



**Maria Jose Moncada**  
Senior Attorney  
Florida Power & Light Company  
700 Universe Boulevard  
Juno Beach, FL 33408-0420  
(561) 304-5795  
(561) 691-7135 (Facsimile)  
Email : maria.moncada@fpl.com

June 9, 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 First Supplemental Response to Office of Public Counsel's ("OPC") Third Set of Interrogatories No. 148. 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 A is submitted for filing in an envelope marked "EXHIBIT A" – CONFIDENTIAL. 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.

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

- COM \_\_\_\_\_
- AFD 1 Exh B
- APA \_\_\_\_\_
- ECO \_\_\_\_\_
- ENG \_\_\_\_\_
- GCL \_\_\_\_\_
- IDM \_\_\_\_\_
- CLK \_\_\_\_\_ Enclosure

Sincerely,

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

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2021 JUN -9 PM 4: 01  
COMMISSION CLERK

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: June 9, 2021

**FLORIDA POWER & LIGHT COMPANY'S REQUEST FOR CONFIDENTIAL  
CLASSIFICATION OF CERTAIN INFORMATION  
PROVIDED IN ITS FIRST SUPPLEMENTAL RESPONSE TO  
OPC'S THIRD SET OF INTERROGATORIES NO. 148**

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 First Supplemental Response to Office of Public Counsel's ("OPC") Third Set of Interrogatories No. 148 (the "Confidential Information"). In support of its Request, FPL states as follows:

1. FPL served its First Supplemental response to OPC's Third Set of Interrogatories No. 148 on June 9, 2021. This request is being filed contemporaneously with service of those responses to request confidential classification of certain information contained in its First Supplemental Response to OPC's Third Set of Interrogatories No. 148, 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. 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 interest rates paid on certain loans. This information is protected by Section 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

R. Wade Litchfield  
Vice President and General Counsel  
Authorized House Counsel No. 0062190  
wade.litchfield@fpl.com  
John T. Burnett  
Vice President and Deputy General Counsel  
Florida Bar No. 173304  
john.t.burnett@fpl.com  
Russell Badders  
Vice President and Associate General Counsel  
Florida Bar No. 007455  
russell.badders@nexteraenergy.com  
Maria Jose Moncada  
Senior Attorney  
Florida Bar No. 0773301  
will.p.cox@fpl.com  
Florida Power & Light Company  
700 Universe Boulevard  
Juno Beach, Florida 33408-0420  
(561) 691-7101  
(561) 691-7135 (fax)

**CERTIFICATE OF SERVICE**

**20210015-EI**

I **HEREBY CERTIFY** that a true and correct copy of the foregoing\* has been furnished by electronic mail this 9<sup>th</sup> day of June 2021 to the following parties:

Suzanne Brownless  
Bianca Lherisson  
Shaw Stiller  
Florida Public Service Commission  
Office of the General Counsel  
2540 Shumard Oak Boulevard  
Tallahassee, Florida 32399-0850  
sbrownle@psc.state.fl.us  
blheriss@psc.state.fl.us  
sstiller@psc.state.fl.us

Thomas A. Jernigan, GS-13, DAF AFIMSC/JA  
Holly L. Buchanan, Maj, USAF AF/JAOE-  
ULFSC  
Robert J. Friedman, Capt., USAF  
Arnold Braxton, TSgt, USAF  
Ebony M. Payton  
Scott L. Kirk, Maj, USAF  
139 Barnes Drive, Suite 1  
Tyndall Air Force Base, Florida 32403  
ULFSC.Tyndall@us.af.mil  
thomas.jernigan.3@us.af.mil  
Holly.buchanan.1@us.af.mil  
robert.friedman.5@us.af.mil  
arnold.braxton@us.af.mil  
ebony.payton.ctr@us.af.mil  
scott.kirk.2@us.af.mil

**Attorneys for Federal Executive Agencies**

Office of Public Counsel  
Richard Gentry  
Patricia A. Christensen  
Anastacia Pirrello  
c/o The Florida Legislature  
111 W. Madison St., Rm 812  
Tallahassee FL 32399-1400  
gentry.richard@leg.state.fl.us  
christensen.patty@leg.state.fl.us  
pirrello.anastacia@leg.state.fl.us

**Attorneys for the Citizens  
of the State of Florida**

James W. Brew  
Laura Wynn Baker  
Joseph R. Briscar  
Stone Mattheis Xenopoulos & Brew, PC  
1025 Thomas Jefferson St, NW  
Suite 800 West  
Washington, D.C. 20007  
jbrew@smxblaw.com  
lwb@smxblaw.com  
jrb@smxblaw.com

**Attorneys for Florida Retail Federation**

Jon C. Moyle, Jr.  
Karen A. Putnal  
Moyle Law Firm, P.A.  
118 North Gadsden Street  
Tallahassee, Florida 32301  
jmoyle@moylelaw.com  
kputnal@moylelaw.com  
mqualls@moylelaw.com

**Attorneys for Florida Industrial Power Users  
Group**

George Cavros  
Southern Alliance for Clean Energy  
120 E. Oakland Park Blvd., Suite 105  
Fort Lauderdale, Florida 33334  
george@cavros-law.com  
**Attorney for Southern Alliance for Clean  
Energy**

Nathan A. Skop, Esq.  
420 NW 50th Blvd.  
Gainesville, FL 32607  
n\_skop@hotmail.com  
**Attorney for Mr. & Mrs. Daniel R. Larson**

Christina I. Reichert  
4500 Biscayne Blvd., Ste. 201  
Miami FL 33137  
(305) 440-5437  
(850) 681-0020  
creichert@earthjustice.org  
flcaseupdates@earthjustice.org

Bradley Marshall  
Jordan Luebke  
Earthjustice  
111 S. Martin Luther King Jr. Blvd.  
Tallahassee, Florida 32301  
bmarshall@earthjustice.org  
jluebke@earthjustice.org  
**Attorneys for Florida Rising, Inc.  
League of United Latin American Citizens of  
Florida  
Environmental Confederation of Southwest  
Florida, Inc.**

Katie Chiles Ottenweller  
Southeast Director  
Vote Solar  
838 Barton Woods Road  
Atlanta, GA 30307  
katie@votesolar.org  
**Attorney for Vote Solar**

Robert Scheffel Wright  
John T. LaVia, III  
Gardner, Bist, Bowden, Dee, LaVia, Wright &  
Perry, P.A.  
1300 Thomaswood Drive  
Tallahassee, Florida 32308  
schef@gbwlegal.com  
jlavia@gbwlegal.com  
**Attorneys for Floridians Against Increased  
Rates, Inc.**

William C. Garner  
Law Office of William C. Garner, PLLC  
3425 Bannerman Road  
Unit 105, #414  
Tallahassee, FL 32312  
bgarner@wcglawoffice.com  
**Attorney for The CLEO Institute Inc.**

Stephanie U. Eaton  
SPILMAN THOMAS & BATTLE, PLLC  
110 Oakwood Drive, Suite 500  
Winston-Salem, NC 27103  
seaton@spilmanlaw.com  
**Attorney for Walmart**

Barry A. Naum  
SPILMAN THOMAS & BATTLE, PLLC  
1100 Bent Creek Boulevard, Suite 101  
Mechanicsburg, PA 17050  
bnaum@spilmanlaw.com  
**Attorney for Walmart**

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:  
Cost of Capital:

Schedules 3 and 4a within the Company's MFR in this case provide the support and calculations behind the short-term and long-term costs of debt of 0.97% and 3.77%, respectively. Both of these rates were then included within the overall cost of capital calculation shown in FPL's MFR Schedule D-1a.

- a. To the extent that there are any debt instruments included in the supporting Excel files for the Company's costs of debt that have a stated interest rate higher than 5.0%, please provide a detailed explanation of the exact steps/analysis that FPL has undertaken or evaluated to replace/redeem these debt issuances.
- b. Please state the exact reasons FPL has/has not chosen to redeem any debt issuance in excess of 5.0%.

RESPONSE:

a. [REDACTED]

b. [REDACTED]

# **EXHIBIT C**

## **JUSTIFICATION TABLE**

**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

<b>Int/POD No.</b>	<b>Description</b>	<b>No. of Pages</b>	<b>Conf. Y/N</b>	<b>Bates Nos.</b>	<b>Line / Column</b>	<b>Florida Statute 366.093(3) Subsection</b>	<b>Declarants</b>
OPC 3 <sup>rd</sup> INT 148, First Supplemental	Explanation of Debt Issuances	1	Y	063130	Lines 1-11	(d)	Robert E. Barrett

# **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 ROBERT E. BARRETT**

1. My name is Robert E. Barrett. I am currently employed by Florida Power & Light Company ("FPL") as Vice President of Finance. 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 First Supplemental response to Office of Public Counsel's Third Set of Interrogatories, No. 148. 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 interest rates paid by FPL on certain loans. 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.



Robert E. Barrett

Date: 6/8/2021