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March 22, 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

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**Re: Docket No. 20200241-EI,
Petition for limited proceeding for recovery of incremental storm restoration costs related to Hurricane 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-EI); 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-EI).**

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 Set of Interrogatories, No. 41 and Third Request for Production of Documents, Response Nos. 47 and 48 in Docket No. 20200241-EI; (2) OPC's Second Set of Interrogatories, Nos. 40-42 and Second Request for Production of Documents, Nos. 38, 39 and 42 in former Docket No. 20210178-EI; and (3) OPC's Second Set of Interrogatories, Nos. 38, 39 and 41, and Second Request for Production of Documents, Response Nos. 36, 38, 42, 43 and 45 in former Docket No. 20210179-EI.

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) 691-2512 or ken.rubin@fpl.com.

Sincerely,

/s/ Kenneth M. Rubin
Kenneth M. Rubin
Attorney for Gulf and FPL
Fla. Bar No. 349038

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.

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.

Docket No: 20200241-EI

Docket No. 20210178-EI

Docket No. 20210179-EI

Date: March 22, 2022

**GULF POWER COMPANY AND FLORIDA POWER & LIGHT COMPANY'S
REQUEST FOR CONFIDENTIAL CLASSIFICATION OF INFORMATION
PROVIDED IN RESPONSE TO: (1) THE OFFICE OF PUBLIC COUNSEL'S ("OPC")
SECOND SET OF INTERROGATORIES, No. 41 AND THIRD REQUEST FOR
PRODUCTION OF DOCUMENTS, Nos. 47 AND 48 IN DOCKET NO. 20200241-EI; (2)
OPC'S SECOND SET OF INTERROGATORIES, Nos. 40-42 AND SECOND REQUEST
FOR PRODUCTION OF DOCUMENTS, Nos. 38, 39 AND 42 IN FORMER DOCKET
NO. 20210178-EI; AND (3) OPC'S SECOND SET OF INTERROGATORIES, Nos. 38, 39
AND 41, AND SECOND REQUEST FOR PRODUCTION OF DOCUMENTS, Nos. 36, 38,
42, 43 AND 45 IN FORMER DOCKET NO. 20210179-EI.**

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 file their Request for Confidential Classification and request confidential treatment of certain documents provided in their responses to the OPC's: (1) Second Set of Interrogatories, No. 41 and Third Request for Production of Documents, Nos. 47 and 48 in Docket No. 20200241-EI; (2) OPC's Second Set of Interrogatories, Nos. 40-42 and Second Request for Production of Documents, Nos. 38, 39 and 42 in former Docket No. 20210178-EI; and (3) OPC's Second Set of Interrogatories, Nos. 38, 39 and 41, and Second Request for

Production of Documents, Response Nos. 36, 38, 42, 43 and 45 in former Docket No. 20210179-EI("Confidential Documents"). In support of this request, Gulf and FPL state as follows:

1. Gulf and FPL served their initial responses to OPC's Second Set of Interrogatories and Third Request for Production of Documents in Docket 20200241-EI; OPC's Second Set of Interrogatories and Second Request for Production of Documents in former Docket 20210178-EI; and OPC's Second Set of Interrogatories and Second Request for Production of Documents in former Docket 20210179-EI (including the Confidential Documents) on March 22, 2022. This request is being filed to request confidential classification of certain information contained in its responses to OPC's: (1) Second Set of Interrogatories, No. 41 and Third Request for Production of Documents, Nos. 47 and 48 in Docket No. 20200241-EI; (2) OPC's Second Set of Interrogatories, Nos. 40-42 and Second Request for Production of Documents, Nos. 38, 39 and 42 in former Docket No. 20210178-EI; and (3) OPC's Second Set of Interrogatories, Nos. 38, 39 and 41, and Second Request for Production of Documents, Response Nos. 36, 38, 42, 43 and 45 in former Docket No. 20210179-EI. 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 have not highlighted the entirety of the information but have instead added a confidential label.
- b. Exhibit B consists of an edited version of the Confidential Documents wherein the information Gulf and FPL assert 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 Michael Spoor, Clare Gerard, Sharon Diaram and Thomas Allain in support of this Request.

2. 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 FPL and their 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.

3. 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.

4. 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 FPL as soon as it is no longer necessary for the Commission to conduct its business. See § 366.093(4), Florida Statutes.

5. **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 their 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 22nd day of March 2022.

Kenneth M. Rubin
Assistant General Counsel
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Juno Beach, FL 33408
Telephone: (561) 691-2512
Facsimile: (561) 691-7135

By: /s/ Kenneth M. Rubin
Kenneth M. Rubin
Florida Bar No. 349038

CERTIFICATE OF SERVICE

Docket No. 20200241-EI

Docket No. 20210178-EI

Docket No. 20200179-EI

I HEREBY CERTIFY that a true and correct copy of the foregoing was served by electronic mail this 22nd day of March 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
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

s/ Kenneth M. Rubin
Kenneth M. Rubin

EXHIBIT B

REDACTED

QUESTION:

Sally - Contractor Costs.

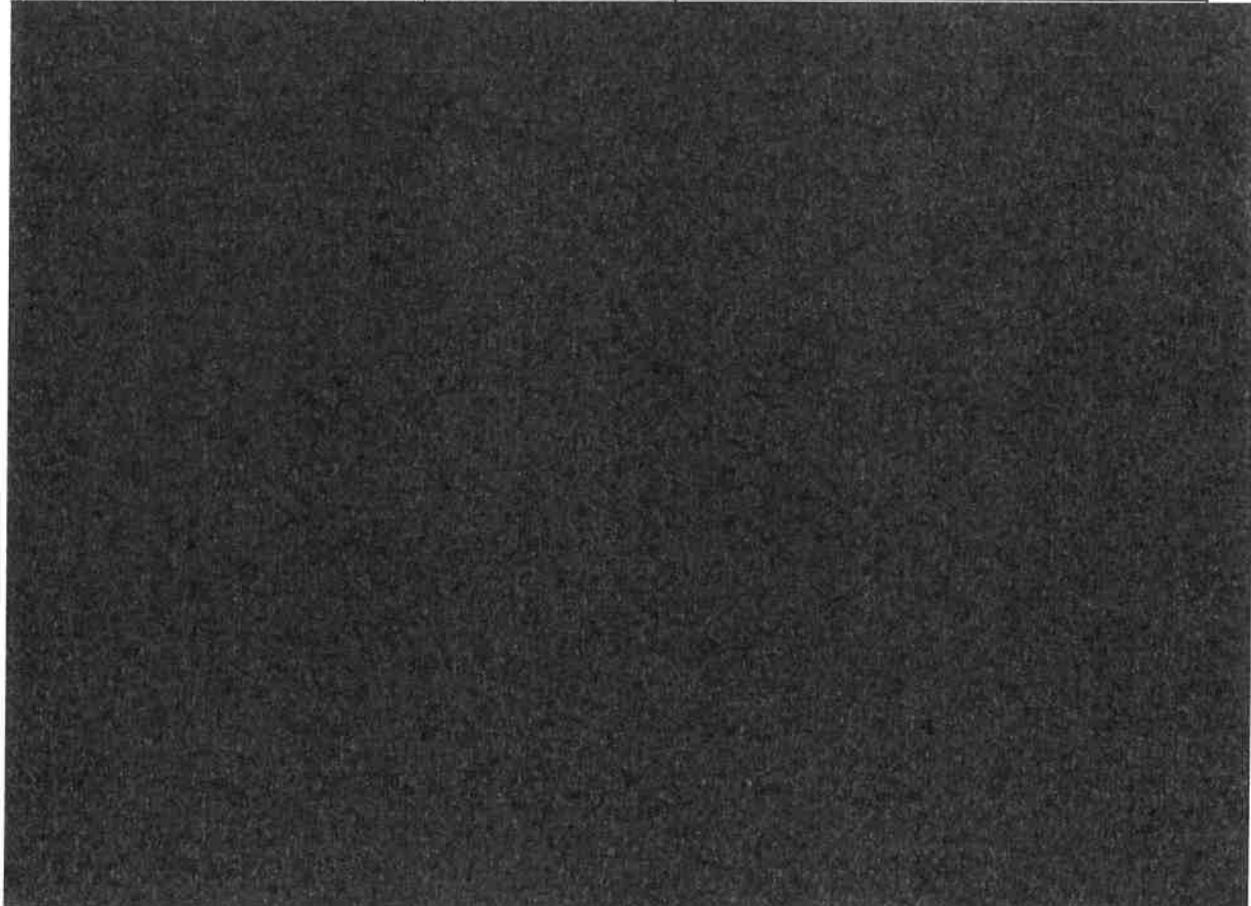
Please refer to the response to OPC's Interrogatory No. 9 subpart a. which states, "The costs associated with the contractors identified in this interrogatory are not related to line crews or vegetation management crews as that term is used in the FPL Hurricane Irma Settlement Agreement." For each of the contractors and amounts listed in OPC's Interrogatory No. 9, define the types of costs that were incurred and explain why they were not related to line crews or vegetation management crews as that term is used in the FPL Hurricane Irma Settlement Agreement.

RESPONSE:

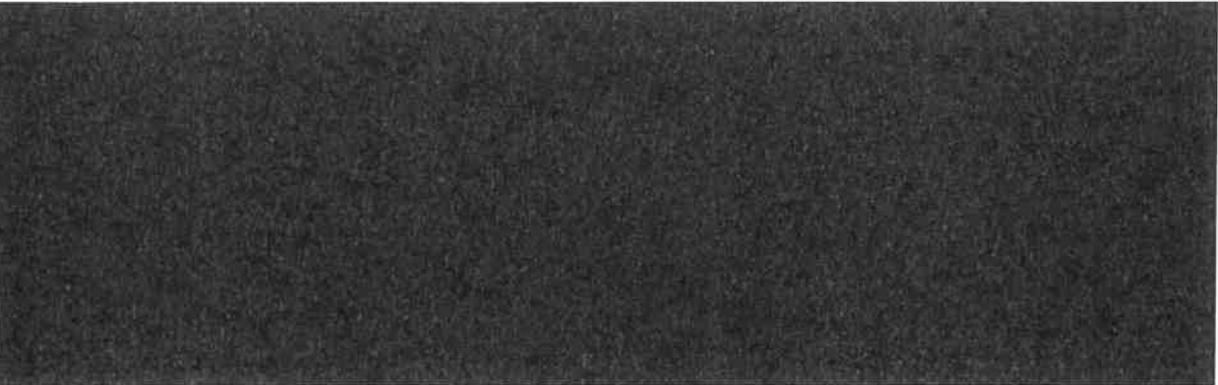
Each of the contractors and amounts listed in the OPC's Interrogatory No. 9 (a) is included below. The third column explains the "Contractor Type".

Contractor	Cost Amount	Contractor Type
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The information in the table shows that the contractors in question provided services involving arborists, overhead post storm restoration, patrollers, transmission storm restoration, emergency first responders and underground restoration, and damage assessors. These services are separate from the work provided by overhead line crews and vegetation management crews that perform the great majority of restoration work following a storm event. In this proceeding, Gulf provided the data exported from the iStormed App for overhead line and vegetation management contractors (i.e., the flat files) on November 12, 2021. As described in paragraph 19 of the FPL Hurricane Irma Settlement Agreement, the early provision of these flat files was “intended to reduce the amount of discovery in future storm proceedings”; in short, OPC did not need to ask for or wait to receive the support for costs related to overhead line crews and vegetation management crews. Additionally, with respect to other vendors and contractors whose costs are the subject of this proceeding, Gulf has also provided additional cost support workpapers, contracts, and invoice support in response to previous discovery responses.

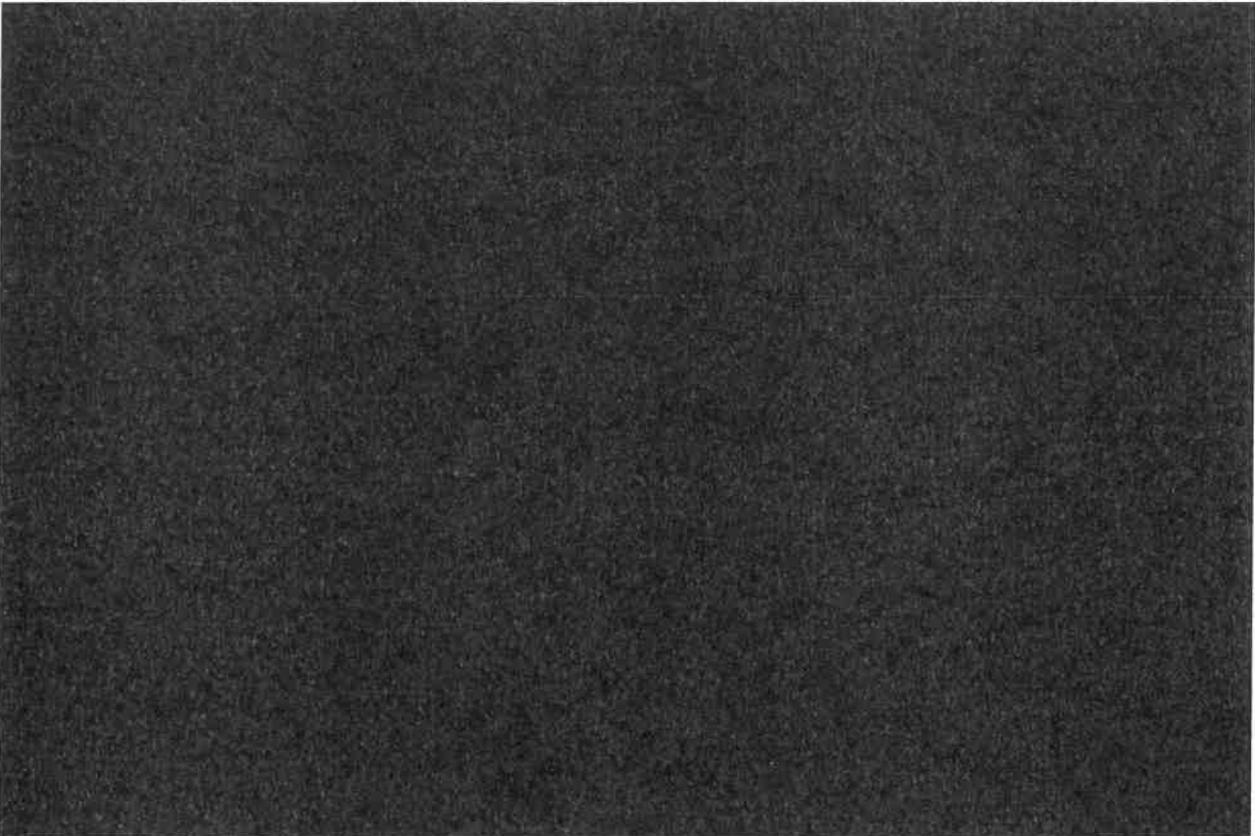
QUESTION:

Sally - Preparedness Plan.

Please provide copies of all studies or analysis developed just prior to the event that compares estimated outage restoration time with resource requirements and resource costs for Hurricane Sally.

RESPONSE:

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The documents responsive to OPC's Third Request for Production of Documents, No. 47, in Docket 20200241-EI, Bates Nos. 026853-026857, are confidential in their entirety.

QUESTION:

Sally - Preparedness Plan.

Please provide copies of all studies or analysis developed after the event that compares actual outage restoration time with actual resources utilized and actual resource costs for Hurricane Sally.

RESPONSE:

1 [REDACTED]
2 [REDACTED]
3 [REDACTED]
4 [REDACTED]
5 [REDACTED]
6 [REDACTED]
7 [REDACTED]
8 [REDACTED]
9 [REDACTED]
10 [REDACTED]
11 [REDACTED]
12 [REDACTED]
13 [REDACTED]
14 [REDACTED]
15 [REDACTED]

The documents responsive to OPC's Third Request for Production of Documents, No. 48, in Docket 20200241-EI, Bates Nos. 026858-026861, are confidential in their entirety.

QUESTION:

Isaias and Eta - Contractor Costs.

Please refer to the response to OPC's Interrogatory No. 9 subpart a. which states, "The costs associated with the contractors identified in this interrogatory are not related to line crews or vegetation management crews as that term is used in the FPL Hurricane Irma Settlement Agreement." For each of the contractors and amounts listed in OPC's Interrogatory No. 9 related to Hurricane Isaias, define the types of costs that were incurred and explain why they were not related to line crews or vegetation management crews as that term is used in the FPL Hurricane Irma Settlement Agreement.

RESPONSE:

Each of the contractors and amounts listed in OPC's Interrogatory No. 9 (a) is included below. The fourth column explains the "Contractor Type".

Contract#	Contractor	Cost Amount	Contractor Type
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]

The information in the table shows that the contractors in question provided services involving emergency first responders and underground restoration, arborists, and damage assessors. These services are separate from the work provided by overhead line crews and vegetation management crews that perform the great majority of restoration work following a storm event. In this proceeding, FPL provided the data exported from the iStormed App for overhead line and vegetation management contractors (i.e., the flat files) on November 12, 2021. As described in paragraph 19 of the FPL Hurricane Irma Settlement Agreement, the early provision of these flat files was "intended to reduce the amount of discovery in future storm proceedings"; in short, OPC did not need to ask for or wait to receive the support for costs related to overhead line crews and

vegetation management crews. Additionally, with respect to other vendors and contractors whose costs are the subject of this proceeding, FPL has also provided additional cost support workpapers, contracts, and invoice support in response to previous discovery responses.

QUESTION:

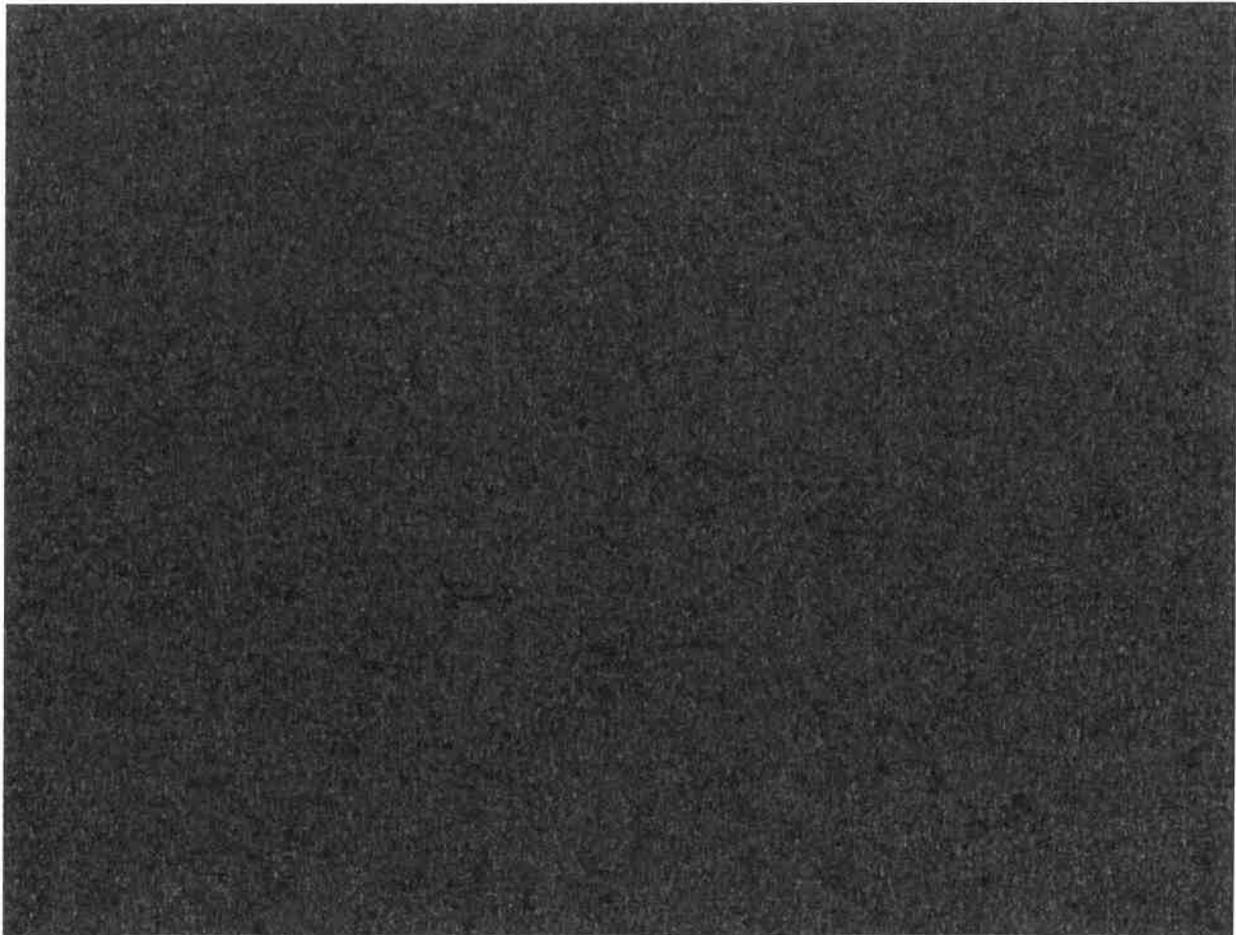
Isaias and Eta -Contractor Costs.

Please refer to the response to OPC's Interrogatory No. 10 subpart a. which states, "The costs associated with the contractors identified in this interrogatory are not related to line crews or vegetation management crews as that term is used in the FPL Hurricane Irma Settlement Agreement." For each of the contractors and amounts listed in OPC's Interrogatory No. 10 related to Tropical Storm Eta, define the types of costs that were incurred and explain why they were not related to line crews or vegetation management crews as that term is used in the FPL Hurricane Irma Settlement Agreement.

RESPONSE:

Each of the contractors and amounts listed in the OPC's Interrogatory No. 10 (a) is included below. The fourth column explains the "Contractor type".

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The information in the table shows that the contractors in question provided services involving emergency first responders and underground restoration, transmission storm restoration, damage assessors and production leads. These services are separate from the work provided by overhead line crews and vegetation management crews that perform the great majority of restoration work following a storm event. In this proceeding, FPL provided the data exported from the iStormed App for overhead line and vegetation management contractors (i.e., the flat files) on November 12, 2021. As described in paragraph 19 of the FPL Hurricane Irma Settlement Agreement, the early provision of these flat files was “intended to reduce the amount of discovery in future storm proceedings”; in short, OPC did not need to ask for or wait to receive the support for costs related to overhead line crews and vegetation management crews. Additionally, with respect to other vendors and contractors whose costs are the subject of this proceeding, FPL has also provided additional cost support workpapers, contracts, and invoice support in response to previous discovery responses.

QUESTION:

Isaias and Eta - Contractor Costs.

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- 1 Please refer to the Confidential Excel flat file for [REDACTED] [REDACTED] provided as part of the Company's November 12, 2021 filing for Tropical Storm Eta. Refer further to the "Expenses" worksheet tab
- 2 at cell row 12, which contains an expense amount of [REDACTED] described in cell column AJ as "equipment necessary for work." Describe the equipment costs charged to the Company and explain why it was charged as part of the recovery costs.

RESPONSE:

The amount charged is for equipment that is necessary and used by the specific vegetation crews. The use of equipment and the right to be reimbursed for the use of that equipment are allowed as a part of their contract, provided it has been specifically pre-authorized by FPL. In this case, the equipment was pre-authorized to be used as a part of the storm restoration effort. The Cost Finalization team verifies that this equipment was used during storm restoration and appropriate rates were charged per their contract.

Please refer to FPL's response to OPC's Request for Production of Document No. 42 for details of the allowable equipment per their contract.

QUESTION:

Isaias and Eta -Preparedness Plan.

Please provide copies of all studies or analysis developed just prior to the event that compares estimated outage restoration time with resource requirements and resource costs for Hurricane Isaias and Tropical Storm Eta.

RESPONSE:

1 [REDACTED]
2 [REDACTED]
3 [REDACTED]
4 [REDACTED]
5 [REDACTED]
6 [REDACTED]
7 [REDACTED]
8 [REDACTED]
9 [REDACTED]
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13 [REDACTED]
14 [REDACTED]
15 [REDACTED]
16 [REDACTED]
17 [REDACTED]
18 [REDACTED]
19 [REDACTED]

The documents responsive to OPC's Second Request for Production of Documents, No. 38, in former Docket 20210178-EI, Bates Nos. 029494-029502, are confidential in their entirety.

QUESTION:

Isaias and Eta -Preparedness Plan.

Please provide copies of all studies or analysis developed after the event that compares actual outage restoration time with actual resources utilized and actual resource costs for Hurricane Isaias and Tropical Storm Eta.

RESPONSE:

1 [REDACTED]
2 [REDACTED]
3 [REDACTED]
4 [REDACTED]
5 [REDACTED]
6 [REDACTED]
7 [REDACTED]
8 [REDACTED]
9 [REDACTED]
10 [REDACTED]
11 [REDACTED]
12 [REDACTED]
13 [REDACTED]
14 [REDACTED]
15 [REDACTED]

The documents responsive to OPC's Second Request for Production of Documents, No. 39, in former Docket 20210178-EI, Bates Nos. 029503-029509, are confidential in their entirety.

The documents responsive to OPC's Second Request for Production of Documents, No. 42, in former Docket 20210178-EI, Bates Nos. 029491-029493, are confidential in their entirety.

QUESTION:

Zeta - Contractor Costs.

Please refer to the response to OPC's Interrogatory No. 9 subpart a. which states, "The costs associated with the contractors identified in this interrogatory are not related to line crews or vegetation management crews as that term is used in the FPL Hurricane Irma Settlement Agreement." For each of the contractors and amounts listed in OPC's Interrogatory No. 9, define the types of costs that were incurred and explain why they were not related to line crews or vegetation management crews as that term is used in the FPL Hurricane Irma Settlement Agreement. In addition, if underground crews are not classified as line crews as part of the Company's interpretation, explain why not.

RESPONSE:

Each of the contractors and amounts listed in the OPC's Interrogatory No. 9 (a) is included below. The third column explains the "Contractor type".

	Contractor	Cost Amount	Contractor Type
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The information in the table shows that the contractors in question provided services including emergency first responders and underground restoration, and post storm vegetation services. Because underground crews provide a range of services including emergency response, restoration of underground facilities, supporting Emergency Operation Centers (EOCs), and switching for overhead facilities, they do not fall within FPL's traditional use of the term "line crews" which FPL generally uses to refer to line crews engaged in overhead line work. These services are separate from the work provided by overhead line crews and vegetation management crews that perform the great majority of restoration work following a storm event. In this proceeding, Gulf provided the data exported from the iStormed App for overhead line and vegetation management contractors (i.e., the flat files) on November 12, 2021. As described in paragraph 19 of the FPL Hurricane Irma Settlement Agreement, the early provision of these flat files was "intended to reduce the amount of discovery in future storm proceedings"; in short, OPC did not need to ask for or wait to receive the support for costs related to overhead line crews and vegetation management crews. Additionally, with respect to other vendors and contractors whose costs are the subject of this proceeding, Gulf has also provided additional cost support workpapers, contracts, and invoice support in response to previous discovery responses.

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[Redacted]

QUESTION:

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Zeta - Contractor Costs.

- 1 Please refer to the Confidential Excel flat file for [REDACTED] [REDACTED] provided as part of the Company's
2 November 12, 2021 filing. Refer further to the "Expenses" worksheet tab at cell row 35, which
3 contains an expense amount of [REDACTED] described in cell column AJ as "equipment necessary for
work." Describe the equipment costs charged to the Company and explain why it was charged as part
of the recovery costs.

RESPONSE:

The amount charged is for equipment that is necessary and used by the specific vegetation crews. The use of equipment and the right to be reimbursed for the use of that equipment are allowed as a part of their contract, provided it has been specifically pre-authorized by FPL. In this case, the equipment was pre-authorized to be used as a part of the storm restoration effort. The Cost Finalization team verifies that these equipment were used during storm restoration and appropriate rates were charged per their contract.

Please refer to FPL's response to OPC's Production of Document Request No. 38 for details of the allowable equipment per their contract.

QUESTION:

Zeta - Mobilization/Demobilization.

Refer to the Confidential Excel flat files provided as part of the Company's November 12, 2021 filing. The vast majority of the contractors charged mobilization hours over the course of portions of three days, charged on-site hours over the course of portions of two days, and then charged no demobilization hours. Describe all reasons why there were virtually no demobilization charges related to Hurricane Zeta and describe the terms of all agreements made with other utilities more heavily impacted from the storm to pass along the responsibility for demobilization of these crews. In addition, identify all other utilities upon which such agreements were made.

RESPONSE:

Once restoration efforts associated with Hurricane Zeta were complete, external resources were released to other utilities as soon as possible to reduce cost. External resources acquired by Gulf were able to assist in the completion of service restoration in less than 24 hours

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The documents responsive to OPC's Second Request for Production of Documents, No. 36, in former Docket 20210179-EI, Bates Nos. 002734-002744, are confidential in their entirety.

QUESTION:

Zeta - Contractor Costs.

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1 Please refer to the Confidential Excel flat file for [REDACTED] [REDACTED] provided as part of the
2 Company's November 12, 2021 filing. Refer further to the "Expenses" worksheet tab at cell row
3 35, which contains an expense amount of [REDACTED] described in cell column AJ as "equipment
necessary for work." Provide copies of all documentation related to this additional equipment
charge.

RESPONSE:

Please see responsive document(s) for the approved equipment costs.

The documents responsive to OPC's Second Request for Production of Documents, No. 38, in former Docket 20210179-EI, Bates Nos. 002702-002705, are confidential in their entirety.

QUESTION:

Zeta - Preparedness Plan.

Please provide copies of all studies or analysis developed just prior to the event that compares estimated outage restoration time with resource requirements and resource costs for Hurricane Zeta.

RESPONSE:

1 [REDACTED]
2 [REDACTED].
3 [REDACTED]
4 [REDACTED]
5 [REDACTED]
6 [REDACTED]
7 [REDACTED]
8 [REDACTED]
9 [REDACTED]
10 [REDACTED]
11 [REDACTED]
12 [REDACTED]
13 [REDACTED]
14 [REDACTED]
15 [REDACTED]
16 [REDACTED]
17 [REDACTED]
18 [REDACTED]
19 [REDACTED].

The documents responsive to OPC's Second Request for Production of Documents, No. 42, in former Docket 20210179-EI, Bates Nos. 002746-002750, are confidential in their entirety.

QUESTION:

Zeta - Preparedness Plan.

Please provide copies of all studies or analysis developed after the event that compares actual outage restoration time with actual resources utilized and actual resource costs for Hurricane Zeta.

RESPONSE:

1 [REDACTED]
2 [REDACTED]
3 [REDACTED]
4 [REDACTED]
5 [REDACTED]
6 [REDACTED]
7 [REDACTED]
8 [REDACTED]
9 [REDACTED]
10 [REDACTED]
11 [REDACTED]
12 [REDACTED]
13 [REDACTED]
14 [REDACTED]
15 [REDACTED]

The documents responsive to OPC's Second Request for Production of Documents, No. 43, in former Docket 20210179-EI, Bates Nos. 002751-002754, are confidential in their entirety.

QUESTION:

Zeta - Mobilization/Demobilization.

Please refer to the Confidential Excel flat files provided as part of the Company's November 12, 2021 filing. The vast majority of the contractors charged mobilization hours over the course of portions of three days, charged on-site hours over the course of portions of two days, and then charged no demobilization hours. Provide copies of documents memorializing agreements between Gulf Power Company and other utilities to pick up the responsibility for demobilization for these crews, if any.

RESPONSE:

Please see "Emergency Restoration Statement of Work" provided with Gulf's response to OPC's First Set of Interrogatories No. 14 which includes the following provision at page 11: "If crews are released to support another utility, the requesting utility will be responsible for all demobilization time and expenses."

1 [REDACTED]
2 [REDACTED]
3 [REDACTED]. FPL, as a SEE
member, is a party to a nondisclosure agreement restricting FPL from producing the agreement.
4 [REDACTED]
5 [REDACTED]. However, as noted above, Gulf's
Emergency Restoration Statement of Work similarly provides for the transfer of demobilization
costs and expenses to the receiving utility.

EXHIBIT C

JUSTIFICATION TABLE

EXHIBIT C

COMPANY: Florida Power & Light Company
TITLE: List of Confidential Documents
DOCKET NO.: 20200241-EI; 20210178-EI; 20210179-EI
DOCKET TITLE: Petition for limited proceeding for recovery of incremental storm restoration costs related to Hurricane Sally, by Gulf Power Company. 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.
SUBJECT: Responses to Office of Public Counsel’s (“OPC”): Second Set of Interrogatories, No. 41, and Third Request for Production of Documents, Nos. 47 and 48 in Docket 20200241-EI; Second Set of Interrogatories, Nos. 40-42, and Second Request for Production of Documents, Nos. 38, 39 and 42 in former Docket 20210178-EI; and Second Set of Interrogatories, Nos. 38, 39 and 41, and Second Request for Production of Documents, Nos. 36, 38, 42-43, and 45 in former Docket 20210179-EI.
DATE: March 22, 2022

Set	Bates Number Start	Bates Number End	Description	Line No. / Col. No.	Florida Statute 3.66.093(3) Subsection	Declarant
Docket 20200241 OPC 2 ND INT 41	026793	026794	Sally Contractor Costs	Page 1, Line 1 to Page 2 Line 7	(d) (e)	Clare Gerard
Docket 20200241 OPC 3 rd POD 47	026853	026853	Sally Preparedness Plan	Lines 1- 19	(d) (e)	Michael Spoor
Docket 20200241 OPC 3 rd POD 47, Attachment	026854	026854	CMH Damage and Customer Impact	All	(d) (e)	Michael Spoor
Docket 20200241 OPC 3 rd POD 47, Attachment	026855	026855	Sally Phase II Estimate	All	(d) (e)	Michael Spoor

Set	Bates Number Start	Bates Number End	Description	Line No. / Col. No.	Florida Statute 3.66.093(3) Subsection	Declarant
Docket 20200241 OPC 3 rd POD 47, Attachment	026856	026857	Sally Work Plan Summary	All	(d) (e)	Michael Spoor
Docket 20200241 OPC 3 rd POD 48	026858	026858	Sally Preparedness Plan	Lines 1-15	(d) (e)	Michael Spoor
Docket 20200241 OPC 3 rd POD 48, Attachment	026859	026860	Sally Phase III Estimate	All	(d) (e)	Michael Spoor
Docket 20200241 OPC 3 rd POD 48 Attachment	026861	0026861	Sally Adjusted Carver Rpt	All	(d) (e)	Michael Spoor
Former Docket 20210178 OPC 2 nd INT 40	029469	029470	Isaias and Eta Contractor Costs	Page 1, Lines 1-16	(d) (e)	Clare Gerard
Former Docket 20210178 OPC 2 nd INT 41	029471	029472	Isaias and Eta Contractor Costs	Page 1, Lines 1-23	(d) (e)	Clare Gerard
Former Docket 20210178 OPC 2 nd INT 42	029473	029473	Isaias and Eta Contractor Costs	Line 1/Col A and Line 2/Col B	(d) (e)	Clare Gerard
Former Docket 20210178 OPC 2 nd POD 38	029494	029494	Isaias and Eta Preparedness Plan	Lines 1-19	(e)	Thomas Allain
Former Docket 20210178 OPC 2 nd POD 38 Attachment	029495	029495	Eta Executive Summary	All	(e)	Thomas Allain
Former Docket 20210178 OPC 2 nd POD 38 Attachment	029496	029496	Eta Phase II Estimate	All	(e)	Thomas Allain

Set	Bates Number Start	Bates Number End	Description	Line No. / Col. No.	Florida Statute 3.66.093(3) Subsection	Declarant
Former Docket 20210178 OPC 2 nd POD 38 Attachment	029497	029498	Eta Work Plan Summary	All	(e)	Thomas Allain
Former Docket 20210178 OPC 2 nd POD 38 Attachment	029499	029499	Isaias Executive Summary	All	(e)	Thomas Allain
Former Docket 20210178 OPC 2 nd POD 38 Attachment	029500	029500	Isaias Phase II Estimate	All	(e)	Thomas Allain
Former Docket 20210178 OPC 2 nd POD 38 Attachment	029501	029502	Isaias Work Plan Summary	All	(e)	Thomas Allain
Former Docket 20210178 OPC 2 nd POD 39	029503	029503	Isaias-Eta Preparedness Plan	Lines 1-15	(e)	Thomas Allain
Former Docket 20210178 OPC 2 nd POD 39 Attachment	029504	029504	Eta Adjusted Carver	All	(e)	Thomas Allain
Former Docket 20210178 OPC 2 nd POD 39 Attachment	029505	029506	Eta Phase III Estimate	All	(e)	Thomas Allain
Former Docket 20210178 OPC 2 nd POD 39 Attachment	029507	029507	Isaias Adjusted Carver	All	(e)	Thomas Allain

Set	Bates Number Start	Bates Number End	Description	Line No. / Col. No.	Florida Statute 3.66.093(3) Subsection	Declarant
Former Docket 20210178 OPC 2 nd POD 39 Attachment	029508	029509	Isais Phase III Estimate	All	(e)	Thomas Allain
Former Docket 20210178 OPC 2 nd POD 42 Attachment	029491	029492	Trees, Inc. Invoice	All	(d) (e)	Clare Gerard
Former Docket 20210178 OPC 2 nd POD 42 Attachment	029493	029493	Trees Specialty Equipment Contract	All	(d) (e)	Clare Gerard
Former Docket 20210179 OPC 2 nd INT 38	002690	002690	Zeta Contractor Costs	Lines 1-7	(d) (e)	Clare Gerard
Former Docket 20210179 OPC 2 nd INT 39	002691	002691	Zeta Contractor Costs	Line 1/Col B and Line 3/Col A	(d) (e)	Clare Gerard
Former Docket 20210179 OPC 2 nd INT 41	002692	002692	Zeta Mobilization	Lines 1-9	(d) (e)	Michael Spoor
Former Docket 20210179 OPC 2 nd POD 36 Attachment	002734	002739	Confidential Contract	All	(d) (e)	Sharon Diaram
Former Docket 20210179 OPC 2 nd POD 36 Attachment	002740	002744	Confidential Contract	All	(d) (e)	Sharon Diaram

Set	Bates Number Start	Bates Number End	Description	Line No. / Col. No.	Florida Statute 3.66.093(3) Subsection	Declarant
Former Docket 20210179 OPC 2 nd POD 38	002702	002702	Zeta Contractor Costs	Line 1/Col B and Line 3/Col A	(d) (e)	Clare Gerard
Former Docket 20210179 OPC 2 nd POD 38 Attachment	002703	002703	Asplundh Specialty Equipment Contract	All	(d) (e)	Clare Gerard
Former Docket 20210179 OPC 2 nd POD 38 Attachment	002704	002705	Equipment Adder Invoice	All	(d) (e)	Clare Gerard
Former Docket 20210179 OPC 2 nd POD 42	002746	002746	Zeta Preparedness Plan	Lines 1- 19	(d) (e)	Michael Spoor
Former Docket 20210179 OPC 2 nd POD 42 Attachment	002749	002750	Zeta Work Plan	All	(d) (e)	Michael Spoor
Former Docket 20210179 OPC 2 nd POD 42 Attachment	002748	002748	Zeta Phase II Estimate	All	(d) (e)	Michael Spoor
Former Docket 20210179 OPC 2 nd POD 42 Attachment	002747	002747	Zeta Executive Summary	All	(d) (e)	Michael Spoor
Former Docket 20210179 OPC 2 nd POD 43	002751	002751	Zeta Preparedness Plan	Lines 1- 15	(d) (e)	Michael Spoor

Set	Bates Number Start	Bates Number End	Description	Line No. / Col. No.	Florida Statute 3.66.093(3) Subsection	Declarant
Former Docket 20210179 OPC 2 nd POD 43 Attachment	002752	002752	Zeta Adjusted Carver Report	All	(d) (e)	Michael Spoor
Former Docket 20210179 OPC 2 nd POD 43 Attachment	002753	002754	Zeta Phase III Estimate	All	(d) (e)	Michael Spoor
Former Docket 20210179 OPC 2 nd POD 45	002745	002745	Zeta Mobilization	Lines 1-5	(d) (e)	Michael Spoor

EXHIBIT D

DECLARATIONS

EXHIBIT D

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

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

Docket No. 20200241-EI

Docket No. 20210178-EI

Docket No. 20210179-EI

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.

WRITTEN DECLARATION OF MICHAEL SPOOR

1. My name is Michael Spoor. I am currently employed by Florida Power & Light Company ("FPL") as Vice President. 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 Gulf Power Company's ("Gulf") and FPL's Request for Confidential Classification, for which I am listed as the declarant on Exhibit C, specifically, the responses to Office of Public Counsel's ("OPC") Third Request for Production of Documents ("POD"), Nos. 47 and 48 in docket 20200241; and OPC's Second set of Interrogatories, No. 41 and Second POD, Nos. 42-43, and 45 in former docket 20210179. 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.



Michael Spoor

Date: 03/21/2022

EXHIBIT D

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

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

Docket No: 20200241-EI

Docket No. 20210178-EI

Docket No. 20210179-EI

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.

WRITTEN DECLARATION OF CLARE GERARD

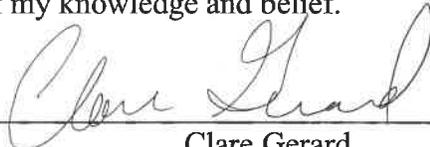
1. My name is Clare Gerard. I am currently employed by Florida Power & Light Company ("FPL") as Vice President of Risk and Credit Exposure Management. I have personal knowledge of the matters stated in this written declaration.

2. I have reviewed the documents and information included in Exhibit A of FPL and Gulf Power Company's Request for Confidential Classification, for which I am listed as the declarant on Exhibit C, specifically FPL's responses to Office of Public Counsel's ("OPC") Second Set of Interrogatories, Nos. 40-42, and Second Request for Production of Documents ("POD"), No.42 in former Docket No. 20210178-EI; OPC's Second Set of Interrogatories, Nos. 38 and 39, and POD No. 38 in former Docket No. 20210179-EI; and OPC's Second Set of Interrogatories, No. 41 in Docket No. 20200241-EI. The documents and files that I have reviewed and which are asserted by FPL and 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 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 and 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, FPL and Gulf have 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.



Clare Gerard

Date: 3-21-2022

EXHIBIT D

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

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

Docket No: 20200241-EI

Docket No. 20210178-EI

Docket No. 20210179-EI

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.

WRITTEN DECLARATION OF SHARON DIARAM

1. My name is Sharon Diaram. I am currently employed by Florida Power & Light (“FPL”) Company as a Sr Manager, Compliance and Support Services. I have personal knowledge of the matters stated in this written declaration.

2. I have reviewed the documents and information included in Exhibit A of FPL and Gulf Power Company's Request for Confidential Classification, for which I am listed as the declarant on Exhibit C, specifically the response to Office of Public Counsel’s Second Request for Production of Documents, No. 36 in former Docket No. 20210179-EI. 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 FPL 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 and FPL have 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 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.

Sharon Diaram

Sharon Diaram
2022.03.19 20:04:56 -04'00'

Sharon Diaram

Date: 3/19/22

EXHIBIT D

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

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

Docket No. 20200041-EI

Docket No. 20210178-EI

Docket No. 20210179-EI

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.

WRITTEN DECLARATION OF THOMAS ALLAIN

1. My name is Thomas Allain. I am currently employed by Florida Power & Light Company ("FPL") as Director of Compliance and Regulatory, Power Delivery. 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, specifically, FPL's responses to OPC's Second Request for Production of Documents, Nos. 38 and 39 in former Docket No. 20210178-EI, 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 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.



Thomas Allain

Date: 3/21/22