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May 24, 2021

**VIA HAND DELIVERY**

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

**Re: Docket No. 20210015-EI**

**REDACTED**

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 Southern Alliance for Clean Energy's ("SACE") Second Request for Production of Documents, No. 6. 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** \_\_\_\_\_
- APA \_\_\_\_\_
- ECO \_\_\_\_\_
- ENG \_\_\_\_\_
- GCL \_\_\_\_\_
- IDM \_\_\_\_\_
- CLK \_\_\_\_\_

1 Ex B

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

Sincerely,

/s/ Maria Jose Moncada  
Maria Jose Moncada  
Senior Attorney  
Fla. Bar No. 0773301

RECEIVED-FPSC  
2021 MAY 24 PM 2:44  
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: Petition by Florida Power & Light  
Company for Rate Unification and for Base  
Rate Increase

Docket No. 20210015-EI

Filed: May 24, 2021

**FLORIDA POWER & LIGHT COMPANY'S REQUEST FOR CONFIDENTIAL  
CLASSIFICATION OF CERTAIN INFORMATION PROVIDED  
IN ITS RESPONSE TO SACE'S SECOND REQUEST FOR  
PRODUCTION OF DOCUMENTS No. 6.**

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 response to Southern Alliance for Clean Energy's ("SACE") Second Request for Production of Documents No. 6 (the "Confidential Information"). In support of its Request, FPL states as follows:

1. FPL served its responses to SACE's Second Request for Production of Documents ("POD") on May 24, 2021. This request is being filed contemporaneously with service of those responses to request confidential classification of certain information contained in its response to SACE's Second Request for Production of Documents No. 6, 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, and 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, some information contains pricing data for fuel contracts and fuel price projections. This information is protected by Sections 366.093(3) (d) and (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 24<sup>th</sup> 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**

PMS 147 Approved Methodology, E-req 2 in Col 23  
 PMS 147 Approved Methodology, E-req 2 in Col 23  
 PMS 147 Approved Methodology, E-req 2 in Col 23

Plus 104 forecast to 2056 for EP GDP fuel  
 Plus 104 forecast to 2056 for EP GDP fuel  
 Plus 104 forecast to 2056 for EP GDP fuel

California EITF  
 California EITF  
 California EITF

California EITF  
 California EITF  
 California EITF

California EITF  
 California EITF  
 California EITF

MONTH	EP Annual Natural Price Forecast				P.M. Annual Natural Price Forecast				Average of Forward Curve			
	Hub	WT	0.7% G/NH Residual	LN-LSL	Hub	WT	0.7% G/NH Residual	LN-LSL	Hub	WT	0.7% G/NH Residual	LN-LSL
Jan-16	2.7	87.0	67.67	2.00	2.7	87.0	67.67	2.00	2.7	87.0	67.67	2.00
Feb-16	2.83	83.9	67.78	2.27	2.83	83.9	67.78	2.27	2.83	83.9	67.78	2.27
Mar-16	2.8	81.0	68.81	2.39	2.8	81.0	68.81	2.39	2.8	81.0	68.81	2.39
Apr-16	2.66	83.9	68.28	2.09	2.66	83.9	68.28	2.09	2.66	83.9	68.28	2.09
May-16	2.67	88.86	67.63	2.17	2.67	88.86	67.63	2.17	2.67	88.86	67.63	2.17
Jun-16	2.88	77.53	69.81	2.39	2.88	77.53	69.81	2.39	2.88	77.53	69.81	2.39
Jul-16	3.00	68.23	72.52	2.21	3.00	68.23	72.52	2.21	3.00	68.23	72.52	2.21
Aug-16	2.62	70.49	67.61	2.13	2.62	70.49	67.61	2.13	2.62	70.49	67.61	2.13
Sep-16	2.85	67.35	68.11	2.12	2.85	67.35	68.11	2.12	2.85	67.35	68.11	2.12
Oct-16	2.62	70.85	75.08	2.35	2.62	70.85	75.08	2.35	2.62	70.85	75.08	2.35
Nov-16	3.18	68.17	68.05	2.39	3.18	68.17	68.05	2.39	3.18	68.17	68.05	2.39
Dec-16	2.78	88.28	68.3	1.85	2.78	88.28	68.3	1.85	2.78	88.28	68.3	1.85
Jan-17	2.8	7.28	63.78	2.06	2.8	7.28	63.78	2.06	2.8	7.28	63.78	2.06
Feb-17	2.88	62.57	67.28	1.88	2.88	62.57	67.28	1.88	2.88	62.57	67.28	1.88
Mar-17	2.88	68.82	68.88	2.02	2.88	68.82	68.88	2.02	2.88	68.82	68.88	2.02
Apr-17	2.71	68.63	70.3	1.97	2.71	68.63	70.3	1.97	2.71	68.63	70.3	1.97
May-17	2.67	65.78	68.85	2.08	2.67	65.78	68.85	2.08	2.67	65.78	68.85	2.08
Jun-17	2.63	62.86	67.57	1.8	2.63	62.86	67.57	1.8	2.63	62.86	67.57	1.8
Jul-17	2.98	68.68	68.4	1.8	2.98	68.68	68.4	1.8	2.98	68.68	68.4	1.8
Aug-17	2.1	68.22	63.28	1.88	2.1	68.22	63.28	1.88	2.1	68.22	63.28	1.88
Sep-17	2.58	66.3	67.88	1.88	2.58	66.3	67.88	1.88	2.58	66.3	67.88	1.88
Oct-17	2.3	68.08	68.28	1.81	2.3	68.08	68.28	1.81	2.3	68.08	68.28	1.81
Nov-17	2.85	5.38	67.88	1.88	2.85	5.38	67.88	1.88	2.85	5.38	67.88	1.88
Dec-17	2.7	67.11	75.23	1.88	2.7	67.11	75.23	1.88	2.7	67.11	75.23	1.88
Jan-18	2.18	61.22	75.8	2.08	2.18	61.22	75.8	2.08	2.18	61.22	75.8	2.08
Feb-18	1.88	58.8	67.88	1.82	1.88	58.8	67.88	1.82	1.88	58.8	67.88	1.82
Mar-18	1.82	63.78	68.08	1.9	1.82	63.78	68.08	1.9	1.82	63.78	68.08	1.9
Apr-18	1.85	22.3	58.27	1.91	1.85	22.3	58.27	1.91	1.85	22.3	58.27	1.91
May-18	1.78	13.01	57.4	0.78	1.78	13.01	57.4	0.78	1.78	13.01	57.4	0.78
Jun-18	1.72	32.88	1.83	0.88	1.72	32.88	1.83	0.88	1.72	32.88	1.83	0.88
Jul-18	1.88	0.16	6.57	1.88	1.88	0.16	6.57	1.88	1.88	0.16	6.57	1.88
Aug-18	1.88	1.88	8.38	1.22	1.88	1.88	8.38	1.22	1.88	1.88	8.38	1.22
Sep-18	2.58	2.58	0	1.38	2.58	2.58	0	1.38	2.58	2.58	0	1.38
Oct-18	2.18	38.88	3.82	1.18	2.18	38.88	3.82	1.18	2.18	38.88	3.82	1.18
Nov-18	2.818	38.22	7.78	1.13	2.818	38.22	7.78	1.13	2.818	38.22	7.78	1.13
Dec-18	2.88	38.88	7.82	1.15	2.88	38.88	7.82	1.15	2.88	38.88	7.82	1.15
Jan-19	2.88	38.88	7.82	1.15	2.88	38.88	7.82	1.15	2.88	38.88	7.82	1.15
Feb-19	2.7	0.28	6.58	1.18	2.7	0.28	6.58	1.18	2.7	0.28	6.58	1.18
Mar-19	2.122	0.88	8.22	1.15	2.122	0.88	8.22	1.15	2.122	0.88	8.22	1.15
Apr-19	2.801	0.68	8.8	1.28	2.801	0.68	8.8	1.28	2.801	0.68	8.8	1.28
May-19	2.781	1.28	8.88	1.21	2.781	1.28	8.88	1.21	2.781	1.28	8.88	1.21
Jun-19	2.788	1.88	8.88	1.22	2.788	1.88	8.88	1.22	2.788	1.88	8.88	1.22
Jul-19	2.817	1.78	8.18	1.2	2.817	1.78	8.18	1.2	2.817	1.78	8.18	1.2
Aug-19	2.828	1.87	8.88	1.28	2.828	1.87	8.88	1.28	2.828	1.87	8.88	1.28
Sep-19	2.811	2.17	8.88	1.27	2.811	2.17	8.88	1.27	2.811	2.17	8.88	1.27
Oct-19	2.8	2.38	8.88	1.28	2.8	2.38	8.88	1.28	2.8	2.38	8.88	1.28
Nov-19	2.888	2.88	8.18	1.28	2.888	2.88	8.18	1.28	2.888	2.88	8.18	1.28
Dec-19	2.828	3.8	8.88	1.38	2.828	3.8	8.88	1.38	2.828	3.8	8.88	1.38
Jan-20	2.188	2.88	8.88	1.31	2.188	2.88	8.88	1.31	2.188	2.88	8.88	1.31
Feb-20	1.986	2.88	8.88	1.35	1.986	2.88	8.88	1.35	1.986	2.88	8.88	1.35
Mar-20	2.80	2.71	6.18	1.32	2.80	2.71	6.18	1.32	2.80	2.71	6.18	1.32
Apr-20	2.73	2.88	5.38	1.32	2.73	2.88	5.38	1.32	2.73	2.88	5.38	1.32
May-20	2.88	2.88	5.18	1.32	2.88	2.88	5.18	1.32	2.88	2.88	5.18	1.32
Jun-20	2.81	2.88	5.18	1.35	2.81	2.88	5.18	1.35	2.81	2.88	5.18	1.35
Jul-20	2.88	3.88	6.28	1.8	2.88	3.88	6.28	1.8	2.88	3.88	6.28	1.8
Aug-20	2.88	3.1	6.28	1.35	2.88	3.1	6.28	1.35	2.88	3.1	6.28	1.35
Sep-20	2.88	3.25	6.28	1.38	2.88	3.25	6.28	1.38	2.88	3.25	6.28	1.38
Oct-20	2.78	3.38	6.28	1.37	2.78	3.38	6.28	1.37	2.78	3.38	6.28	1.37
Nov-20	2.887	3.3	6.28	1.38	2.887	3.3	6.28	1.38	2.887	3.3	6.28	1.38
Dec-20	2.78	3.38	6.28	1.38	2.78	3.38	6.28	1.38	2.78	3.38	6.28	1.38
Jan-21	2.78	3.38	6.28	1.38	2.78	3.38	6.28	1.38	2.78	3.38	6.28	1.38
Feb-21	2.78	3.38	6.28	1.38	2.78	3.38	6.28	1.38	2.78	3.38	6.28	1.38
Mar-21	2.78	3.38	6.28	1.38	2.78	3.38	6.28	1.38	2.78	3.38	6.28	1.38
Apr-21	2.78	3.38	6.28	1.38	2.78	3.38	6.28	1.38	2.78	3.38	6.28	1.38
May-21	2.78	3.38	6.28	1.38	2.78	3.38	6.28	1.38	2.78	3.38	6.28	1.38
Jun-21	2.78	3.38	6.28	1.38	2.78	3.38	6.28	1.38	2.78	3.38	6.28	1.38
Jul-21	2.78	3.38	6.28	1.38	2.78	3.38	6.28	1.38	2.78	3.38	6.28	1.38
Aug-21	2.78	3.38	6.28	1.38	2.78	3.38	6.28	1.38	2.78	3.38	6.28	1.38
Sep-21	2.78	3.38	6.28	1.38	2.78	3.38	6.28	1.38	2.78	3.38	6.28	1.38
Oct-21	2.78	3.38	6.28	1.38	2.78	3.38	6.28	1.38	2.78	3.38	6.28	1.38
Nov-21	2.78	3.38	6.28	1.38	2.78	3.38	6.28	1.38	2.78	3.38	6.28	1.38
Dec-21	2.78	3.38	6.28	1.38	2.78	3.38	6.28	1.38	2.78	3.38	6.28	1.38

EP Annual Natural Price Forecast		P.M. Annual Natural Price Forecast		Average of Forward Curve	
Hub	WT	0.7% G/NH Residual	LN-LSL	Hub	WT
Jan-16	2.7	87.0	67.67	2.7	87.0
Feb-16	2.83	83.9	67.78	2.83	83.9
Mar-16	2.8	81.0	68.81	2.8	81.0
Apr-16	2.66	83.9	68.28	2.66	83.9
May-16	2.67	88.86	67.63	2.67	88.86
Jun-16	2.88	77.53	69.81	2.88	77.53
Jul-16	3.00	68.23	72.52	3.00	68.23
Aug-16	2.62	70.49	67.61	2.62	70.49
Sep-16	2.85	67.35	68.11	2.85	67.35
Oct-16	2.62	70.85	75.08	2.62	70.85
Nov-16	3.18	68.17	68.05	3.18	68.17
Dec-16	2.78	88.28	68.3	2.78	88.28
Jan-17	2.8	7.28	63.78	2.8	7.28
Feb-17	2.88	62.57	67.28	2.88	62.57
Mar-17	2.88	68.82	68.88	2.88	68.82
Apr-17	2.71	68.63	70.3	2.71	68.63
May-17	2.67	65.78	68.85	2.67	65.78
Jun-17	2.63	62.86	67.57	2.63	62.86
Jul-17	2.98	68.68	68.4	2.98	68.68
Aug-17	2.1	68.22	63.28	2.1	68.22
Sep-17	2.58	66.3	67.88	2.58	66.3
Oct-17	2.3	68.08	68.28	2.3	68.08
Nov-17	2.85	5.38	67.88	2.85	5.38
Dec-17	2.7	67.11	75.23	2.7	67.11
Jan-18	2.18	61.22	75.8	2.18	61.22
Feb-18	1.88	58.8	67.88	1.88	58.8
Mar-18	1.82	63.78	68.08	1.82	63.78
Apr-18	1.85	22.3	58.27	1.85	22.3
May-18	1.78	13.01	57.4	1.78	13.01
Jun-18	1.72	32.88	1.83	1.72	32.88
Jul-18	1.88	0.16	6.57	1.88	0.16
Aug-18	1.88	1.88	8.38	1.88	1.88
Sep-18	2.58	2.58	0	2.58	2.58
Oct-18	2.18	38.88	3.82	2.18	38.88
Nov-18	2.818	38.22	7.78	2.818	38.22
Dec-18	2.88	38.88	7.82	2.88	38.88
Jan-19	2.88	38.88	7.82	2.88	38.88
Feb-19	2.7	0.28	6.58	2.7	0.28
Mar-19	2.122	0.88	8.22	2.122	0.88
Apr-19	2.801	0.68	8.8	2.801	0.68
May-19	2.781	1.28	8.88	2.781	1.28
Jun-19	2.788	1.88	8.88	2.788	1.88
Jul-19	2.817	1.78	8.18		



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Table with 100 columns and multiple rows, mostly blank. The table structure is defined by the column headers at the top and the row numbers on the left side.

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Year	Month	Day	Time	Location	Activity	Remarks
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# **EXHIBIT C**

## **JUSTIFICATION TABLE**



**EXHIBIT C**

**COMPANY:** Florida Power & Light Company  
**TITLE:** Petition by Florida Power & Light Company for Rate Unification and for Base Rate Increase

**DOCKET NO.:** 20210015-EI  
**DATE:** May 24, 2021

<b>Int/POD No.</b>	<b>Description</b>	<b>No. of Pages</b>	<b>Conf. Y/N</b>	<b>Page / Line / Column</b>	<b>Florida Statute 366.093(3) Subsection</b>	<b>Declarants</b>
SACE Second Request for Production of Documents, No. 6	Fuel Prices and Fuel Price Projections	8	Y	Page 1 / 12-16 / L-0	(d) (e)	Sam Forrest
SACE Second Request for Production of Documents, No. 6	Fuel Prices and Fuel Price Projections	8	Y	Page 1 / 17-35 / H-0	(d) (e)	Sam Forrest
SACE Second Request for Production of Documents, No. 6	Fuel Prices and Fuel Price Projections	8	Y	Page 1 / 36-45 / H-L	(d) (e)	Sam Forrest
SACE Second Request for Production of Documents, No. 6	Fuel Prices and Fuel Price Projections	8	Y	Page 1 / 46-94 / H-K	(d) (e)	Sam Forrest
SACE Second Request for Production of Documents, No. 6	Fuel Prices and Fuel Price Projections	8	Y	Pages 1-8 / 72-1007 / B-E	(d) (e)	Sam Forrest

# **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

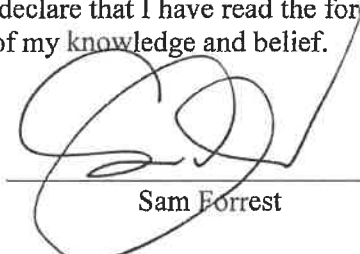
**DECLARATION OF SAM FORREST**

1. My name is Sam Forrest. I am currently employed by Florida Power & Light Company ("FPL") as Vice President of Energy Marketing and Trading. 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 to Southern Alliance for Clean Energy's Second Request for Production of Documents, No. 6. 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, as well as 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 information contains fuel contract pricing and fuel price projections. 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.

  
\_\_\_\_\_  
Sam Forrest

Date: 5/20/2021