsx	Y	All	(d)	Jeffrey Kopp
OPC's 1 st Request for Production of Documents, No. 36	012263	012288	Martin.xlsx	Y	All	(d)	Jeffrey Kopp
OPC's 1 st Request for Production of Documents, No. 36	012289	012306	Miami Dade.xlsx	Y	All	(d)	Jeffrey Kopp
OPC's 1 st Request for Production of Documents, No. 36	012307	012324	Northern Preserve.xlsx	Y	All	(d)	Jeffrey Kopp

Int/POD No.	Begin Bates Number	End Bates Number	Description	Confidential	Page Line/Col	Florida Statute 366.093 (3) Subsection	Declarant
OPC's 1 st Request for Production of Documents, No. 36	012325	012350	Okeechobee.xlsx	Y	All	(d)	Jeffrey Kopp
OPC's 1 st Request for Production of Documents, No. 36	012351	012367	Pea Ridge.xlsx	Y	All	(d)	Jeffrey Kopp
OPC's 1 st Request for Production of Documents, No. 36	012377	012402	Perdido.xlsx	Y	All	(d)	Jeffrey Kopp
OPC's 1 st Request for Production of Documents, No. 36	012403	012420	Pioneer.xlsx	Y	All	(d)	Jeffrey Kopp
OPC's 1 st Request for Production of Documents, No. 36	012421	012446	Port Everglades.xlsx	Y	All	(d)	Jeffrey Kopp
OPC's 1 st Request for Production of Documents, No. 36	012447	012472	Riviera Beach.xlsx	Y	All	(d)	Jeffrey Kopp

Int/POD No.	Begin Bates Number	End Bates Number	Description	Confidential	Page Line/Col	Florida Statute 366.093 (3) Subsection	Declarant
OPC's 1 st Request for Production of Documents, No. 36	012473	012498	Sanford.xlsx	Y	All	(d)	Jeffrey Kopp
OPC's 1 st Request for Production of Documents, No. 36	012499	012526	Scherer.xlsx	Y	All	(d)	Jeffrey Kopp
OPC's 1 st Request for Production of Documents, No. 36	012527	012543	Solar Proxy.xlsx	Y	All	(d)	Jeffrey Kopp
OPC's 1 st Request for Production of Documents, No. 36	012544	012560	Southfork.xlsx	Y	All	(d)	Jeffrey Kopp
OPC's 1 st Request for Production of Documents, No. 36	012561	012577	Space Coast.xlsx	Y	All	(d)	Jeffrey Kopp
OPC's 1 st Request for Production of Documents, No. 36	012578	012594	Sunshine.xlsx	Y	All	(d)	Jeffrey Kopp

Int/POD No.	Begin Bates Number	End Bates Number	Description	Confidential	Page Line/Col	Florida Statute 366.093 (3) Subsection	Declarant
OPC's 1 st Request for Production of Documents, No. 36	012595	012611	Sweetbay.xlsx	Y	All	(d)	Jeffrey Kopp
OPC's 1 st Request for Production of Documents, No. 36	012612	012637	Turkey Point.xlsx	Y	All	(d)	Jeffrey Kopp
OPC's 1 st Request for Production of Documents, No. 36	012638	012655	Twin Lakes.xlsx	Y	All	(d)	Jeffrey Kopp
OPC's 1 st Request for Production of Documents, No. 36	012656	012681	West County.xlsx	Y	All	(d)	Jeffrey Kopp
OPC's 1 st Request for Production of Documents, No. 36	012682	012699	Wildflower.xlsx	Y	All	(d)	Jeffrey Kopp
OPC's 5 th Request for Production of Documents, No. 91	046000	046017	Babcock Preserve.xlsx	Y	All	(d)	Jeffrey Kopp

Int/POD No.	Begin Bates Number	End Bates Number	Description	Confidential	Page Line/Col	Florida Statute 366.093 (3) Subsection	Declarant
OPC's 5th Request for Production of Documents, No. 91	046018	043035	Babcock Ranch.xlsx	Y	All	(d)	Jeffrey Kopp
OPC's 5th Request for Production of Documents, No. 91	046036	046053	Barefoot Bay.xlsx	Y	All	(d)	Jeffrey Kopp
OPC's 5th Request for Production of Documents, No. 91	046054	046071	Blue Cypress.xlsx	Y	All	(d)	Jeffrey Kopp
OPC's 5th Request for Production of Documents, No. 91	046072	046089	Blue Heron.xlsx	Y	All	(d)	Jeffrey Kopp
OPC's 5th Request for Production of Documents, No. 91	046090	046107	Blue Indigo.xlsx	Y	All	(d)	Jeffrey Kopp
OPC's 5th Request for Production of Documents, No. 91	046108	046132	Cape Canaveral.xlsx	Y	All	(d)	Jeffrey Kopp

Int/POD No.	Begin Bates Number	End Bates Number	Description	Confidential	Page Line/Col	Florida Statute 366.093 (3) Subsection	Declarant
OPC's 5th Request for Production of Documents, No. 91	046133	046150	Cattle Ranch.xlsx	Y	All	(d)	Jeffrey Kopp
OPC's 5th Request for Production of Documents, No. 91	046151	046170	Citrus Solar.xlsx	Y	All	(d)	Jeffrey Kopp
OPC's 5th Request for Production of Documents, No. 91	046171	046188	Coral Farms.xlsx	Y	All	(d)	Jeffrey Kopp
OPC's 5th Request for Production of Documents, No. 91	046189	046215	Crist.xlsx	Y	All	(d)	Jeffrey Kopp
OPC's 5th Request for Production of Documents, No. 91	046216	046241	Dania Beach.xlsx	Y	All	(d)	Jeffrey Kopp
OPC's 5th Request for Production of Documents, No. 91	046242	046259	Desoto.xlsx	Y	All	(d)	Jeffrey Kopp

Int/POD No.	Begin Bates Number	End Bates Number	Description	Confidential	Page Line/Col	Florida Statute 366.093 (3) Subsection	Declarant
OPC's 5th Request for Production of Documents, No. 91	046260	046277	Echo River.xlsx	Y	All	(d)	Jeffrey Kopp
OPC's 5th Request for Production of Documents, No. 91	046278	046301	Ft. Myers.xlsx	Y	All	(d)	Jeffrey Kopp
OPC's 5th Request for Production of Documents, No. 91	046302	046328	Gulf Daniel.xlsx	Y	All	(d)	Jeffrey Kopp
OPC's 5th Request for Production of Documents, No. 91	046329	046346	Hammock.xlsx	Y	All	(d)	Jeffrey Kopp
OPC's 5th Request for Production of Documents, No. 91	046347	046366	Hibiscus.xlsx	Y	All	(d)	Jeffrey Kopp
OPC's 5th Request for Production of Documents, No. 91	046367	046384	Horizon.xlsx	Y	All	(d)	Jeffrey Kopp

Int/POD No.	Begin Bates Number	End Bates Number	Description	Confidential	Page Line/Col	Florida Statute 366.093 (3) Subsection	Declarant
OPC's 5th Request for Production of Documents, No. 91	046385	046402	Indian River.xlsx	Y	All	(d)	Jeffrey Kopp
OPC's 5th Request for Production of Documents, No. 91	046403	046420	Interstate.xlsx	Y	All	(d)	Jeffrey Kopp
OPC's 5th Request for Production of Documents, No. 91	046421	046444	Lauderdale.xlsx	Y	All	(d)	Jeffrey Kopp
OPC's 5th Request for Production of Documents, No. 91	046445	046462	Loggerhead.xlsx	Y	All	(d)	Jeffrey Kopp
OPC's 5th Request for Production of Documents, No. 91	046463	046482	Manatee Battery.xlsx	Y	All	(d)	Jeffrey Kopp
OPC's 5th Request for Production of Documents, No. 91	046483	046502	Manatee Solar.xlsx	Y	All	(d)	Jeffrey Kopp

Int/POD No.	Begin Bates Number	End Bates Number	Description	Confidential	Page Line/Col	Florida Statute 366.093 (3) Subsection	Declarant
OPC's 5th Request for Production of Documents, No. 91	046503	046525	Manatee.xlsx	Y	All	(d)	Jeffrey Kopp
OPC's 5th Request for Production of Documents, No. 91	046526	046551	Martin.xlsx	Y	All	(d)	Jeffrey Kopp
OPC's 5th Request for Production of Documents, No. 91	046552	046569	Miami Dade.xlsx	Y	All	(d)	Jeffrey Kopp
OPC's 5th Request for Production of Documents, No. 91	046570	046587	Northern Preserve.xlsx	Y	All	(d)	Jeffrey Kopp
OPC's 5th Request for Production of Documents, No. 91	046588	046607	Okeechobee Solar.xlsx	Y	All	(d)	Jeffrey Kopp
OPC's 5th Request for Production of Documents, No. 91	046608	046633	Okeechobee.xlsx	Y	All	(d)	Jeffrey Kopp

Int/POD No.	Begin Bates Number	End Bates Number	Description	Confidential	Page Line/Col	Florida Statute 366.093 (3) Subsection	Declarant
OPC's 5th Request for Production of Documents, No. 91	046634	046659	Pea Ridge.xlsx	Y	All	(d)	Jeffrey Kopp
OPC's 5th Request for Production of Documents, No. 91	046660	046685	Perdido.xlsx	Y	All	(d)	Jeffrey Kopp
OPC's 5th Request for Production of Documents, No. 91	046686	046703	Pioneer.xlsx	Y	All	(d)	Jeffrey Kopp
OPC's 5th Request for Production of Documents, No. 91	046704	046729	Port Everglades.xlsx	Y	All	(d)	Jeffrey Kopp
OPC's 5th Request for Production of Documents, No. 91	046730	046755	Riviera Beach.xlsx	Y	All	(d)	Jeffrey Kopp
OPC's 5th Request for Production of Documents, No. 91	046756	046781	Sanford.xlsx	Y	All	(d)	Jeffrey Kopp

Int/POD No.	Begin Bates Number	End Bates Number	Description	Confidential	Page Line/Col	Florida Statute 366.093 (3) Subsection	Declarant
OPC's 5th Request for Production of Documents, No. 91	046782	046810	Scherer.xlsx	Y	All	(d)	Jeffrey Kopp
OPC's 5th Request for Production of Documents, No. 91	046811	046830	Solar Proxy.xlsx	Y	All	(d)	Jeffrey Kopp
OPC's 5th Request for Production of Documents, No. 91	046831	046848	Southfork.xlsx	Y	All	(d)	Jeffrey Kopp
OPC's 5th Request for Production of Documents, No. 91	046849	046866	Space Coast.xlsx	Y	All	(d)	Jeffrey Kopp
OPC's 5th Request for Production of Documents, No. 91	046867	046884	Sunshine.xlsx	Y	All	(d)	Jeffrey Kopp
OPC's 5th Request for Production of Documents, No. 91	046885	046902	Sweetbay.xlsx	Y	All	(d)	Jeffrey Kopp

Int/POD No.	Begin Bates Number	End Bates Number	Description	Confidential	Page Line/Col	Florida Statute 366.093 (3) Subsection	Declarant
OPC's 5th Request for Production of Documents, No. 91	046903	046928	Turkey Point.xlsx	Y	All	(d)	Jeffrey Kopp
OPC's 5th Request for Production of Documents, No. 91	046929	046946	Twin Lakes.xlsx	Y	All	(d)	Jeffrey Kopp
OPC's 5th Request for Production of Documents, No. 91	046947	046972	West County.xlsx	Y	All	(d)	Jeffrey Kopp
OPC's 5th Request for Production of Documents, No. 91	046973	046990	Wildflower.xlsx	Y	All	(d)	Jeffrey Kopp

EXHIBIT D

DECLARATIONS

EXHIBIT D

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Petition by Florida Power & Light Company
for Rate Unification and for Base Rate Increase

Docket No: 20210015-EI

DECLARATION OF JEFFREY T. KOPP

1. My name is Jeffrey T. Kopp. I am currently employed by 1898 & Company as Managing Director of Utility Consulting. I have personal knowledge of the matters stated in this written declaration.

2. I have reviewed the documents referenced and incorporated in FPL's Request for Confidential Classification, specifically the materials provided in my responses to Office of the Public Counsel's First Request for Production of Documents, No. 36, and Fifth Request for Production of Documents, No. 91. The documents or materials that I have reviewed and which are proprietary confidential business information contain competitive business information the disclosure of which would impair the competitive business of the provider of the information. Specifically, some information contains contractual data such as pricing information 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 these documents and materials.

3. Consistent with the provisions of the Florida Administrative Code, such materials should remain confidential for a period of not less than 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.



Jeffrey T. Kopp

Date: _____

5-7-2021