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November 12, 2021

VIA HAND DELIVERY

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

REDACTED

COM	_____
AFD	_____ I
APA	_____
ECO	_____
ENG	_____
GCL	_____
IDM	_____
CLK	_____

Exhibit B

**Re: Docket No. 20200241-EI
Gulf Power Company's Request for Confidential Classification of
Information Provided in Support of Its Petition for Evaluation of
Hurricane Sally Storm Costs**

Dear Mr. Teitzman:

I enclose for filing in the above referenced docket Gulf Power Company's ("Gulf") Request for Confidential Classification of information provided in support of its Petition for Evaluation of Hurricane Sally Storm Costs. The enclosed filing includes Exhibits A, B, C and D.

Exhibit A consists of the confidential documents, some of which are provided on a disc, and all the information that Gulf asserts is entitled to confidential treatment has been highlighted. Exhibit B is an edited version of Exhibit A, consisting of an identifying cover page and redacted responses. Exhibit C is a justification table in support of Gulf's Request for Confidential Classification. Exhibit D contains a declaration in support of Gulf's filing.

Please contact me if you or your Staff has any questions regarding this filing at (561) 691-7108 or jason.higginbotham@fpl.com.

Sincerely,

/s/ Jason A. Higginbotham
Jason A. Higginbotham

Enclosure

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

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Petition by Gulf Power Company for
Limited Proceeding for Recovery of Incremental
Storm Restoration Costs Related to Hurricane
Sally

Docket No: 20200241-EI

Date: November 12, 2021

**GULF POWER COMPANY'S REQUEST
FOR CONFIDENTIAL CLASSIFICATION OF INFORMATION
IDENTIFIED IN GULF POWER COMPANY'S
NOTICE OF FILING CONFIDENTIAL SUPPORTING MATERIALS IN SUPPORT OF
ITS PETITION FOR EVALUATION OF HURRICANE SALLY STORM COSTS**

Pursuant to Section 366.093, Florida Statutes ("F.S."), and Rule 25-22.006, Florida Administrative Code ("F.A.C."), Gulf Power Company ("Gulf") hereby requests confidential classification of certain documents and information specified in Gulf's Notice of Filing ("Notice"), which is being filed contemporaneously with this request in support of Gulf's Petition for Evaluation of Hurricane Sally Storm Costs:

1. This Request is being filed in accordance with Rule 25-22.006, F.A.C., in order to request confidential classification of certain information related to Gulf's Hurricane Sally costs. Specifically, Gulf seeks confidential classification of the information specified in the Notice, which are: (i) searchable spreadsheets that provide data documenting the receipt, review, adjustment where appropriate, and payment of Gulf's Hurricane Sally costs incurred for line contractors and vegetation contractors; (ii) Hurricane Sally contractor travel logs; and (iii) additional information identified in paragraph 4 of the Hurricane Michael Stipulation and

Settlement approved by the Commission in Order No. PSC-2020-0349-S-EI, Docket No. 20190038-EI¹ (together, the “Confidential Documents”).

2. The following exhibits are attached to and made a part of this Request:
 - a. Exhibit A consists of a copy of the Confidential Documents, provided in electronic format on CDs, wherein all of the information contained is entitled to confidential treatment. Because the confidential materials are being provided in electronic format and are voluminous, and therefore cannot be readily highlighted, Gulf has not highlighted the entirety of the information contained on the CDs.
 - b. Exhibit B consists of summary page that identifies the Bates numbered pages associated with the Confidential Documents, which are entitled to confidential treatment in their entirety.
 - c. Exhibit C is a table that identifies the information in Exhibit A and references the specific statutory basis for the claim of confidentiality and identifies the Declarant who supports the requested classification.
 - d. Exhibit D consists of the declarations of David Hughes and Clare Gerard in support of this Request.

3. Gulf submits that the information in Exhibit A is proprietary and confidential business information, and its disclosure would cause harm to Gulf and its customers. Pursuant to Section 366.093, F.S. such materials are entitled to confidential treatment and are exempt from the

¹ Under paragraph 4 of the Settlement Agreement, “beginning with the 2021 storm season, Gulf will implement paragraphs 5 through 20 of the “Process Provisions” contained in the FPSC-approved settlement in the Docket 20180049-EI for In re: Evaluation of storm restoration costs for Florida Power & Light Company related to Hurricane Irma.” Notwithstanding that Hurricane Sally occurred during the 2020 hurricane season, Gulf voluntarily implemented the Process Provisions referenced in paragraph 4 in its response to Hurricane Sally.

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 in Exhibit D, the confidential business information 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), F.S.. The confidential business information further includes information relating to competitive interests, the disclosure of which would impair the competitive business of the provider of the information. This information is protected by Section 366.093(3)(e), F.S.

5. Upon a finding by the Commission that the information contained in the Confidential Documents is proprietary and confidential business information, the information should not be declassified for at least eighteen (18) month period and should be returned to Gulf as soon as it is no longer necessary for the Commission to conduct its business. *See* Section 366.093(4), F.S.

WHEREFORE, for the above and foregoing reasons, as more fully set forth in the supporting materials, Florida Power & Light Company respectfully requests that its Request for Confidential Classification be granted.

Respectfully submitted this 12th day of November 2021.

Jason A. Higginbotham
Senior Attorney
Jason.Higginbotham@fpl.com
Florida Power & Light Company
700 Universe Boulevard
Juno Beach, FL 33408
Telephone: (561) 691-7108
Facsimile: (561) 691-7135

By: /s/ Jason A. Higginbotham
Jason A. Higginbotham
Florida Authorized Counsel No. 1017875

EXHIBIT B

REDACTED

The documents marked with Bates Nos. 000001-0000286 are
confidential in their entirety.

EXHIBIT C

JUSTIFICATION TABLE

EXHIBIT C

COMPANY: Florida Power & Light Company
TITLE: List of Confidential Documents
DOCKET NO.: 20200241-EI
DOCKET TITLE: Petition for Limited Proceeding for Recovery of Incremental Storm Restoration Costs Related to Hurricane Sally, By Gulf Power Company.
DATE: November 12, 2021

Set	Bates Number Start	Bates Number End	Description	Page No. / Line No.	Florida Statute 3.66.093(3) Subsection	Declarant
N/A	000001	000004	ABC Tree 100 Final Pay Veg Sally 4.20 AC-V_2 - Terri S - ELI	All	(d), (e)	Clare Gerard
N/A	000005	000008	Arc American 100 Final Pay OH Sally 5.20 V_18 CF Final JF MA	All	(d), (e)	Clare Gerard
N/A	000009	000012	Asplundh Construction 100 Final Pay OH Sally 5.11 V_18 CF TS - JC	All	(d), (e)	Clare Gerard
N/A	000013	000016	Asplundh Tree 100 Final Pay Veg Sally 5.18 AC-V_2 MK - Mara - Eli - Heather MACRO V2	All	(d), (e)	Clare Gerard
N/A	000017	000020	B&B Electric 100 Final Pay OH Sally 3.12 V_18 CF Clare Gerard	All	(d), (e)	Clare Gerard
N/A	000021	000024	BHI 100 Final Pay OH Sally 3.26 V_18 CF_TS_Glenn	All	(d), (e)	Clare Gerard
N/A	000025	000028	Bird Electric 100 Final Pay OH Sally 4.5 V_18 CF_Glenn	All	(d), (e)	Clare Gerard
N/A	000029	000032	Burford Construction 100 Final Pay Veg Sally 5.3 AC-DM	All	(d), (e)	Clare Gerard
N/A	000033	000036	Burford Tree 100 Final Pay Veg Sally 5.10 v_23 JF EE	All	(d), (e)	Clare Gerard
N/A	000037	000040	Cardinal Power 100 Final Pay OH Sally 2.23 V_18 CF K.H.	All	(d), (e)	Clare Gerard
N/A	000041	000044	CC Power 100% Final Pay OH Sally V_18 CF_TO	All	(d), (e)	Clare Gerard
N/A	000045	000048	Chain Electric 100 Final Pay OH Sally 3.12 V_18 CF TS	All	(d), (e)	Clare Gerard
N/A	000049	000052	Concurrent 100% Adv Pay OH Sally V_18 CF AB Rev	All	(d), (e)	Clare Gerard

N/A	00053	000056	CW Wright 100 Adv Pay OH Sally 7.30.21 V_18 CF_TO REVISED	All	(d), (e)	Clare Gerard
N/A	000057	000060	CW Wright 100 Adv Pay OH Sally 8.11.21 V_18 CF_TO REV Addl	All	(d), (e)	Clare Gerard
N/A	000061	000064	Danella 100 Final Pay OH Sally 5.10 V_18 CF PM - VJ	All	(d), (e)	Clare Gerard
N/A	000065	000068	Davey Tree 100 Final Pay Veg Sally 4.28 AC-V_2 - AR_DM	All	(d), (e)	Clare Gerard
N/A	000069	000072	Davis H Elliot 100 Final Pay OH Sally TM,LA, HM_V2	All	(d), (e)	Clare Gerard
N/A	000073	000076	Dynamic 100% Adv Pay OH Sally V_18 CF TF	All	(d), (e)	Clare Gerard
N/A	000077	000080	Edison Power 100% Adv Pay OH Sally V_18 CF AB_V2	All	(d), (e)	Clare Gerard
N/A	000081	000084	Fishel 100% Adv Pay OH Sally V_18 CF_TO	All	(d), (e)	Clare Gerard
N/A	000085	000088	Grays 100% Adv Pay OH Sally V_18 CF AB Rev	All	(d), (e)	Clare Gerard
N/A	000089	000092	Great Lakes 100 Adv Pay OH Sally V_18 CF - AB Revised_Glenn	All	(d), (e)	Clare Gerard
N/A	000093	000096	Halter Tree 100 Final Pay Veg Sally 3.26 v_23 JF	All	(d), (e)	Clare Gerard
N/A	000097	000100	Heart 100% Adv Pay OH Sally V_18 AB CF Rev	All	(d), (e)	Clare Gerard
N/A	000101	000104	Henkels 100 Final Pay OH Sally 2.23 V_18 CF K.H.	All	(d), (e)	Clare Gerard
N/A	000105	000108	Higher Power 100 Final Pay OH Sally 5.26 V_18 CF- DM VJ FINAL	All	(d), (e)	Clare Gerard
N/A	000109	000112	Hydaker 100% Adv Pay OH Sally V_18 CF AB Rev	All	(d), (e)	Clare Gerard
N/A	000113	000116	Intren 100 Final Pay OH Sally 3.14 V_18 CF_MA	All	(d), (e)	Clare Gerard
N/A	000117	000120	Irby 100 Final Pay OH Sally AC 4.19 V_18 TF_GA	All	(d), (e)	Clare Gerard
N/A	000121	000124	Jaflo 100 Final Pay Veg Sally 4.14 v_23 Jeff - ELI	All	(d), (e)	Clare Gerard
N/A	000125	000128	JF Electric 100 Final Pay OH Sally 3.3 V_18 CF- Donald Sendecke	All	(d), (e)	Clare Gerard

N/A	000129	000132	Jordan HV 100 Final Pay OH Sally V_18 CF-KH.	All	(d), (e)	Clare Gerard
N/A	000133	000136	Kent Power 100 Final Pay OH Sally 3.14 V_18 DW_GA	All	(d), (e)	Clare Gerard
N/A	000137	000140	KV Power 100% Adv Pay OH Sally V_18 CF_TO	All	(d), (e)	Clare Gerard
N/A	000141	000144	L.E. Meyers 100 Final Pay OH Sally AC 5.4 V_18 KH-VJ	All	(d), (e)	Clare Gerard
N/A	000145	000148	Lee Electrical 100 Final Pay OH Sally 4.26 V_18 CF_Tabina-VJ	All	(d), (e)	Clare Gerard
N/A	000149	000152	Lewis Tree 100 Final Pay Veg Sally 6.09 v_23- Final TF_TS	All	(d), (e)	Clare Gerard
N/A	000153	000156	LineTec 100 Ad Pay OH Sally V_18 CF	All	(d), (e)	Clare Gerard
N/A	000157	000160	Mastec 100 Final Pay OH Sally AC 4.28 V_18 AS	All	(d), (e)	Clare Gerard
N/A	000161	000164	Mohawk HV 100 Final Pay OH Sally 3.4 V_18 CF TF	All	(d), (e)	Clare Gerard
N/A	00165	000168	Musgrove 100 Final Pay OH Sally 4.5 V_18 ES	All	(d), (e)	Clare Gerard
N/A	000170	000173	Nelson Tree 100 Final Pay Veg Sally 3.22 v_23_CF - AB Revised - ELI	All	(d), (e)	Clare Gerard
N/A	000174	000177	New River 100 Final Pay OH Sally AC 5.27 V_18 CF LA- MA Final	All	(d), (e)	Clare Gerard
N/A	000178	000181	One Source 100 Final Pay OH Sally AC 4.27 V_18 LA	All	(d), (e)	Clare Gerard
N/A	000182	000185	OnPower 100 Final Pay OH Sally 2.23 V_18 CF KH-Final 2	All	(d), (e)	Clare Gerard
N/A	000186	000189	Overhead Lines 100 Final Pay OH Sally 4.5 V_18 CF_AR	All	(d), (e)	Clare Gerard
N/A	000190	000193	Pike 100 Final Pay OH Sally 3.20 V_18 CF-KH Final-V2	All	(d), (e)	Clare Gerard
N/A	000194	000197	Powergrid 100 Final Pay OH Sally AC 4.29 V_18 KH DA V2	All	(d), (e)	Clare Gerard
N/A	000199	000202	Powertown 100% Adv Pay OH Sally V_18 CF- KH2	All	(d), (e)	Clare Gerard
N/A	000203	000206	Primary Source 100 Final Pay OH Sally 3 - TM_AB_Glenn	All	(d), (e)	Clare Gerard

N/A	000207	000210	Primoris 100 Final Pay OH Sally-May 11 NS-VJ	All	(d), (e)	Clare Gerard
N/A	000211	000214	River City 100 Final Pay OH Sally AC 4.30 V_18 TM JC	All	(d), (e)	Clare Gerard
N/A	000215	000218	Service Electric 100 Final Pay OH Sally AC 5.26_18 TF Final	All	(d), (e)	Clare Gerard
N/A	000219	000222	Southern Electric 100 Final Pay OH Sally AC 5.11 V_18 TF_MF -FINAL	All	(d), (e)	Clare Gerard
N/A	000223	000226	Thayer 100% Final Pay OH Sally V_18 CF_AB Rev	All	(d), (e)	Clare Gerard
N/A	000227	000230	Townsend Tree 100 Final Pay Veg Sally v_23 TF	All	(d), (e)	Clare Gerard
N/A	000231	000234	Trees Inc 100 Final Pay Veg Sally 5 final MF-DM	All	(d), (e)	Clare Gerard
N/A	000235	000238	Utility Lines 100 Final Pay OH Sally 6.7 V_18 CF KH KT -Final with Invoice	All	(d), (e)	Clare Gerard
N/A	000239	000242	Volt Power 100 Final Pay OH Sally AC 4.22 V_18 AF	All	(d), (e)	Clare Gerard
N/A	000243	000246	Wampole Miller 100 Final Pay OH Sally- May 14 NS_MA	All	(d), (e)	Clare Gerard
N/A	000247	000250	Wilco 100 Final Pay OH Sally 3.31 V_18 CF-04-21_GL	All	(d), (e)	Clare Gerard
N/A	000251	000254	William E Groves 100 Final Pay OH Sally V_18 CF-K.H.	All	(d), (e)	Clare Gerard
N/A	000255	000258	Wright Tree 100 Final Pay Veg Sally-May 18 - Nusrat - ELI Final	All	(d), (e)	Clare Gerard
N/A	000259	000262	Xtreme Power 100 Final Pay OH Sally AC 5.5_18 KH DM Final	All	(d), (e)	Clare Gerard
N/A	000263	000285	DH-1 SALLY 07.2021 Rev2	All	(d), (e)	David Hughes
N/A	000286	000286	Sally Travel Orders	All	(d), (e)	Clare Gerard

EXHIBIT D

DECLARATIONS

EXHIBIT D

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Petition by Gulf Power Company
for Limited Proceeding for Recovery of
Incremental Storm Restoration Costs
Related to Hurricane Sally

Docket No: 20200241EI

DECLARATION OF DAVID HUGHES

1. My name is David Hughes. I am currently employed by Florida Power & Light Company as Assistant Controller. I have personal knowledge of the matters stated in this declaration.

2. I have reviewed the documents and information included in Exhibit A to Gulf Power Company's ("Gulf's") Request for Confidential Classification, for which I am listed as the declarant on Exhibit C. The documents and files that I have reviewed and which are asserted by FPL to be proprietary confidential business information contain or constitute information concerning bids or other contractual data, the disclosure of which would impair the efforts of Gulf to contract for goods or services on favorable terms. Additionally, the documents and files that I have reviewed, and which are asserted by Gulf to be proprietary confidential business information contain or constitute information relating to competitive interests, the disclosure of which would impair the competitive business of the provider of the information. To the best of my knowledge, Gulf has maintained the confidentiality of this information.

3. Consistent with the provisions of the Florida Administrative Code, such materials should remain confidential for a period of eighteen (18) months. In addition, they should be returned to Gulf as soon as the information is no longer necessary for the Commission to conduct its business so that Gulf 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.



David Hughes

Date: 11/11/2021

EXHIBIT D

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Petition by Gulf Power Company
for Limited Proceeding for Recovery of
Incremental Storm Restoration Costs
Related to Hurricane Sally

Docket No: 20200241EI

DECLARATION OF CLARE GERARD

1. My name is Clare Gerard. I am currently employed by NextEra Energy Marketing, LLC., a subsidiary of NextEra Energy, Inc., as the Vice President of Risk and Credit Exposure Management. I have personal knowledge of the matters stated in this declaration.

2. I have reviewed the documents and information included in Exhibit A to Gulf Power Company's ("Gulf's") Request for Confidential Classification, for which I am listed as the declarant on Exhibit C. The documents and files that I have reviewed and which are asserted by Gulf to be proprietary confidential business information contain or constitute information concerning bids or other contractual data, the disclosure of which would impair the efforts of Gulf to contract for goods or services on favorable terms. Additionally, the documents and files that I have reviewed, and which are asserted by Gulf to be proprietary confidential business information contain or constitute information relating to competitive interests, the disclosure of which would impair the competitive business of the provider of the information. To the best of my knowledge, Gulf has maintained the confidentiality of this information.

3. Consistent with the provisions of the Florida Administrative Code, such materials should remain confidential for a period of eighteen (18) months. In addition, they should be returned to Gulf as soon as the information is no longer necessary for the Commission to conduct its business so that Gulf 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.



Clare Gerard

Date: 11-11-21