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June 8, 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 Florida Public Service Commission Staff's ("Staff") Third Request for Production of Documents Nos. 11 and 12, and Staff's Third Set of Interrogatories No. 80. The request includes Exhibits A, B (two copies), C and D.

Exhibit A consists of the documents containing confidential information, some of 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. Certain 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

Sincerely,

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

Enclosure

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

- COM _____
- AFD** 1 exhb
- APA _____
- ECO _____
- ENG _____
- GCL _____
- IDM _____
- CLK _____

RECEIVED-FPSC
2021 JUN -8 PM 3:46
COMMISSION CLERK

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: June 8, 2021

**FLORIDA POWER & LIGHT COMPANY’S REQUEST FOR CONFIDENTIAL
CLASSIFICATION OF CERTAIN INFORMATION PROVIDED IN ITS RESPONSES
TO STAFF’S THIRD REQUEST FOR PRODUCTION OF DOCUMENTS
NOS. 11 AND 12 AND THIRD SET OF INTERROGATORIES NO. 80**

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 responses to Florida Public Service Commission Staff’s (“Staff”) Third Request for Production of Documents Nos. 11 and 12 and Third Set of Interrogatories No. 80 (the “Confidential Information”). In support of its Request, FPL states as follows:

1. FPL served responses to Staff’s Third Request for Production of Documents Nos. 11 and 12 and Third Set of Interrogatories No. 80 on June 8, 2021. This request is being filed contemporaneously with service of those responses to request confidential classification of certain information contained in its response to Staff’s Third Request for Production of Documents Nos. 11 and 12, and Third Set of Interrogatories No. 80, 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. Attachments to Staff’s Third Request for Production of Documents No. 12 are voluminous and confidential in their entirety, 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 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, as well as information relating to competitive interests, the disclosure of which would impair the competitive business of FPL. Specifically, some information is related to construction project bids, and fuel prices and fuel price projections. This information is protected by Section 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 8th day of June 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:
North Florida Resiliency Connection (NFRC) Transmission Line Project

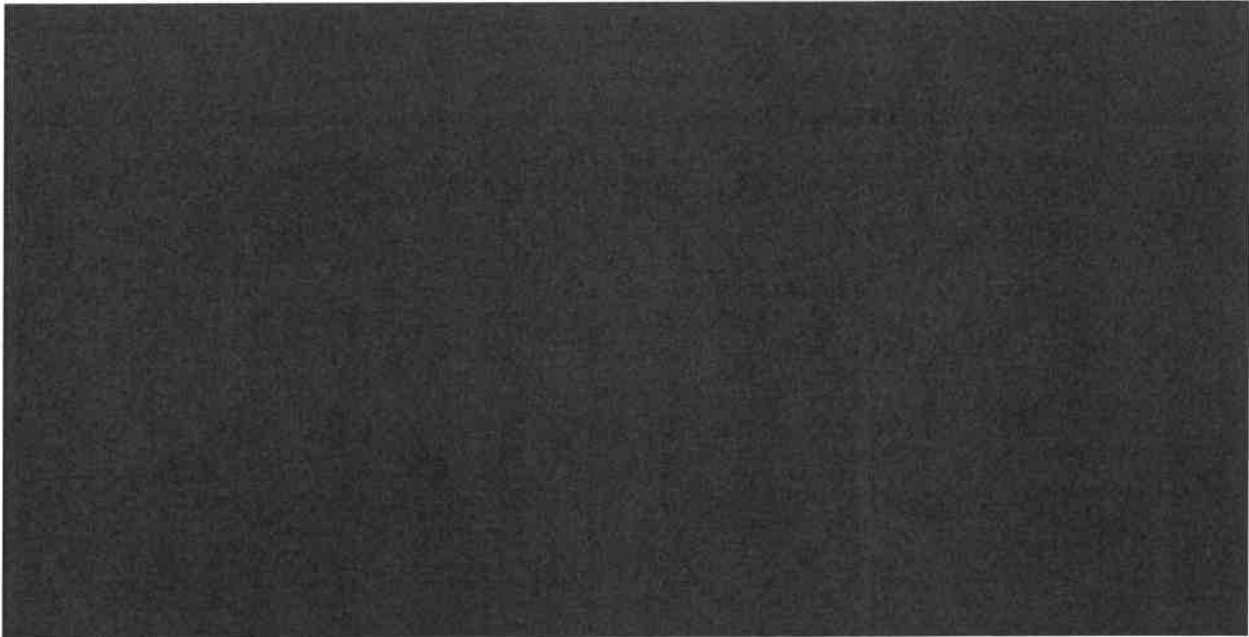
Please refer to FPL witness Sim's direct testimony, page 13, lines 1-2. Please indicate whether or not a request for proposals (RFP) was issued for construction of the transmission line. If so, please complete the table below listing each bidder, the total cost per bidder, and the reason why the bidder was/was not selected. If FPL has not and does not intend to issue a RFP, please explain why in detail.

Bidder Name	Total Cost	Reason for Selection/Rejection

RESPONSE:
Yes. Please see the confidential table below.

A B C

1
2
3
4
5
6
7
8
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10
11
12
13
14
15



	A	B	C	D	E	F	G	H	I	J	K	L
3	ASSET OPTIMIZATION DETAIL											
4	Actual for the Period of: January 2021 through December 2021											
5												
6	(1)	(2)	(3)	(4)	(5)	(6)	(7)	(8)	(9)	(10)	(11)	(12)
7		Natural Gas	Natural Gas	Natural Gas	Natural Gas	Delivered	Natural Gas	Natural Gas	OGA	Electric Transmission	NOX	Total
8		Delivered City-Gate	Production Area	Capacity Release	Option	Natural Gas	Storage	AMA	Service	Capacity Release	Emissions	Asset Optimization
9		Sales	Sales	Firm Transport	Premiums	Savings	Optimization	Gains	Gains	Firm Transmission	Sales	Gains
10	Month	(\$)	(\$)	(\$)	(\$)	(\$)	(\$)	(\$)	(\$)	(\$)	(\$)	(\$)
11												
12	January											1,947,560
13												
14	February											3,538,152
15												
16	March											1,872,307
17												
18	April											0
19												
20	May											0
21												
22	June											0
23												
24	July											0
25												
26	August											0
27												
28	September											0
29												
30	October											0
31												
32	November											0
33												
34	December											0
35												
36	Total	435,563	227,672	793,037	2,585,337	0	2,094,497	1,008,000	12,900	0	0	7,156,168

	A	B	C	D	E	F	G	H	I
1	ASSET OPTIMIZATION DETAIL								
2	Actual for the Period of: January 2013 through December 2013								
3									
4	(1)	(2)	(3)	(4)	(5)	(6)	(7)	(8)	(9)
5		Natural Gas	Natural Gas	Natural Gas	Natural Gas	Natural Gas	Natural Gas	Electric Transmission	Total
6		Delivered City-Gate	Production Area	Capacity Release	Option	Storage	AMA	Capacity Release	Asset Optimization
7		Sales	Sales	Firm Transport	Premiums	Optimization	Gains	Firm Transmission	Gains
8	Month	(\$)	(\$)	(\$)	(\$)	(\$)	(\$)	(\$)	(\$)
9									
10	January								252,822
11									
12	February								468,770
13									
14	March								386,343
15									
16	April								1,323,425
17									
18	May								1,260,419
19									
20	June								1,014,037
21									
22	July								1,137,216
23									
24	August								908,988
25									
26	September								1,122,089
27									
28	October								1,016,305
29									
30	November								557,181
31									
32	December								757,524
33									
34	Total	908,857	2,649,611	678,798	3,162,795	158,513	1,569,554	1,076,991	10,205,119

	A	B	C	D	E	F	G	H	I	J
1	ASSET OPTIMIZATION DETAIL									
2	Actual for the Period of January 2014 through December 2014									
3										
4	(1)	(2)	(3)	(4)	(5)	(6)	(7)	(8)	(9)	(10)
5		Natural Gas	Natural Gas	Natural Gas	Natural Gas	Natural Gas	Natural Gas	Coal	Electric Transmission	Total
6		Delivered City-Gate	Production Area	Capacity Release	Option	Storage	AMA	Sales	Capacity Release	Asset Optimization
7		Sales	Sales	Firm Transport	Premiums	Optimization	Gains	Gains	Firm Transmission	Gains
8	Month	(\$)	(\$)	(\$)	(\$)	(\$)	(\$)	(\$)	(\$)	(\$)
10	January									2,046,044
12	February									1,064,077
14	March									1,411,207
16	April									826,424
18	May									961,429
20	June									1,709,376
22	July									933,564
24	August									906,071
26	September									923,907
28	October									895,393
30	November									960,785
32	December									984,394
34	Total	744,104	964,123	1,006,558	5,895,600	1,030,023	2,302,331	20,000	1,659,932	13,622,670

	A	B	C	D	E	F	G	H	I
1	ASSET OPTIMIZATION DETAIL								
2	Actual for the Period of: January 2015 through December 2015								
3									
4	(1)	(2)	(3)	(4)	(5)	(6)	(7)	(8)	(9)
5		Natural Gas	Natural Gas	Natural Gas	Natural Gas	Natural Gas	Natural Gas	Electric Transmission	Total
6		Delivered City-Gate	Production Area	Capacity Release	Option	Storage	AMA	Capacity Release	Asset Optimization
7		Sales	Sales	Firm Transport	Premiums	Optimization	Gains	Firm Transmission	Gains
8	Month	(\$)	(\$)	(\$)	(\$)	(\$)	(\$)	(\$)	(\$)
10	January								1,382,983
12	February								2,108,498
14	March								1,327,720
16	April								1,065,146
18	May								1,098,629
20	June								885,670
22	July								898,360
24	August								752,095
26	September								848,241
28	October								894,303
30	November								883,821
32	December								1,763,400
34	Total	1,260,405	471,992	856,448	6,963,597	725,204	1,545,201	2,086,020	13,908,866

	A	B	C	D	E	F	G	H	I	J	K
1	ASSET OPTIMIZATION DETAIL										
2	Actual for the Period of: January 2016 through December 2016										
3											
4	(1)	(2)	(3)	(4)	(5)	(6)	(7)	(8)	(9)	(10)	(11)
5		Natural Gas	Natural Gas	Natural Gas	Natural Gas	Delivered	Natural Gas	Natural Gas	Electric Transmission	NOX	Total
6		Delivered City-Gate	Production Area	Capacity Release	Option	Natural Gas	Storage	AMA	Capacity Release	Emissions	Asset Optimization
7		Sales	Sales	Firm Transport	Premiums	Savings	Optimization	Gains	Firm Transmission	Sales	Gains
8	Month	(\$)	(\$)	(\$)	(\$)	(\$)	(\$)	(\$)	(\$)	(\$)	(\$)
9											
10	January										2,089,200
11											
12	February										2,170,466
13											
14	March										2,397,346
15											
16	April										1,460,364
17											
18	May										1,647,415
19											
20	June										977,805
21											
22	July										1,252,890
23											
24	August										1,735,230
25											
26	September										918,409
27											
28	October										1,365,228
29											
30	November										1,109,624
31											
32	December										1,522,727
33											
34	Total	2,553,001	465,746	264,299	6,731,475	1,976,565	1,083,371	816,138	4,099,574	656,538	18,646,705

	A	B	C	D	E	F	G	H	I
1	ASSET OPTIMIZATION DETAIL								
2	Actual for the Period of: January 2017 through December 2017								
3									
4	(1)	(2)	(3)	(4)	(5)	(6)	(7)	(8)	(9)
5		Natural Gas	Natural Gas	Natural Gas	Natural Gas	Natural Gas	Natural Gas	NOX	Total
6		Delivered City-Gate	Production Area	Capacity Release	Option	Storage	AMA	Emissions	Asset Optimization
7		Sales	Sales	Firm Transport	Premiums	Optimization	Gains	Sales	Gains
8	Month	(\$)	(\$)	(\$)	(\$)	(\$)	(\$)	(\$)	(\$)
9									
10	January								1,032,914
11									
12	February								1,168,100
13									
14	March								1,120,311
15									
16	April								1,121,805
17									
18	May								1,975,986
19									
20	June								1,656,384
21									
22	July								1,744,266
23									
24	August								2,069,815
25									
26	September								1,851,678
27									
28	October								1,220,333
29									
30	November								1,417,614
31									
32	December								2,383,603
33									
34	Total	3,538,237	602,559	3,217,971	8,945,075	861,359	1,478,429	119,180	18,762,809

	A	B	C	D	E	F	G	H	I	J	K
1	ASSET OPTIMIZATION DETAIL										
2	Actual for the Period of January 2018 through December 2018										
3											
4	(1)	(2)	(3)	(4)	(5)	(6)	(7)	(8)	(9)	(10)	(10)
5		Natural Gas	Natural Gas	Natural Gas	Natural Gas	Delivered	Natural Gas	Natural Gas	Electric Transmission	NOX	Total
6		Delivered City-Gate	Production Area	Capacity Release	Option	Natural Gas	Storage	AMA	Capacity Release	Emissions	Asset Optimization
7		Sales	Sales	Firm Transport	Premiums	Savings	Optimization	Gains	Firm Transmission	Sales	Gains
8	Month	(\$)	(\$)	(\$)	(\$)	(\$)	(\$)	(\$)	(\$)	(\$)	(\$)
9											
10	January										6,917,445
11	February										1,599,802
12	March										1,674,495
13	April										1,005,623
14	May										1,464,993
15	June										1,362,678
16	July										1,310,817
17	August										1,114,406
18	September										1,335,598
19	October										1,191,781
20	November										1,614,537
21	December										1,406,134
22											
23											
24											
25											
26											
27											
28											
29											
30											
31											
32											
33											
34	Total	5,752,546	959,088	1,870,986	8,120,859	0	3,307,897	1,986,933	0	0	21,998,309

	A	B	C	D	E	F	G	H	I	J	K
1	ASSET OPTIMIZATION DETAIL										
2	Actual for the Period of January 2019 through December 2019										
3											
4	(1)	(2)	(3)	(4)	(5)	(6)	(7)	(8)	(9)	(10)	(10)
5		Natural Gas	Natural Gas	Natural Gas	Natural Gas	Delivered	Natural Gas	Natural Gas	Electric Transmission	NOX	Total
6		Delivered City-Gate	Production Area	Capacity Release	Option	Natural Gas	Storage	AMA	Capacity Release	Emissions	Asset Optimization
7		Sales	Sales	Firm Transport	Premiums	Savings	Optimization	Gains	Firm Transmission	Sales	Gains
8	Month	(\$)	(\$)	(\$)	(\$)	(\$)	(\$)	(\$)	(\$)	(\$)	(\$)
10	January										1,322,235
12	February										1,114,490
14	March										1,527,355
16	April										918,027
18	May										1,358,121
20	June										1,415,887
22	July										1,322,462
24	August										1,403,601
26	September										1,389,963
28	October										1,252,833
30	November										1,439,401
32	December										1,950,180
34	Total	2,871,488	764,202	2,187,698	7,502,695	0	721,237	2,364,635	0	600	16,412,556

	A	B	C	D	E	F	G	H	I	J	K	L
1	ASSET OPTIMIZATION DETAIL											
2	Actual for the Period of: January 2020 through December 2020											
3												
4	(1)	(2)	(3)	(4)	(5)	(6)	(7)	(8)	(9)	(10)	(11)	(12)
5		Natural Gas	Natural Gas	Natural Gas	Natural Gas	Delivered	Natural Gas	Natural Gas	OBA	Electric Transmission	NOX	Total
6		Delivered City-Gate	Production Area	Capacity Release	Option	Natural Gas	Storage	AMA	Service	Capacity Release	Emissions	Asset Optimization
7		Sales	Sales	Firm Transport	Premiums	Savings	Optimization	Gains	Gains	Firm Transmission	Sales	Gains
8	Month	(\$)	(\$)	(\$)	(\$)	(\$)	(\$)	(\$)	(\$)	(\$)	(\$)	(\$)
10	January											
12	February											
14	March											
16	April											
18	May											
20	June											
22	July											
24	August											
26	September											
28	October											
30	November											
32	December											
34	Total	1,919,429	800,131	2,836,728	7,546,469	0	1,679,113	3,161,263	28,000	0	0	17,975,132

The documents responsive to Staff's Third Request for
Production of Documents No. 12, Bates Nos. 062097-063126,
are confidential in their entirety

EXHIBIT C

COMPANY: Florida Power & Light Company
TITLE: Petition by Florida Power & Light Company for Rate Unification and Base Rate Increase
DOCKET NO.: 20210015-EI
DATE: June 8, 2021

Int/POD No.	Description	No. of Pages	Conf. Y/N	Bates Nos.	Line / Column	Florida Statute 366.093(3) Subsection	Declarants
Staff's 3 rd Interrogatory, No. 80	Request for Proposals Bids	1	Y	063127	1-15/A-C	(d)	Matt Valle
Staff's 3 rd POD, No. 11	2013-2020 Fuel Costs and Fuel Cost Projections	8	Y	062027	Page 1 10-32/B-H	(e)	Sam Forrest
Staff's 3 rd POD, No. 11	2013-2020 Fuel Costs and Fuel Cost Projections	8	Y	062028	Page 2 10-32/B-I	(e)	Sam Forrest
Staff's 3 rd POD, No. 11	2013-2020 Fuel Costs and Fuel Cost Projections	8	Y	062029	Page 3 10-32/B-H	(e)	Sam Forrest

Int/POD No.	Description	No. of Pages	Conf. Y/N	Bates Nos.	Line / Column	Florida Statute 366.093(3) Subsection	Declarants
Staff's 3 rd POD, No. 11	2013-2020 Fuel Costs and Fuel Cost Projections	8	Y	062030	Page 4 10-32/B-J	(e)	Sam Forrest
Staff's 3 rd POD, No. 11	2013-2020 Fuel Costs and Fuel Cost Projections	8	Y	062031	Page 5 10-32/B-H	(e)	Sam Forrest
Staff's 3 rd POD, No. 11	2013-2020 Fuel Costs and Fuel Cost Projections	8	Y	062032-062033	Pages 6-7 10-32/B-J	(e)	Sam Forrest
Staff's 3 rd POD, No. 11	2013-2020 Fuel Costs and Fuel Cost Projections	8	Y	062034	Page 8 10-32/B-L	(e)	Sam Forrest
Staff's 3 rd POD, No. 11	2021 YTD Fuel Costs and Fuel Cost Projections	1	Y	062025	12-34/B-K	(e)	Sam Forrest
Staff's 3 rd POD, No. 12	Pike Construction Bid	26	Y	062097-062122	All	(d)	Matt Valle
Staff's 3 rd POD, No. 12	Probst Construction Bid	254	Y	062123-062376	All	(d)	Matt Valle

Int/POD No.	Description	No. of Pages	Conf. Y/N	Bates Nos.	Line / Column	Florida Statute 366.093(3) Subsection	Declarants
Staff's 3 rd POD, No. 12	EC Source Construction Bid	275	Y	062377-062651	All	(d)	Matt Valle
Staff's 3 rd POD, No. 12	Irby Construction Bid	254	Y	062652-062905	All	(d)	Matt Valle
Staff's 3 rd POD, No. 12	Pike Construction Bid	194	Y	062906-063099	All	(d)	Matt Valle
Staff's 3 rd POD, No. 12	Probst Construction Bid	27	Y	063100-063126	All	(d)	Matt Valle

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

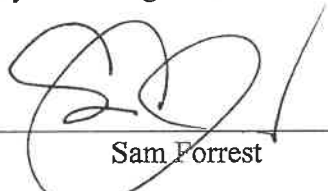
DECLARATION OF SAM FORREST

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 FPL's response to Staff's Third Request for Production of Documents, No. 11. 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: 6/7/2021

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 MATT VALLE

1. My name is Matt Valle. I am currently employed by Florida Power & Light Company ("FPL") as Vice-President, Development. 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 FPL's response to Staff's Third Request for Production of Documents, No. 12, and Staff's Third Set of Interrogatories, No. 80. The documents or materials that I have reviewed and which are proprietary confidential business information contain 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 vendor bids relating to construction projects. 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.



Matt Valle

Date: _____

6/7/21