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April 20, 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 Hurricanes Sally, by Gulf Power Company; Petition for evaluation of Hurricane Isaias and Tropical Storm Eta storm costs, by Florida Power & Light Company (formerly Docket 20210178); and Petition for limited proceeding for recovery of incremental storm restoration costs and associated true-up process related to Hurricane Zeta, by Gulf Power Company (formerly Docket 20210179).**

Dear Mr. Teitzman:

I enclose for filing in the above referenced docket Gulf Power Company's ("Gulf") and Florida Power & Light Company's ("FPL") Request for Confidential Classification of Information Provided in Response to the Office of Public Counsel's ("OPC") Fifth Set of Interrogatories, Nos. 51, 52, 54, 57-59 and 66-68.

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

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

Sincerely,

/s/ Kate Cotner
Kate Cotner

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

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

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

Date: April 20, 2022

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.

**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") FIFTH SET OF INTERROGATORIES, Nos. 51, 52, 54, 57-59,
and 66-68 DOCKET NO. 20200241-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) Fifth Set of Interrogatories, Nos. 51, 52, 54, 57-59, and 66-68 in Docket No. 20200241-EI ("Confidential Documents"). In support of this request, Gulf and FPL state as follows:

1. Gulf and FPL served their responses to OPC's Fifth Set of Interrogatories in Docket 20200241-EI (including the Confidential Documents) on April 20, 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) Fifth Set of

Interrogatories, Nos. Nos. 51, 52, 54, 57-59, and 66-68 in Docket No. 20200241-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.
- 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 Thomas Allain, Paul Talley, Clare Gerard and Timothy Drum 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 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.

3. As described in the declarations in Exhibit D, the confidential business information includes information relating to competitive interests, the disclosure of which would impair the

competitive business 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 20th day of April 2022.

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Telephone: (561) 694-3850
Facsimile: (561) 691-7135

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

CERTIFICATE OF SERVICE

Docket No. 20200241-EI

Docket No. 20210178-EI

Docket No. 20210179-EI

I HEREBY CERTIFY that a true and correct copy of the foregoing was served by electronic mail this 20th 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
Sarah Lewis
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
lewis.sarah@leg.state.fl.us

s/ Kate Cotner

Kate Cotner

* The exhibits to this Request are not included with the service copies, but copies of Exhibits B, C and D are available upon request.

EXHIBIT B

REDACTED

The response to OPC's Fifth Set of Interrogatories, No. 51, in Docket 20200241-EI, Bates Nos. 029458-029459, is confidential in its entirety.

The response to OPC's Fifth Set of Interrogatories, No. 52, in
Docket 20200241-EI, Bates Nos. 029460-029461, is
confidential in its entirety.

The response to OPC's Fifth Set of Interrogatories, No. 54, in Docket 20200241-EI, Bates Nos. 029462, is confidential in its entirety.

The response to OPC's Fifth Set of Interrogatories, No. 57, in former Docket 20200241-EI, Bates Nos. 029463, is confidential in its entirety.

The response to OPC's Fifth Set of Interrogatories, No. 58, in former Docket 20200241-EI, Bates Nos. 029464, is confidential in its entirety.

The response to OPC's Fifth Set of Interrogatories, No. 59, in former Docket 20200241-EI, Bates Nos. 029465, is confidential in its entirety.

The response to OPC's Fifth Set of Interrogatories, No.66 in former Docket 20200241-EI, Bates Nos. 029466, is confidential in its entirety.

The response to OPC's Fifth Set of Interrogatories, No. 67, in former Docket 20200241-EI, Bates Nos. 029467-029468, is confidential in its entirety.

The response to OPC's Fifth Set of Interrogatories, No. 68, in former Docket 20200241-EI, Bates Nos. 029469-029470, is confidential in its entirety.

EXHIBIT C

JUSTIFICATION TABLE

EXHIBIT C

COMPANY: Florida Power & Light Company
TITLE: List of Confidential Documents
DOCKET NO.: 20200241-EI; 20210178-EI; 202100179
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 evaluation of Hurricane Zeta storm costs, by Gulf Power Company
SUBJECT: Responses to Office of Public Counsel’s (“OPC”): Fifth Set of Interrogatories, Nos. 50-68 in Docket 20200241-EI.
DATE: April 20, 2022

Set	Bates Number Start	Bates Number End	Description	Line No. / Col. No.	Florida Statute 3.66.093(3) Subsection	Declarant
Docket 20200241 OPC 5th INT 51	029458	029459	Interrogatory Response	All	(e)	Thomas Allain Paul Talley Timothy Drum
Docket 20200241 OPC 5th INT 52	029460	029461	Interrogatory Response	All	(e)	Thomas Allain Paul Talley Timothy Drum
Docket 20200241 OPC 5th INT 54	029462	029462	Interrogatory Response	All	(e)	Timothy Drum
Docket 20200241 OPC 5th INT 57	029463	029463	Interrogatory Response	All	(e)	Timothy Drum
Docket 20200241 OPC 5th INT 58	029464	029464	Interrogatory Response	All	(e)	Timothy Drum
Docket 20200241 OPC 5th INT 59	029465	029465	Interrogatory Response	All	(e)	Timothy Drum

Set	Bates Number Start	Bates Number End	Description	Line No. / Col. No.	Florida Statute 3.66.093(3) Subsection	Declarant
Docket 20200241 OPC 5th INT 66	029466	029466	Interrogatory Response	All	(e)	Thomas Allain Paul Talley Timothy Drum
Docket 20200241 OPC 5th INT 67	029467	029468	Interrogatory Response	All	(e)	Thomas Allain Paul Talley
Docket 20200241 OPC 5th INT 68	029469	029470	Interrogatory Response	All	(e)	Thomas Allain Paul Talley Clare Gerard

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.

Docket No. 20200041-EI
Docket No. 20210178-EI
Docket No. 20210179-EI

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.

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 Fifth Set of Interrogatories, Nos. 51-52, and 66-68 in Docket 20200241-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: 04/19/2022

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

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

Docket No. 20200041-EI
Docket No. 20210178-EI
Docket No. 20210179-EI

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.

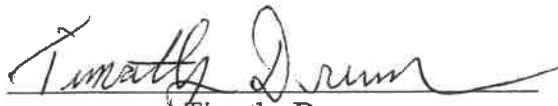
WRITTEN DECLARATION OF TIMOTHY DRUM

1. My name is Timothy Drum. I am currently employed by Florida Power & Light Company ("FPL") as Meteorologist. 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 Fifth Request Set of Interrogatories, Nos. Nos. 51, 52, 54, 57-59, and 66 in Docket 20200241-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.


Timothy Drum

Date: April 20, 2022

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

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

Docket No. 20200041-EI

Docket No. 20210178-EI

Docket No. 20210179-EI

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.

WRITTEN DECLARATION OF PAUL TALLEY

1. My name is Paul Talley. I am currently employed by Florida Power & Light Company ("FPL") as General Manager of Technical Services, Distribution. 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 Fifth Request Set of Interrogatories, Nos. 51-52, and 66-68 in Docket 20200241-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.


Paul Talley

Date: 4-20-22

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

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

Docket No. 20200041-EI
Docket No. 20210178-EI
Docket No. 20210179-EI

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.

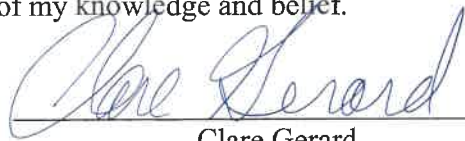
WRITTEN DECLARATION OF CLARE GERARD

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 to FPL's Request for Confidential Classification, specifically, FPL's responses to OPC's Fifth Request Set of Interrogatories, No. 68 in Docket 20200241-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: 4-20-22