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June 25, 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 the testimony of Floridians Against Increased Rates' ("FAIR") witness Breandan T. Mac Mathuna. The request includes Exhibits A, B (two copies), C and D. Exhibit A consists of the documents containing confidential information. 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.

Sincerely,

s/ Maria Jose Moncada
Maria Jose Moncada

Enclosure

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

- COM _____
- AFD 1 exh B
- APA _____
- ECO _____
- ENG _____
- GCL _____
- IDM _____
- CLK _____

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COMMISSION
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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 25, 2021

**FLORIDA POWER & LIGHT COMPANY'S REQUEST FOR CONFIDENTIAL
CLASSIFICATION OF CERTAIN INFORMATION PROVIDED IN TESTIMONY
OF FAIR WITNESS BREANDAN T. MAC MATHUNA**

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 specifically identified portions of the direct testimony of Floridians Against Increased Rates' ("FAIR") witness Breandan T. Mac Mathuna ("Mac Mathuna"), dated June 21, 2021. (the "Confidential Information"). In support of its Request, FPL states as follows:

1. Prior to filing the direct testimony of Mr. Mac Mathuna on June 21, 2021, FAIR advised that certain confidential information would be included within Mr. Mac Mathuna's testimony. Contemporaneously with service of FAIR's testimony, FPL filed a Notice of Intent to Request Confidential Classification of certain information contained in Mr. Mac Mathuna's testimony, 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 declarant who support the requested classification.

d. Exhibit D contains the declaration of Robert E. Barrett 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 contains information relating to competitive interests, the disclosure of which would impair the competitive business of FPL. Specifically, some information pertains to an equity analyst report. This information is protected by Section 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 25th 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

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

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

DOCKET NO. 20210015-EI
FILED: JUNE 21, 2021

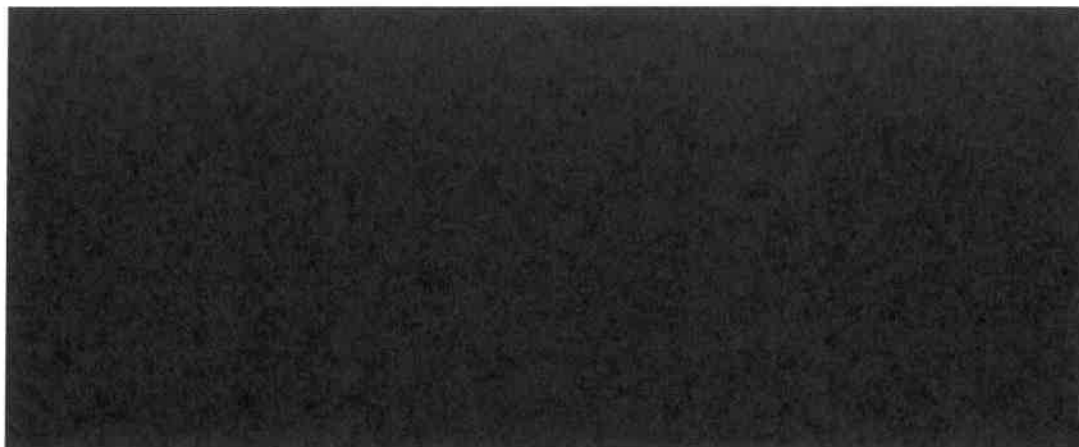
DIRECT TESTIMONY

OF BREANDAN T. MAC MATHUNA

On Behalf of

Floridians Against Increased Rates, Inc.

1 Moreover, a Scotiabank analyst, Andrew Wiesel, expressed an



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12 Therefore, it is clear that the cost recovery clause mechanisms, and in
13 particular the reserve surplus amortization mechanism, greatly minimize
14 FPL's cost recovery risk and actively contribute to FPL's earning at the top
15 of the ROE range.

2. *Economic Outlier Tests*

16 **Q. Please explain the economic outlier tests that you apply as part of your**
17 **ROE analysis.**

18 **A. Applying tests of economic logic in relation to the outlying results from an**
19 **array of results produced by an ROE model is appropriate to help ensure the**
20 **economic logic of the results. I apply a low-end test that I consider reasonably**
21 **meets the objective of identifying ROE results that are so low as to be**
22 **considered to yield essentially the same return as debt. I also apply a high-**

³⁰ Scotiabank, Equity Research, Daily Edge, January 26, 2021. Provided in response to request from the Office of Public Counsel, First of Set of Production of Documents, Number 13.

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: June 25, 2021

Document	Begin Bates Number	End Bates Number	Description	No. of Pages	Confidential	Line/Col	Florida Statute 366.093 (3) Subsection	Declarant
Testimony of FAIR Witness Mac Mathuna	N/A	N/A	FAIR Witness Mac Mathuna Testimony	2	Y	Page 31, Lines 2-10	(e)	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, 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 FAIR Witness Breandan T. Mac Mathuna's testimony. The documents or materials that I have reviewed and which are asserted by FPL to be proprietary confidential business information contain competitive business information the disclosure of which would impair the competitive business of FPL. Specifically, the information relates to an equity analyst report. 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: 06/25/21