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July 27, 2022

VIA HAND DELIVERY

Mr. Adam Teitzman
Commission Clerk
Florida Public Service Commission
2540 Shumard Oak Blvd.
Tallahassee, FL 32399-0850

REDACTED

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2022 JUL 27 PM 4:15
COMMISSION CLERK

Re: Docket No. 20220001-EI

Dear Mr. Teitzman:

I enclose for filing in the above docket Florida Power & Light Company's ("FPL") Request for Confidential Classification of Certain Information included in FPL's 2023 Risk Management Plan, which is being filed contemporaneously with this request as part of FPL's 2022 Actual/Estimated True-up Petition in Docket 20220001-EI. The request includes Exhibits A, B (two copies), C and D.

Exhibit A consists of the confidential documents, wherein 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.

COM _____

AFD 1 exh "B"

APA _____

ECO _____

ENG _____

GCL _____

Enclosure

IDM _____

CLK _____

cc: Counsel for Parties of Record (w/ copy of FPL's Request for Confidential Classification)

Sincerely,

David M. Lee

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

| | |
|---|---|
| In re: Fuel and Purchased Power Cost Recovery Clause with Generating Performance Incentive Factor | Docket No: 20220001-EI Date: July 27, 2022 |
|---|---|

**FLORIDA POWER & LIGHT COMPANY’S REQUEST FOR
CONFIDENTIAL CLASSIFICATION OF MATERIALS
PROVIDED IN ITS 2023 RISK MANAGEMENT PLAN**

Pursuant to Section 366.093, Florida Statutes, and Rule 25-22.006, Florida Administrative Code, Florida Power & Light Company (“FPL”) requests confidential classification of certain information (the “Confidential Information”) contained in FPL’s 2023 Risk management Plan, which is being filed contemporaneously with this request as part of FPL’s 2022 Actual/Estimated True-up Petition. In support of this Request, FPL states as follows:

1. FPL is filing its 2023 Risk Management Plan (Exhibit GJY-2) contemporaneously with this request. Portions of the Risk Management Plan contain confidential information.
2. The following exhibits are included with and made a part of this request:
 - a. Exhibit A is a copy of the Risk Management Plan in which all the Confidential Information has been highlighted
 - b. Exhibit B consists of two copies of the Risk Management Plan in which all the Confidential Information has been redacted. Where entire pages are confidential, FPL includes only identifying cover pages in Exhibit B.
 - c. Exhibit C is a table that identifies the specific line and page references to the Confidential Information for which FPL seeks confidential treatment and provides a brief description of the Confidential Information. The table also references the specific statutory basis for confidentiality and the declarant who supports the requested classification.

d. Exhibit D is the declaration of Gerard J. Yupp.

3. The Confidential Information is intended to be and has been treated by pre-consolidation FPL as private, its confidentiality has been maintained, and its disclosure would cause harm to FPL and its customers. Pursuant to Section 366.093, Fla. Stat., such information is entitled to confidential treatment and is 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 explained in more detail in the declaration included as Exhibit D, and described in Exhibit C, the Confidential Information relates to bids or other contractual data, the disclosure of which would impair the efforts of FPL to contract for goods on favorable terms, to the detriment of FPL and its customers. Specifically, this information includes data pertinent to FPLs procurement activities. This information is protected by Sections 366.093(3)(d), Fla. Stat.

5. Additionally, the Confidential Information contained in the Risk Management Plan also relates to competitive interests, and its disclosure would impair the competitive business of FPL. Specifically, the confidential information contained in the 2023 Risk Management Plan relates to competitive interests and internal policy and procedures, the disclosure of which would impair the competitive business as well as the efforts of FPL to contract for goods and services on favorable terms, also to the detriment of FPL and its customers. This information is protected by Sections 366.093(3)(e), Fla. Stat.

5. Upon a finding by the Commission that the Confidential Information highlighted in Exhibit A and referenced in Exhibit C is proprietary confidential business information, the

confidential Information should not be declassified for at least eighteen (18) months and should be returned to FPL as soon as the information is no longer necessary for the Commission to conduct its business. See § 366.093(4), Fla. Stat.

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 Extension of Confidential Classification be granted.

Respectfully submitted,

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By: _____



David M. Lee
Florida Bar No. 103152

CERTIFICATE OF SERVICE

Docket No. 20220001-EI

I HEREBY CERTIFY that a true and correct copy of the foregoing* has been furnished by electronic mail on this 27th day of July 2022 to the following:

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By: _____



David M. Lee
Florida Bar No. 103152

* Copies of Attachments B and C are available upon request

20220001-EI

FPL's Request for Confidential Classification

2023 Risk Management Plan

EXHIBIT "B"

REDACTED VERSION OF CONFIDENTIAL DOCUMENTS

[Pages 2 through 26]

Attachment 1 to GJY-2 (NextEra Energy, Inc., Risk and Credit
Exposure Management Policy)

REDACTED VERSION OF CONFIDENTIAL DOCUMENTS

[Pages 2 through 60]

Attachment 2 to GJY-2 (FPL Risk and Credit Exposure
Management Procedures Manual)

EXHIBIT C

COMPANY: Florida Power & Light Company
TITLE: List of Confidential Exhibits
DOCKET TITLE: Fuel and Purchased Power Cost Recovery Clause with Generating Performance Incentive Factor
DOCKET NO: 20220001-EI
DATE: July 27, 2022

| Description | Page Nos. | Column No./Line No. | Florida Statute 366.093 (3) Subsection | Declarant |
|---|------------------|----------------------------|---|------------------|
| Attachment 1 to GJY-2 (NEE Trading Risk Mgmt Policy - Mar 2022) | 2 through 26 | ALL | (d), (e) | G. Yupp |
| Attachment 2 to GJY-2 (EMT Trading Risk Mgmt Procedures as of Apr 22) | 2 through 60 | ALL | (d), (e) | G. Yupp |

EXHIBIT D

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Fuel and purchased power cost recovery clause with generating performance incentive factor.

Docket No: 20220001-EI

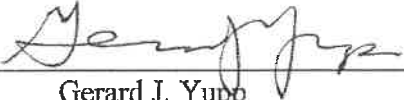
DECLARATION OF GERARD J. YUPP

1. My name is Gerard J. Yupp. I am currently employed by Florida Power & Light Company ("FPL") as Senior Director of Wholesale Operations in the Energy Marketing and Trading business unit. I have personal knowledge of the matters stated in this written declaration.

2. I have reviewed Exhibit C and the documents and information included in Exhibit A of FPL's Request for Confidential Classification of its 2023 Risk Management Plan. The documents and materials in Exhibit A which are asserted by FPL to be proprietary confidential business information contain or constitute data pertinent to FPLs procurement activities. Additionally, the confidential information contained in the 2023 Risk Management Plan relates to competitive interests and internal policy and procedures, the disclosure of which would impair the competitive business as well as the efforts of FPL to contract for goods and services on favorable terms, also to the detriment of FPL and its customers. 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.



Gerard J. Yupp

Date: 7/26/22