



Kate Cotner  
Principal Attorney  
Florida Power & Light Company  
700 Universe Boulevard  
Juno Beach, FL 33408-0420  
(561) 694-3850  
E-mail: [kate.cotner@fpl.com](mailto:kate.cotner@fpl.com)

January 28, 2022

**VIA HAND DELIVERY**

Mr. Adam Teitzman  
Division of the Commission Clerk and Administrative Services  
Florida Public Service Commission  
2540 Shumard Oak Blvd.  
Tallahassee, FL 32399-0850

RECEIVED-FPSC  
2022 JAN 28 PM 4:33  
COMMISSION  
CLERK

REDACTED

- COM \_\_\_\_\_
- AFD 1 *ex "B"*
- APA \_\_\_\_\_
- ECO \_\_\_\_\_
- ENG \_\_\_\_\_
- GCL \_\_\_\_\_
- IDM \_\_\_\_\_
- CLK \_\_\_\_\_

**Re: Docket No. 20200241-EI,  
Petition for limited proceeding for recovery of incremental storm restoration costs related to Hurricanes Sally, by Gulf Power Company; Petition for evaluation of Hurricane Isaias and Tropical Storm Eta storm costs, by Florida Power & Light Company (formerly Docket 20210178); and Petition for limited proceeding for recovery of incremental storm restoration costs and associated true-up process related to Hurricane Zeta, by Gulf Power Company(formerly Docket 20210179).**

Dear Mr. Teitzman:

I enclose for filing in the above referenced docket Gulf Power Company's ("Gulf") and Florida Power & Light Company's ("FPL") Request for Confidential Classification of Information Provided in Response to: (1) the Office of Public Counsel's ("OPC") Second Request for Production of Documents, Response Nos. 12, 19, 22 and 40; (2) Gulf's responses to OPC's First Request for Production of Documents, Nos. 6, 12, 15 and 32 in former Docket 20210179; and (3) FPL's responses to OPC's First Request for Production of Documents, Response Nos. 6, 7 and 16 in former Docket 20210178.

The enclosed filing includes Exhibits A, B, C, and D. Exhibit A consists of a copy of the Confidential Documents. The information that Gulf and FPL assert is entitled to confidential treatment is highlighted. Exhibit B is an edited version of Exhibit A, in which the information Gulf and FPL assert is confidential has been redacted; or for responses deemed confidential in their entirety, an identifying cover page. Exhibit C is a justification table in support of Gulf and FPL's Request for Confidential Classification. Exhibit D contains declarations in support of Gulf and FPL's filing.

Please contact me if you or your Staff has any questions regarding this filing at (561) 694-3850 or [kate.cotner@fpl.com](mailto:kate.cotner@fpl.com).

Sincerely,

/s/ Kate Cotner  
Kate Cotner

**BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION**

In re: Petition for limited proceeding for recovery of incremental storm restoration costs related to Hurricanes Sally, by Gulf Power Company.

Docket No: 20200241-EI

Date: January 28, 2022

Petition for evaluation of Hurricane Isaias and Tropical Storm Eta storm costs, by Florida Power & Light Company.

Petition for limited proceeding for recovery of incremental storm restoration costs and associated true-up process related to Hurricane Zeta, by Gulf Power Company.

**GULF POWER COMPANY AND FLORIDA POWER & LIGHT COMPANY'S  
REQUEST FOR CONFIDENTIAL CLASSIFICATION OF INFORMATION  
PROVIDED IN RESPONSE TO THE OFFICE OF PUBLIC COUNSEL'S: (1) SECOND  
REQUEST FOR PRODUCTION OF DOCUMENTS, RESPONSE NOS. 12, 19, 22 and 40;  
(2) FIRST REQUEST FOR PRODUCTION OF DOCUMENTS, NOS. 6, 12, 15 and 32 IN  
FORMER DOCKET 20210179; AND (3) FIRST REQUEST FOR PRODUCTION OF  
DOCUMENTS, NOS. 6, 7 AND 16 IN FORMER DOCKET 20210178**

Pursuant to Section 366.093, Florida Statutes, and Rule 25-22.006, Florida Administrative Code ("Rule 25-22.006"), Gulf Power Company ("Gulf") and Florida Power & Light Company ("FPL") hereby files their Request for Confidential Classification and requests confidential treatment of certain documents provided in its responses to the Office of Public Counsel's ("OPC"): (1) Second Request for Production of Documents, Nos. 12, 19, 22 and 40; (2) First Request for Production of Documents, Nos. 6, 12, 15 and 32 in former Docket 20210179; and (3) First Request for Production of Documents, Nos. 6, 7 and 16 in former Docket 20210178 ("Confidential Documents"). In support of this request, Gulf and FPL state as follows:

1. Gulf and FPL served their initial responses to OPC's Request for Production of Documents (including the Confidential Documents) on January 14, 2022 and January 18, 2022

(former docket numbers 20210179 and 20210178) and served additional responses on January 21, 2022. This request is being filed subsequently to service of those responses to request confidential classification of certain information contained in its responses to OPC's (1) Second Request for Production of Documents, Nos. 12, 19, 22 and 40; (2) First Request for Production of Documents, Nos. 6, 12, 15 and 32 in former Docket 20210179; and (3) First Request for Production of Documents, Nos. 6, 7 and 16 in former Docket 20210178 consistent with Rule 25-22.006.

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. The information that Gulf and FPL assert is entitled to confidential treatment is highlighted; or, for confidential documents that are voluminous, and therefore cannot be readily highlighted, Gulf and FPL has not highlighted the entirety of the information but has instead added a confidential label.
- b. Exhibit B consists an edited version of the Confidential Documents wherein the information Gulf asserts is entitled to confidential treatment has been redacted.
- c. Exhibit C is a table that identifies the information designated as confidential in Exhibit A and references the specific statutory bases for the claim of confidentiality and identifies the Declarant who supports the requested classification.
- d. Exhibit D consists of the declarations of Jorge Gutierrez, David Hughes and Sharon Diaram in support of this Request.

3. Gulf and FPL submit that the highlighted 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, 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 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), Florida Statutes. 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), Florida Statutes.

5. Upon a finding by the Commission that the Confidential Documents are proprietary and confidential business information, the information should not be declassified for at least eighteen (18) months and should be returned to Gulf and FPL as soon as it is no longer necessary for the Commission to conduct its business. *See* § 366.093(4), Florida Statutes.

6. **WHEREFORE**, for the above and foregoing reasons, as more fully set forth in the supporting materials, Gulf Power Company and Florida Power & Light Company respectfully request that its Request for Confidential Classification be granted. Additionally, Gulf and FPL respectfully request that the Commission, the Office of Public Counsel, and any other party subject to the public records law treat the materials as confidential pending a formal ruling by the Commission or the return of the materials, consistent with Section 366.093(2), Florida Statutes.

Respectfully submitted this 28<sup>th</sup> day of January 2022.

Kate Cotner  
Principal Attorney  
Kate.cotner@fpl.com  
Florida Power & Light Company  
700 Universe Boulevard  
Juno Beach, FL 33408  
Telephone: (561) 694-3850  
Facsimile: (561) 691-7135

By: /s/ Kate Cotner  
Kate Cotner  
Florida Bar No. 60581

**CERTIFICATE OF SERVICE**

**Docket No. 20200241-EI**

I HEREBY CERTIFY that a true and correct copy of the foregoing was served by electronic mail this 28<sup>th</sup> day of January 2022 to the following:

Public Service Commission  
Office of General Counsel  
Shaw Stiller  
Jennifer Crawford  
Ryan Sandy  
2540 Shumard Oak Blvd.  
Tallahassee, FL 32399-0850  
sstiller@psc.state.fl.us  
jcrawfor@psc.state.fl.us  
rsandy@psc.state.fl.us

Richard Gentry  
Patricia A. Christensen  
Anastacia Pirrello  
Office of Public Counsel  
111 W. Madison Street, Room 812  
Tallahassee, Florida 32399  
Gentry.richard@leg.state.fl.us  
Christensen.patty@leg.state.fl.us  
Pirrello.anastacia@leg.state.fl.us

*s/ Kate Cotner*

\_\_\_\_\_  
Kate Cotner

# **EXHIBIT B**

**REDACTED**

The documents responsive to OPC's Second Request for Production of Documents No. 12, Bates No. 024698-026713, are confidential in their entirety.



The documents responsive to OPC's Second Request for Production of Documents No. 19, Bates No. 026722-026741, are confidential in their entirety.

The documents responsive to OPC's Second Request for Production of Documents No. 22, Bates No. 024805-024967, are confidential in their entirety.

The documents responsive to OPC's First Request for Production of Documents No. 40, Bates No. 024959-024967, are confidential in their entirety.

**ITEMS FROM FORMER DOCKET 20210178**

The documents responsive to OPC's First Request for Production of Documents No. 6, Bates No. 029296-029337, are confidential in their entirety.

The documents responsive to OPC's First Request for Production of Documents No. 7, Bates No. 029338-029468, are confidential in their entirety.

The documents responsive to OPC's First Request for Production of Documents No. 16, Bates No. 029183-029289, are confidential in their entirety.

**ITEMS FROM FORMER DOCKET20210179**



The documents responsive to OPC's First Request for Production of Documents No. 6, Bates No. 002656-002677, are confidential in their entirety.

The documents responsive to OPC's First Request for Production of Documents No. 12, Bates No. 002636-002655, are confidential in their entirety.

The documents responsive to OPC's First Request for Production of Documents No. 15, Bates No. 002462-002614, are confidential in their entirety.

The documents responsive to OPC's First Request for Production of Documents No. 32, Bates No. 002615-002615, are confidential in their entirety.

# **EXHIBIT C**

## **JUSTIFICATION TABLE**

**EXHIBIT C**

**COMPANY:** Gulf Power Company  
**TITLE:** List of Confidential Documents  
**DOCKET NO.:** 20200241-EI

**DOCKET TITLE:** Docket No. 20200241-EI, Petition by Gulf Power Company for Limited Proceeding for Recovery of Incremental Storm Restoration Costs Related to Hurricanes Sally; Petition for limited proceeding for recovery of incremental storm restoration costs and associated true-up process related to Hurricane Zeta, by Gulf Power Company (formerly Docket 20210179); and Petition for evaluation of Hurricane Isaias and Tropical Storm Eta storm costs, by Florida Power & Light Company (formerly Docket 20210178)

**SUBJECT:** Gulf Power Company and Florida Power & Light Company's Request for Confidential Classification of Information Provided in Response to Office of Public Counsel's: (1) Second Request For Production Of Documents, Response Nos. 12, 19, 22 And 40; (2) First Request For Production Of Documents, Nos. 6, 12, 15 and 32 in former Docket 20210179; and (3) First Request For Production Of Documents, Nos. 6, 7 and 16 in former Docket 20210178

**DATE:** January 28, 2022

| Set                             | Bates Number Start | Bates Number End | Description                     | Page No. / Line No. | Florida Statute 3.66.093(3) Subsection | Declarant       |
|---------------------------------|--------------------|------------------|---------------------------------|---------------------|--|-----------------|
| OPC 2 <sup>nd</sup> POD, No. 12 | 024968             | 024968           | Invoice Detail                  | All                 | (d) (e)                                | Jorge Gutierrez |
| OPC 2 <sup>nd</sup> POD, No. 12 | 024974             | 026659           | Invoices – Binder 1             | All                 | (d) (e)                                | Jorge Gutierrez |
| OPC 2 <sup>nd</sup> POD, No. 12 | 026660             | 026713           | Invoices – Binder 2             | All                 | (d) (e)                                | Jorge Gutierrez |
| OPC 2 <sup>nd</sup> POD, No. 12 | 024969             | 024973           | Pike Sally Invoice              | All                 | (d) (e)                                | Jorge Gutierrez |
| OPC 2 <sup>nd</sup> POD, No. 19 | 026722             | 026725           | FPL Storm Compensation Policy   | All                 | (d) (e)                                | David Hughes    |
| OPC 2 <sup>nd</sup> POD, No. 19 | 026741             | 026741           | Internal Order Letter           | All                 | (d) (e)                                | David Hughes    |
| OPC 2 <sup>nd</sup> POD, No. 19 | 026726             | 026730           | Accounting for Uninsured Losses | All                 | (d) (e)                                | David Hughes    |
| OPC 2 <sup>nd</sup> POD, No. 19 | 026731             | 026740           | SOX Narratives                  | All                 | (d) (e)                                | David Hughes    |

|  |        |        |                                    |     |         |                 |
|--|--------|--------|------------------------------------|-----|---------|-----------------|
| OPC 2 <sup>nd</sup> POD,<br>No. 22         | 024957 | 024957 | Emergency Procurement              | All | (d) (e) | Sharon Diaram   |
| OPC 2 <sup>nd</sup> POD,<br>No. 22         | 024805 | 024806 | Bid Communication                  | All | (d) (e) | Sharon Diaram   |
| OPC 2 <sup>nd</sup> POD,<br>No. 22         | 024807 | 024837 | VM Storm Handbook                  | All | (d) (e) | Sharon Diaram   |
| OPC 2 <sup>nd</sup> POD,<br>No. 22         | 024838 | 024956 | OH RFP Attachments                 | All | (d) (e) | Sharon Diaram   |
| OPC 2 <sup>nd</sup> POD,<br>No. 40         | 024959 | 024967 | Sally Transmission Invoice         | All | (d) (e) | Jorge Gutierrez |
| <b>RESPONSES IN FORMER DOCKET 20210178</b> |        |        |                                    |     |         |                 |
| OPC 1 <sup>st</sup> POD,<br>No. 6          | 002656 | 002662 | Mastec                             | All | (d) (e) | Jorge Gutierrez |
| OPC 1 <sup>st</sup> POD,<br>No. 6          | 002663 | 002663 | Wright Tree 81K00 INV-<br>header   | All | (d) (e) | Jorge Gutierrez |
| OPC 1 <sup>st</sup> POD,<br>No. 6          | 002664 | 002664 | Wright Tree 81K05 INV-<br>header   | All | (d) (e) | Jorge Gutierrez |
| OPC 1 <sup>st</sup> POD,<br>No. 6          | 002665 | 002665 | Wright Tree 81K08 INV-<br>header   | All | (d) (e) | Jorge Gutierrez |
| OPC 1 <sup>st</sup> POD,<br>No. 6          | 002666 | 002666 | Wright Tree 81K20 INV-<br>header   | All | (d) (e) | Jorge Gutierrez |
| OPC 1 <sup>st</sup> POD,<br>No. 6          | 002667 | 002667 | Wright Tree 81K90 INV-<br>header   | All | (d) (e) | Jorge Gutierrez |
| OPC 1 <sup>st</sup> POD,<br>No. 6          | 002668 | 002668 | Wright Tree 82K04 INV-<br>header   | All | (d) (e) | Jorge Gutierrez |
| OPC 1 <sup>st</sup> POD,<br>No. 6          | 002669 | 002669 | Wright Tree 81K04 INV-<br>header   | All | (d) (e) | Jorge Gutierrez |
| OPC 1 <sup>st</sup> POD,<br>No. 6          | 002670 | 002677 | Wilco Zeta                         | All | (d) (e) | Jorge Gutierrez |
| OPC 1 <sup>st</sup> POD,<br>No. 12         | 002636 | 002636 | Internal Order Letter              | All | (d) (e) | David Hughes    |
| OPC 1 <sup>st</sup> POD,<br>No. 12         | 002637 | 002640 | Storm Compensation Policy          | All | (d) (e) | David Hughes    |
| OPC 1 <sup>st</sup> POD,<br>No. 12         | 002651 | 002655 | Accounting for Uninsured<br>Losses | All | (d) (e) | David Hughes    |
| OPC 1 <sup>st</sup> POD,<br>No. 12         | 002641 | 002650 | SOX Narratives                     | All | (d) (e) | David Hughes    |

|                                    |        |        |                                       |     |         |                 |
|------------------------------------|--------|--------|---------------------------------------|-----|---------|-----------------|
| OPC 1 <sup>st</sup> POD,<br>No. 15 | 002463 | 002464 | Restoration Bid<br>Communication      | All | (d) (e) | Sharon Diaram   |
| OPC 1 <sup>st</sup> POD,<br>No. 15 | 002584 | 002614 | Storm Handbook                        | All | (d) (e) | Sharon Diaram   |
| OPC 1 <sup>st</sup> POD,<br>No. 15 | 002465 | 002583 | OH RFP Attachments                    | All | (d) (e) | Sharon Diaram   |
| OPC 1 <sup>st</sup> POD,<br>No. 15 | 002462 | 002462 | Emergency Procurement                 | All | (d) (e) | Sharon Diaram   |
| OPC 1 <sup>st</sup> POD,<br>No. 32 | 002615 | 002615 | Confidential Attachment<br>5100076882 | All | (d) (e) | Jorge Gutierrez |

**RESPONSES IN FORMER DOCKET 20210178**

|                                   |        |        |                        |     |         |                 |
|-----------------------------------|--------|--------|------------------------|-----|---------|-----------------|
| OPC 1 <sup>st</sup> POD,<br>No. 6 | 029298 | 029305 | Conf Jordan Isaias     | All | (d) (e) | Jorge Gutierrez |
| OPC 1 <sup>st</sup> POD,<br>No. 6 | 029306 | 029310 | Conf Lewis Isaias      | All | (d) (e) | Jorge Gutierrez |
| OPC 1 <sup>st</sup> POD,<br>No. 6 | 029311 | 029315 | Conf Mastec Isaias     | All | (d) (e) | Jorge Gutierrez |
| OPC 1 <sup>st</sup> POD,<br>No. 6 | 029296 | 029297 | Conf Pike Isaias       | All | (d) (e) | Jorge Gutierrez |
| OPC 1 <sup>st</sup> POD,<br>No. 6 | 029316 | 029320 | Conf Pike Isaias excel | All | (d) (e) | Jorge Gutierrez |
| OPC 1 <sup>st</sup> POD,<br>No. 6 | 029334 | 029337 | POD 6 WMS              | All | (d) (e) | Jorge Gutierrez |
| OPC 1 <sup>st</sup> POD,<br>No. 6 | 029321 | 029326 | Conf Volt Isaias       | All | (d) (e) | Jorge Gutierrez |
| OPC 1 <sup>st</sup> POD,<br>No. 6 | 029327 | 029333 | Conf Wilco Isaias      | All | (d) (e) | Jorge Gutierrez |
| OPC 1 <sup>st</sup> POD,<br>No. 7 | 029439 | 029446 | Danella                | All | (d) (e) | Jorge Gutierrez |
| OPC 1 <sup>st</sup> POD,<br>No. 7 | 029338 | 029409 | 5104149618             | All | (d) (e) | Jorge Gutierrez |
| OPC 1 <sup>st</sup> POD,<br>No. 7 | 029435 | 029438 | 5104149995             | All | (d) (e) | Jorge Gutierrez |
| OPC 1 <sup>st</sup> POD,<br>No. 7 | 029410 | 029411 | 5104184974             | All | (d) (e) | Jorge Gutierrez |
| OPC 1 <sup>st</sup> POD,<br>No. 7 | 029447 | 029452 | BHJ J47 Invoice        | All | (d) (e) | Jorge Gutierrez |



|                                    |        |        |                                  |     |         |                 |
|------------------------------------|--------|--------|----------------------------------|-----|---------|-----------------|
| OPC 1 <sup>st</sup> POD,<br>No. 7  | 029453 | 029458 | BHJ J48 Invoice                  | All | (d) (e) | Jorge Gutierrez |
| OPC 1 <sup>st</sup> POD,<br>No. 7  | 029412 | 029414 | Irby 5104155706                  | All | (d) (e) | Jorge Gutierrez |
| OPC 1 <sup>st</sup> POD,<br>No. 7  | 029415 | 029415 | Irby                             | All | (d) (e) | Jorge Gutierrez |
| OPC 1 <sup>st</sup> POD,<br>No. 7  | 029459 | 029466 | Jordan Invoice                   | All | (d) (e) | Jorge Gutierrez |
| OPC 1 <sup>st</sup> POD,<br>No. 7  | 029416 | 029416 | Mastec                           | All | (d) (e) | Jorge Gutierrez |
| OPC 1 <sup>st</sup> POD,<br>No. 7  | 029467 | 029467 | Pike POD 7                       | All | (d) (e) | Jorge Gutierrez |
| OPC 1 <sup>st</sup> POD,<br>No. 7  | 029417 | 029417 | Pike                             | All | (d) (e) | Jorge Gutierrez |
| OPC 1 <sup>st</sup> POD,<br>No. 7  | 029418 | 029433 | Wilco 5104134815                 | All | (d) (e) | Jorge Gutierrez |
| OPC 1 <sup>st</sup> POD,<br>No. 7  | 029434 | 029434 | Wilco                            | All | (d) (e) | Jorge Gutierrez |
| OPC 1 <sup>st</sup> POD,<br>No. 16 | 029183 | 029184 | Storm Restoration Bid            | All | (d) (e) | Sharon Diaram   |
| OPC 1 <sup>st</sup> POD,<br>No. 16 | 029185 | 029219 | VM Storm Restoration<br>Handbook | All | (d) (e) | Sharon Diaram   |
| OPC 1 <sup>st</sup> POD,<br>No. 16 | 029289 | 029289 | Emergency Procurements           | All | (d) (e) | Sharon Diaram   |
| OPC 1 <sup>st</sup> POD,<br>No. 16 | 029220 | 029288 | RFP Attachments                  | All | (d) (e) | Sharon Diaram   |

# **EXHIBIT D**

# **DECLARATIONS**

**EXHIBIT D**

**BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION**

In re: Petition for evaluation of Hurricane  
Isaias and Tropical Storm Eta storm costs,  
by Florida Power & Light Company.

Docket No: 20210178-EI

**WRITTEN DECLARATION OF JORGE GUTIERREZ**

1. My name is Jorge Gutierrez. I am currently employed by Florida Power & Light Company ("FPL") as Manager Accounts Payable. I have personal knowledge of the matters stated in this written declaration.

2. I have reviewed the documents and information included in Exhibit A to FPL'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 FPL to contract for goods or services on favorable terms. Additionally, the documents and files that I have reviewed and which are asserted by FPL 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, FPL 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 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.

Jorge Gutierrez  
Jorge Gutierrez

Date: 1/12/2022

**EXHIBIT D**

**BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION**

In re: Petition for evaluation of Hurricane  
Isaias and Tropical Storm Eta storm costs,  
by Florida Power & Light Company.

Docket No: 20210178-EI

**WRITTEN DECLARATION OF SHARON DIARAM**

1. My name is Sharon Diaram. I am currently employed by Florida Power & Light Company as a Sourcing Manager, Compliance. I have personal knowledge of the matters stated in this written declaration.

2. I have reviewed the documents and information included in Exhibit A FPL'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 FPL to contract for goods or services on favorable terms. Additionally, the documents and files that I have reviewed and which are asserted by FPL 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, FPL 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 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.



Sharon Diaram  
2022.01.12 10:42:34 -05'00'

---

Sharon Diaram

Date: 1/12/22

**EXHIBIT D**

**BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION**

In re: Petition for limited proceeding for recovery of incremental storm restoration costs and associated true-up process related to Hurricane Zeta, by Gulf Power Company.

Docket No: 20210179-EI

**WRITTEN 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 written declaration.

2. I have reviewed the documents and information included in Exhibit A Gulf Power Company's ("Gulf") 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.

  
David Hughes

Date: 1/20/2022