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August 25, 2021

VIA HAND DELIVERY

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

REDACTED

RECEIVED-FPSC
AUG 25 PM 4:09
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 Rising's, the League of United Latin American Citizens', and the Environmental Confederation of Southwest Florida's Fourth Request for Production of Documents, Nos. 37, 38. The request includes Exhibits A, B (two copies), C and D.

Exhibit A consists of the documents containing confidential information – some of which are provided on a disc due to the volume of the file and/or the file type – 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; or, where documents are confidential in their entirety, an identifying cover page has been added. 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 eth B
- APA _____
- ECO _____
- ENG _____
- GCL _____
- IDM _____
- CLK _____ Enclosure

Sincerely,

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

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: August 25, 2021

**FLORIDA POWER & LIGHT COMPANY'S REQUEST FOR CONFIDENTIAL
CLASSIFICATION OF CERTAIN INFORMATION PROVIDED IN ITS
RESPONSES TO FLORIDA RISING'S, LEAGUE OF UNITED LATIN AMERICAN
CITIZENS', AND ENVIRONMENTAL CONFEDERATION OF SOUTHWEST
FLORIDA'S FOURTH REQUEST FOR PRODUCTION OF DOCUMENTS (NOS. 37, 38)**

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 Rising's, the League of United Latin American Citizens', and the Environmental Confederation of Southwest Florida's ("LULAC") Fourth Request for Production of Documents (Nos. 37, 38) (the "Confidential Information"). In support of its Request, FPL states as follows:

1. FPL served its responses to LULAC's Fourth Request for Production of Documents on August 25, 2021. This request is being filed contemporaneously with service of those responses to request confidential classification of certain information contained in its responses to LULAC's Fourth Request for Production of Documents, Nos. 37 and 38, 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 CD containing documents for which FPL is seeking confidential treatment in their entirety. For documents not confidential in their entirety, Exhibit A also contains 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 documents are confidential in their entirety, an identifying cover page has been placed in the exhibit.

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, Florida Statutes, 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 Exhibit D (containing the supporting declarations), the Confidential Information contained in FPL's response to LULAC's Fourth Request for Production of Documents, No. 38, includes: information relating to bids or other contractual data, the disclosure of which would impair the efforts of the public utility or its affiliates to contract for goods or services on favorable terms. This information is protected by Section 366.093(3)(d), Florida Statutes.

5. As also 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 the provider of the information. Specifically, the information contains pricing and cost data related to electric vehicle charging that can be used to derive vendor product bid pricing. This information is protected by Section 366.093(3)(e), Florida Statutes.

6. 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 Section 399.093(4), Florida Statutes.

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/ R. Wade Litchfield

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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 August 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

The documents responsive to LULAC's Fourth Request for Production of Documents No. 37, Bates Nos. 070629-070631 are confidential in their entirety.

FPL 070673
20210015-EI

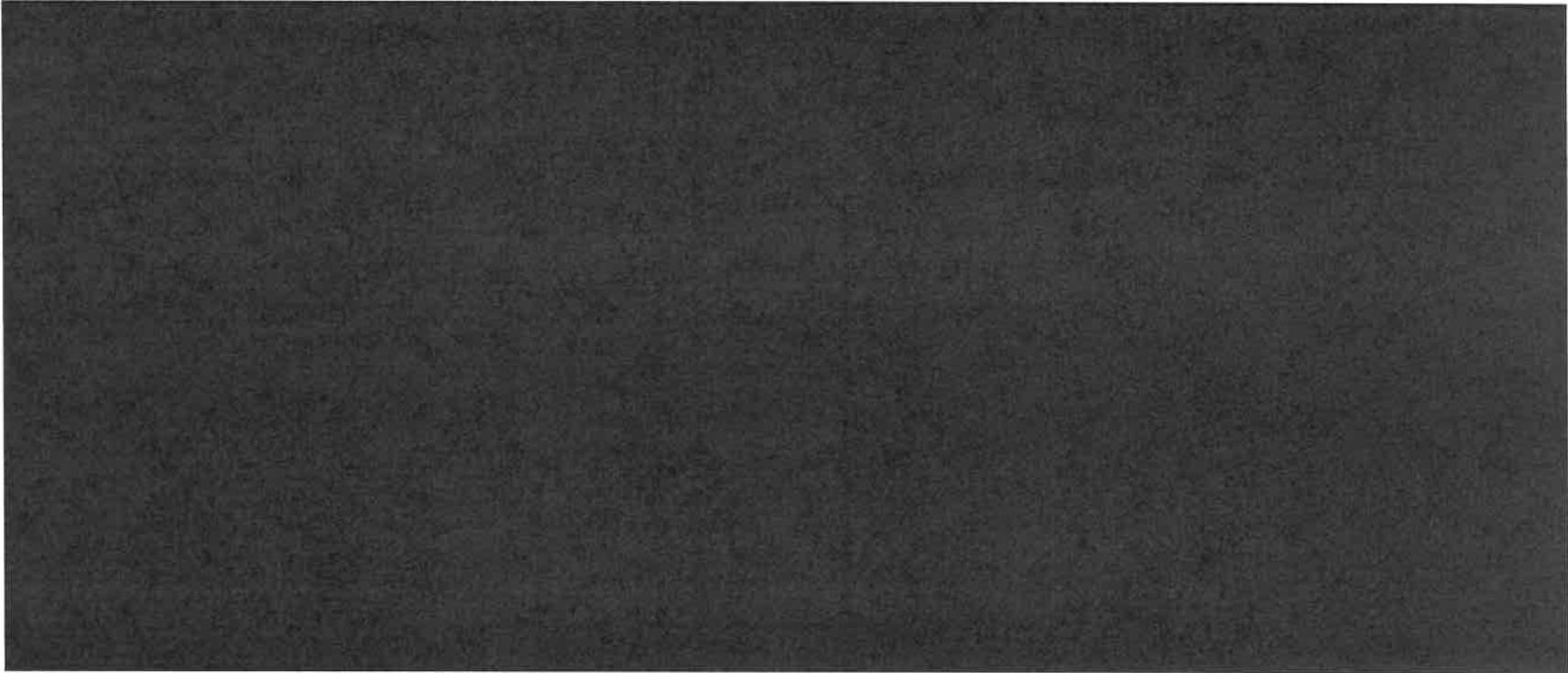


EXHIBIT C

JUSTIFICATION TABLE

EXHIBIT C

COMPANY: Florida Power & Light Company
TITLE: Petition by Florida Power & Light Company for Base Rate Increase and Rate Unification Company
DOCKET NO.: 20210015-EI
DATE: August 25, 2021

Int/POD No.	Begin Bates Number	End Bates Number	Description	Confidential	Page No.	Line/Col	Florida Statute 366.093 (3) Subsection	Declarant
LULAC 4 th POD, No. 37	070629	070629	AURORA SolarTogether Phase 2 RATE CASE_CONFIDENTIAL_Archive (Bates 070629)	Y	All	All	(e)	Steve Sim
LULAC 4 th POD, No. 37	070630	070630	OutputDB_AURORA_with_SolarTogether_Phase 2_CONFIDENTIAL (Bates 070630)	Y	All	All	(e)	Steve Sim
LULAC 4 th POD, No. 37	070631	070631	OutputDB_AURORA_without_SolarTogether_Phase2_CONFIDENTIAL (Bates 070631)	Y	All	All	(e)	Steve Sim
LULAC 4 th POD, No. 38	070673	070673	Residential EV CPVRR	Y	All	All	(d) (e)	Matt Valle

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 STEVE SIM

1. My name is Steve 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 to Florida Rising's, the League of United Latin American Citizens', and the Environmental Confederation of Southwest Florida's Fourth Request for Production of Documents, No. 37. 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 materials contain information regarding software that is provided to FPL as part of a subscription service, and such software is proprietary to a third party vendor. 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.



Steve Sim

Date: 8/23/2021

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

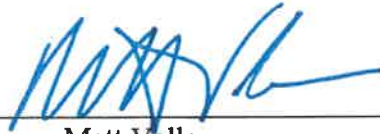
DECLARATION OF MATT VALLE

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 information contained in FPL's response to Florida Rising's, the League of United Latin American Citizens', and the Environmental Confederation of Southwest Florida's Fourth Request for Production of Documents, No. 38. The documents or materials that I have reviewed and which are asserted by FPL to be proprietary confidential business information contain information relating to competitive interests, the disclosure of which would impair the competitive business of the provider of the information, as well as FPL's ability to contract for goods or services on favorable terms. Specifically, the information contains pricing and cost data related to electric vehicle charging that can be used to derive vendor product bid pricing. 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: _____

8/25/21