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May 11, 2021

VIA HAND DELIVERY

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

REDACTED

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2021 MAY 11 PM 2:51
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 Florida Retail Federation's ("FRF") First Set of Interrogatories No. 3. The request includes Exhibits A, B (two copies), C, and D.

Exhibit A consists of the documents containing confidential information that is the subject of FPL's Request for Confidential Classification. 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 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.

- COM _____
- AFD 1 *ex 8*
- 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 11, 2021

**FLORIDA POWER & LIGHT COMPANY'S REQUEST FOR CONFIDENTIAL
CLASSIFICATION OF CERTAIN INFORMATION PROVIDED IN ITS
RESPONSES TO FRF'S FIRST SET OF INTERROGATORIES**

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 Florida Retail Federation's ("FRF") First Set of Interrogatories (the "Confidential Information"). In support of its Request, FPL states as follows:

1. FPL served its responses to FRF's First Set of Interrogatories ("INT") on May 11, 2021. This request is being filed contemporaneously with service of those responses to request confidential classification of certain information contained in its response to FRF's First Set of Interrogatories No. 3, 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.
 - 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.
 - 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 information relating to competitive interests, the disclosure of which would impair the competitive business of FPL. Specifically, some information contains data related to projected system load peaks and transfer limits. This information is protected by Sections 366.093(3) (e), 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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CERTIFICATE OF SERVICE
20210015-EI

I HEREBY CERTIFY that a true and correct copy of the foregoing* has been furnished by electronic mail this 11th day of May 2021 to the following parties:

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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

QUESTION:

For this interrogatory, please reference Witness Sim's Direct Testimony at page 60. Please state the expected system conditions and time of year under which the transfer capability of the NFRC will be limited.

- a. What is the projected transfer capability during the periods when the transfer capability is projected to be constrained?
- b. Please describe the nature of the constraint (thermal or other).

RESPONSE: (do not edit or delete this line or anything above this)

[REDACTED]

- b. The constraints are thermal overloads.

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
DOCKET NO.: 20210015-EI
DATE: May 11, 2021

Int/POD No.	Description	No. of Pages	Conf. Y/N	Line / Column	Florida Statute 366.093(3) Subsection	Declarants
FRF's 1 st Set of Interrogatories, No. 3	System Transfer Limits	1	Y	Lines 1-13	(e)	Steve Sim

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

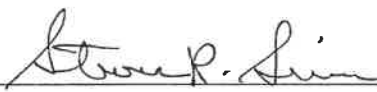
DECLARATION OF STEVEN R. SIM

1. My name is Steven R. Sim. I am currently employed by Florida Power & Light Company ("FPL") as Director of Integrated Resource Planning. 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 response Florida Retail Federation's First Set of Interrogatories No. 3. 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, the information contains projected system peak loads and transfer limits. 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.



Steven R. Sim

Date: 5/7/2021