BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Petition by Florida Power & Light Company for Base Rate Increase and Rate Unification

Docket No. 20210015-EI

Filed: January 30, 2023

FLORIDA POWER & LIGHT COMPANY'S
FIRST REQUEST FOR EXTENSION OF CONFIDENTIAL
CLASSIFICATION OF CERTAIN INFORMATION PROVIDED
IN ITS RESPONSES TO OFFICE OF PUBLIC COUNSEL'S THIRD SET OF
INTERROGATORIES AND THIRD REQUEST FOR PRODUCTION OF DOCUMENTS

Pursuant to Section 366.093, Florida Statutes, and Rule 25-22.006, Florida Administrative Code, Florida Power & Light Company ("FPL") hereby submits its First Request for Confidential Classification of certain information provided in its responses to Office of Public Counsel's ("OPC") Third Set of Interrogatories, No. 146 and OPC's Third Request for Production of Documents, No. 76 (the "Confidential Information"). In support of its Request, FPL states as follows:

- 1. On April 26, 2021, FPL filed a Request for Confidential Classification of the Confidential Information, which included Exhibits A, B, C and D ("April 26, 2021 Request"). Document No. 03704-2021. By Order No. PSC-2021-0285-CFO-EI, dated July 29, 2021 ("Order 0285"), the Commission granted FPL's April 26, 2021 Request. FPL adopts and incorporates by reference the April 26, 2021 Request and Order 0285.
- 2. The period of confidential treatment granted by Order 0285 will soon expire. The Confidential Information that was the subject of FPL's April 26, 2021 Request and Order No. 0285 warrants continued treatment as proprietary and confidential business information within the meaning of Section 366.093(3). Accordingly, FPL hereby submits its First Request for Extension of Confidential Classification.

- 3. All of the information designated in Exhibits A and B to the April 26, 2021 Request remains confidential. Accordingly, those exhibits will not be reproduced or reattached here. Regarding First Revised Exhibit C, all of the information listed in the April 26, 2021 Request remains confidential; the Exhibit is revised only to identify Andrew Whitley as a new declarant who is sponsoring information that was previously sponsored by Steve Sim.
- 4. Also included is First Revised Exhibit D, which consists of the declarations of Andrew Whitley and Antonio Maceo.
- 5. The Confidential Information is intended to be and has been treated by 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 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.
- 6. As described in the declarations included as Exhibit D, the Confidential Information consists of proprietary confidential business information, the disclosure of which would cause harm to FPL's customers and its business operations. Specifically, some information contains data that is proprietary to third party vendors and subject to non-disclosure agreements. This information is protected by Sections 366.093(3)(e), Fla. Stat.
- 7. Also, some of the Confidential Information consists of internal audits. This information is protected by Section 366.093(3)(b).
- 8. Upon a finding by the Commission that the Confidential Information is proprietary confidential business information, the information should not be declassified for a period of 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 and declarations, FPL respectfully requests that its First Request for Extension of Confidential Classification be granted.

Respectfully submitted,

FLORIDA POWER & LIGHT COMPANY

By: /s/ Maria Jose Moncada

Maria Jose Moncada Managing Attorney Florida Bar No. 0773301 maria.moncada@fpl.com Florida Power & Light Company 700 Universe Boulevard Juno Beach, Florida 33408-0420 (561) 691-7101 (561) 691-7135 (fax)

CERTIFICATE OF SERVICE 20210015-EI

I HEREBY CERTIFY that a true and correct copy of the foregoing has been furnished

by electronic mail this 30th day of January 2023 to the following parties:

Suzanne Brownless
Shaw Stiller
Florida Public Service Commission
Office of the General Counsel
2540 Shumard Oak Boulevard
Tallahassee, Florida 32399-0850
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By: s/ Maria Jose Moncada

Maria Jose Moncada Florida Bar No. 0773301

Docket No. 20210015-EI FIRST REVISED EXHIBIT "C"

FIRST REVISED EXHIBIT C

COMPANY: Florida Power & Light Company

TITLE: Petition by Florida Power & Light Company for Base Rate Increase and Rate Unification

Company

DOCKET NO.: 20210015-EI **DATE:** January 30, 2023

Bold denotes revision to reduce the amount of confidential classification previously requested or a new declarant

Int/POD No.	Begin Bates No.	End Bates No.	Description	No. of Pages	Line/ Col	Florida Statute 366.093 (3) Sub- section	Declarant
OPC's 3rd Set of Interrogs, No. 146	N/A	N/A	Reserve Margin Analysis Model	1	All	(e)	Andrew Whitley
	025427	025432	A01 - FPL-FIN-AC-00-2013-0001- FPL Affiliate Management Fee Audit	6	All	(b)	Antonio Maceo
	025433	025448	D01 - FY2013 CostAllocationManual-Final	16	All	(b)	Antonio Maceo
OPC's 3rd	025449	025449	E01a - CMA Email to SAP Control Team to Input	1	All	(b)	Antonio Maceo
Request for Production	025450	025450	E01b - CMA Email to Business Units - FY2013	1	All	(b)	Antonio Maceo
of Documents No. 76	025451	025452	E02.02c - M - Kristin Manz Email including FPL AMF Payroll Support (FY2013)	2	All	(b)	Antonio Maceo
	025453	025454	E02.02d - M - Barry Fisher Email including FPL AMF PPE & Revenue Support (FY2013)	2	All	(b)	Antonio Maceo
	025455	025457	E02.02e - M - Email from CMA quantifying M3 Driver Error (FPLES and NEER)	3	All	(b)	Antonio Maceo
	025458	025459	E02.03b - M - Patricia D'Annolfo Email including NEET, NHT & LST AMF Support (FY2013)	2	All	(b)	Antonio Maceo
	025460	025461	E02.04b - M - William Strazinsky Email including NEER, Seabrook, Duane Arnold & Point Beach AMF Support (FY2013)	2	All	(b)	Antonio Maceo
	025462	025462	E02.05b - H - Mercedes Demick Email including H driver AMF Support (FY2013)	1	All	(b)	Antonio Maceo
	025463	025464	E02.06c - S - Adriana Alvarez Email including Square Footage AMF Support (FY2013)	2	All	(b)	Antonio Maceo

Int/POD No.	Begin Bates No.	End Bates No.	Description	No. of Pages	Line/ Col	Florida Statute 366.093 (3) Sub- section	Declarant
	025465	025466	E02.07b - MW - John Kenney Email including MW AMF Support (FY2013)	2	All	(b)	Antonio Maceo
	025467	025468	E02.07c - MW - John Kenney Email including Updated MW AMF Support (FY2013)	2	All	(b)	Antonio Maceo
	025469	025494	G_01.01 - Executed PO 2000083692 Reed Elsevler	26	All	(b)	Antonio Maceo
	026302	026310	G_02.03 - EX - Executive Non- payroll	9	All	(b)	Antonio Maceo
	026311	026317	G_02.03A - EEI Invoice for 2013	7	All	(b)	Antonio Maceo
	026318	026325	G_02.04 - Deloitte Invoice for Q1 2013 Audit Fees	8	All	(b)	Antonio Maceo
OPC's 3rd	026326	026326	G_02.05 - Oracle Invoice for Database fees	1	All	(b)	Antonio Maceo
Request for Production	026327	026332	G_02.06 - Relocation Expense	6	All	(b)	Antonio Maceo
of Documents	025495	025497	G_02.07A - CBRE PO Award #2400000548 Executed 121912	3	All	(b)	Antonio Maceo
No. 76	025498	025499	G_02.09 - 4500447675-CHANGE LOUIS AND ASS INC	2	All	(b)	Antonio Maceo
	026333	026336	G_02.11 - Ricoh Framework PO 2400000228	4	All	(b)	Antonio Maceo
	026337	026352	G_02.12 - Jan 2013 J Holmes Bus Airfare	16	All	(b)	Antonio Maceo
	026353	026409	G_02.14 - FERC PUCT Compliance Plan Master Template	57	All	(b)	Antonio Maceo
	026410	026410		1	All	(b)	Antonio Maceo
	026411	026411	G_02.17 - Center for Energy Workforce development	1	All	(b)	Antonio Maceo
	026412	026414	G_02.18 - BellSouth PO 2400000602 Fully Executed-header	3	All	(b)	Antonio Maceo
	026415	026417	G_02.21A - Cyveillance Corporate Security Solutions PO	3	All	(b)	Antonio Maceo
	026418	026434	G_02.21B - Cyveillance Corporate Security Solutions Contract	17	All	(b)	Antonio Maceo
	026435	026467	G_02.23 - BMC Remedy Invoice for Maintenance fees	33	All	(b)	Antonio Maceo
	026468	026475	G_02.24 - Corporate Credit Posting	8	All	(b)	Antonio Maceo
	026476	026495	G_02.25 - IBM ELA 2013-2015 countersigned-header	20	All	(b)	Antonio Maceo
	026496	026498	G_02.26 - Fibernet Invoice to FPL for Data Usage	3	All	(b)	Antonio Maceo

Int/POD No.	Begin Bates No.	End Bates No.	Description	No. of Pages	Line/ Col	Florida Statute 366.093 (3) Sub- section	Declarant
	022632	022634	G_02.27 - SAP_NextErafully_executed_0629 12	3	All	(b)	Antonio Maceo
	022635	022666	G_02.28 - IBM Invoice for Maintenance fees	32	All	(b)	Antonio Maceo
	022667	022688	G_02.30A - Clearion Software 2013 Invoice	22	All	(b)	Antonio Maceo
	022689	022689	G_02.30B - Clearion FPL TVM - Quote 2013_V1-01	1	All	(b)	Antonio Maceo
	022690	022719	E02.00 - 12-17-2012 2013 Budget Drivers with Backup Tabs W NEE	30	All	(b)	Antonio Maceo
	022720	022734	E02.01 - Formatted 2013 AMF Drivers and Supporting Models Final 1 0-10-17-2012	15	All	(b)	Antonio Maceo
OPC's 3rd	022735	022735	E02.02a - M - FPL Utility Barry Fisher Preliminary 2013 - 2015 MF Components - FPL as of 12-17-2012	1	All	(b)	Antonio Maceo
Request for Production	022736	022736	E02.02b - M - Kristin Manz FPL Payroll Base Dollars AMF 12 18 12	1	All	(b)	Antonio Maceo
of Documents No. 76	022737	022737	E02.03a - M - Transm -Preliminary 2013 - 2015 Mass Formula Components - as of 12-03-2012	1	All	(b)	Antonio Maceo
	022738	022741	E02.04a - M - NEER Copy of Preliminary 2013 - 2015 Mass Formula Components - as of 12-03- 2012 (2)	4	All	(b)	Antonio Maceo
	022742	022747	E02.05a - H1 & H6 -Headcount by location 9-25-12 pivot only	6	All	(b)	Antonio Maceo
	022748	022754	E02.06a - S - 2013 Square Footage Drivers	7	All	(b)	Antonio Maceo
	022755	022755	E02.06b - S - 2013 Unformatted Square Footage Drivers	1	All	(b)	Antonio Maceo
	022756	022760	E02.07a - MW - 2013 - 2015 FPL vs NEER MWs using nameplate ratings	5	All	(b)	Antonio Maceo
	022761	022772	E02.08a - CH - FINAL 2013 IM Capitalized Hardware Software Drivers	12	All	(b)	Antonio Maceo
	022773	022773	G01A - BW Report_AMF Front End IO Report	1	All	(b)	Antonio Maceo
	022774	022774	G01C - Dollars for AMF Front End IOs	1	All	(b)	Antonio Maceo
	022775	022784	F01 - WBS Listing with AMF Type v7	10	All	(b)	Antonio Maceo
	022785	022785	G_02.07B - CBRE_FPL - Master Site List 2012-header	1	All	(b)	Antonio Maceo
	022786	022820	G01 - Invoice Selections and Testing (Master)	35	All	(b)	Antonio Maceo
	022821	022821	G03 - AMF Invoices - \$ Impact	1	All	(b)	Antonio Maceo

Int/POD No.	Begin Bates No.	End Bates No.	Description	No. of Pages	Line/ Col	Florida Statute 366.093 (3) Sub- section	Declarant
	022822	022827	D03 - SOX Process - 08.38.01 - FPL Affiliate Management Fee	6	All	(b)	Antonio Maceo
	022828	022833	A02 - FINAL - Affiliate Management Fee Audit 12 6 2013	6	All	(b)	Antonio Maceo
	022834	022836	B01.1 - FY2013 Audit Plan - Affiliate Transactions	3	All	(b)	Antonio Maceo
	022837	022838	D02 - IA's Affiliate Management Fee Process - FY2013 v3	2	All	(b)	Antonio Maceo
	022839	022852	G03b - AMF - Testing of IO charges - Follow up Questions 10 25 2013 - CMA Responses 11-8-2013	14	All	(b)	Antonio Maceo
	022853	022857	IT Audit Planning Checklist v3 01232013	5	All	(b)	Antonio Maceo
	022858	022858	B01.2 - RE FPL - AMF Audit	1	All	(b)	Antonio Maceo
OPC's 3rd	022859	022859	E02.08b - CH - Fabian Tejedor -BW AMF Projects Cap forecast_v2	1	All	(b)	Antonio Maceo
Request for Production	022860	022860	G_02.02 - No Invoice or PO Included - Copy	1	All	(b)	Antonio Maceo
of Documents	022861	022861	G_02.02 - No Invoice or PO Included	1	All	(b)	Antonio Maceo
No. 76	022862	022862	G_02.08 - No Invoice or PO Included	1	All	(b)	Antonio Maceo
	022863	022863	G_02.10 - No Invoice or PO Included	1	All	(b)	Antonio Maceo
	022864	022864	G_02.13 - No Invoice or PO Included	1	All	(b)	Antonio Maceo
	022865	022865	G_02.15 - No Invoice or PO Included	1	All	(b)	Antonio Maceo
	022866	022866	G_02.19 - No Invoice or PO Included	1	All	(b)	Antonio Maceo
	022867	022867	G_02.20 - No Invoice or PO Included	1	All	(b)	Antonio Maceo
	022868	022868	G_02.22 - No Invoice or PO Included	1	All	(b)	Antonio Maceo
	022869	022869	G_02.29 - No Invoice or PO Included	1	All	(b)	Antonio Maceo
	022870	022874	A02 - FINAL - FPL Affiliate Direct Charges - 6 2 2014	5	All	(b)	Antonio Maceo
	022875	022878	D02 - 4Q13 DRAFT SOX_08 38 03 Direct Affiliate Charge	4	All	(b)	Antonio Maceo
	022879	022879	F01.01 NEER Overhead rate	1	All	(b)	Antonio Maceo

Int/POD No.	Begin Bates No.	End Bates No.	Description	No. of Pages	Line/ Col	Florida Statute 366.093 (3) Sub- section	Declarant
	022880	022880	F01.02 NEER Overhead Rate Support	1	All	(b)	Antonio Maceo
	022881	022891	G01 1. NSS - Support	11	All	(b)	Antonio Maceo
	022892	022911	G01 3. NSS - Support	20	All	(b)	Antonio Maceo
	022912	022915	G01 4. NSS - Support	4	All	(b)	Antonio Maceo
	022916	022925	G01 5. NSS - Support	10	All	(b)	Antonio Maceo
	022926	022929	G01 10. NSS - Support	4	All	(b)	Antonio Maceo
	022930	022934	G01 12. NSS - Support	5	All	(b)	Antonio Maceo
	022935	022936	G01 16. SSS - Support - Re_FPL Affiliates Direct Charges Audit.	2	All	(b)	Antonio Maceo
	022937	022938	G01 17. SSS - Support - RE_ FPL Affiliates Direct Charges	2	All	(b)	Antonio Maceo
	022939	022940	G01 18. SSS - Support - RE_ FPL Affiliates Direct Charges	2	All	(b)	Antonio Maceo
	022941	022942	G01 19. SSS - Support - RE_ FPL Affiliates Direct Charges Audit	2	All	(b)	Antonio Maceo
	022943	022944	G01 21. SSS - Support - RE_ FPL Affiliates Direct Charges Audit	2	All	(b)	Antonio Maceo
	022945	022946	G01 22. SSS - Support - RE_ FPL Affiliates Direct Charges Audit	2	All	(b)	Antonio Maceo
OPC's 3rd Request for	022947	022948	G01 23. SSS - Support - RE_ FPL Affiliates Direct Charges Audit - here is the info	2	All	(b)	Antonio Maceo
Production of	022949	022949	G01 24. SSS - Support - FPL Affiliates Direct Charges Audit	1	All	(b)	Antonio Maceo
Documents No. 76	022950	022955	G01 26. SSS - Support	6	All	(b)	Antonio Maceo
	022956	022959	G01 28. SSS - Support - COGNOS Expense	4	All	(b)	Antonio Maceo
	022961	022962	G01 29. SSS - Support - FPL Affiliates Direct Charges Microsoft - AUDIT REQUEST	2	All	(b)	Antonio Maceo
	022963	022975	G01 30. Support EdLink January 2013 Invoice	13	All	(b)	Antonio Maceo
	022976	022978	G02.03a - Fibernet Invoice 314570	3	All	(b)	Antonio Maceo
	022979	022984	G02.03b - FREC Storm Bonds Collected by FPL	6	All	(b)	Antonio Maceo

Int/POD No.	Begin Bates No.	End Bates No.	Description	No. of Pages	Line/ Col	Florida Statute 366.093 (3) Sub- section	Declarant
	022985	022990	G02.03c - Fibernet Revenue Collected by FPL	6	All	(b)	Antonio Maceo
	022991	022991	G02.03d - IMO South Invoice 01-01- 2013	1	All	(b)	Antonio Maceo
	022992	022995	G02.03e - FPL Fibernet Invoice	4	All	(b)	Antonio Maceo
	023738	023743	G02.03f - FREC Storm Bonds Collected by FPL	6	All	(b)	Antonio Maceo
	023744	023749	G02.03g - FREC Storm Bonds Collected by FPL	6	All	(b)	Antonio Maceo
	023750	023752	G02.03h - FiberNet Invoice 315126 (2)	3	All	(b)	Antonio Maceo
	023753	023753	G02.03i - Asset Transaction Worksheet	1	All	(b)	Antonio Maceo
	023754	023760	G02.03j - FREC Storm Bonds Collected by FPL	7	All	(b)	Antonio Maceo
	023761	023772	G02.03k - FPL Fibernet Invoice	12	All	(b)	Antonio Maceo
	023773	023775	G02.031 - Asset Transaction Worksheets	3	All	(b)	Antonio Maceo
	023776	023777	G02.03n - FW_ FPL Direct Charge Audit - Affiliate to FPL Charge Audit Confirmation	2	All	(b)	Antonio Maceo
OPC's 3rd	023778	023780	G02.03o - FW_ IMPORTANT_ FPL Direct Charge Audit - Affiliate to FPL Charge Audit Confirmation	3	All	(b)	Antonio Maceo
Request for Production of	023781	023782	G02.03q - RE_ FPL Direct Charge Audit - Affiliate to FPL Charge Audit Confirmation	2	All	(b)	Antonio Maceo
Documents No. 76	023783	023794	F01.00 - 2013 - FPL Overhead Rates (1)	12	All	(b)	Antonio Maceo
	023795	023795	G01.01 Summary Transactions Non- Settled Services Purchased by TP	1	All	(b)	Antonio Maceo
	023796	023796	G01.02 Summary Transactions Non- Settled Services Sold by TP	1	All	(b)	Antonio Maceo
	023797	023799	G01.04 - Page 458 2013 DRAFT TO IA 4-14-14	3	All	(b)	Antonio Maceo
	023800	023802	G01.05 - Summary Transactions Settled Services Sold for IA	3	All	(b)	Antonio Maceo
	023803	023804	G02.03r - 2013 Income Tax Forecast Budget Tracking	2	All	(b)	Antonio Maceo
	023805	023806	G01.00 NSS_NSP Reports	2	All	(b)	Antonio Maceo
	023807	023838	G01.03 FPL Affiliate Direct Charges Lead Sheet	32	All	(b)	Antonio Maceo
	023839	023846	G02.01 - Affiliate to FPL Detail Charges (Settled & Non-Settled) - 1.1.13 - 12.31.13	8	All	(b)	Antonio Maceo

Int/POD No.	Begin Bates No.	End Bates No.	Description	No. of Pages	Line/ Col	Florida Statute 366.093 (3) Sub- section	Declarant
	023847	023850	G02.02 - Affiliate to FPL Direct Charge Testing (both Settled and Non-Settled)	4	All	(b)	Antonio Maceo
	023851	023853	G02.03p - Copy of F02.1 - 2013 EMT Service Fee Employees (Current)	3	All	(b)	Antonio Maceo
	023854	023854	G01 9. NSS - Support - \$176K Intercompany Transaction Support	1	All	(b)	Antonio Maceo
	023855	023855	G01 2. NSS - Support	1	All	(b)	Antonio Maceo
	023856	023856	G01 6. NSS - Support	1	All	(b)	Antonio Maceo
	023857	023857	G01 7. NSS - Support	1	All	(b)	Antonio Maceo
	023858	023858	G01 8. NSS - Support	1	All	(b)	Antonio Maceo
	023859	023859	G01 11. NSS - Support	1	All	(b)	Antonio Maceo
	023860	023860	G01 14. NSS - Support	1	All	(b)	Antonio Maceo
	023861	023861	G01 15. NSS - Support	1	All	(b)	Antonio Maceo
	023862	023862	G01 20. NSS - Support	1	All	(b)	Antonio Maceo
OPC's 3rd Request for	023863	023863	G01 27. SSS - Support	1	All	(b)	Antonio Maceo
Production of	023864	023864	G02.03m - NEER Estimated State Income Tax Payment	1	All	(b)	Antonio Maceo
Documents No. 76	023865	023865	A01 - FPL-FIN-AC-00-2014-0001- FPL Affiliate Direct Charges Audit	1	All	(b)	Antonio Maceo
110.70	023866	023866	B03 - RE_ FPL Affiliate Direct Charges Fraud & IT Assessment	1	All	(b)	Antonio Maceo
	023867	023867	D01 - FY2013 CostAllocationManual-Final	1	All	(b)	Antonio Maceo
	023868	023873	A01 - FPL-FIN-AC-00-2014-0002- FPL Affiliate Service Fee Audit	6	All	(b)	Antonio Maceo
	023874	023879	A02 - DRAFT - FPL Service Fee Audit Report 3 31 2014 (Rating Included) FINAL	6	All	(b)	Antonio Maceo
	023880	023880	B01 - FPL Service Fee Audit - Kick- Off Meeting	1	All	(b)	Antonio Maceo
	023881	023882	B03 - IA Consideration of Fraud Risk & Use of IM	2	All	(b)	Antonio Maceo
	023883	023898	D01 - FY2013 CostAllocationManual-Final	16	All	(b)	Antonio Maceo
	023899	023902	D02 - 4Q13 DRAFT SOX_08 38 02 Svc Fee Narrative	4	All	(b)	Antonio Maceo
	023903	023904	D03 - Affiliate Rule 25-6.1351	2	All	(b)	Antonio Maceo

Int/POD No.	Begin Bates No.	End Bates No.	Description	No. of Pages	Line/ Col	Florida Statute 366.093 (3) Sub- section	Declarant
	023905	023955	D04 - FERC Order 707-A	51	All	(b)	Antonio Maceo
	023956	023956	E01.01 NEER Overhead rate	1	All	(b)	Antonio Maceo
	023957	023957	E01.02 NEER Overhead Rate Support	1	All	(b)	Antonio Maceo
	023958	023962	F02 - Nuclear Allocation Support	5	All	(b)	Antonio Maceo
	023963	023964	F02.2 - Veronica Birch E-mail (Time Study Discussion)	2	All	(b)	Antonio Maceo
	023965	023966	F02.4 - EMT Response for EMT to FPLES Service Fee Time Study	2	All	(b)	Antonio Maceo
	023967	023971	F02.5 - Management Analysis of Time Study Impact	5	All	(b)	Antonio Maceo
	023972	023974	G01.02 - FY 2013 Nuclear employee Servia fee listing	3	All	(b)	Antonio Maceo
	023975	023986	E01.00 - 2013 - FPL Overhead Rates (1)	12	All	(b)	Antonio Maceo
	023987	023987	E02.01 - FY2013 Comparative Analysis-Incl Exp PR Tax (A@Fc) - 6-2013, 9-2013 Srvc Fee Budgets	1	All	(b)	Antonio Maceo
	023988	023989	E02.02 - IM Nuclear 2013 BW Monthly Perf NSF	2	All	(b)	Antonio Maceo
	023990	023990	E02.03 2013 Service Fee Actual vs Budget IA	1	All	(b)	Antonio Maceo
OPC's 3rd Request for	23991	23991	G01.00 - Summary Transactions Settled Services Purchased for IA	1	All	(b)	Antonio Maceo
Production of Documents	23992	23997	G01.01 - Lead Sheet Summary Transactions Settled Services Sold for IA	6	All	(b)	Antonio Maceo
No. 76	24731	24733	F02.1 - 2013 EMT Service Fee Employees (Current)	3	All	(b)	Antonio Maceo
	24734	24739	F02.3 - 2013-2014 EMTPMI Split Metrics (Time Study Support)	6	All	(b)	Antonio Maceo
	24740	24762	G01.01a - Sample selection support	23	All	(b)	Antonio Maceo
	24763	24764	G01.03 - Jan2013 SAP Details ZFCAT7 tie out	2	All	(b)	Antonio Maceo
	24765	24766	G01.04 - March2013 SAP Details ZFCAT7 tie out	2	All	(b)	Antonio Maceo
	24767	24768	G01.05 - SAP Details to ZFCAT7 tie out June 2013	2	All	(b)	Antonio Maceo
	24769	24770	G01.06 - SAP Details to ZFCAT7 tie out August 2013	2	All	(b)	Antonio Maceo
	24771	24772	G01.07 - SAP Details to ZFCAT7 tie out dec 2013	2	All	(b)	Antonio Maceo
	24773	24773	G02.1 - BW Report w. Service Fee IOs & FY2013 Amounts	1	All	(b)	Antonio Maceo

Int/POD No.	Begin Bates No.	End Bates No.	Description	No. of Pages	Line/ Col	Florida Statute 366.093 (3) Sub- section	Declarant
	24774	24781	G02.2 - EMT Service Fee Reconciliation - SAP to ZFCAT7 Reports (FY2013)	8	All	(b)	Antonio Maceo
	24782	24785	G02.3 - EMT Service Fee Charges Audit Testing	4	All	(b)	Antonio Maceo
	24786	24788	G04 - EMT & NEER Service Fee Loader Rates	3	All	(b)	Antonio Maceo
	24789	24789	F01 - Service Fee IOs	1	All	(b)	Antonio Maceo
	24790	24790	G01.02a Individuals in IM Nuclear Service Fee	1	All	(b)	Antonio Maceo
	24791	24791	G01.09 RE IM Nuclear Service fee listing NEER Employees	1	All	(b)	Antonio Maceo
	24792	24794	A02 Affiliate Transactions Review Report Cross-Referenced	3	All	(b)	Antonio Maceo
	24795	24795	B01 Opening Meeting Minutes	1	All	(b)	Antonio Maceo
	24796	24796	B02 Risk Control Worksheet_Final	1	All	(b)	Antonio Maceo
	24797	24797	B02 Risk ID_Final	1	All	(b)	Antonio Maceo
	24798	24818	D01.1 Cost Allocation Manual	21	All	(b)	Antonio Maceo
	24819	24822	D01.2 Direct Affiliate Charges SOX Narrative	4	All	(b)	Antonio Maceo
	24823	24825	D03a - Lead Sheet - Review of FPA Affiliate Charges	3	All	(b)	Antonio Maceo
OPC's 3rd Request for	24826	24827	D03a.1 - Meeting to discuss FP&A Review of Affiliates Charges	2	All	(b)	Antonio Maceo
Production of Documents	24828	24829	D03a.2 - Negative confirmation that FPA process was approved by Regulatory Accounting	2	All	(b)	Antonio Maceo
No. 76	24830	24832	D03a.4 - FPA Charging - Policy Process Methodology - Rev. 1 062419	3	All	(b)	Antonio Maceo
	24833	24834	D03a.7 - email - FP&A Organizations - Cost Allocations have been Updated! - March 2020	2	All	(b)	Antonio Maceo
	24835	24839	D03a.8 - email - FPA errors found in payroll allocations and other controls in place	5	All	(b)	Antonio Maceo
	24840	24844	D03a.9 - email - FPA - why there were differences in the allocations for pp 3.13 for Project Team employees tested	5	All	(b)	Antonio Maceo
	24845	24848	D03a.10 - email - FPA payroll allocation testing - explanation for some of the errors found	4	All	(b)	Antonio Maceo

Int/POD No.	Begin Bates No.	End Bates No.	Description	No. of Pages	Line/ Col	Florida Statute 366.093 (3) Sub- section	Declarant
	24849	24853	D03a.11 - email - FPA meeting with PGD to discuss charging process - invite - and % of FPA payroll charged to affiliates	5	All	(b)	Antonio Maceo
	24854	24855	D03a.12 - RE_ Join us for a FP&A and TFI Brunch and Learn_ Charging across the Enterprise! - invite 1.29.20	2	All	(b)	Antonio Maceo
	24856	24856	D03a.13 - email - FP&A Projects Team - PI-9 Project allocations announced	1	All	(b)	Antonio Maceo
	24857	24862	D03a.14 - FP&A audit findings and corrections	6	All	(b)	Antonio Maceo
	24863	24863	D03b - Lead Sheet - Review of FCOE Affiliate Charges	1	All	(b)	Antonio Maceo
	24864	24864	D03b.1 - Meeting to discuss FCOE Review of Affiliates Charges	1	All	(b)	Antonio Maceo
	24865	24865	D03c - Lead Sheet - Review of IOs created via request form	1	All	(b)	Antonio Maceo
	24866	24873	E01.1 CSC SOX Narratives	8	All	(b)	Antonio Maceo
	24874	24874	E01.2 Mgmt. Q Review & Signif Events Memo	1	All	(b)	Antonio Maceo
	24875	24875	A01 FPL-FIN-AC-00-2020-0007- Affiliate Transactions Review	1	All	(b)	Antonio Maceo
	24876	24876	B01.1 Opening Meeting for Affiliate Transactions Review 6.5.2020	1	All	(b)	Antonio Maceo
	24877	24880	D03c.1 - Testing of IOs requested via Form	4	All	(b)	Antonio Maceo
	24881	24918	D02.1 Direct Affiliate Charges Testing (Settled)	38	All	(b)	Antonio Maceo
OPC's 3rd	24919	24935	D02.2 Population and Selections Files	17	All	(b)	Antonio Maceo
Request for Production	24936	24937	D02.3 Direct Affiliate Charges Testing (Non-Settled)	2	All	(b)	Antonio Maceo
of Documents	24938	24940	D03a.3 - IA Testing and Timesheet Data for IA FPA affiliates testing	3	All	(b)	Antonio Maceo
No. 76	24941	24945	D03a.5 - FPA 2020 Allocations by BU and Quarter - Q2 Analysis 042820	5	All	(b)	Antonio Maceo
	24946	24946	D03a.6 - FPA Projects Team - PI-10 Project allocation calculator 06 15 20	1	All	(b)	Antonio Maceo
	24947	24949	D03b.2 - IA testing and FCOE Accounting Structure Consolidated	3	All	(b)	Antonio Maceo
	24950	24953	E02.1.1 CSC % Testing	4	All	(b)	Antonio Maceo
	24954	24962	E02.1.2 2020 Budget Drivers Testing	9	All	(b)	Antonio Maceo
	24963	24967	E02.1.3 2019 Budget Drivers Testing	5	All	(b)	Antonio Maceo

Int/POD No.	Begin Bates No.	End Bates No.	Description	No. of Pages	Line/ Col	Florida Statute 366.093 (3) Sub- section	Declarant
	24968	24972	E02.1.4 I.T. 2020 Budget Drivers Testing	5	All	(b)	Antonio Maceo
	24973	24974	E02.1.5 I.T. 2019 Budget Drivers Testing	2	All	(b)	Antonio Maceo
	24975	24976	E02.1.6 Gulf \$235,128	2	All	(b)	Antonio Maceo
	24977	24978	E02.1.7 Gulf \$321,382	2	All	(b)	Antonio Maceo
	24979	24982	E02.2 CSC Subselection Detail Testing	4	All	(b)	Antonio Maceo
	24983	24984	E02.2.1 CSC 2020 Population and Selections	2	All	(b)	Antonio Maceo
	24985	24985	E02.2.2 CSC 2019 Population and Selections	1	All	(b)	Antonio Maceo
OPC's 3rd Request for Production of Documents No. 76	24986	24986	D01.3 Periodic Email Communications Regarding Guidelines for Charging Affiliate IOs	1	All	(b)	Antonio Maceo

Docket No. 20210015-EI FIRST REVISED EXHIBIT "D"

FIRST REVISED EXHIBIT D

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Petition by Florida Power & Light Company for Base Rate Increase and Rate Unification

DECLARATION OF ANDREW WHITLEY

- 1. My name is Andrew Whitley. I am currently employed by Florida Power & Light Company ("FPL") as Engineering Manager, Resource Planning. I have personal knowledge of the matters stated in this declaration.
- 2. I have reviewed the documents referenced and incorporated in FPL's Request for Confidential Classification, specifically the materials provided in my response to Office of the Public Counsel's Third Set of Interrogatories, No. 146. The documents or materials that I have reviewed and which are proprietary confidential business information contain competitive business information the disclosure of which would impair the competitive business of the provider of the information. Specifically, it contains software that is proprietary to a third party vendor who provides it to FPL as part of a subscription service. To the best of my knowledge, FPL has maintained the confidentiality of these documents and materials.
- 3. Nothing has occurred since the issuance of Order No. PSC-2021-0285-CFO-EI to render the designated information stale or pubic, such that continued confidential treatment would not be appropriate. Therefore, consistent with the provisions of the Florida Administrative Code, such materials should remain confidential for a period of at least an additional 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 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.

Andrew Whitley

Docket No: 20210015-EI

Date: 01/27/2023

FIRST REVISED EXHIBIT D

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Petition by Florida Power & Light Company for Base Rate Increase and Rate Unification

Docket No. 20210015-EI

DECLARATION OF ANTONIO MACEO

- 1. My name is Antonio Maceo. I am currently employed by Florida Power & Light Company ("FPL") as Senior Manager, Internal Audit. I have personal knowledge of the matters stated in this declaration.
- 2. I have reviewed the documents referenced and incorporated in FPL's Request for Confidential Classification, specifically the materials provided in response to Office of the Public Counsel's Third Request for Production of Documents No. 76. The documents or materials that I have reviewed and which are asserted by FPL to be proprietary confidential business information contain reports of internal auditors. To the best of my knowledge, FPL has maintained the confidentiality of these documents and materials.
- 3. Nothing has occurred since the issuance of Order No. PSC-2021-0285-CFO-EI to render the designated information stale or pubic, such that continued confidential treatment would not be appropriate. Therefore, consistent with the provisions of the Florida Adminstrative Code, such materials should remain confidential for a period of at least an additional eighteen (18) months. In addition, they should be teturned to FPL as soon as the information is no longer necessary for the Commission to conduct its business so that FPL can continue 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.

Antonio Maceo

Date: 127