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April 1, 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. 20220045-EI
Petition for determination of Need for Sweatt-Whidden 230 kV Transmission
Line in Okeechobee, DeSoto, Highlands, and Glades Counties, by Florida
Power & Light Company.**

Dear Mr. Teitzman:

I enclose for filing in the above referenced docket, Florida Power & Light Company's ("FPL") Request for Confidential Classification of Information ("Request") contained in the exhibits and attachments provided in support of FPL's Petition for Determination of Need for Sweatt-Whidden 230 kV Transmission Line in Okeechobee, DeSoto, Highlands, and Glades Counties, ("Petition") and pre-filed testimony of FPL witness Francisco Prieto. The documents for which the enclosed request seeks confidential protection, along with the Petition, are being filed contemporaneously with this Request.

The enclosed filing includes Exhibits A, B, C, and D. Exhibit A consists of the confidential documents, and all the information that FPL asserts is entitled to confidential treatment has been highlighted. Exhibit B is an edited version of Exhibit A, in which the information FPL asserts is confidential has been redacted. Exhibit C is a justification table in support of FPL's Request for Confidential Classification. Exhibit D contains the declaration in support of FPL's request.

Please contact me if you or your Staff has any questions regarding this filing at (561) 304-5662 or will.p.cox@fpl.com.

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

Sincerely,

William P. Cox
Florida Bar No. 0093531

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Petition for determination of Need for Sweatt-Whidden 230 kV Transmission Line in Okeechobee, DeSoto, Highlands, and Glades Counties, by Florida Power & Light Company.

Docket No: 20220045-EI

Date: April 1, 2022

FLORIDA POWER & LIGHT COMPANY'S REQUEST FOR CONFIDENTIAL CLASSIFICATION OF INFORMATION CONTAINED IN EXHIBITS AND ATTACHMENTS PROVIDED IN SUPPORT OF ITS PETITION FOR DETERMINATION OF NEED FOR SWEATT-WHIDDEN 230 KV TRANSMISSION LINE IN OKEECHOBEE, DESOTO, HIGHLANDS, AND GLADES COUNTIES.

Pursuant to Section 366.093, Florida Statutes ("Section 366.093"), and Rule 25-22.006, Florida Administrative Code, Florida Power & Light Company ("FPL") hereby requests confidential classification of certain documents and information contained in the exhibits and attachments included with FPL's Petition for Determination of Need for Sweatt-Whidden 230 kV Transmission Line in Okeechobee, DeSoto, Highlands, and Glades Counties ("Petition") and pre-filed testimony of FPL witness Francisco Prieto, which are being filed contemporaneously with this request:

1. This Request is being filed in accordance with Rule 25-22.006, Florida Administrative Code, to request confidential classification of certain information related to FPL's Sweatt-Whidden Need Determination. Specifically, FPL seeks confidential classification of information contained in: Exhibit A to the Petition (and its Attachments Nos. 4 and 7; and Load Flow Diagrams Appendices); Exhibits FP-2 and FP-4 to the testimony of Francisco Prieto (together, the "Confidential Documents").

2. The following exhibits are attached to and made a part of this Request:

- a. Exhibit A consists of the confidential documents, and all the information that FPL asserts is entitled to confidential treatment has been highlighted.

- b. Exhibit B is an edited version of Exhibit A, in which the information FPL assets is confidential has been redacted.
- 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 declaration of Francisco Prieto in support of this Request.

3. FPL submits that the information in Exhibit A is proprietary and confidential business information, and its disclosure would cause harm to FPL 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 security measures, systems or procedures. This information is protected by Sections 366.093(3) (c), Florida Statutes.

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

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 1st day of April 2022.

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By: 
William P. Cox
Florida Bar No. 0093531

CERTIFICATE OF SERVICE
Docket No. 20220045-EI

I HEREBY CERTIFY that a true and correct copy of the foregoing was served by electronic mail this 1st day of April 2022 to the following:

Public Service Commission
Office of General Counsel
Ashley Weisenfeld, Esq.
2540 Shumard Oak Blvd.
Tallahassee, FL 32399-0850
aweisenf@psc.state.fl.us



William P. Cox

EXHIBIT B

REDACTED

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

DOCKET NO. 20220045-EI

FLORIDA POWER AND LIGHT COMPANY

APRIL 1, 2022

**IN RE: PETITION FOR DETERMINATION OF NEED FOR
SWEATT-WHIDDEN 230KV TRANSMISSION LINE
IN OKEECHOBEE, HIGHLANDS, AND DESOTO COUNTIES, BY
FLORIDA POWER & LIGHT COMPANY**

EXHIBIT A TO THE PETITION

The Sweatt-Whidden Project

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Executive Summary

This Petition provides the background information concerning the Sweatt-Whidden 230kV Project (“SWP” or “Project”), as well as the need for and benefits resulting from the SWP. The need for the SWP is based on the following considerations:

- The need to improve reliability for FPL customers served from the existing 69kV circuit between Okeechobee and Whidden substations;
- The need to provide an additional transmission path to increase east to west power transfer capabilities; and
- The need to mitigate potential overloads and low voltage conditions under contingency events.

The SWP will efficiently and effectively meet this need by improving reliability for FPL customers currently served from the existing 69kV circuit between Okeechobee and Whidden substations, increasing east to west power transfer capabilities of the transmission network by providing a resilient, hardened 230kV circuit between the east and west areas of FPL’s territory north of Lake Okeechobee, relieving potential overloads and low voltage conditions under contingency events, and reducing line loading on existing transmission circuits.

FPL evaluated multiple transmission alternatives for meeting this identified need, which resulted in the selection of the SWP. The SWP presents the best alternative, taking into account the demand for electricity, enhancing electric system reliability and integrity, and addressing the need for abundant, low-cost electrical energy to assure the economic well-being of the citizens of this state. Furthermore, the project meets area load requirements by serving potential

future industrial, commercial and residential load, while maximizing system reliability and minimizing cost to customers.

I. Description of FPL Electrical Facilities

In order to provide an overview of FPL's existing electrical transmission system, a map of FPL's transmission network indicating the general location of generating plants, major substations, and transmission lines is shown in Attachment 1. As shown in Attachment 1, the load in the west portion of FPL's West Region is presently served by existing generation resources, one 500kV circuit east-west, one 230kV circuit east-west, one 138kV circuit east-west, and one 69kV circuit east-west. FPL's West Region also has five 230kV tie lines with other utilities.

A listing of FPL's historical and forecasted peak demand is provided in Schedules 3.1 and 3.2 of Florida Power & Light Company and Gulf Power Company's Ten Year Power Plant Site Plan (2022-2031) submitted on April 1, 2022, to the Florida Public Service Commission (the "Commission"), incorporated herein as Attachments 2 and 3.

The SWP will address the increasing forecasted demand in the Okeechobee, Highlands, DeSoto, Collier, Lee, Sarasota, and Manatee Counties and enhance reliability in the region by minimizing the area's exposure to double contingency events. The SWP best meets the needs of the Project Service Area, as described more fully in the following section.

II. The Sweatt-Whidden Project

Over the past six years (2015-2021), the FPL West Region has reported winter peak loads between 4000 MW and 5400 MW. FPL is forecasting that by 2031, the winter load in the West Region, an area that includes Collier, Lee, Hendry, Charlotte, Glades, Sarasota, DeSoto and Manatee Counties, will be approximately 5800 MW (an increase of approximately 400 MW with respect to the 2020 forecast). Transmission assessment studies conducted by FPL in 2021 have identified potential system limitations that will require reliability improvements for Okeechobee, Highlands, DeSoto, Collier, Lee, Sarasota, and Manatee Counties. The studies also identified that by 2025, load to generation imbalance in the West Region continues to grow, and the system would benefit from an increase in transfer capability into the area.

Currently, the east to west power transfer capability under several contingency scenarios, such as generation unavailable and [REDACTED], is limited and the existing 69kV line is operating normally open to avoid potential thermal overloads. The proposed SWP would convert portions of FPL's existing Okeechobee-Whidden 69kV right-of-way ("ROW") to address the anticipated reliability limitation concerns beginning in 2025.

The SWP will consist of a new 230kV transmission line extending from FPL's Sweatt substation to FPL's Whidden substation, which will be designed to improve reliability for FPL customers served from the existing 69kV circuit between Okeechobee and Whidden

substations, increase east to west power transfer capabilities of the transmission network by providing a resilient, hardened 230kV circuit between the east and west areas of FPL's territory north of Lake Okeechobee, relieve potential overloads and low voltage conditions under contingency events, and reduce line loading on existing transmission circuits.

The SWP includes the construction of approximately 21 miles of a new single circuit 230kV transmission line in Okeechobee County and the conversion of approximately 59 miles of 69kV to 230kV in Okeechobee, Highlands, and DeSoto Counties (subject to final certification under the Florida Transmission Line Siting Act or "TLSA"). The line will be constructed with a single pole design on existing and new ROW and will have a voltage of 230kV. Approximately 75% of the new transmission line will follow the path of the existing 69kV transmission line. The project will also include the rebuild/conversion to 230kV of Brighton, Basinger (Glades Electric Cooperative, Inc. ("GEC")), Morgan Henderson (GEC), and Dorr Field substations. The entire SWP will serve existing and future FPL distribution substations in FPL's service territory and increase capacity to the transmission network with a resilient, hardened 230kV line.

Attachment 4 Page 1 is a map showing the SWP corridor route, along with the existing electrical facilities in the area. The corridor route is conceptual and for illustrative purposes only. The ultimate route will be selected through the TLSA process.

The estimated construction costs for SWP include design, engineering, ROW preparation, and land acquisition, in nominal or year-of-installation dollars.

Sweatt-Whidden Project Construction Costs	Estimated Cost in MM
Estimated Transmission Project Costs: Sweatt-Whidden 230kV line	\$213.5 (\$226.4 CPVRR)

III. Transmission Planning Criteria and Process

FPL plans, designs, and operates its transmission system to comply with North American Electric Reliability Corporation (“NERC”) Reliability Standards. The Transmission System Planning Performance Requirements Reliability Standard (TPL-001-4) defines scenarios and expected levels of system performance that the Bulk Electric System (“BES”) must comply with in the long-term planning horizon. In general, the system will remain stable and both thermal and voltage limits will be within applicable facility ratings for each of the contingency categories listed on Table 1 of the NERC Reliability Standard TPL-001-4 provided in Attachment 5. FPL follows the NERC standard guidance on system performance requirements for its transmission planning criteria.

FPL’s transmission planning process consists of five major steps: (1) the preparation of system models, (2) the assessment of the transmission system performance to comply with NERC Reliability Standards, (3) the development and evaluation of transmission expansion alternatives, (4) the selection and approval of the preferred alternatives, and (5) the incorporation of the

expansion plan into the Florida Reliability Coordinating Council (“FRCC”) Regional Planning Process. A more detailed discussion of these steps is provided in Attachment 6.

IV. Discussion of Need and Benefits

The need for the SWP is based on the following considerations:

- The need to improve reliability for FPL customers served from the existing 69kV circuit between Okeechobee and Whidden substations;
- The need to provide an additional transmission path to increase east to west power transfer capabilities; and
- The need to mitigate potential overloads and low voltage conditions under contingency events.

The existing Okeechobee-Whidden 69kV line is operated in a radial configuration due to contingency loading limitations, with a normal open switch at Childs 69kV substation. As a result of the radial configuration, customers along this line have experienced service interruptions for single contingency scenarios on the transmission system. In addition, transmission assessment studies conducted by FPL in 2021 have identified potential system limitations that will require reliability improvements for Okeechobee, Highlands, DeSoto, Collier, Lee, Sarasota, and Manatee Counties. These studies have also identified that by 2025, load to generation imbalance in the West Region continues to grow. The east to west power transfer capability under several contingency scenarios is limited, supporting the need for an additional transmission path.

The SWP will address these system reliability deficiencies and provide a resilient, hardened path from east to west. A detailed description of the system improvements follows:

Improve Customer Reliability

The existing Okeechobee-Whidden 69kV line is currently operated normally open at Childs 69kV substation to avoid exceeding line rating operating limits for contingency events. As a result of the radial configuration, customers along this line have experienced multiple service interruptions for single contingency scenarios in the transmission system. The SWP will provide a resilient, hardened path that will be operated normally closed and will reduce customer interruptions. The SWP will allow for a more reliable protection scheme. FPL studies have identified the following contingency event as one of the most critical scenarios for the Project Service Area reliability: With the Okeechobee-Whidden 69kV line operating normally closed, the loss of [REDACTED] line section followed by the loss of [REDACTED] line. Under this scenario, the Okeechobee-Whidden 69kV line could exceed the line rating operating limit and substation voltages could drop to a potential collapse (see Appendix B page 9). In order to avoid this type of event, the system will be sectionalized after the first contingency, causing consequential loss of service after the second contingency for FPL and GEC customers served from Dorr Field, Morgan Henderson (GEC), Brighton, Basinger (GEC), Okeechobee, JC Eisinger (GEC), Sherman and Allapattah substations. With the construction of the SWP, the number of impacted substations by the same contingency event is reduced. In addition, the SWP will considerably improve the voltage support in the area (see Appendix B page 10) to efficiently and effectively serve existing and future load in FPL and GEC distribution substations along the route of the SWP.

Increase Transfer Capability

Currently, the existing 69kV circuit between Okeechobee and Whidden substations is operated on a radial configuration resulting in [REDACTED] of power transfer capability between the east and west regions across this circuit. If the 69kV circuit is operated normally closed, the east to west flows would not change for the system under normal conditions (see Appendix A page 1), while under single contingency conditions, the flows will increase between [REDACTED] and [REDACTED] (see Appendix A pages 3, 5 & 7). The construction of the SWP will provide a significant increase of transfer capability for the system in the range of [REDACTED] under normal conditions (see Appendix A page 1) and [REDACTED] under single contingency conditions (see Appendix A pages 3, 5 & 7). The SWP will increase the power transfer capabilities of the transmission network by providing an additional hardened, resilient 230kV circuit between the east and west areas of FPL's territory, north of Lake Okeechobee.

Mitigate Potential System Limitations

FPL studies have identified the following contingency event as one of the most critical scenarios for the system: [REDACTED]
[REDACTED]. For the aforementioned scenario, several transmission lines could experience overloads as a result of the increase in the east to west flows including the existing 69kV circuit between Okeechobee and Whidden substations if operating normally closed. Appendix B page 1 shows the power flows under the scenario in Winter 2025 without the SWP implemented and operating the Okeechobee-Whidden 69kV line normally closed. The results show the [REDACTED] line loading as high as [REDACTED] thermal rating and the [REDACTED] line loading as high as [REDACTED] thermal rating (see Appendix B page 1).

For another contingency scenario, [REDACTED], the results show the [REDACTED] line loading as high as [REDACTED] thermal rating (see Appendix B page 5). In order to mitigate the overloads mentioned above, it would be necessary to implement load management system in the West Area and reduce generation in the Central Area of FPL's service territory.

In addition, the following contingency event has significant reliability impact in the Project Service Area: With the Okeechobee-Whidden 69kV line operating normally closed, the loss of [REDACTED] line followed by the loss of [REDACTED] line (N-1-1). Under this scenario, the Okeechobee-Whidden 69kV would exceed the line rating operating limit and substation voltages would drop to a potential collapse. In order to avoid this type of event, the system will be sectionalized after the first contingency, causing consequential load loss after the second contingency for customers served from Dorr Field, Morgan Henderson (GEC), Brighton, Basinger (GEC), Okeechobee, JC Eisinger (GEC), Sherman and Allapattah substations (see Appendix B, page 9).

Appendix B pages 2, 6, and 10 show loadflow output diagrams for 2025 Winter peak conditions with the SWP in-service under the contingencies described above. With the construction of the SWP, there is a new, hardened, resilient 230kV east to west connection which resolves the 69kV overloads by converting the line, mitigates the overloads in the [REDACTED] and reduces the number of impacted substations under N-1-1 contingencies. In addition, the SWP will considerably improve the voltage support in the area.

Reduce Line Loading

Due to the limited number of transmission connections between the east and west FPL regions, the [REDACTED] transmission line in combination with another generation or transmission line outage would cause several transmission lines to overload. For the scenario of [REDACTED] [REDACTED] circuit would experience overloads as high as [REDACTED] thermal rating and the [REDACTED] circuit will experience overloads as high as [REDACTED] thermal rating (see Appendix C page 1). Moreover, the loss of any section of the [REDACTED] circuit followed by the loss of [REDACTED] line would cause overloads on the [REDACTED] line sections as high as [REDACTED] thermal rating (see Appendix C page 9) and in the [REDACTED] line section as high as [REDACTED] thermal rating (see Appendix B page 5).

Notably, Appendix C page 2 shows that overloads in the [REDACTED] line sections are reduced between [REDACTED] and [REDACTED] under contingency scenarios with the SWP in-service. It also shows that the [REDACTED] line section overload is reduced by [REDACTED].

Appendix C pages 6 and 10 show overloads decreasing by [REDACTED] in the [REDACTED] line section and the [REDACTED] line section with the SWP in-service.

Project Benefits

The construction of the SWP provides the following benefits to the Project Service Area:

- Provides a more reliable delivery of power to FPL customers;
- Substantially mitigates customer impact during contingency events;
- Provides resilient, hardened transmission service to the area;
- Improves voltage support in the area to efficiently and effectively serve existing and future load in FPL distribution substations along the route of the project;
- Increases east to west power transfer capabilities of the transmission network by providing an additional 230kV circuit between the east and west areas of FPL's territory north of Lake Okeechobee;
- Reduces line loading on existing transmission circuits;
- Reduces transmission losses by approximately 3 MW at peak load levels and approximately 2 MW at off peak load levels; and
- Meets the Project Service Area's long term reliability requirements.

V. Discussion of Project Transmission Alternatives

In order to maintain a reliable electric system for the Project Service Area and meet the identified need discussed above, FPL evaluated the following transmission alternatives for SWP. The factors used to evaluate the performance of these alternatives include reliability, cost, feasibility, and compatibility with long range plans. Attachment 8 includes a matrix comparing each of the transmission alternatives.

Alternative I

The Ft. Drum-Whidden Project consists of a new 230kV transmission line extending from FPL's Ft. Drum substation in Indian River County to FPL's Whidden substation in DeSoto County. It will require the construction of approximately 92 miles (subject to certification under the Florida TLSA) of a single circuit 230kV transmission line in the Indian River, Okeechobee, Highlands, and DeSoto Counties.

Attachment 4 Page 2 is a map showing the proposed Alternative I Project along with the existing electrical facilities in the area. The line route is conceptual and for illustrative purposes only. The estimated construction cost of this alternative is \$283.9 million (\$300.3 million CPVRR).

This alternative was rejected for the following reasons:

1. It does not provide the needed reliability improvements for all customers served from the existing 69kV circuit between Okeechobee and Whidden substations.
2. The cost of the alternative is approximately \$70 million higher than the SWP.
3. This alternative does not provide for future transmission network flexibility, nor does it substantially improve reliability in the Project Service Area because it only allows for reconfiguration of existing infrastructure on the 69kV network.

Alternative II

The Martin-Whidden Project consists of a new 230kV transmission line extending from FPL's Martin substation in Martin County to FPL's Whidden substation in DeSoto County. It would require the construction of approximately 87 miles (subject to certification under the Florida

TLISA) of a single circuit 230 kV transmission line in Martin, Okeechobee, Highlands, and DeSoto Counties.

Attachment 4 Page 3 is a map showing the proposed Alternative II Project along with the existing electrical facilities in the area. The line route is conceptual and for illustrative purposes only. The estimated construction cost of this alternative is \$223.3 million (\$236.5 million CPVRR).

This alternative was rejected for the following reasons:

1. It does not provide the needed reliability improvements for all customers served from the existing 69kV circuit between Okeechobee and Whidden substations.
2. The cost of the alternative is approximately \$10 million higher than the SWP.
3. This alternative does not substantially improve reliability in the Project Service Area because it only allows for reconfiguration of existing infrastructure on the 69kV network.

Attachment 8 shows the decision-making analysis which summarizes the points of comparison of the SWP and Alternatives I and II, described above. The points of comparison are cost, reliability, ROW diversity, system expandability, operational flexibility, and construction difficulty.

VI. Adverse Consequences of Not Constructing the Sweatt-Whidden Project

The purpose and need for the SWP is to improve reliability for FPL customers as described in detail above. If the SWP is not built by December 2025, then sufficient transmission capacity

would not be available to serve the existing and future industrial, commercial, and residential customers in the Project Service Area and, by virtue of the current radial transmission service configuration, system reliability and integrity would not be at the same level delivered to other FPL customers which have normal looped transmission service.

VII. Conclusion

The SWP is needed by December 2025 to efficiently and effectively improve reliability for customers served from the FPL's existing 69kV circuit between Okeechobee and Whidden substations, provide a transmission route to increase east to west power transfer capability, mitigate potential overloads and low voltage conditions under contingency events, and reduce line loading on existing transmission circuits. The Project is the most cost-effective alternative, taking into account the demand for electricity, the enhancement of electric system reliability and integrity, and the need for abundant, low-cost electrical energy to assure the economic well-being of the citizens of this state. Furthermore, the Project meets area load requirements by serving potential future industrial, commercial and residential load, while maximizing system reliability and minimizing cost to customers. The Commission, therefore, should grant FPL's Petition for a Determination of Need for the Sweatt-Whidden Project and determine that the cost and reliability benefits of the Project would preserve and enhance electric system reliability and integrity in the area.

Attachment No. 4 is Confidential in Its Entirety

(Bates Nos. 000020-000022)

Attachment No. 7 is Confidential in Its Entirety
(Bates No. 000023)

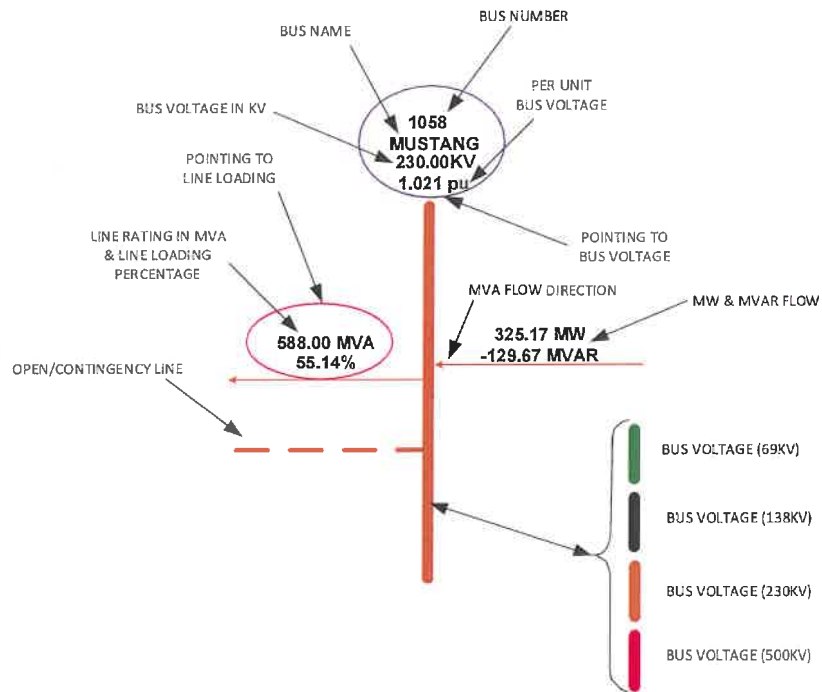
Exhibit FP-2 is Confidential in Its Entirety
(Bates No. 000018)

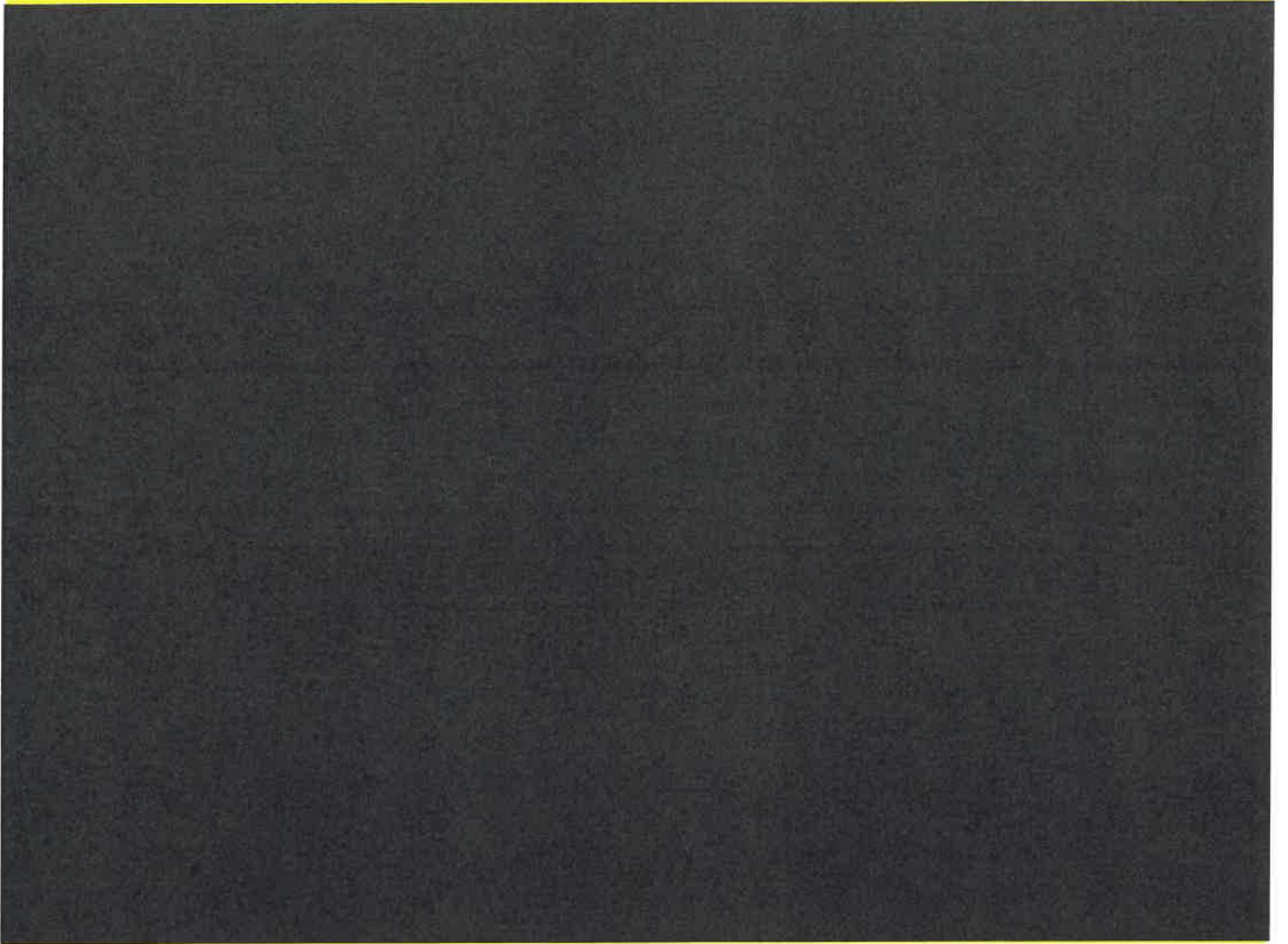
Exhibit FP-4 is Confidential in Its Entirety
(Bates No. 000019)

Appendix A

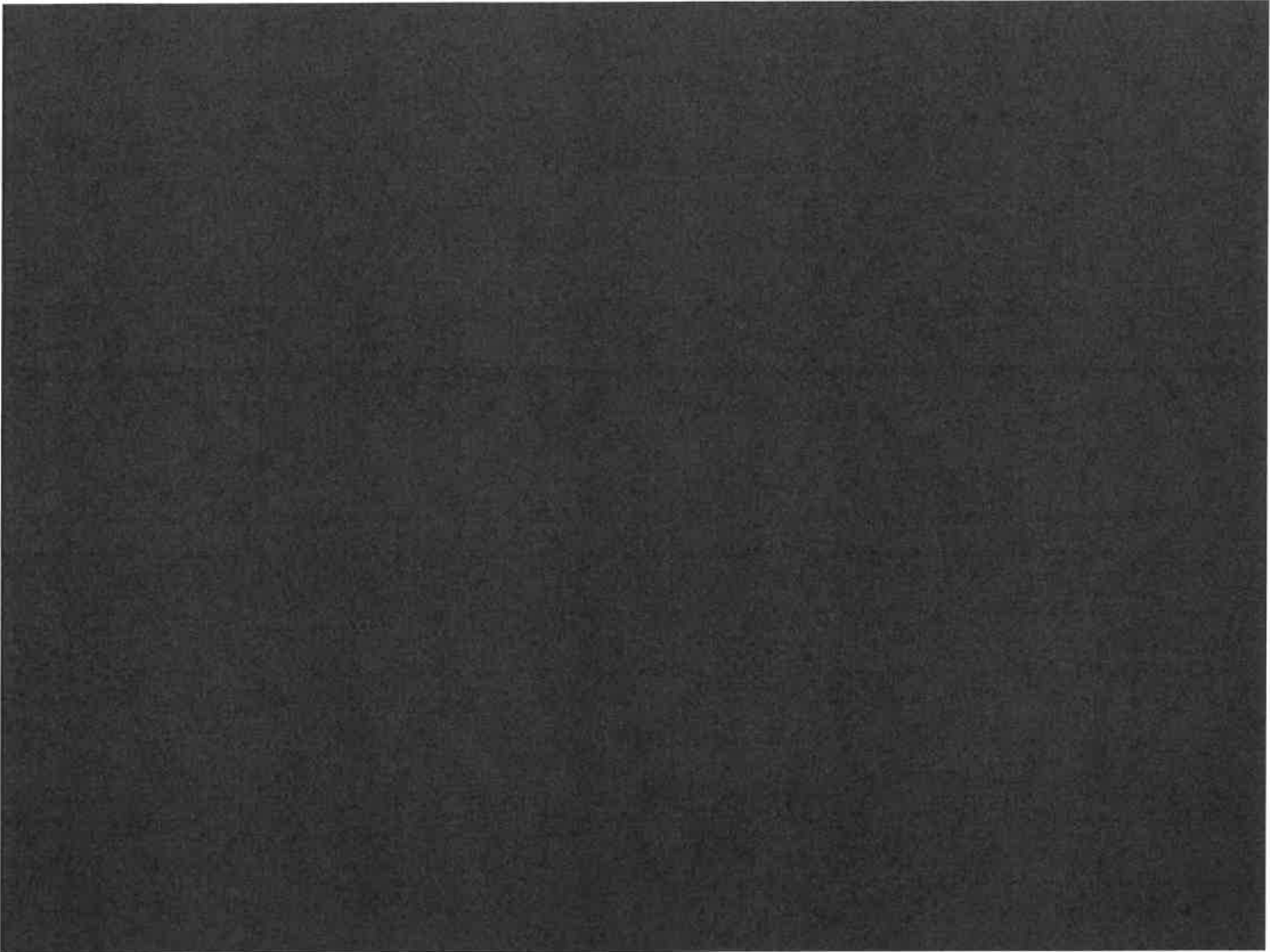
Load Flow Diagrams / Transfer Analysis

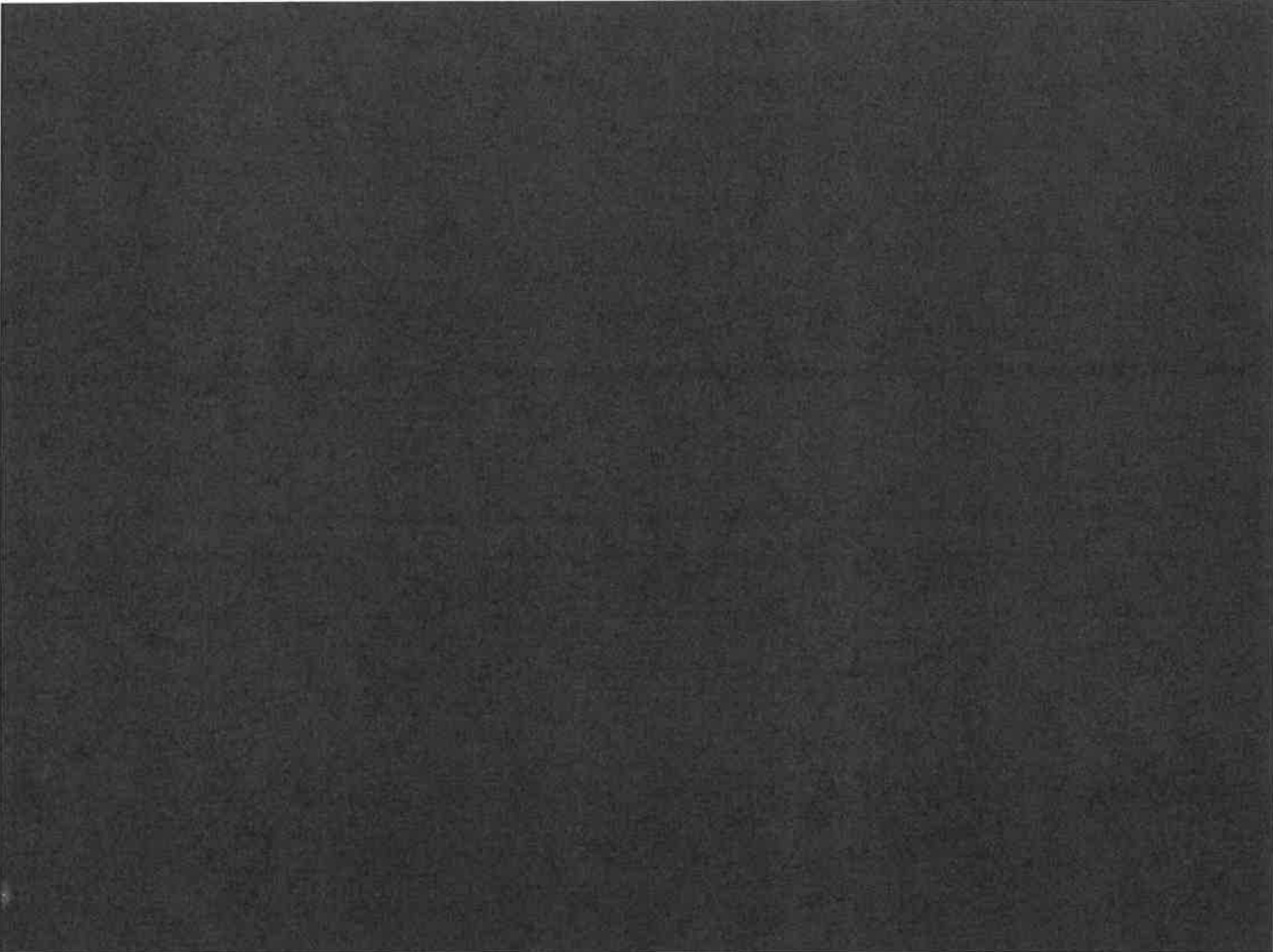
Load Flow Diagram Key

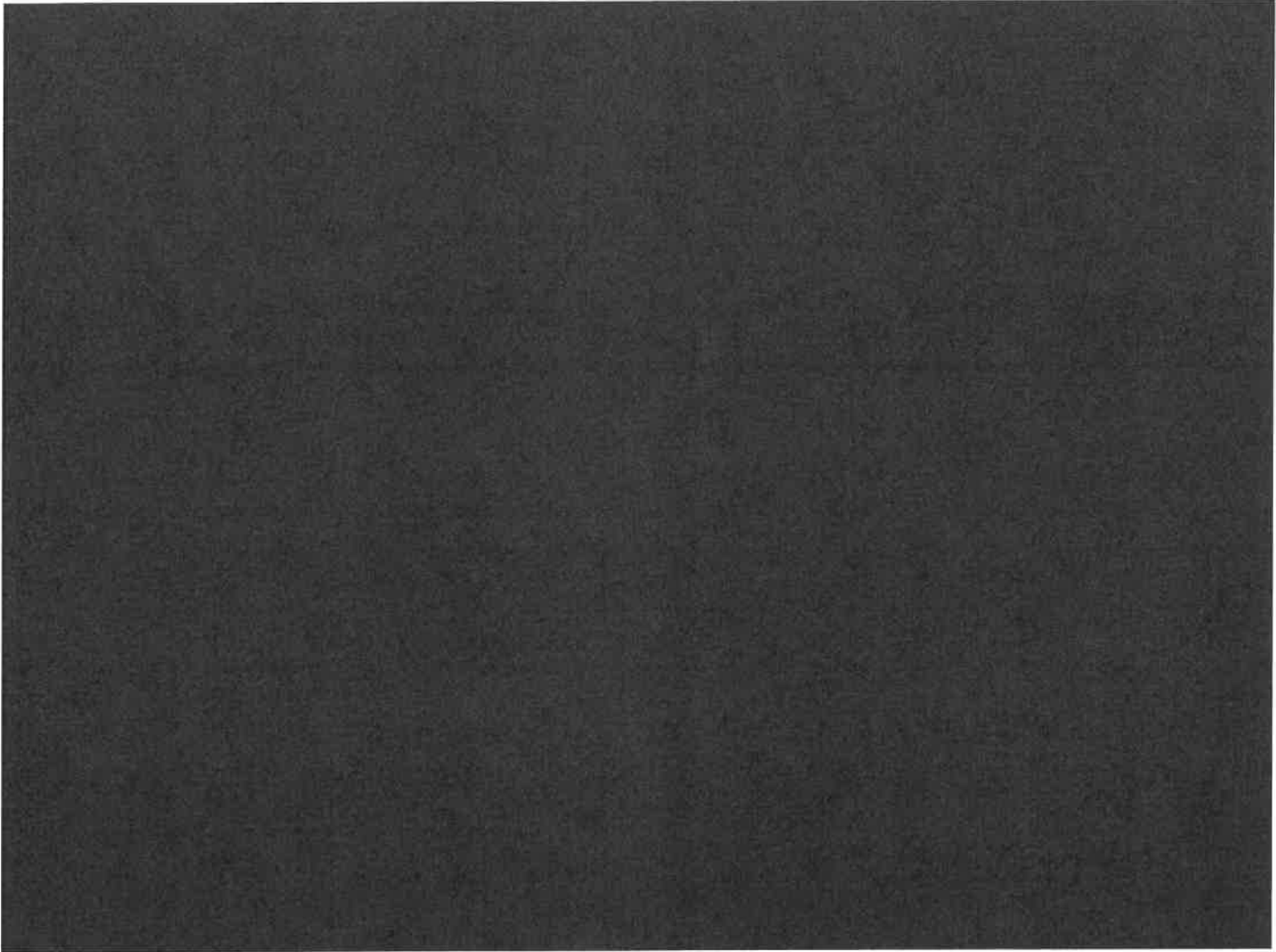




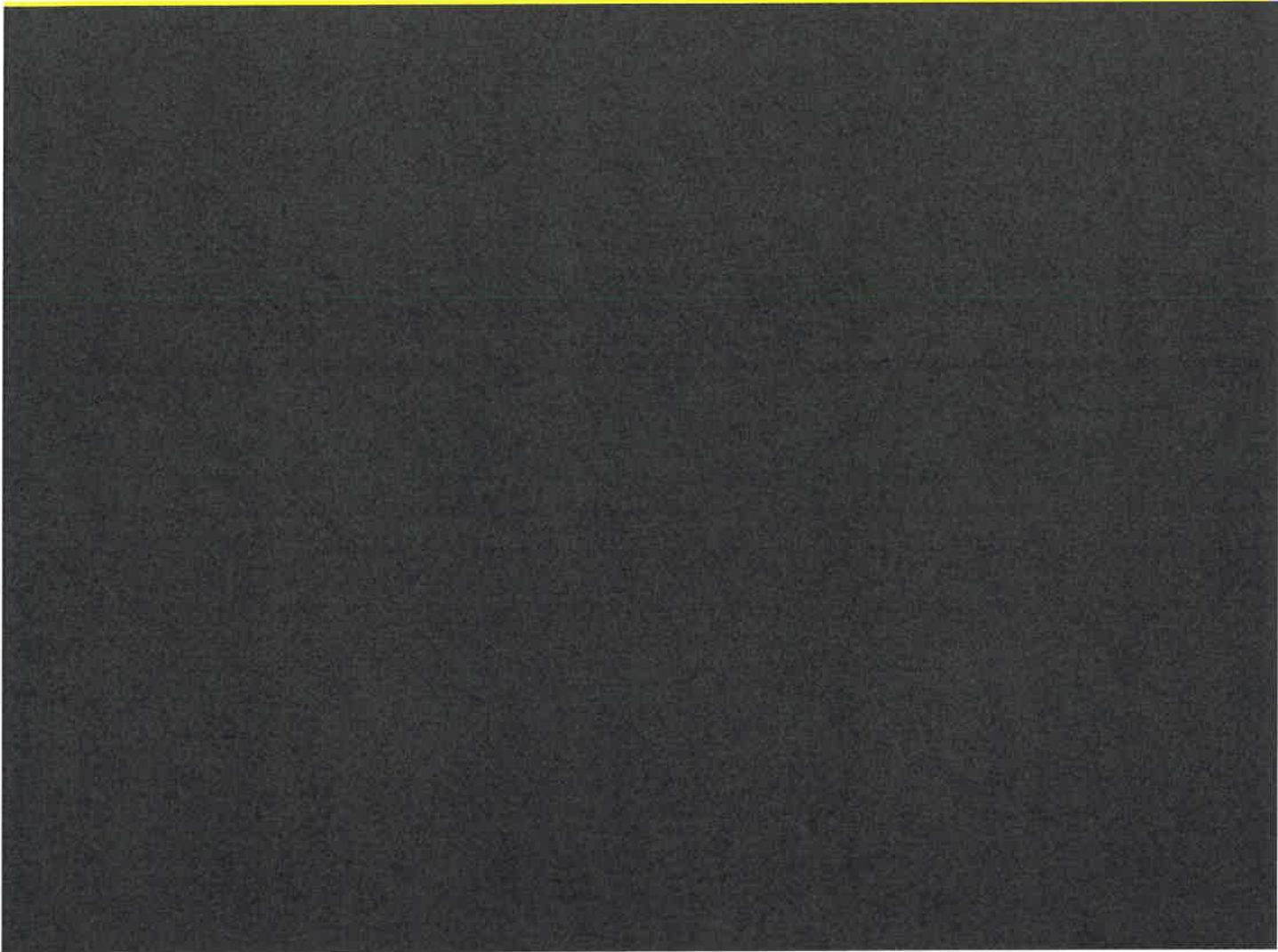
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20220045-EI

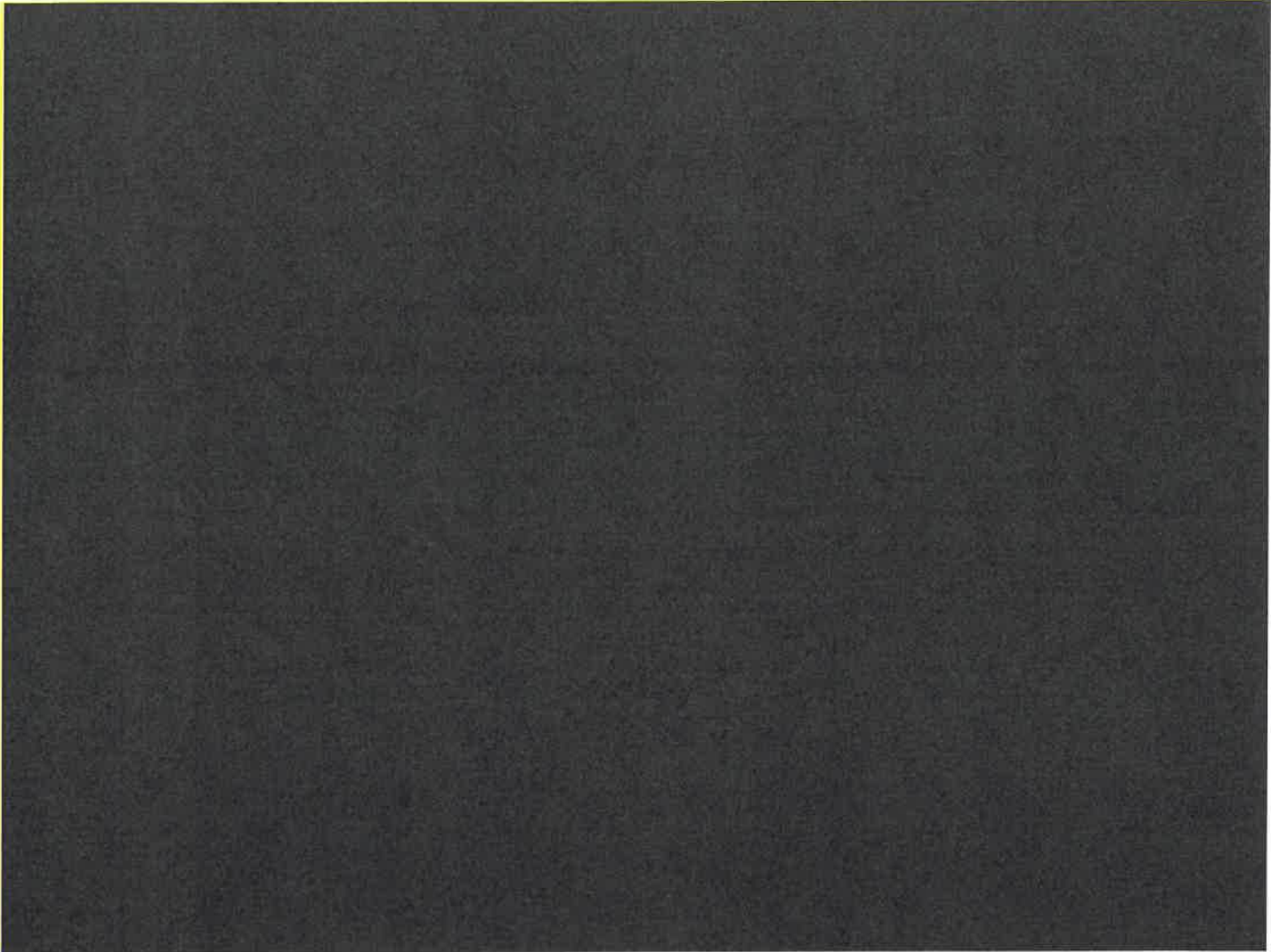




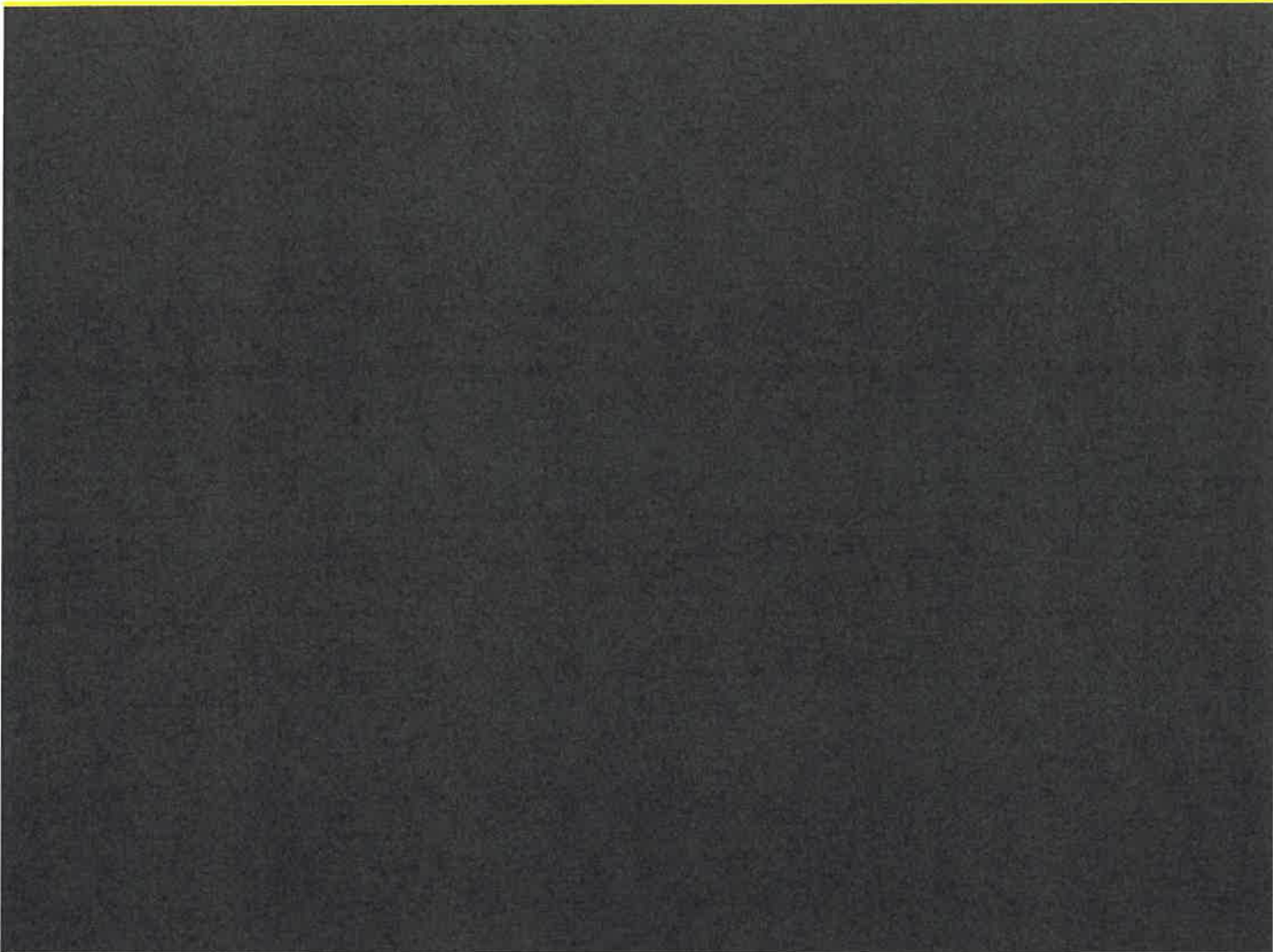


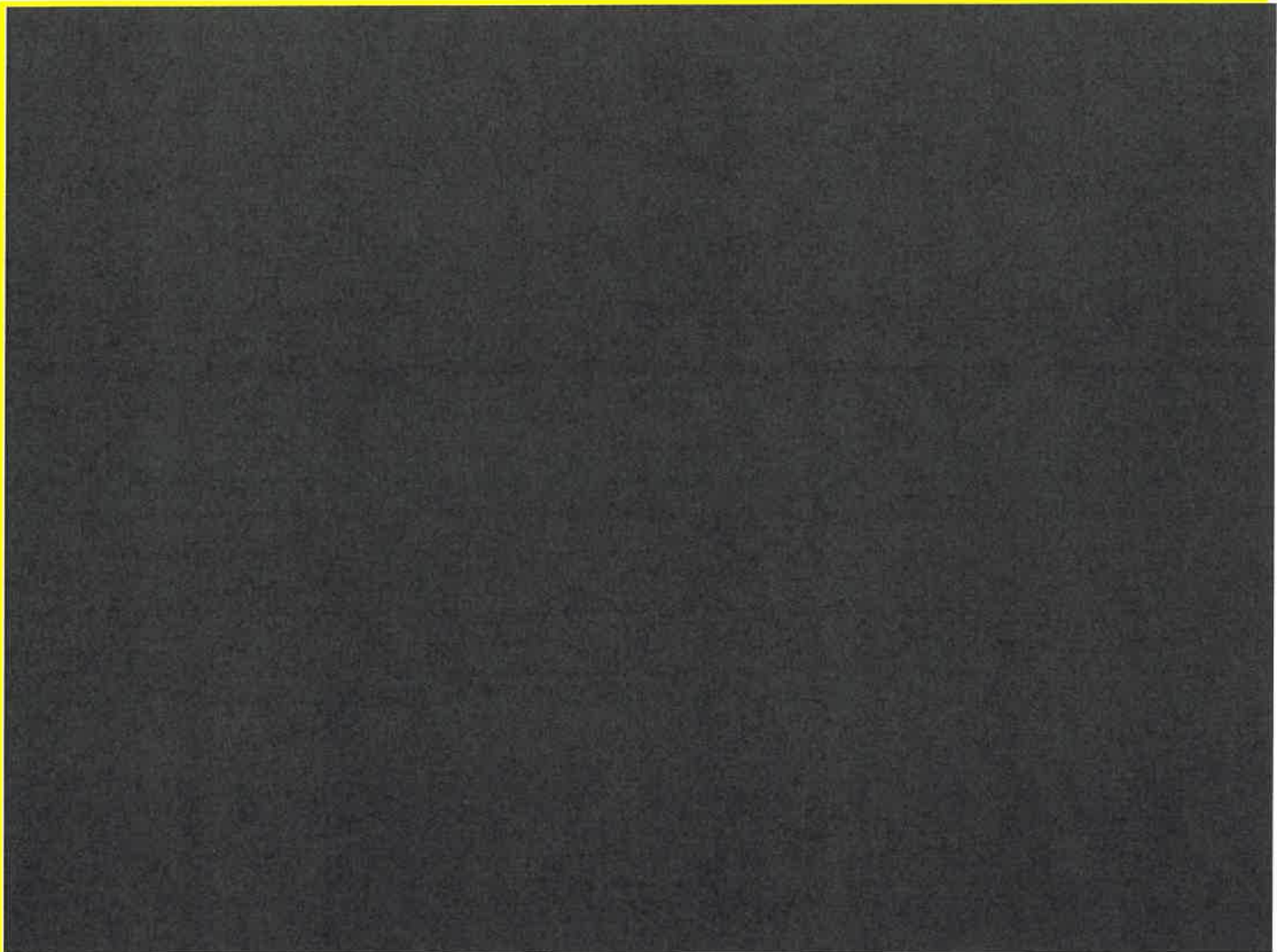
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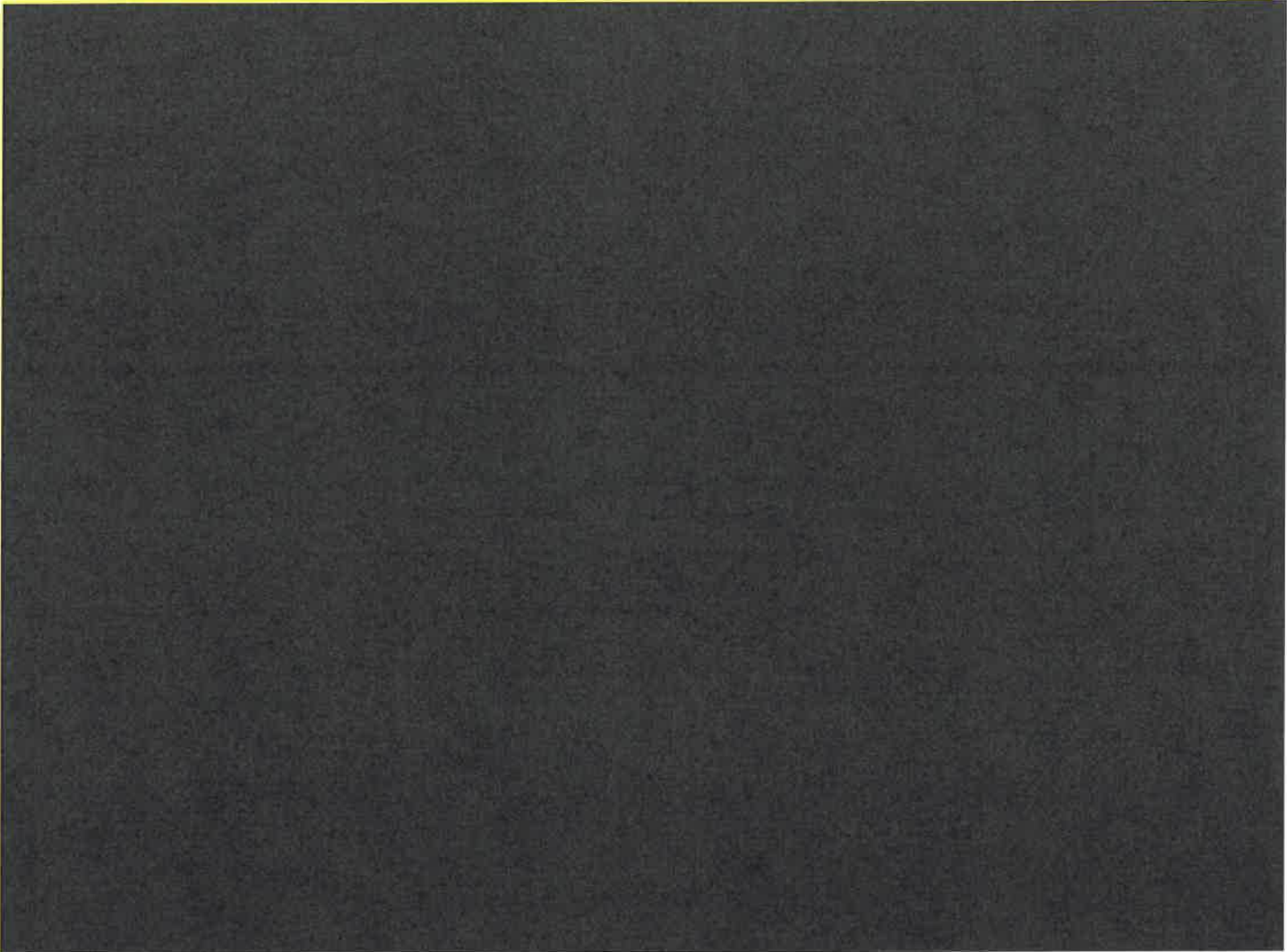




FPL 000031
20220045-EI



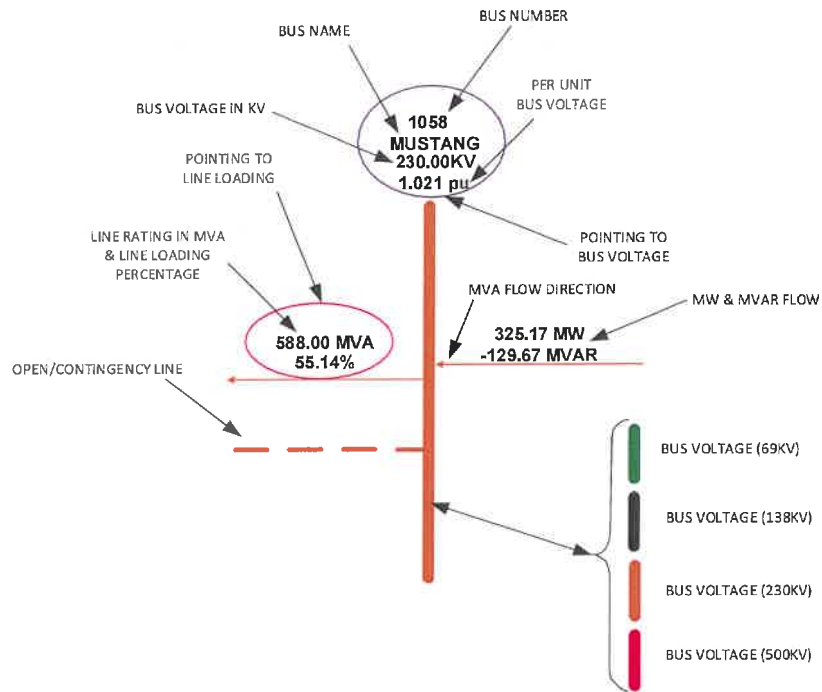


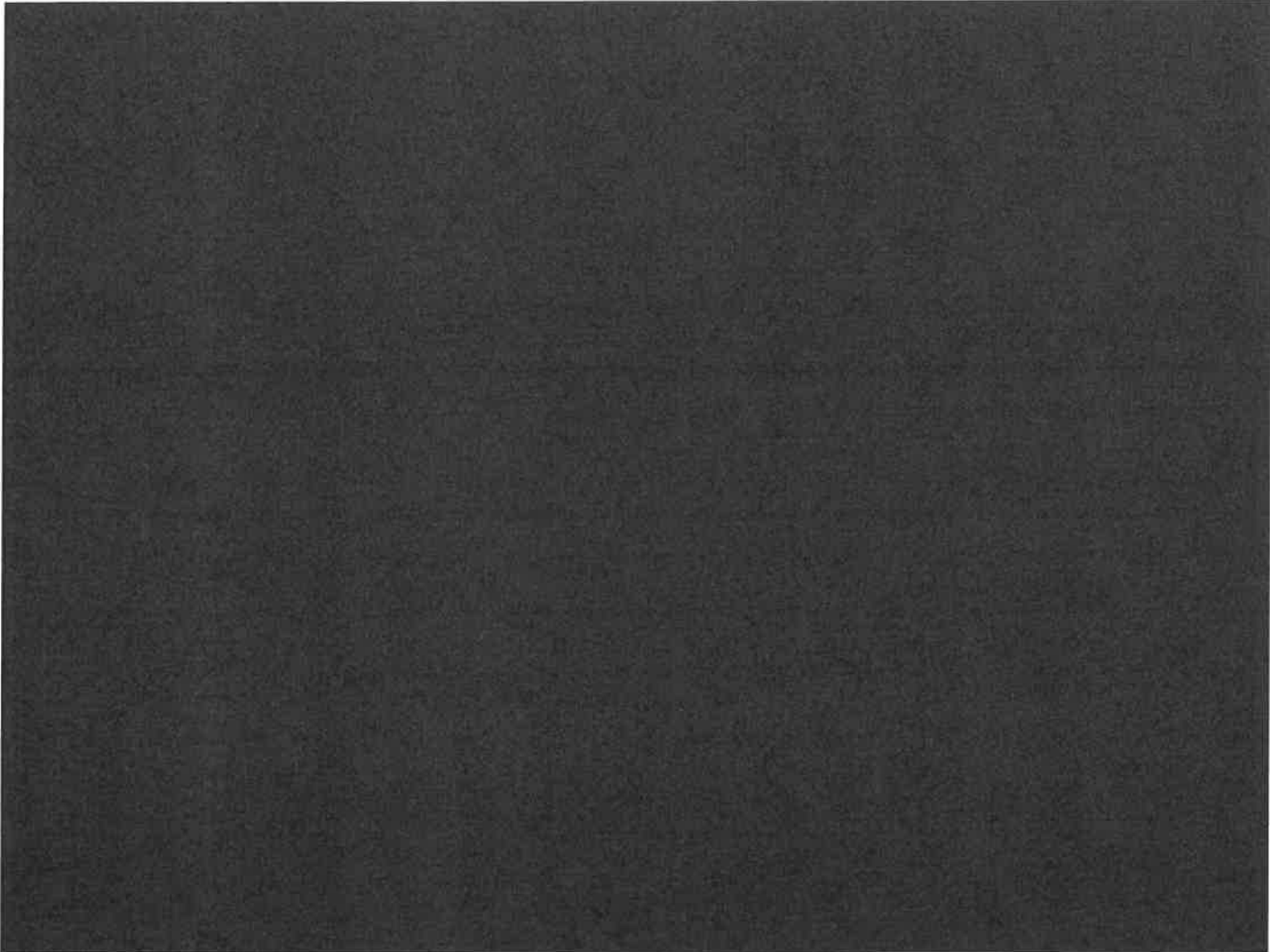


Appendix B

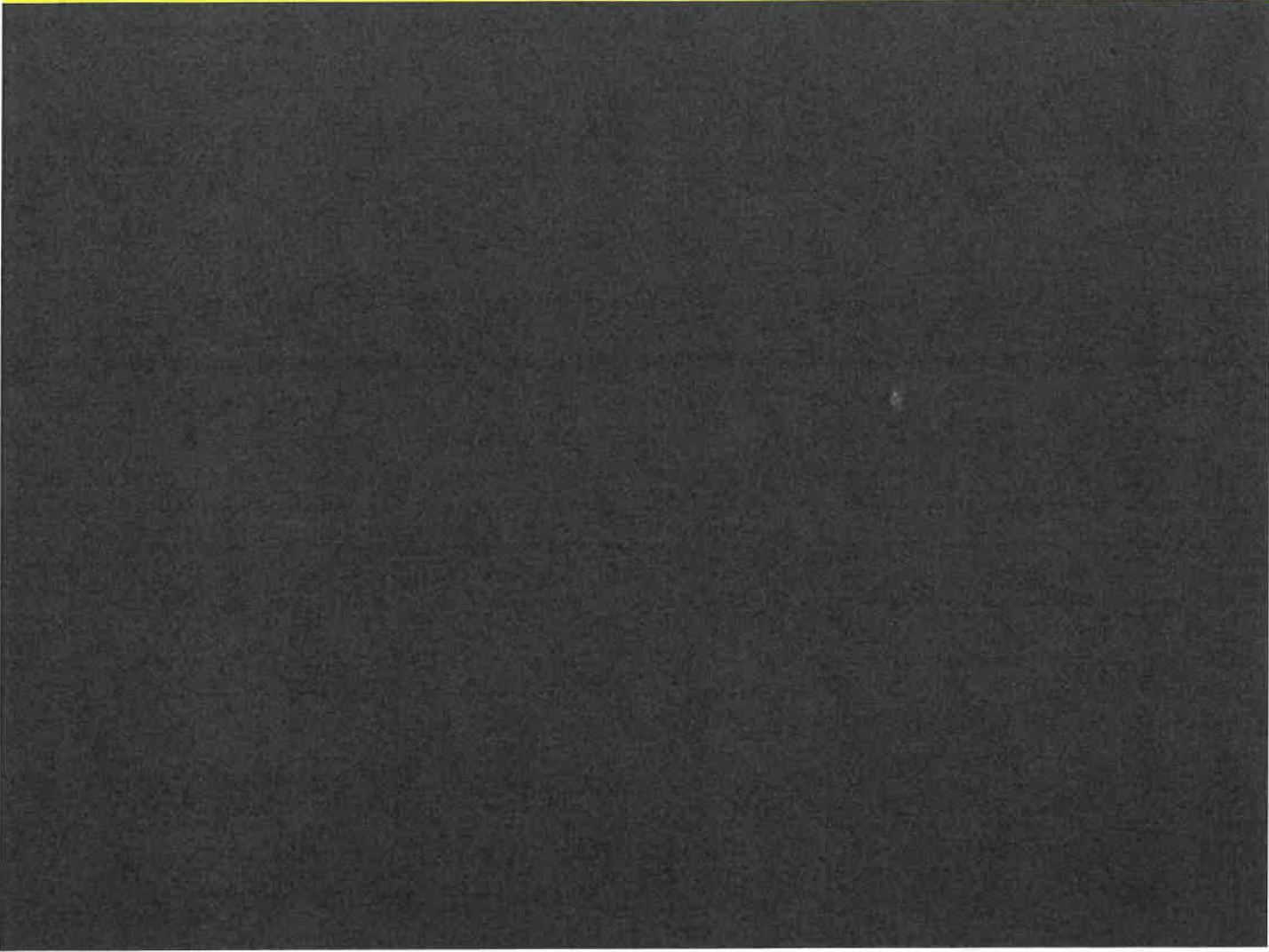
Load Flow Diagrams / Mitigate Potential System Limitations

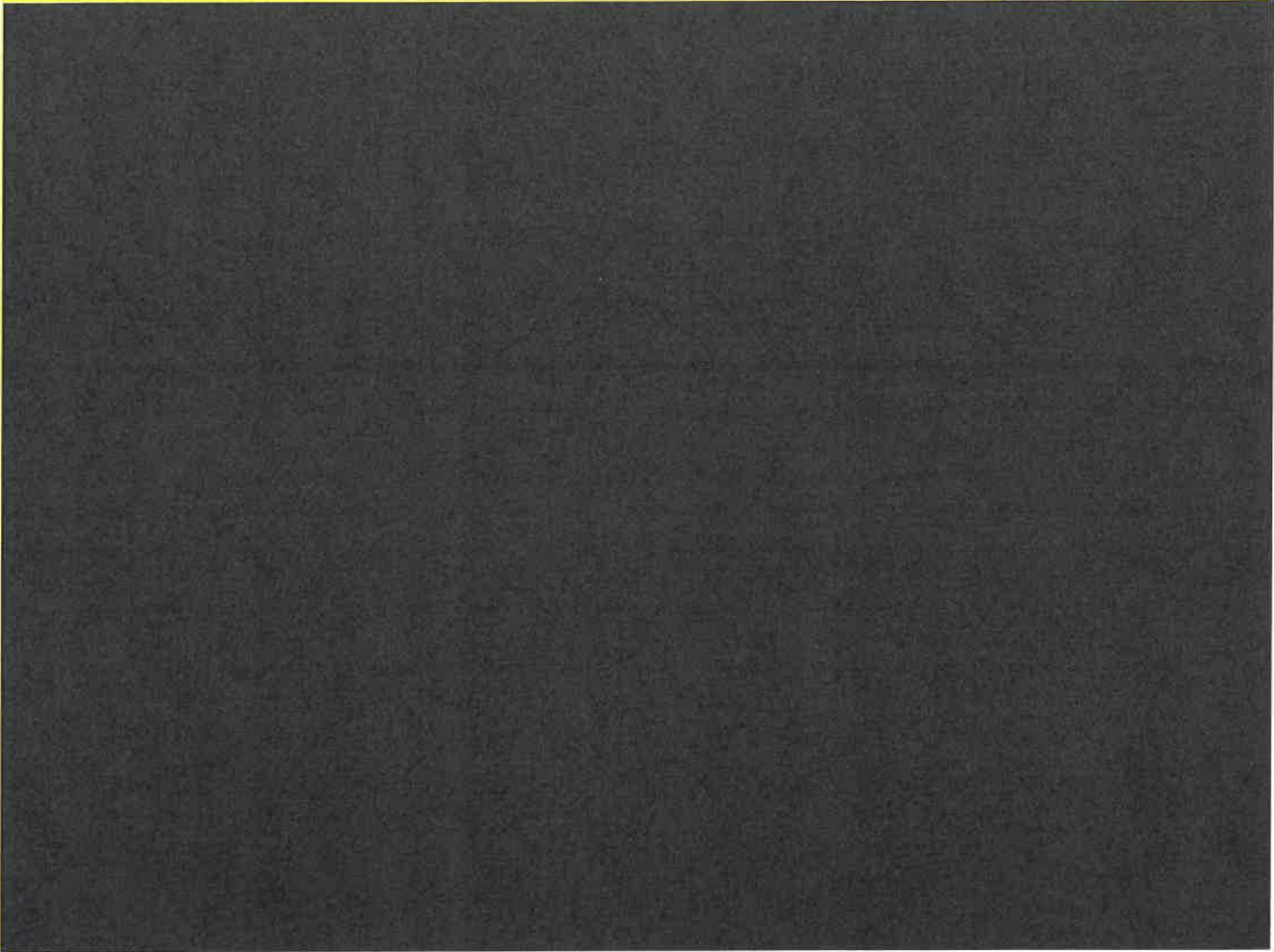
Load Flow Diagram Key

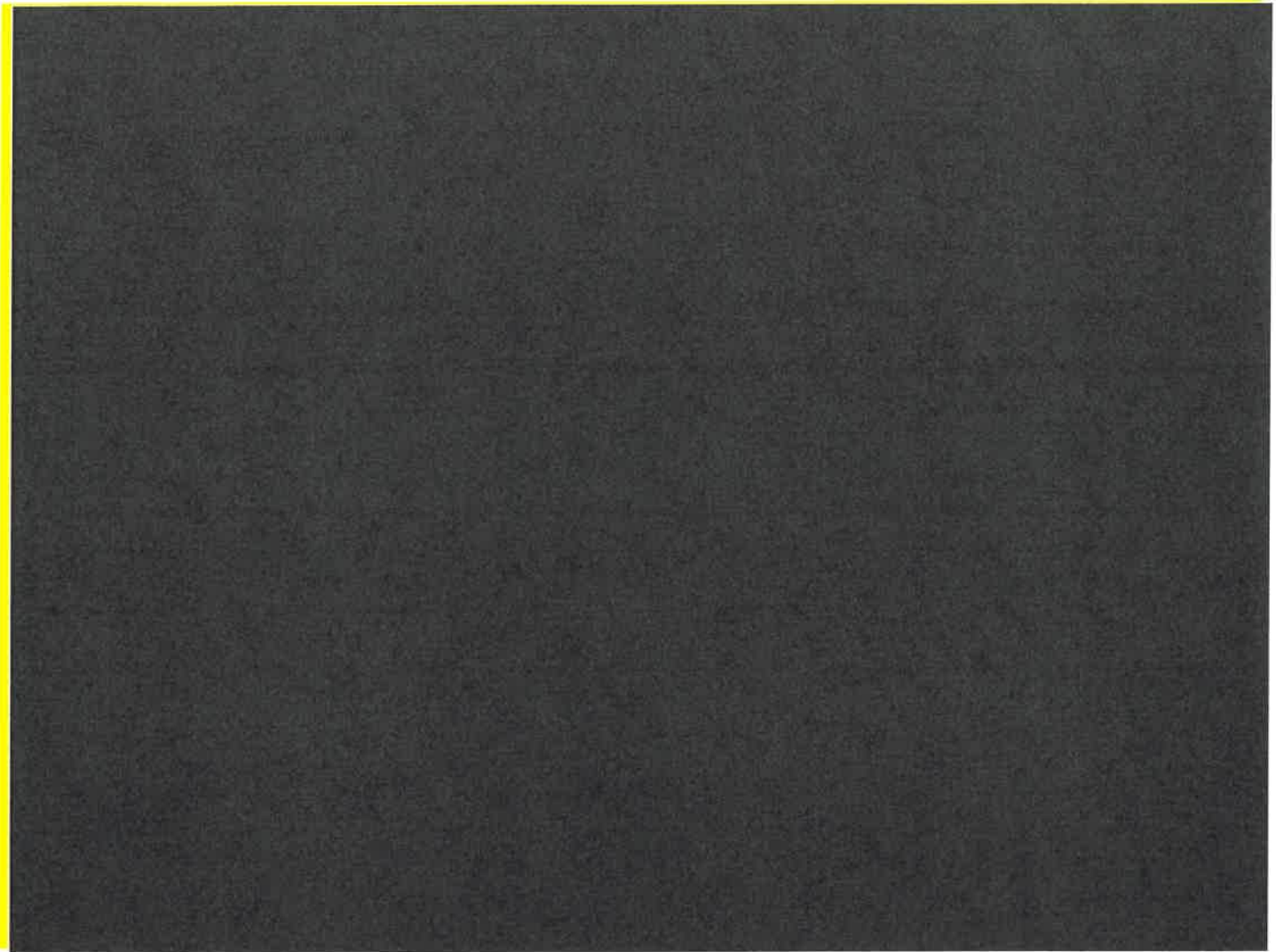




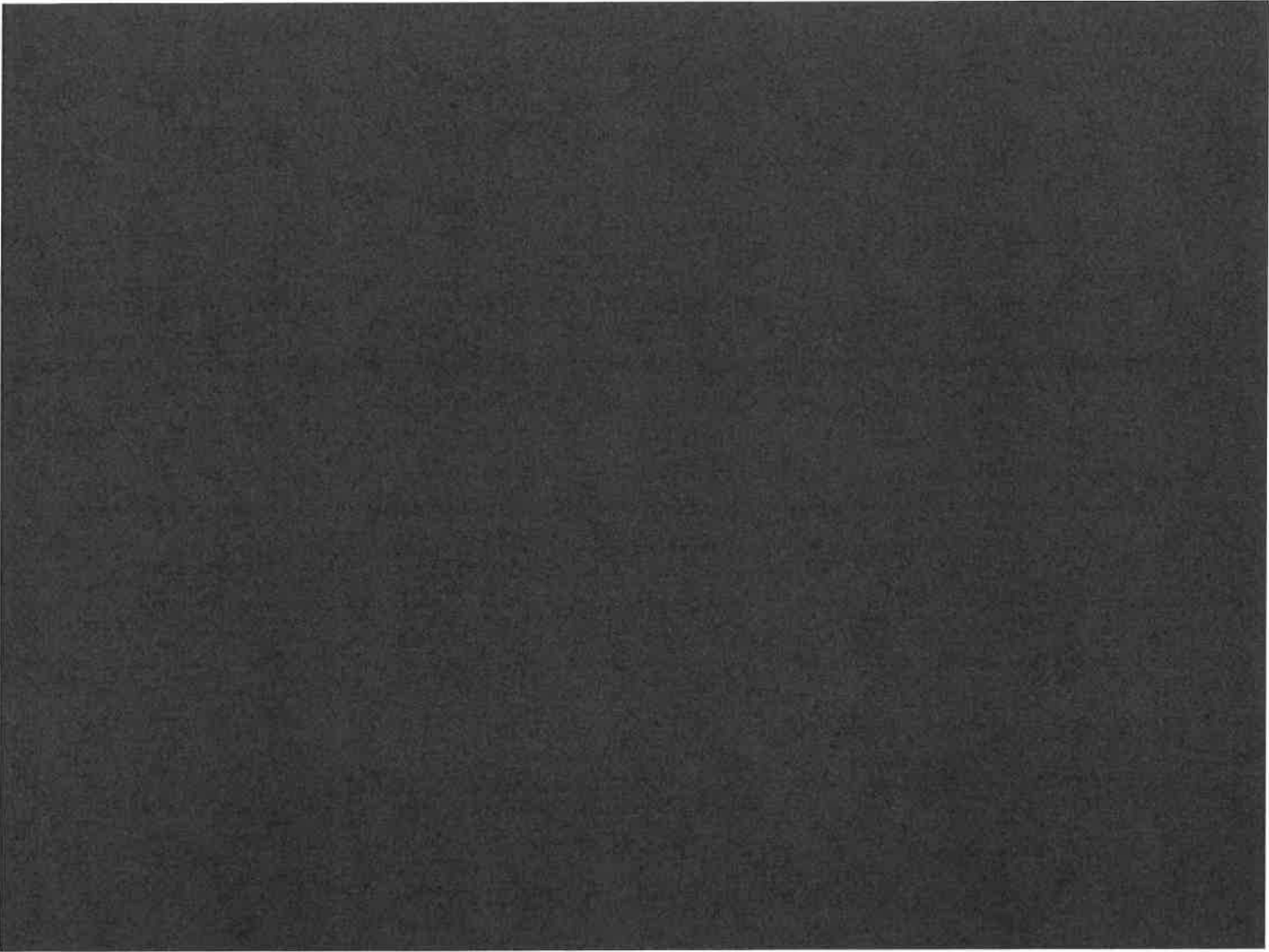
FPL 000037
20220045-EI

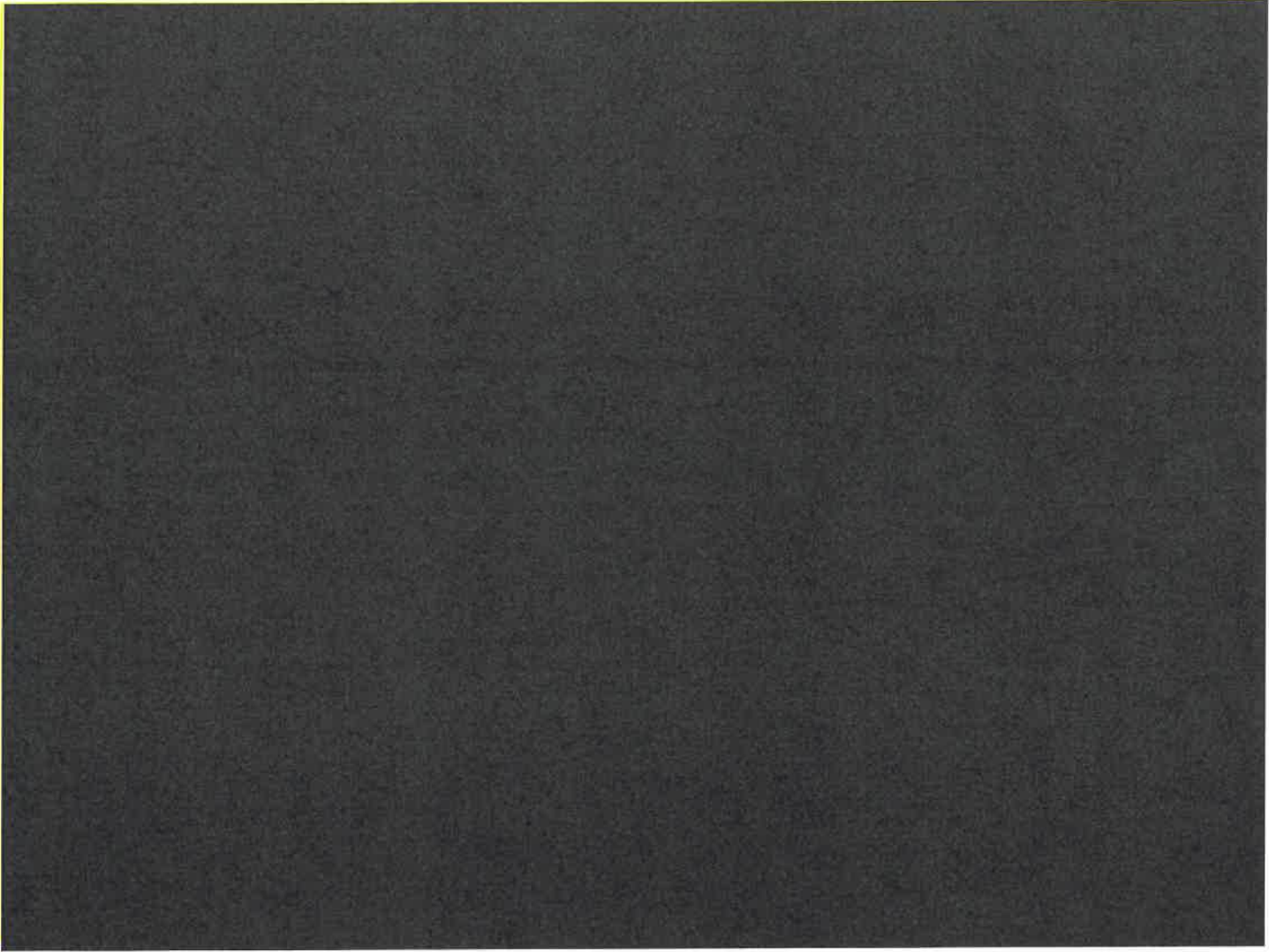


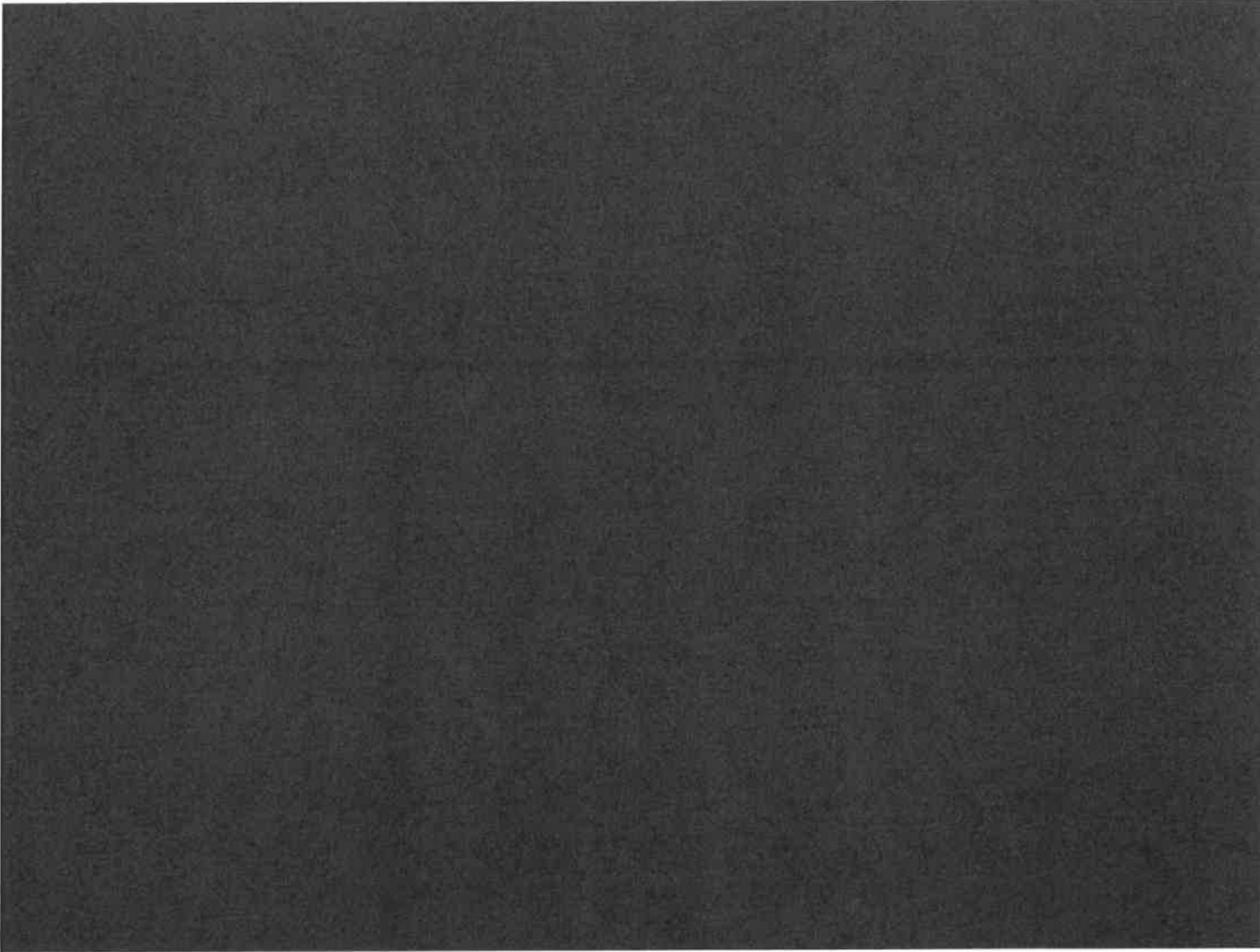


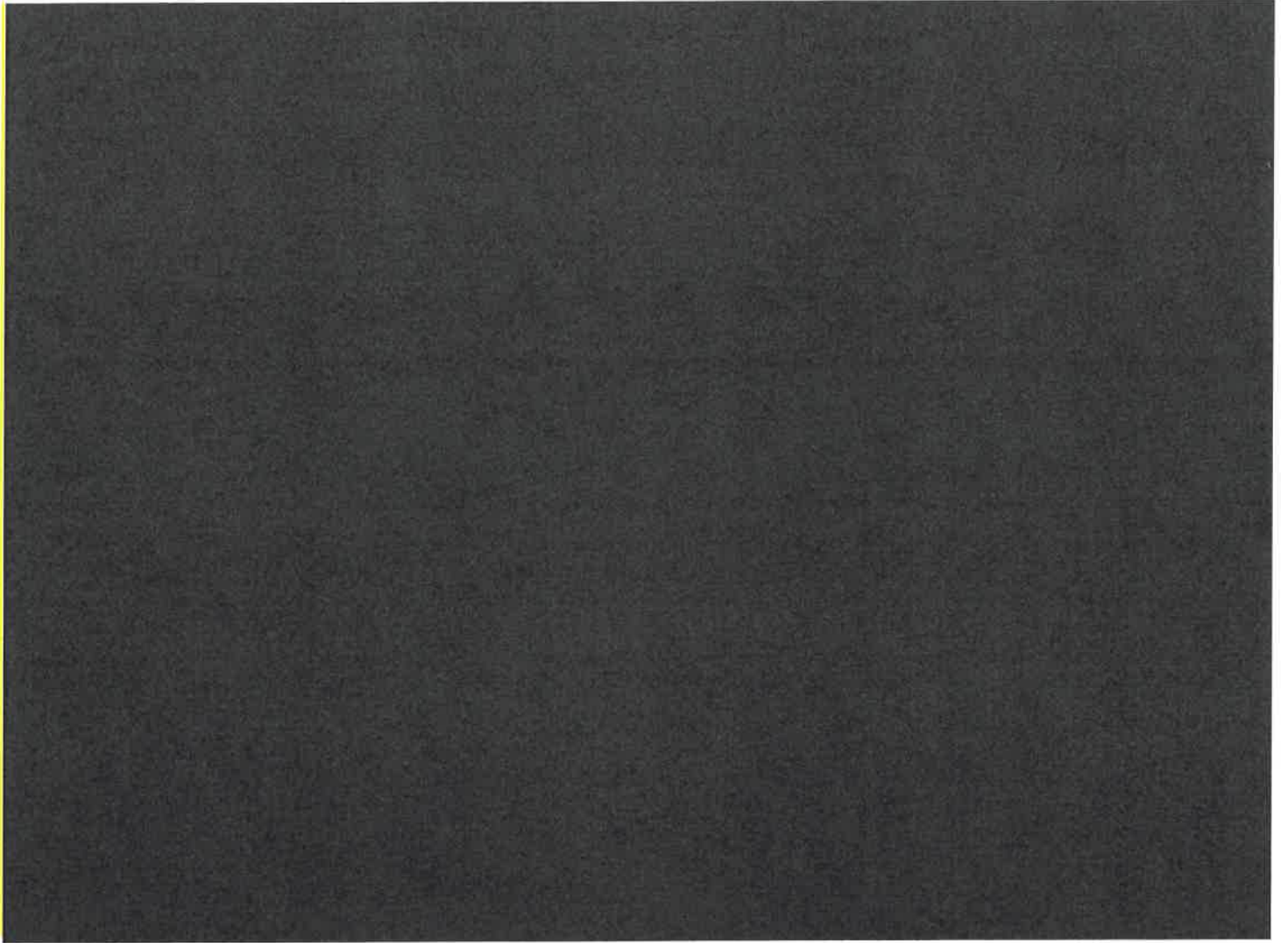


FPL 000040
20220045-EI

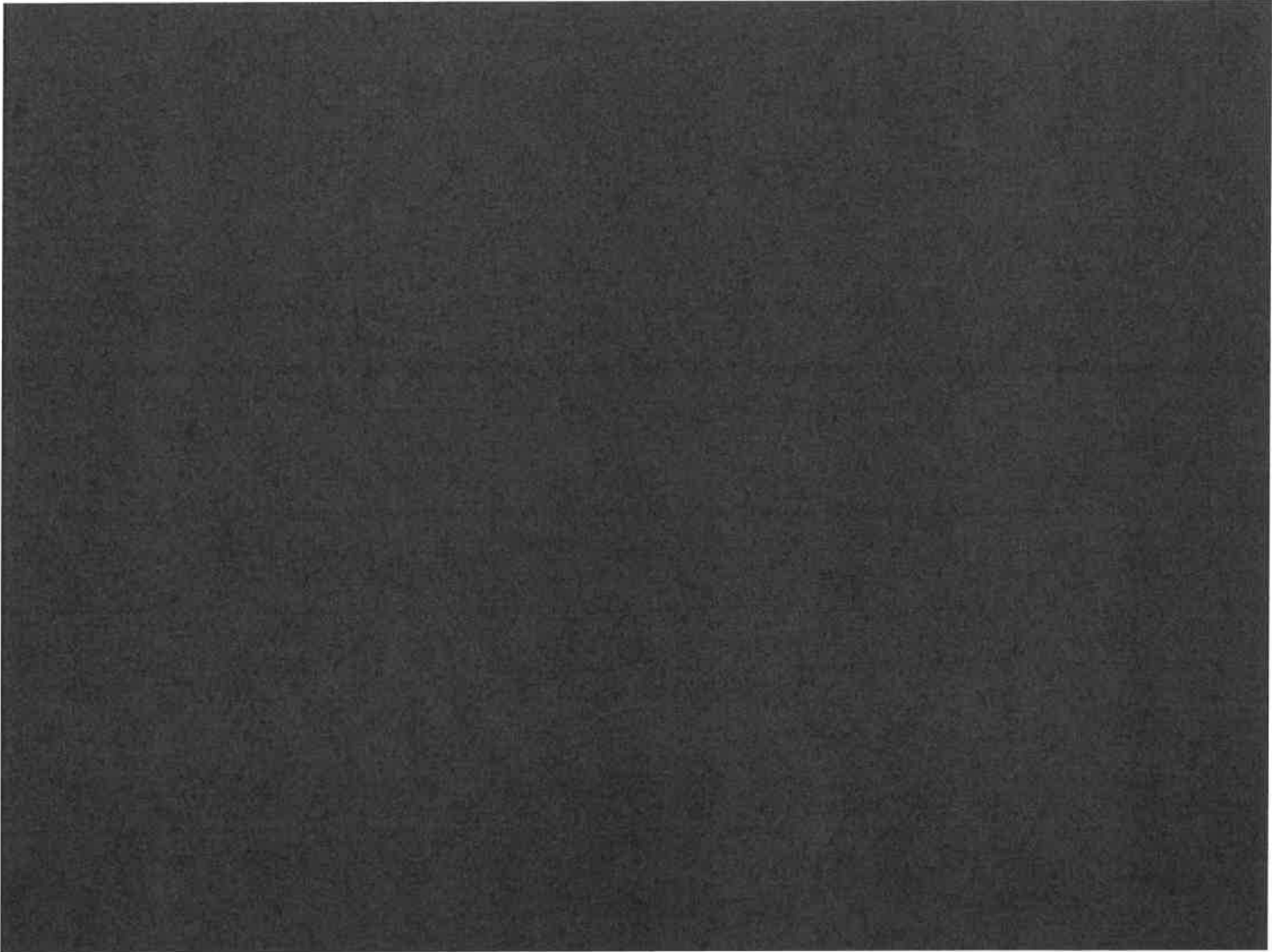




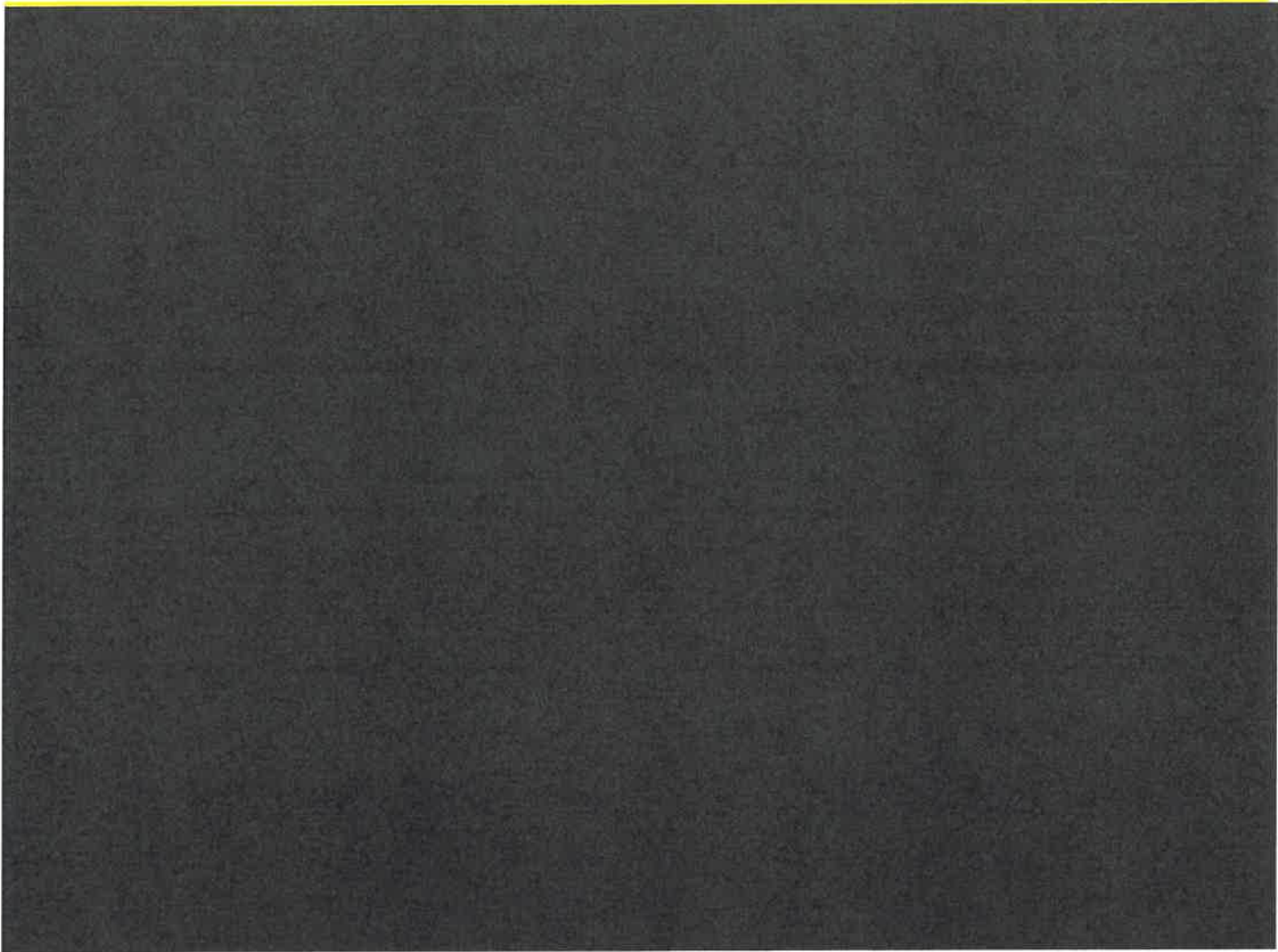




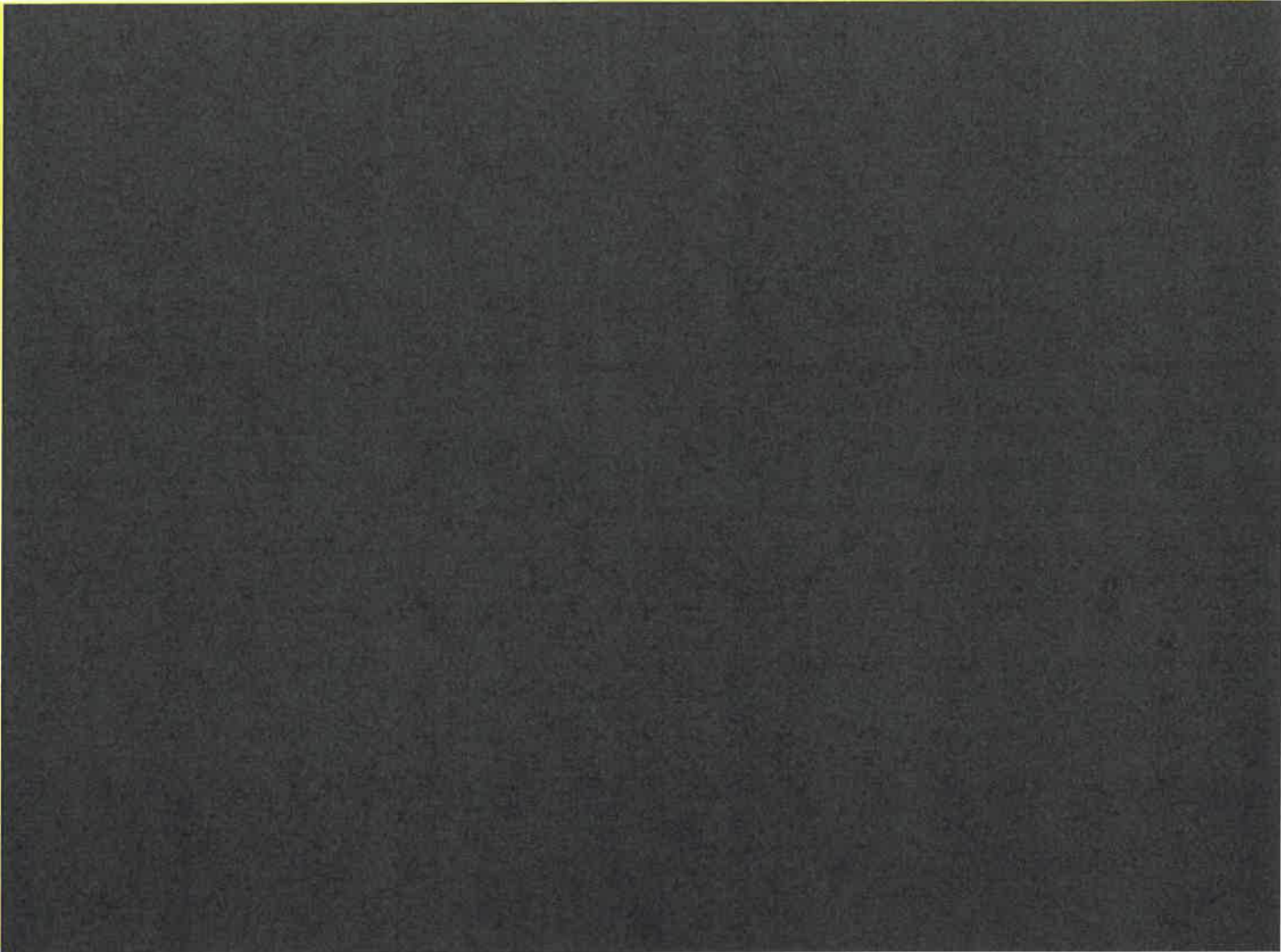
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20220045-EI



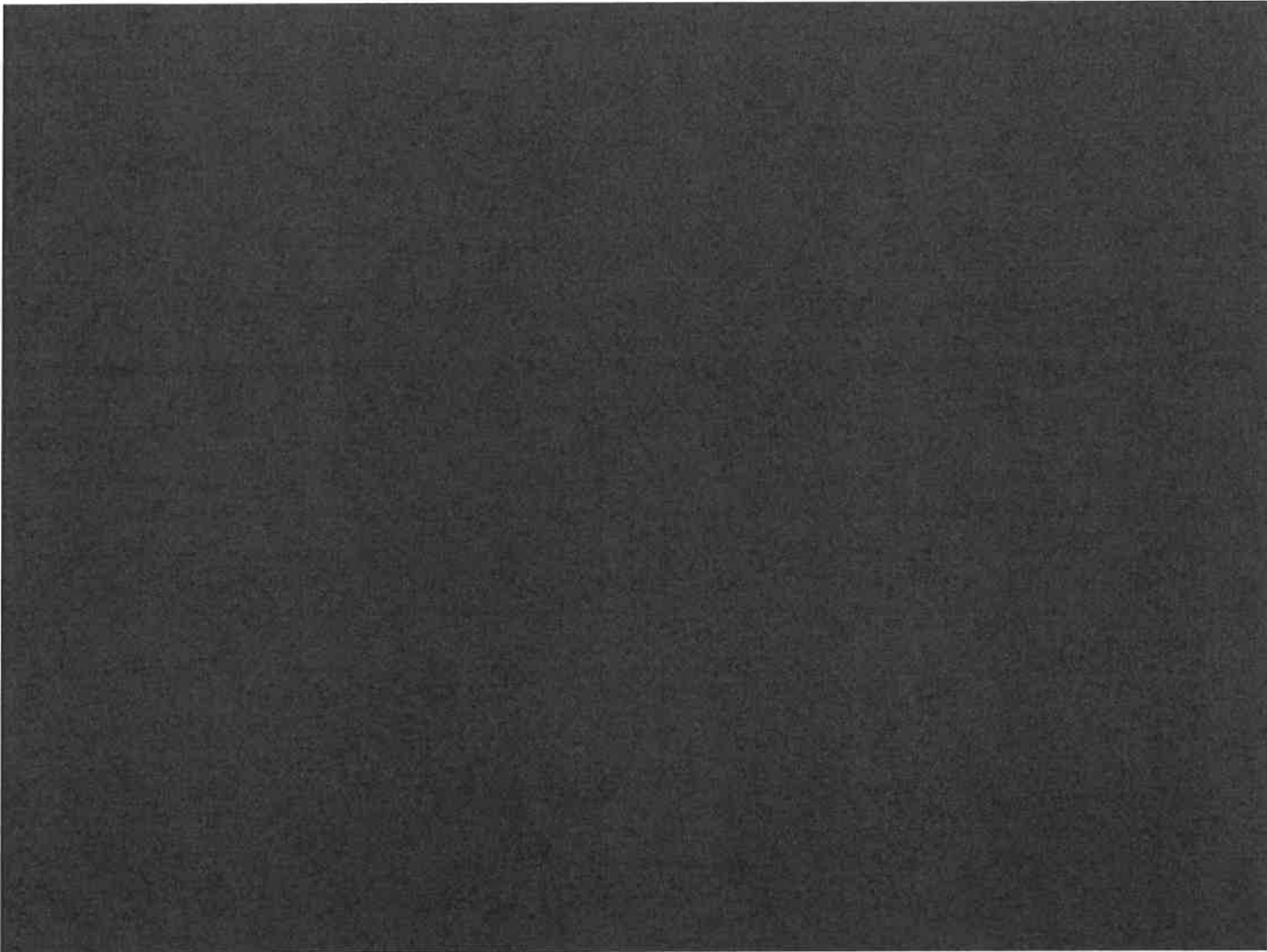
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20220045-EI



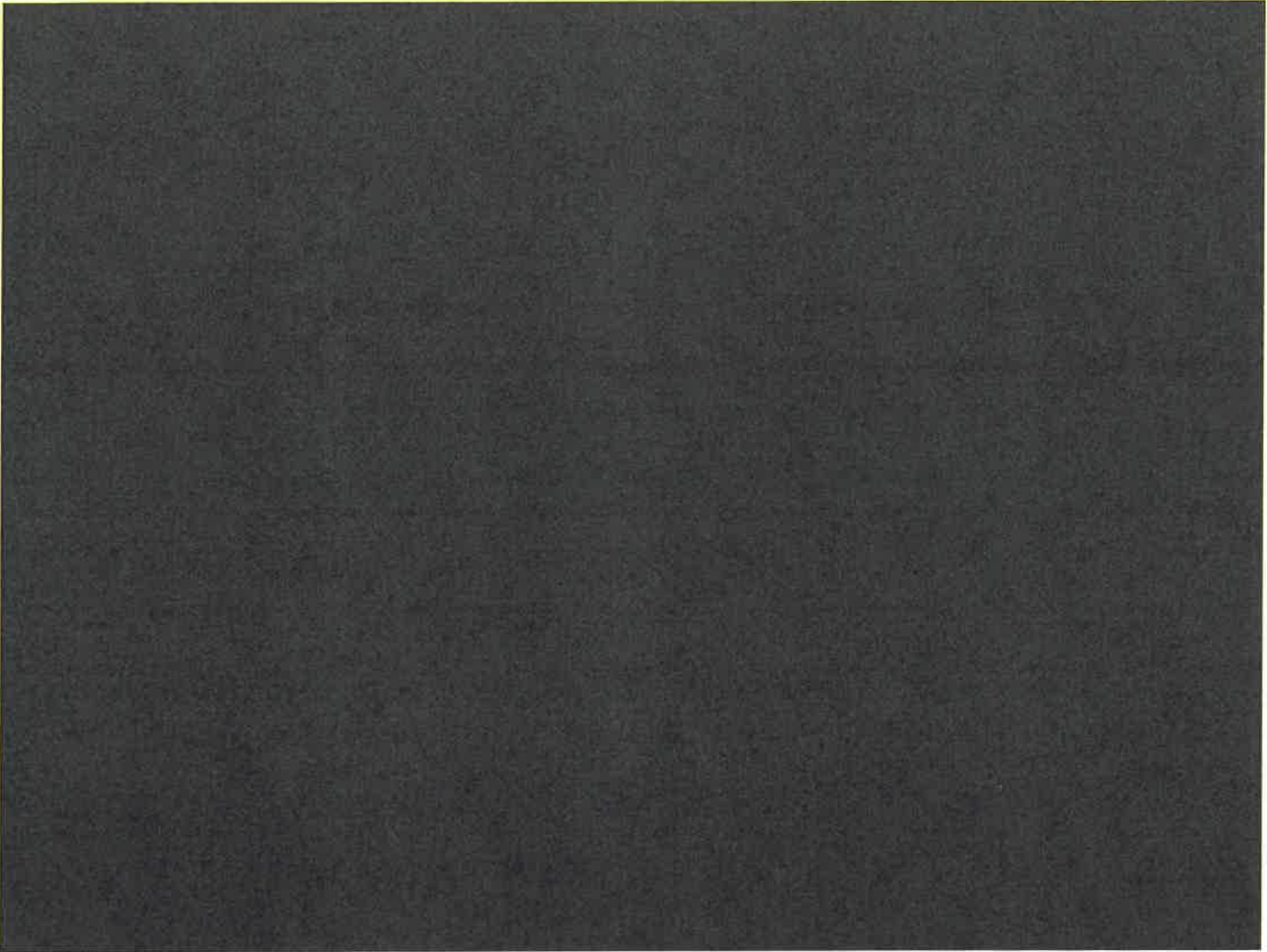
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20220045-EI



FPL 000047
20220045-EI



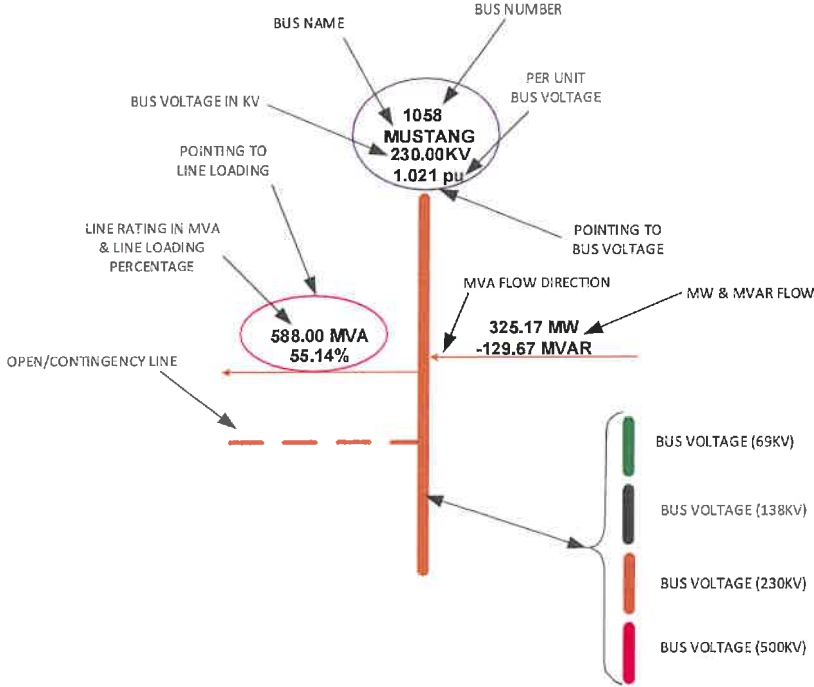
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20220045-EI

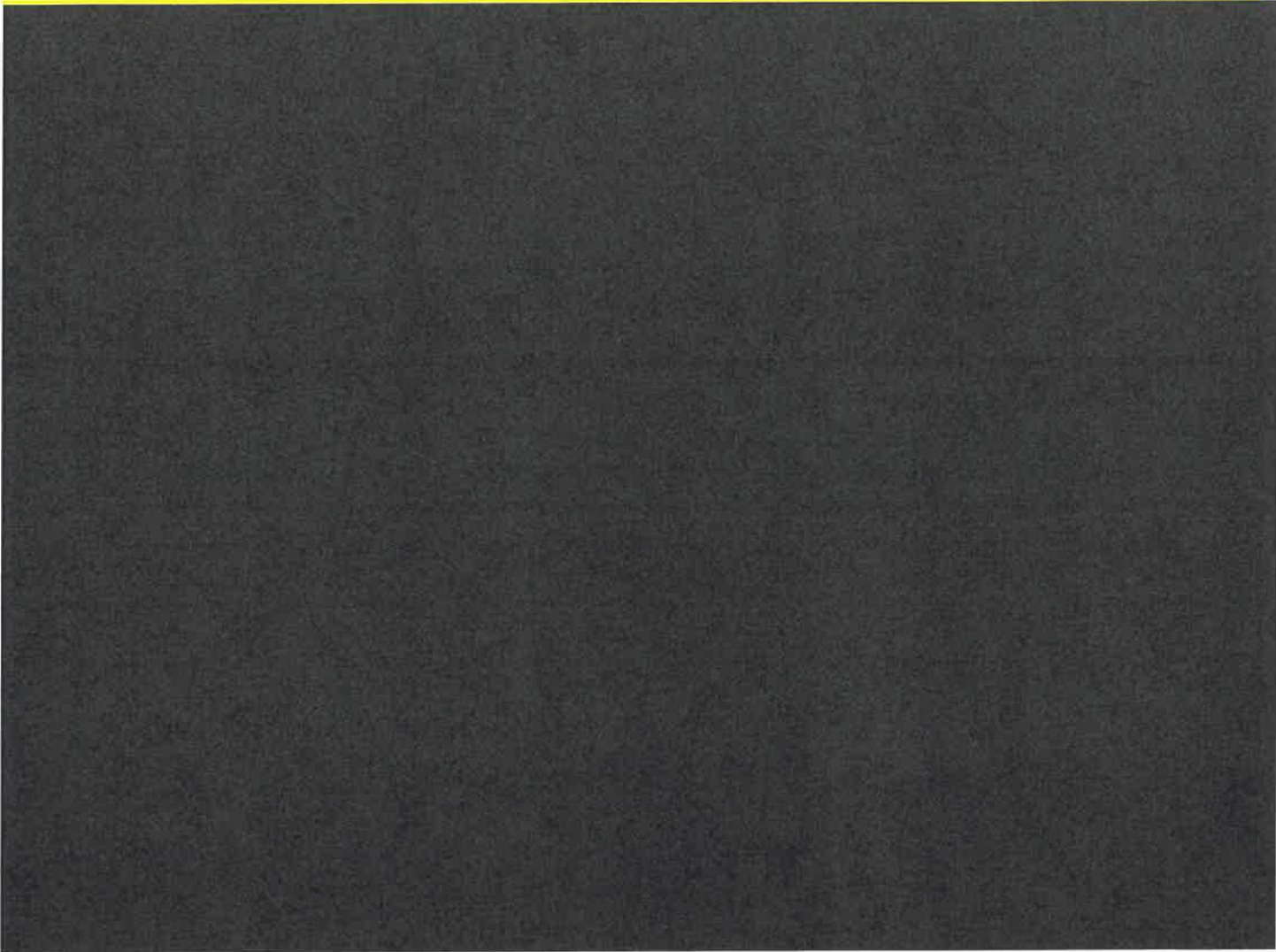


Appendix C

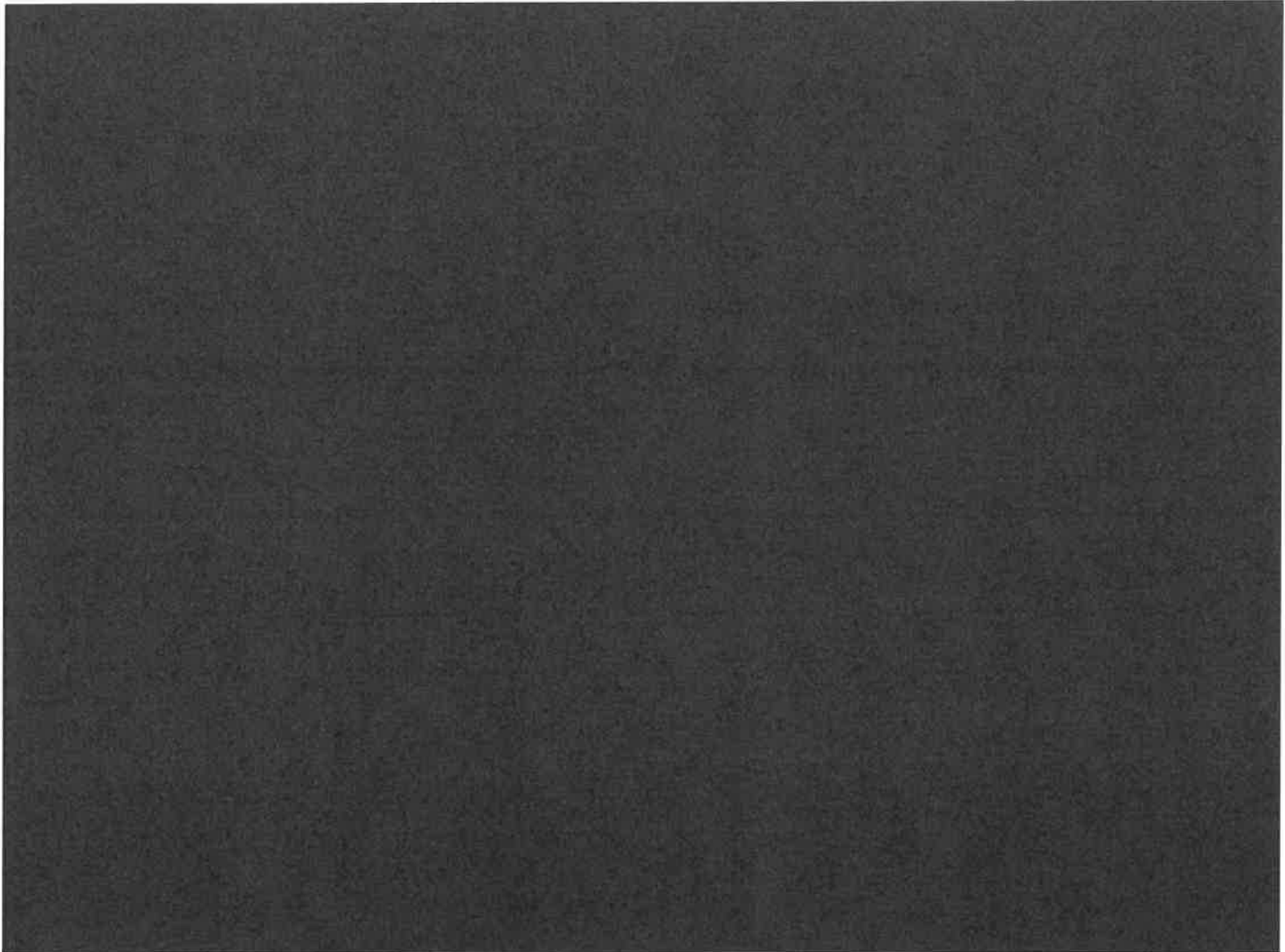
Load Flow Diagrams / Reduce Line Loading

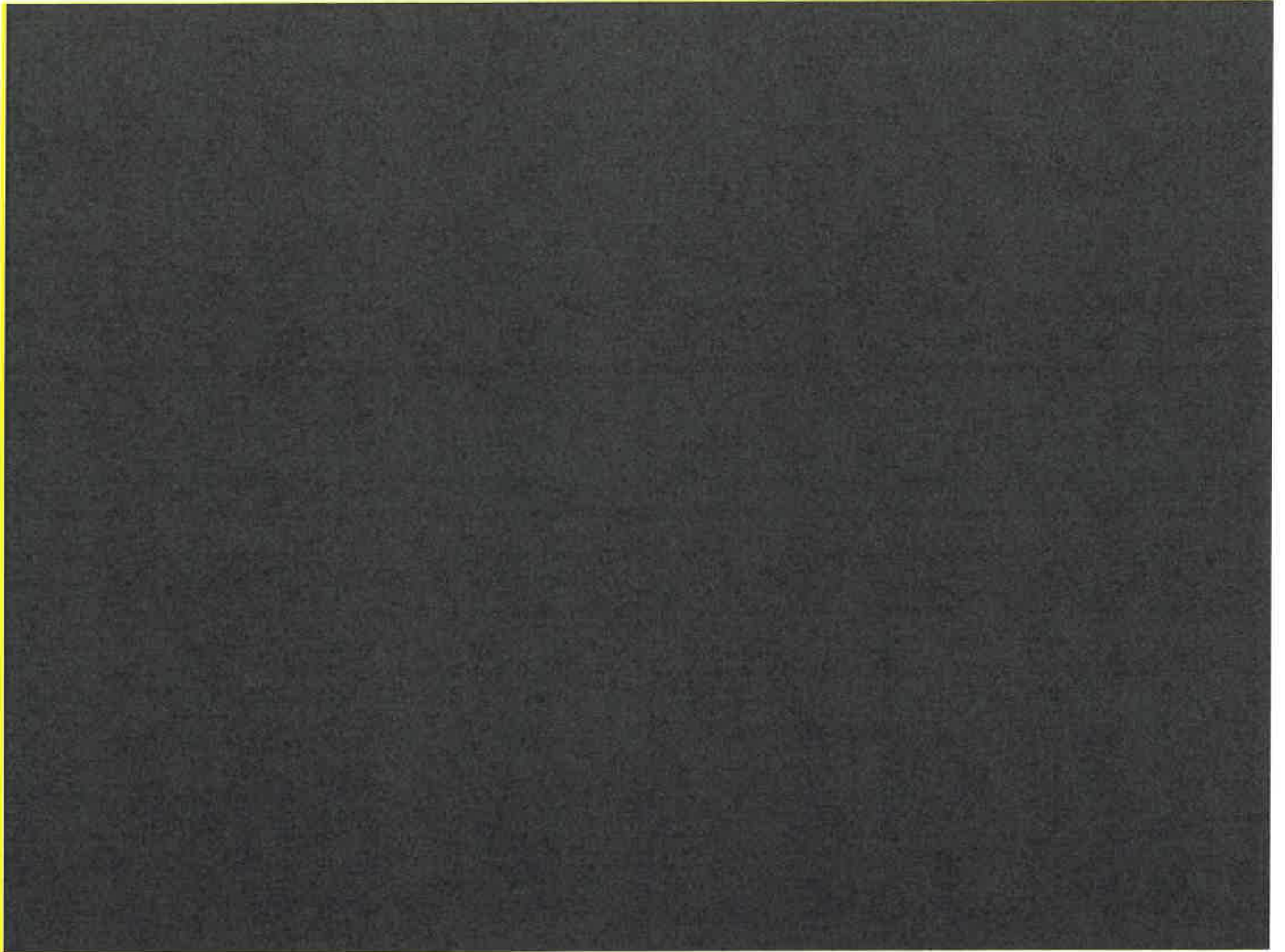
Load Flow Diagram Key

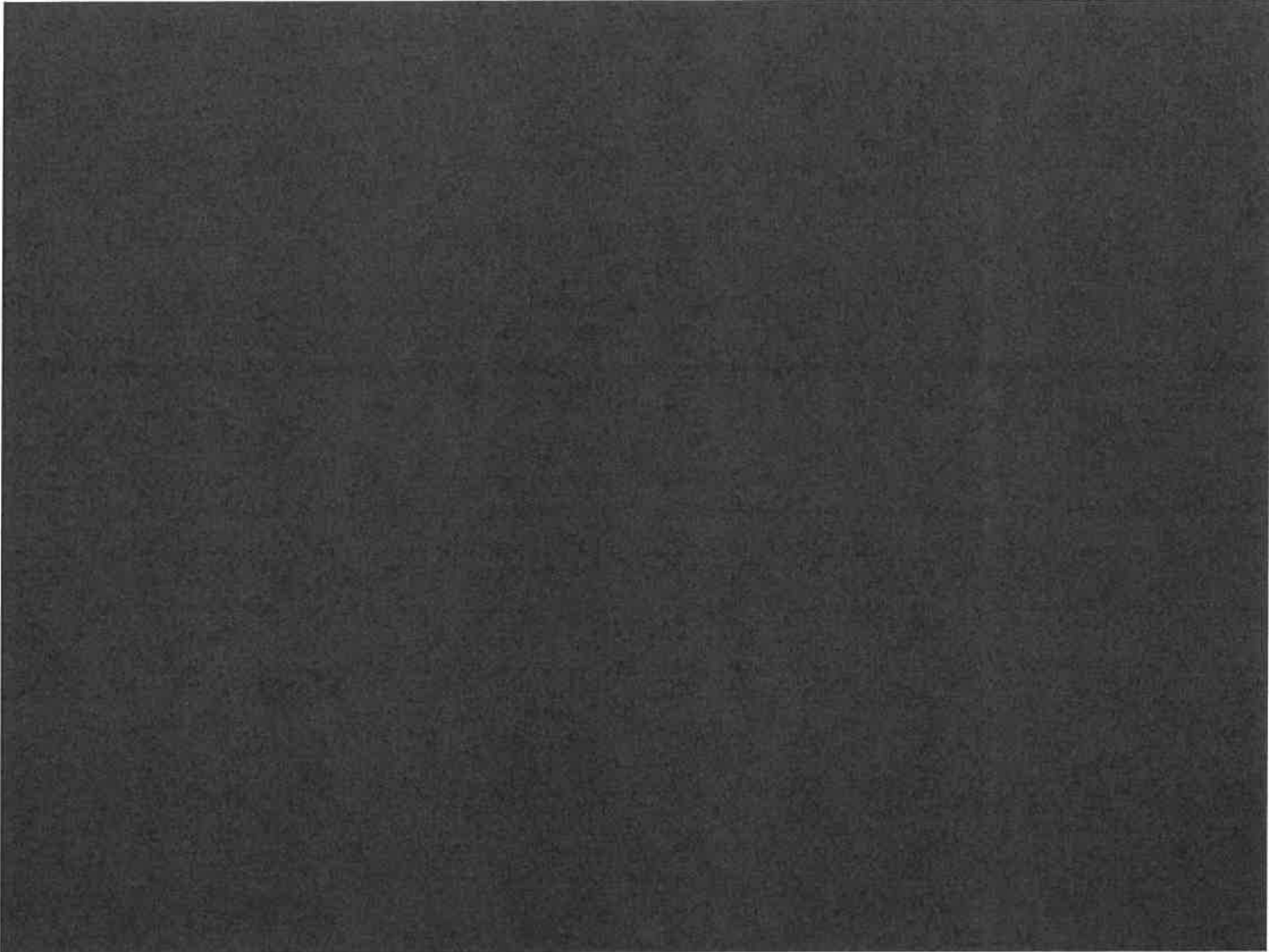


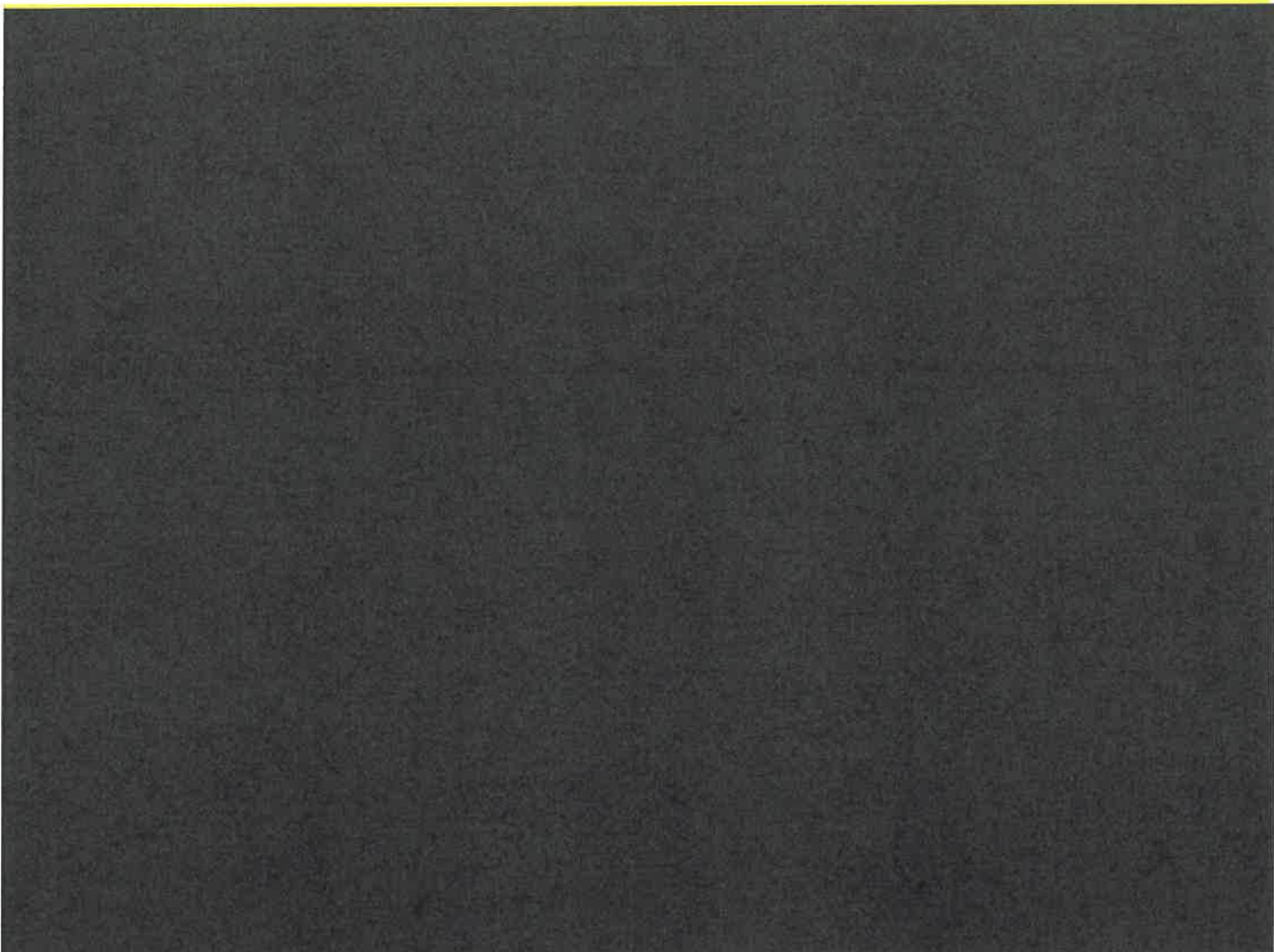


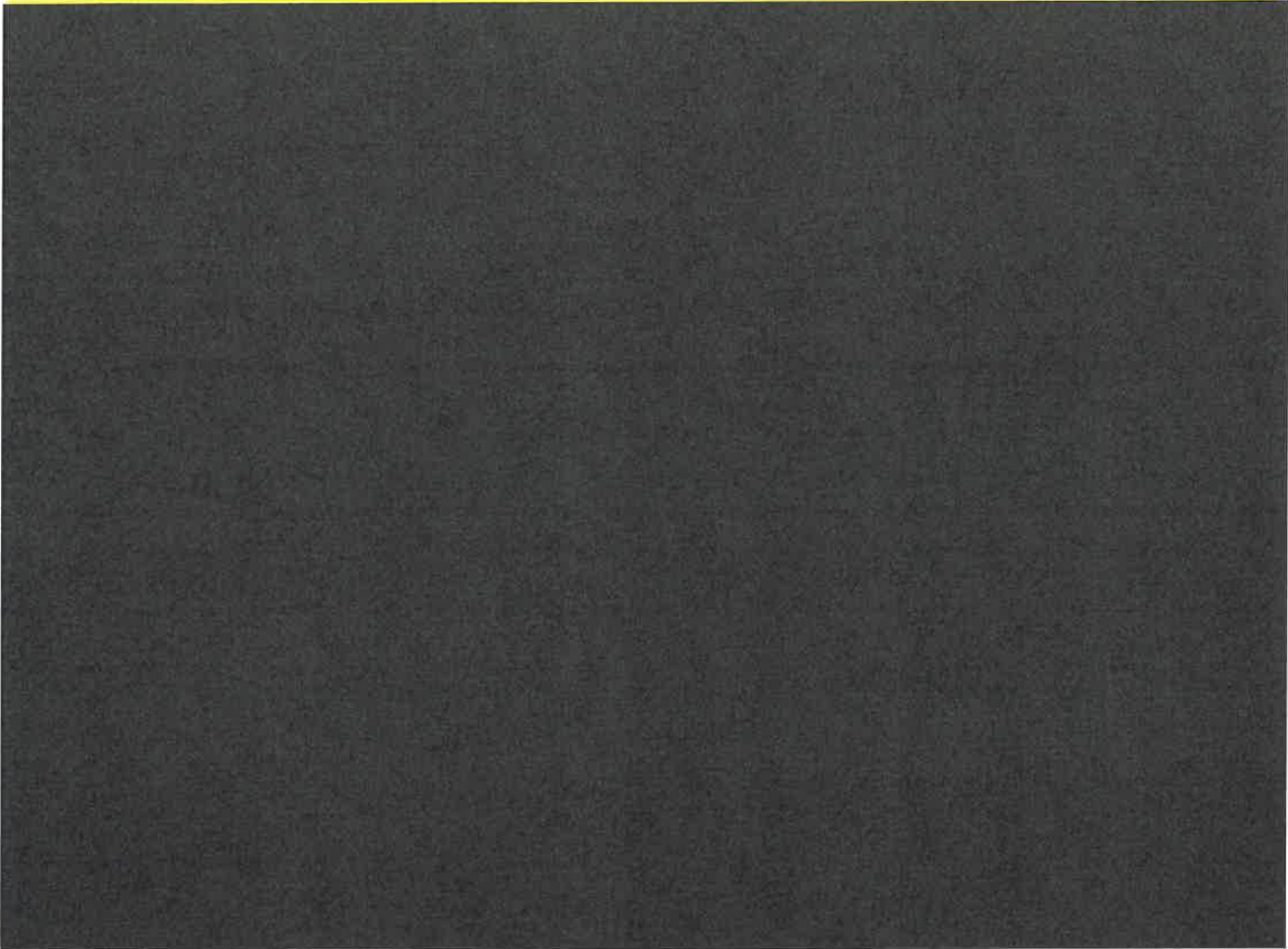
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20220045-EI

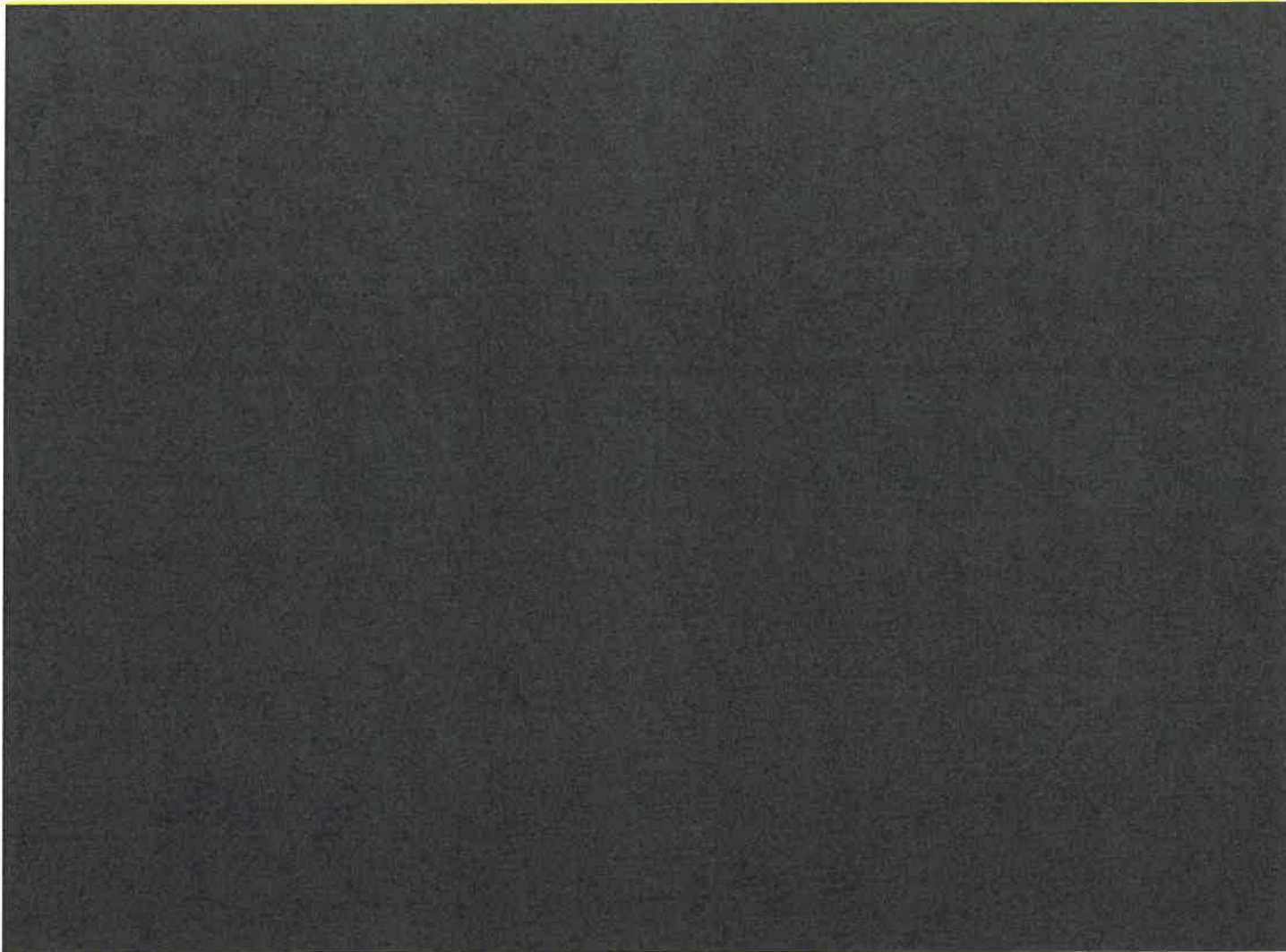




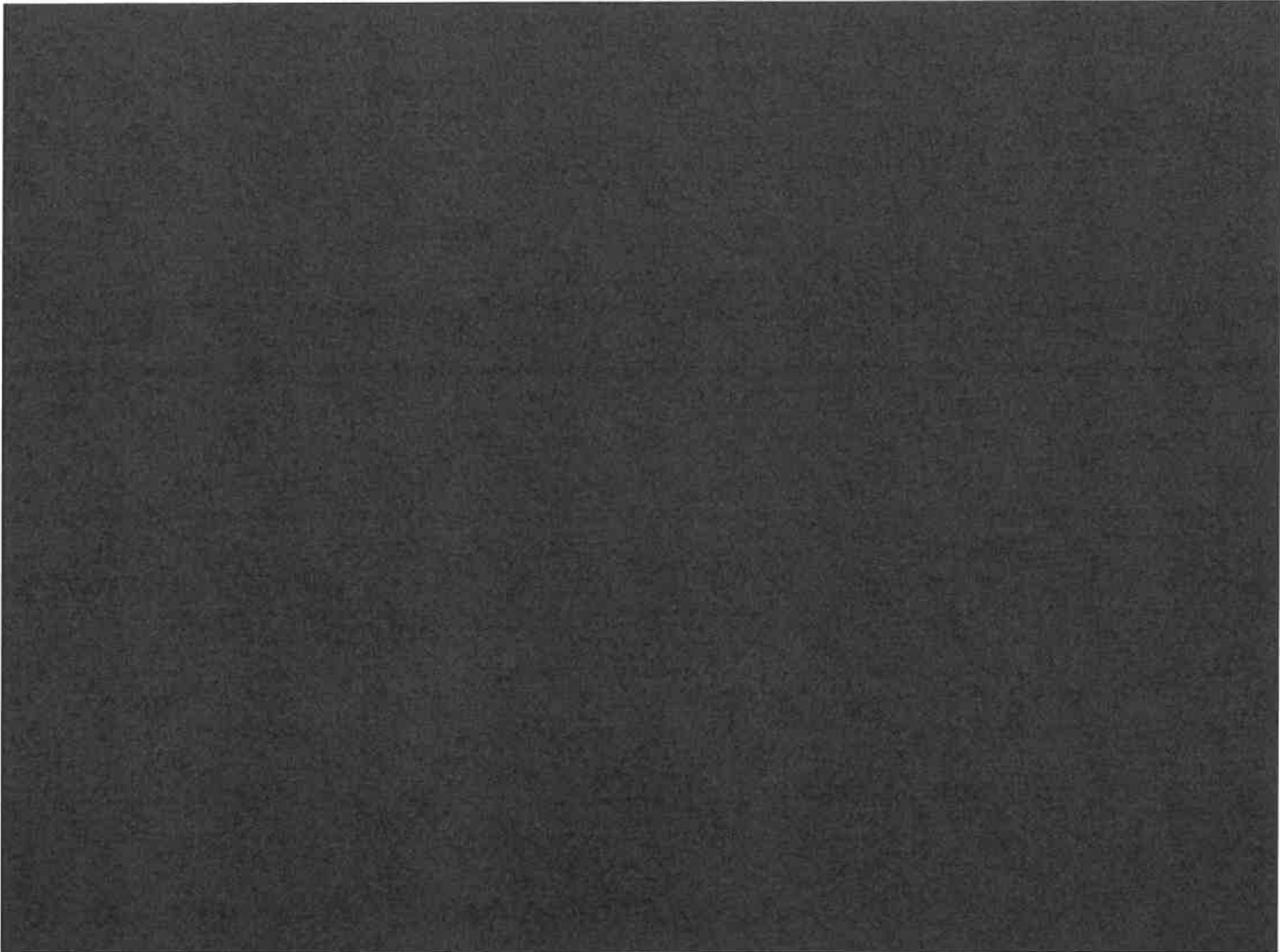




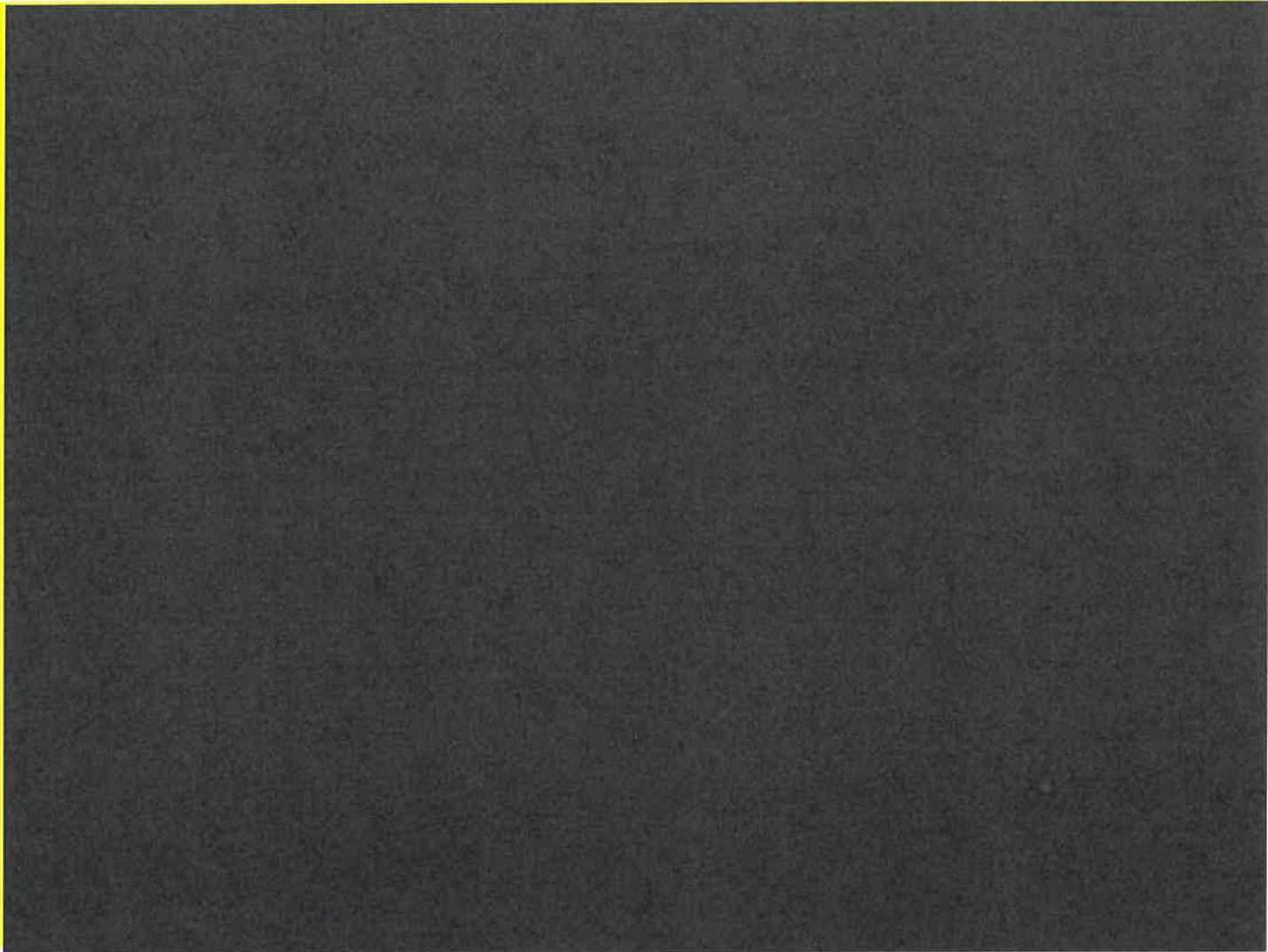


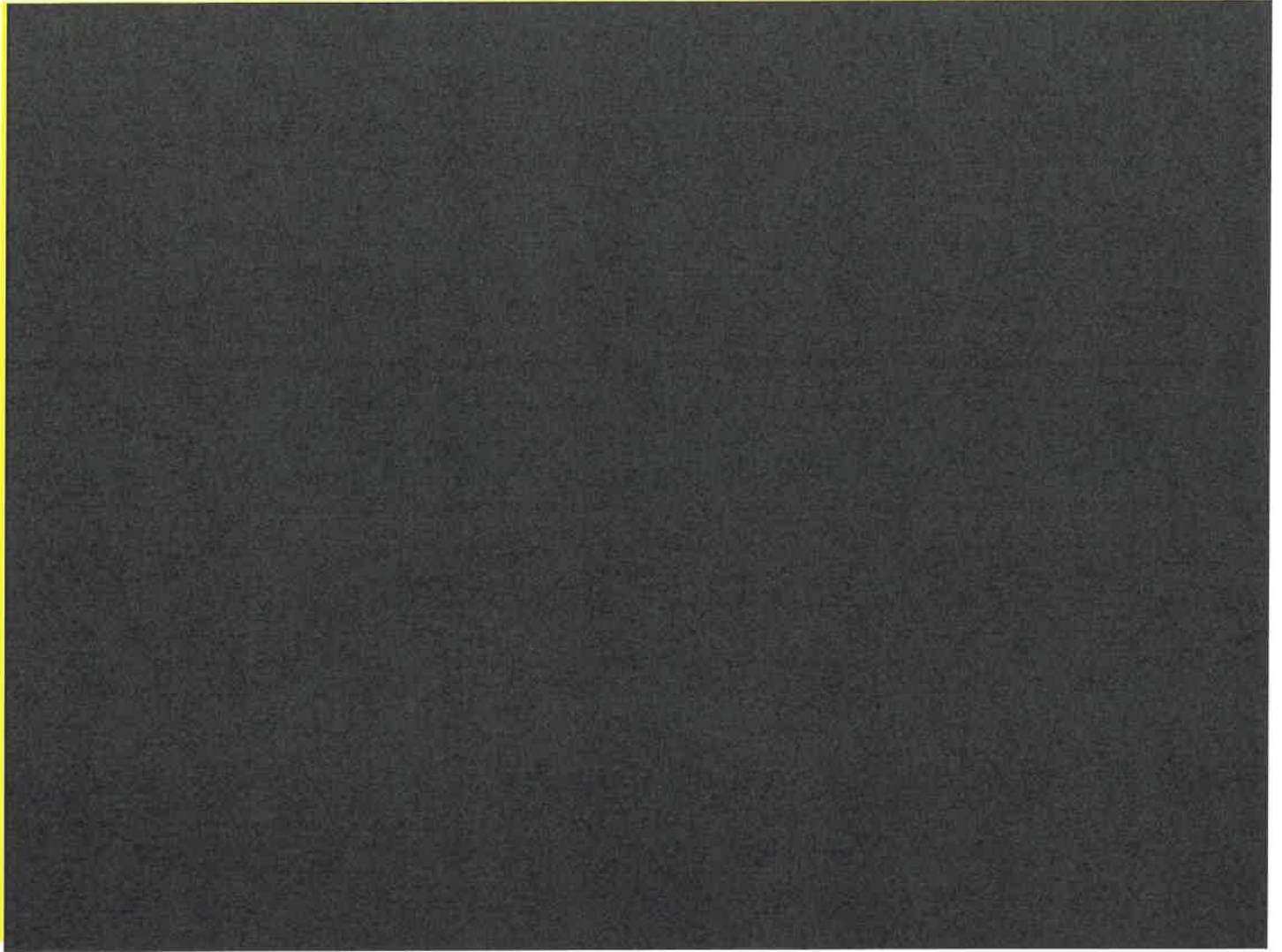


FPL 000059
20220045-EI

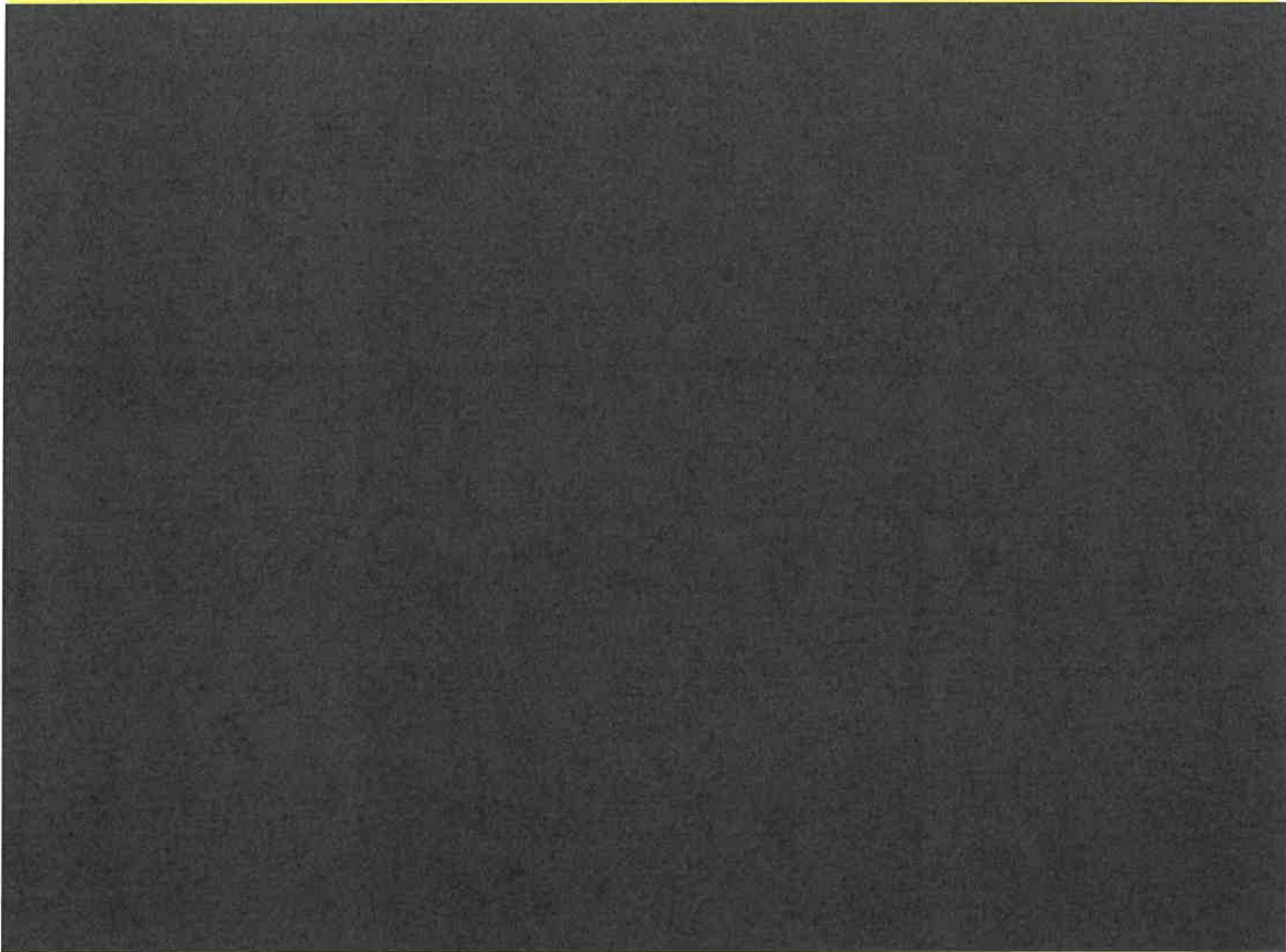


FPL 000060
20220045-EI





FPL 000062
20220045-EI



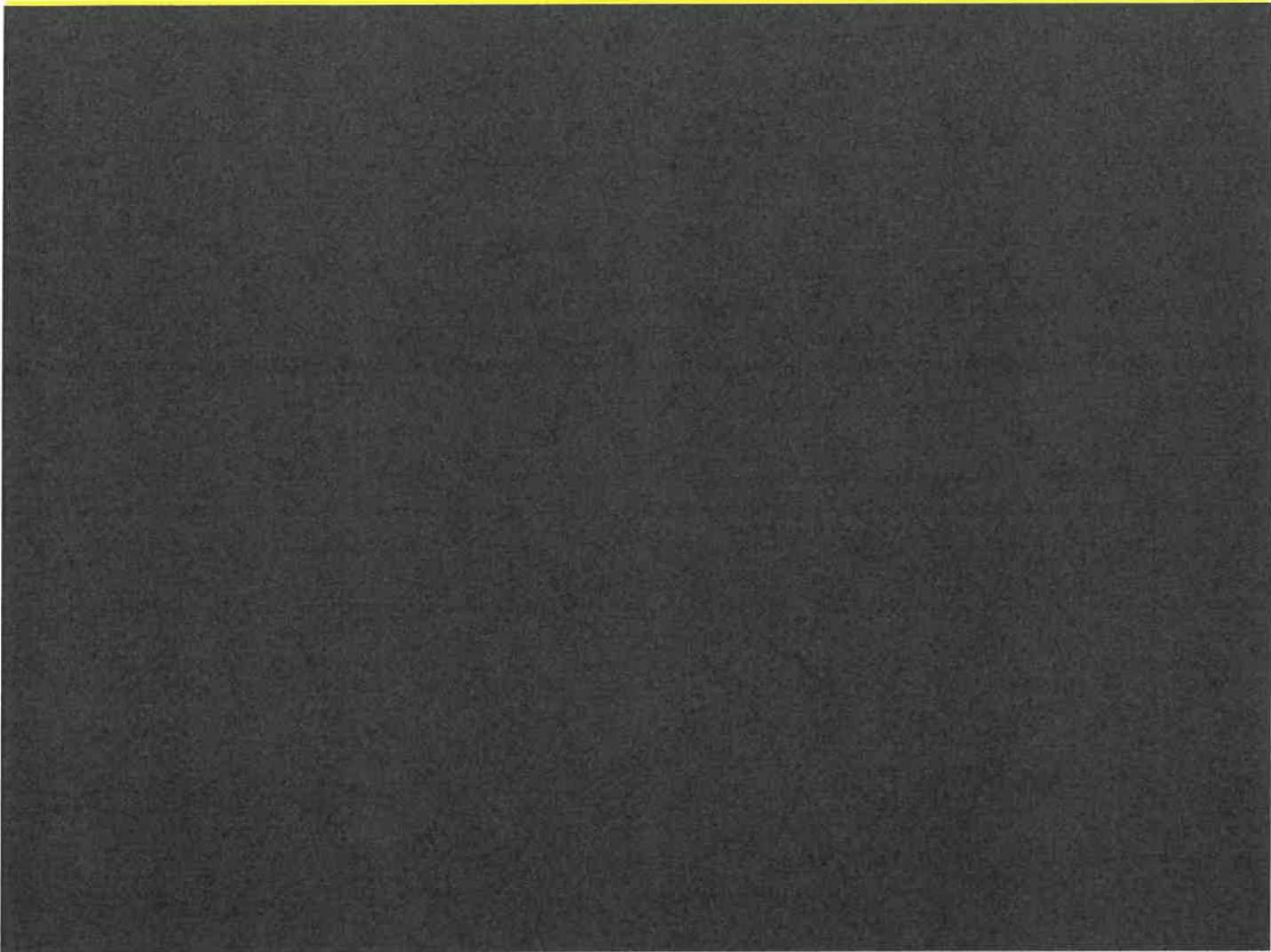


EXHIBIT C

JUSTIFICATION TABLE

EXHIBIT C

COMPANY: Florida Power & Light Company
TITLE: List of Confidential Documents
DOCKET NO.: 20220045-EI
DOCKET TITLE: Petition for determination of Need for Sweatt-Whidden 230 kV Transmission Line in Okeechobee, DeSoto, Highlands, and Glades Counties, by Florida Power & Light Company.
SUBJECT: Florida Power & Light Company’s Request for Confidential Classification of Information Contained in Testimony and Exhibits Provided in Support of its Petition For Determination of Need for Sweatt-Whidden 230 KV Transmission Line in Okeechobee, Desoto, Highlands, and Glades Counties.
DATE: April 1, 2022

Document	Bates Number Start	Bates Number End	Description	Line No. / Col. No.	Florida Statute 366.093(3) Subsection	Declarant
Exhibit A	000006	000006	Exhibit A to the Petition	Line 1	(c)	Francisco Prieto
Exhibit A	000010	000010	Exhibit A to the Petition	Lines 1-2	(c)	Francisco Prieto
Exhibit A	000011	000011	Exhibit A to the Petition	Line 1, Col. B Line 2, Col. D Line 3, Col. A Line 4, Col. C	(c)	Francisco Prieto
Exhibit A	000011	000011	Exhibit A to the Petition	Line 5, Col. B Line 6, Col. B-D Line 7, Col. A Line 8 Col. B,D Line 9, Col. B,D	(c)	Francisco Prieto

Document	Bates Number Start	Bates Number End	Description	Line No. / Col. No.	Florida Statute 366.093(3) Subsection	Declarant
Exhibit A	000012	000012	Exhibit A to the Petition	Line 1, Col. C Line 2, Col. A,C Line 3, Col. B Line 4, Col. A,C Line 5, Col. A	(c)	Francisco Prieto
Exhibit A	000013	000013	Exhibit A to the Petition	Line 1, Col. A,B Line 3, Col. B-E Line 4, Col. A-C Line 5, Col. A,D Line 6, Col. B Line 7, Col C Line 8, Col. A,E Line 9, Col. B Line 10, Col. A,D Line 12, Col. D,E Line 13, Col. B,C Line 14, Col. C Line 15, Col. A Line 16 Col. D,E Line 17, Col. A,B	(c)	Francisco Prieto
Attachment No. 4	000020	000022	Attachment No. 4 to the Petition	All	(c)	Francisco Prieto
Attachment No. 7	000023	000023	Attachment No. 7 to the Petition	All	(c)	Francisco Prieto
Exhibit FP-2	000018	000018	Map of Study Area with Existing Facilities and SWP	All	(c)	Francisco Prieto

Document	Bates Number Start	Bates Number End	Description	Line No. / Col. No.	Florida Statute 366.093(3) Subsection	Declarant
Exhibit FP-4	000019	000019	List of Contingencies	All	(c)	Francisco Prieto
Appendix A	000026	000034	Load Flow Diagrams	All	(c)	Francisco Prieto
Appendix A	000037	000049	Load Flow Diagrams	All	(c)	Francisco Prieto
Appendix A	000052	000064	Load Flow Diagrams	All	(c)	Francisco Prieto

EXHIBIT D

DECLARATIONS

EXHIBIT D

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Petition for determination of Need for Sweatt-Whidden 230 kV Transmission Line in Okeechobee, DeSoto, Highlands, and Glades Counties, by Florida Power & Light Company.

Docket No: 20220045-EI

WRITTEN DECLARATION OF FRANCISCO PRIETO

1. My name is Francisco Prieto. I am currently employed by Florida Power & Light Company ("FPL") as Senior Manager of System Planning, Transmission and Substations. 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 security measures, systems or procedures. 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.

Francisco Prieto

Francisco Prieto

Date: March 30, 2022