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Assistant General Counsel
Florida Power & Light Company
700 Universe Boulevard
Juno Beach, FL 33408-0420
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April 4, 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

REDACTED

**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 (Docket No. 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(Docket No. 20210179-EI).**

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COMMISSION CLERK

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") Third Set of Interrogatories, Nos. 44-47 and Fourth Request for Production of Documents, Nos. 52-56 in Docket No. 20200241-EI; and (2) OPC's Third Set of Interrogatories, Nos. 47-48 and Third Request for Production of Documents, Nos. 44-47 in Docket No. 20210178-EI.

The enclosed filing includes Exhibits A, B, C, and D. Exhibit A consists of a copy of the Confidential Documents, some of which are provided on disk. 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

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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.

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

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: 20200241-EI
Docket No. 20210178-EI
Docket No. 20210179-EI

Date: April 4, 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")
THIRD SET OF INTERROGATORIES, Nos. 44-47 AND FOURTH REQUEST FOR
PRODUCTION OF DOCUMENTS, Nos. 52-56 IN DOCKET NO. 20200241-EI; AND (2)
OPC'S THIRD SET OF INTERROGATORIES, Nos. 47-48 AND THIRD REQUEST FOR
PRODUCTION OF DOCUMENTS, Nos. 44-47 IN DOCKET NO. 20210178-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) Third Set of Interrogatories, Nos. 44-47 and Fourth Request for Production of Documents, Nos. 52-56 in Docket No. 20200241-EI; and (2) OPC's Third Set of Interrogatories, Nos. 47-48 and Third Request for Production of Documents, Nos. 44-47 in Docket No. 20210178-EI ("Confidential Documents"). In support of this request, Gulf and FPL state as follows:

1. Gulf and FPL served their responses to OPC's Third Set of Interrogatories and Fourth Request for Production of Documents in Docket 20200241-EI; and OPC's Third Set of

Interrogatories and Third Request for Production of Documents in Docket 20210178-EI (including the Confidential Documents) on April 4, 2022. This request is being filed contemporaneously with service of those responses to request confidential classification of certain information contained in its responses to OPC's: (1) Third Set of Interrogatories, Nos. 44-47 and Fourth Request for Production of Documents, Nos. 52-56 in Docket No. 20200241-EI; and (2) OPC's Third Set of Interrogatories, Nos. 47-48 and Third Request for Production of Documents, Nos. 44-47 in Docket No. 20210178-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 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 Claire Gerard and Sharon Diaram 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 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.

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 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 4th day of April 2022.

Kenneth M. Rubin
Assistant General Counsel
Ken.rubin@fpl.com
Florida Power & Light Company
700 Universe Boulevard
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

I HEREBY CERTIFY that a true and correct copy of the foregoing was served by electronic mail this 4th day of April 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
jcrowfor@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:

Isaias and Eta - Contractor Costs.

Please refer to the Confidential Excel flat file for [REDACTED] (expenses only file) related to Hurricane Isaias provided as part of the Company's November 12, 2021 filing. Refer further to the "Expenses" worksheet tab at cell row 4, which contains an expense amount of [REDACTED] contained in miscellaneous expense column BQ. Describe the miscellaneous expense amount charged to the Company and explain why it was charged as part of the recovery costs.

RESPONSE:

The amount charged is for approved specialty equipment that is necessary and used by the specific vegetation crews in the course of their storm restoration activities. The use of specialty 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 the equipment was used during storm restoration and appropriate rates were charged per their contract. Please refer to FPL's response to OPC's Third Request for Production of Documents No. 47 for details of the allowable specialty equipment per their contract.

QUESTION:

Hurricane Sally - Contractor Costs.

Please refer to the Confidential Excel flat file for [REDACTED] related to Hurricane Sally provided as part of the Company's November 12, 2021 filing. Refer further to the "Expenses" worksheet tab at cell rows 333 and 334, which contain separate expense amounts of [REDACTED] and [REDACTED], respectively, described in cell column AJ as "equipment necessary for work." Describe the equipment costs charged to the Company and explain why each was charged as part of the recovery costs.

RESPONSE:

The amount charged is for approved specialty equipment that is necessary and used by the specific vegetation crews in the course of their storm restoration activities. The use of specialty 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 the equipment was used during storm restoration and appropriate rates were charged per their contract. Please see Gulf's response to OPC's Fourth Request for Production of Documents No. 53.

QUESTION:

Hurricane Sally -Contractor Costs.

Please refer to the Confidential Excel flat file for [REDACTED] [REDACTED] related to Hurricane Sally provided as part of the Company's November 12, 2021 filing. Refer further to the "Expenses" worksheet tab at cell row 170, 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 each was charged as part of the recovery costs.

RESPONSE:

The amount charged is for approved specialty equipment that is necessary and used by the specific vegetation crews in the course of their storm restoration activities. The use of specialty 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 the equipment was used during storm restoration and appropriate rates were charged per their contract. Please see Gulf's response to OPC's Fourth Request for Production of Documents No. 54.

QUESTION:

Hurricane Sally -Contractor Costs.

Please refer to the Confidential Excel flat file for [REDACTED] related to Hurricane Sally provided as part of the Company's November 12, 2021 filing. Refer further to the "Expenses" worksheet tab at cell rows 11-28, 48-62, and 68-85, which contain expense amounts summing to [REDACTED] described in cell column AJ as "equipment necessary for work." Describe the equipment costs charged to the Company and explain why each was charged as part of the recovery costs.

RESPONSE:

The amount charged is for approved specialty equipment that is necessary and used by the specific vegetation crews in the course of their storm restoration activities. The use of specialty 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 the equipment was used during storm restoration and appropriate rates were charged per their contract. Upon review of the invoices, it was determined that the vendor was paid the correct amount, which was approximately \$8 less than the amounts reflected on their invoices. Please see Gulf's response to OPC's Fourth Request for Production of Documents No. 55.

QUESTION:

Hurricane Sally -Contractor Costs.

Please refer to the Confidential Excel flat file for [REDACTED] [REDACTED] [REDACTED] related to Hurricane Sally provided as part of the Company's November 12, 2021 filing. Refer further to the "Expenses" worksheet tab at cell rows 7, 10, 12, 13, and 16, which contain expense amounts summing to [REDACTED] described in cell column AJ as either "equipment necessary for work" or "Per FPL/Gulf direction." Describe the equipment costs charged to the Company and explain why each was charged as part of the recovery costs.

RESPONSE:

The amount charged is for approved specialty equipment that is necessary and used by the specific vegetation crews in the course of their storm restoration activities. The use of specialty 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 the equipment was used during storm restoration and appropriate rates were charged per their contract. Please see Gulf's response to OPC's Fourth Request for Production of Documents No. 56.

The documents responsive to OPC's Fourth Request for Production of Documents, No. 52, in Docket No. 20200241-EI, Bates Nos. 026862-029430, are confidential in their entirety.

A

B

C

QUESTION:

Hurricane Sally -Contractor Costs.

1 Please refer to the Confidential Excel flat file for [REDACTED] [REDACTED] related to Hurricane Sally
2 provided as part of the Company's November 12, 2021 filing. Refer further to the "Expenses"
3 worksheet tab at cell rows 333 and 334, which contain separate expense amounts of [REDACTED]
4 and [REDACTED], respectively, described in cell column AJ as "equipment necessary for work."
Provide copies of all documentation related to these additional equipment charges.

RESPONSE:

Please see confidential response documents included with this response.

The documents responsive to OPC's Fourth Request for Production of Documents, No. 53, in Docket No. 20200241-EI, Bates Nos. 029431-029436, are confidential in their entirety.

QUESTION:

Hurricane Sally -Contractor Costs.

Please refer to the Confidential Excel flat file for [REDACTED] related to Hurricane Sally provided as part of the Company's November 12, 2021 filing. Refer further to the "Expenses" worksheet tab at cell row 170, 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 confidential response documents included with this response.

The documents responsive to OPC's Fourth Request for Production of Documents, No. 54, in Docket No. 20200241-EI, Bates Nos. 029438-029441, are confidential in their entirety.

QUESTION:

Hurricane Sally -Contractor Costs.

Please refer to the Confidential Excel flat file for [REDACTED] [REDACTED] related to Hurricane Sally provided as part of the Company's November 12, 2021 filing. Refer further to the "Expenses" worksheet tab at cell rows 11-28, 48-62, and 68-85, which contain expense amounts summing to [REDACTED] described in cell column AJ as "equipment necessary for work." Provide copies of all documentation related to these additional equipment charges.

RESPONSE:

Please see response document(s) included with this response.

The documents responsive to OPC's Fourth Request for Production of Documents, No. 55, in Docket No. 20200241-EI, Bates Nos. 029443-029446, are confidential in their entirety.

QUESTION:

Hurricane Sally -Contractor Costs.

Please refer to the Confidential Excel flat file for [REDACTED] [REDACTED] [REDACTED] related to Hurricane Sally provided as part of the Company's November 12, 2021 filing. Refer further to the "Expenses" worksheet tab at cell rows 7, 10, 12, 13, and 16, which contain expense amounts summing to [REDACTED] described in cell column AJ as either "equipment necessary for work" or "Per FPL/Gulf direction." Provide copies of all documentation related to these additional equipment charges.

RESPONSE:

Please see confidential response documents included with this response.

The documents responsive to OPC's Fourth Request for Production of Documents, No. 56, in Docket No. 20200241-EI, Bates Nos. 029448-029453, are confidential in their entirety.

QUESTION:

Isaias and Eta - Contractor Costs. Please refer to the Confidential Excel flat file for [REDACTED] [REDACTED] related to Hurricane Isaias provided as part of the Company's November 12, 2021 filing. Refer further to the "Expenses" worksheet tab at cell rows 373 and 374, which contain separate expense amounts of [REDACTED] and [REDACTED] respectively, described in cell column AJ as "equipment necessary for work." Describe the equipment costs charged to the Company and explain why each was charged as part of the recovery costs.

RESPONSE:

The amount charged is for approved specialty equipment that is necessary and used by the specific vegetation crews in the course of their storm restoration activities. The use of specialty 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 the equipment was used during storm restoration and appropriate rates were charged per their contract. Please refer to FPL's response to OPC's Third Request for Production of Documents No. 46 for details of the allowable specialty equipment per their contract.

QUESTION:

Isaias and Eta - Contractor Costs.

Please refer to the Confidential Excel flat file for [REDACTED] (expenses only file) related to Hurricane Isaias provided as part of the Company's November 12, 2021 filing. Refer further to the "Expenses" worksheet tab at cell row 4, which contains an expense amount of [REDACTED] contained in miscellaneous expense column BQ. Describe the miscellaneous expense amount charged to the Company and explain why it was charged as part of the recovery costs.

RESPONSE:

The amount charged is for approved specialty equipment that is necessary and used by the specific vegetation crews in the course of their storm restoration activities. The use of specialty 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 the equipment was used during storm restoration and appropriate rates were charged per their contract. Please refer to FPL's response to OPC's Third Request for Production of Documents No. 47 for details of the allowable specialty equipment per their contract.

The documents responsive to OPC's Third Request for Production of Documents, No. 44, in Docket No. 20210178-EI, Bates Nos. 029510-033204, are confidential in their entirety.

The documents responsive to OPC's Third Request for Production of Documents, No.45 in Docket No. 20210178-EI, Bates Nos. 033209-036387, are confidential in their entirety.

QUESTION:

Isaias and Eta -Contractor Costs.

Please refer to the Confidential Excel flat file for [REDACTED] [REDACTED] related to Hurricane Isaias provided as part of the Company's November 12, 2021 filing. Refer further to the "Expenses" worksheet tab at cell rows 373 and 374, which contain separate expense amounts of \$ [REDACTED] and [REDACTED] respectively, described in cell column AJ as "equipment necessary for work." Provide copies of all documentation related to each of these additional equipment charges.

RESPONSE:

Please see confidential documents included with this response.

The documents responsive to OPC's Third Request for Production of Documents, No. 46, in Docket No. 20210178-EI, Bates Nos. 036390-036397, are confidential in their entirety.

QUESTION:

Isaias and Eta -Contractor Costs.

Please refer to the Confidential Excel flat file for [REDACTED] expenses only file) related to Hurricane Isaias provided as part of the Company's November 12, 2021 filing. Refer further to the "Expenses" worksheet tab at cell row 4, which contains an expense amount of [REDACTED] contained in miscellaneous expense column BQ. Provide copies of all documentation related to this additional miscellaneous expense amount.

RESPONSE:

Please see confidential documents included with this response.

The documents responsive to OPC's Third Request for Production of Documents, No. 47, in Docket No. 20210178-EI, Bates Nos. 036398-036400, are confidential in their entirety.

EXHIBIT C

JUSTIFICATION TABLE

EXHIBIT C

COMPANY: Florida Power & Light Company and Gulf Power Company
TITLE: List of Confidential Documents
DOCKET NO.: 20200241-EI; 20210178-EI; 20200179-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 by Gulf Power Company for Limited Proceeding for Recovery of Incremental Storm Restoration Costs Related to Hurricane Zeta.
SUBJECT: Responses to Office of Public Counsel’s (“OPC”): Third Set of Interrogatories, Nos. 44-47, and Fourth Request for Production of Documents, Nos. 52-56 in Docket No. 20200241-EI; Third Set of Interrogatories, Nos. 47-48, and Third Request for Production of Documents, Nos. 44-47 in Docket No. 20210178-EI.
DATE: April 4, 2022

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 INT 44	029454	029454	Interrogatory Response	Line 1, Col. B Line 3, Col. C Line 4, Col. A	(d)	Clare Gerard
Docket 20200241 OPC 3 rd INT 45	029455	029455	Interrogatory Response	Line 1, Col. A Line 3, Col. B	(d)	Clare Gerard
Docket 20200241 OPC 3 rd INT 46	029456	029456	Interrogatory Response	Line 1, Col. B Line 4, Col. A	(d)	Clare Gerard
Docket 20200241 OPC 3 rd INT 47	029457	029457	Interrogatory Response	Line 1, Col. B Line 4, Col. A	(d)	Clare Gerard
Docket 20200241 OPC 3 rd INT 44	029454	029454	Interrogatory Response	Line 1, Col. B Line 3, Col. C Line 4, Col. A	(d)	Clare Gerard

Set	Bates Number Start	Bates Number End	Description	Line No. / Col. No.	Florida Statute 3.66.093(3) Subsection	Declarant
Docket 20200241 OPC 4 th POD 52	026862	029430	Vendor Contracts	All	(d)(e)	Sharon Diaram
Docket 20200241 OPC 4 th POD 53	029437	029437	POD 53 Narrative Response	Line 1 Col. B Line 3, Col. C Line 4, Col. A	(d)	Clare Gerard
Docket 20200241 OPC 4 th POD 53	029431	029436	Vendor Invoices	All	(d)(e)	Clare Gerard Sharon Diaram
Docket 20200241 OPC 4 th POD 54	029440	029440	POD 54 Narrative Response	Line 1 Col. A Line 3, Col. B	(d)	Clare Gerard
Docket 20200241 OPC 4 th POD 54	029438	0294341	Vendor Invoices	All	(d)(e)	Clare Gerard Sharon Diaram
Docket 20200241 OPC 4 th POD 55	029442	029442	POD 55 Narrative Response	Line 1 Col. B Line 4, Col. A	(d)	Clare Gerard
Docket 20200241 OPC 4 th POD 55	029443	029446	Vendor Invoices	All	(d)(e)	Clare Gerard Sharon Diaram
Docket 20200241 OPC 4 th POD 56	029447	029447	POD 56 Narrative Response	Line 1 Col. B Line 4, Col. A	(d)	Clare Gerard
Docket 20200241 OPC 4 th POD 56	029448	029453	Vendor Invoices and Contracts	All	(d)(e)	Clare Gerard Sharon Diaram
Docket 20210178 OPC 3 rd INT 47	033207	033207	Interrogatory Response	Line 1, Col. D Line 2, Col. A Line 4, Col. B Line 4, Col. C	(d)	Clare Gerard
Docket 20210178 OPC 3 rd INT 48	033208	033208	Interrogatory Response	Line 1, Col. A Line 3, Col. B	(d)	Clare Gerard

Set	Bates Number Start	Bates Number End	Description	Line No. / Col. No.	Florida Statute 3.66.093(3) Subsection	Declarant
Docket 20210178 OPC 3 rd POD 44	029510	033026	Vendor Contracts	All	(d)	Sharon Diaram
Docket 20210178 OPC 3 rd POD 45	033209	036387	Vendor Contracts	All	(d)	Sharon Diaram
Docket 20210178 OPC 4 th POD 46	036388	036388	POD 46 Narrative Response	Line 1 Col. B Line 3, Col. C Line 4, Col. A	(d)	Clare Gerard
Docket 20210178 OPC 3 rd POD 46	036390	036397	Vendor Invoices and Contracts	All	(d)	Clare Gerard Sharon Diaram
Docket 20210178 OPC 4 th POD 47	036401	036401	POD 47 Narrative Response	Line 1 Col. A Line 3, Col. B	(d)	Clare Gerard
Docket 20210178 OPC 3 rd POD 47	036398	036400	Vendor Invoices and Contracts	All	(d)	Clare Gerard Sharon Diaram

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 Hurricanes Sally, by Gulf Power Company.

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

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: 20200241-EI

Docket No. 20210178-EI

Docket No. 20210179-EI

WRITTEN DECLARATION OF SHARON DIARAM

1. My name is Sharon Diaram. I am currently employed by Florida Power & Light (“FPL”) Company as Senior 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 (“Gulf”) Request for Confidential Classification, for which I am listed as the declarant on Exhibit C, specifically the response to Office of Public Counsel’s (“OPC”) Fourth Request for Production of Documents, Nos. 52-56 in Docket No. 20200241-EI; and OPC’s Third Request for Production of Documents, Nos. 44-47, in former Docket 20210178. The documents and files that I have reviewed and which are asserted by Gulf and FPL to be proprietary confidential business information contain or constitute information concerning bids or other contractual data, the disclosure of which would impair the efforts of Gulf and 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 and 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, 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
2022.04.01 10:53:20 -04'00'

Sharon Diaram Date:

4/1/22

EXHIBIT D

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

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

Docket No. 20200241-EI
Docket No. 20210178-EI

Petition for evaluation of Hurricane Isaias and Tropical Storm Eta storm costs, by Florida Power & Light 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, 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 to FPL's Request for Confidential Classification, specifically, (1) FPL's responses to Office of Public Counsel's ("OPC") Third Set of Interrogatories, Nos. 44-47 and Fourth Request for Production of Documents, Nos. 53-56 in Docket 20200241; and (2) OPC's Third Set of Interrogatories, Nos. 47-48, and Third Request for Production of Documents, Nos. 46-47 in former Docket 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.


Clare Gerard

Date: 27-1-2022