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

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Filed: January 30, 2023

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

Pursuant to Section 366.093, Florida Statutes, and Rule 25-22.006, Florida Administrative Code, Florida Power & Light Company ("FPL") hereby submits it First Request for Extension of Confidential Classification of certain information provided in its supplemental responses to Office of Public Counsel's ("OPC") First Request for Production of Documents Nos. 12-17, 35, 36, 44, 45, 48-50, 52, 57, 64 and 67 and OPC's First Set of Interrogatories Nos. 48, 49, 54-56, 67, 68, 93-96, 111, 112 and 115 (the "Confidential Information"). In support of its Request, FPL states as follows:

- 1. On April 6, 2021, FPL filed a Request for Confidential Classification of the Confidential Information, which included Exhibits A, B, C and D ("April 6, 2021 Request"). Document No. 03262-2021. By Order No. PSC-2021-0283-CFO-EI, dated July 29, 2021 ("Order 0283"), the Commission granted FPL's April 6, 2021 Request. FPL adopts and incorporates by reference the April 6, 2021 Request and Order 0283.
- 2. The period of confidential treatment granted by Order 0283 will soon expire. The Confidential Information that was the subject of FPL's April 6, 2021 Request and Order 0283 warrant continued treatment as proprietary and confidential business information within the meaning of Section 366.903(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 6, 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 6, 2021 Request remains confidential; the Exhibit is revised only to identify Scott Bores and Andrew Whitley as new declarants supporting responses that were previously supported by Robert Barrett and Steve Sim, respectively.
- 4. Also included is First Revised Exhibit D, which consists of the declarations of Scott Bores, Liz Fuentes, Keith Ferguson, Kathleen Slattery, Andrew Whitley, Antonio Maceo, James Coyne and John Reed.
- 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, 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 consists of internal audits, which is protected by Section 366.093(3)(b). The responses also contain information concerning 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 Sections 366.093(3)(d). Other information contains data that is

proprietary to third party vendors and subject to non-disclosure agreements, while other

information contains affecting competitive interests of the provider of the information. This

information is protected by Section 366.093(3)(e).

7. 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 an additional 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

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(561) 691-7101

(561) 691-7135 (fax)

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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
sbrownle@psc.state.fl.us
sstiller@psc.state.fl.us

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 and Light Company

TITLE: Petition by Florida Power and 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.	Bates Nos.	Description	No. of Pages	Page No.	Line / Column	Florida Statute 366.093(3) Subsection	Declarants
OPC's 1 st Request for Production of Documents No. 12 - Supplemental	004570	2019 Annual Update - Fitch	73	9	Line 1	(e)	Scott Bores
OPC's 1 st Request for Production of Documents No. 12 - Supplemental	004643	2019 Annual Moody's Update	73	9	Line 1	(e)	Scott Bores
OPC's 1 st Request for Production of Documents No. 12 - Supplemental	004716	2019 Annual Update - SP	73	9	Line 1	(e)	Scott Bores
OPC's 1 st Request for Production of Documents No. 12 - Supplemental	007592	2020 Peer Analysis – Moodys	43	6	Line 1	(e)	Scott Bores
OPC's 1 st Request for Production of Documents No. 12 - Supplemental	007635	2020 SP Peer Analysis and Mid-year Update	55	5	Line 1-4	(e)	Scott Bores

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Production of	-	Guggenheim Research	8	All	Entire	(e)	Scott
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Production of	002805	KeyBank Research			Entire	_	Scott
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Documents	-	Argus Research 12AUG20*	5	All	Entire document	(e)	Scott Bores
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Documents	-	Argus Research 30APR20*	5	All	document	(e)	Bores
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Documents	-	22APR20*	6	All	document	(e)	Bores
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Request for	002441						
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Documents	-	17APR20*	9	All	document	(e)	Bores
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Documents	002417	03AUG20*	1	All		(e)	
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Documents	002713	13JAN21*	1	All	document	(C)	Bores
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Documents	002406	21OCT20*			document	(3)	Bores
No. 13 -	002100						
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Production of	002402	RBC Capital Research	1	All	Entire	(e)	Scott
Documents	002402	26OCT20*	1	All	document	(C)	Bores
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Request for	002204						
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Documents	002401	22JUL20*	8	All	document	(e)	Bores
No. 13 -	002401						
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Request for	002205						
Production of	002385	Vertical Partners Research			Entire		Scott
Documents	-	27JAN21*	9	All	document	(e)	Bores
No. 13 -	002393	_,,,,,,,,,					20105
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Documents	-	23APR20*	4	All	document	(e)	Bores
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OPC's 1st Request for Production of Documents No. 13 -	002351 - 002364	Credit Suisse Research 18OCT20*	14	All	Entire document	(e)	Scott Bores
Supplemental OPC's 1st Request for Production of Documents No. 13 - Supplemental	002336 - 002350	Credit Suisse Research 27JAN20*	15	All	Entire document	(e)	Scott Bores
OPC's 1 st Request for Production of Documents No. 13 - Supplemental	002326 - 002335	Credit Suisse Research 08MAR21*	10	All	Entire document	(e)	Scott Bores
OPC's 1 st Request for Production of Documents No. 13 - Supplemental	002318	Credit Suisse Research 03JAN20*	8	All	Entire document	(e)	Scott Bores
OPC's 1 st Request for Production of Documents No. 13 - Supplemental	002313	Credit Suisse Research 24JAN20*	5	All	Entire document	(e)	Scott Bores
OPC's 1st Request for Production of Documents No. 13 - Supplemental	002307 - 002312	Credit Suisse Research 21OCT20*	6	All	Entire document	(e)	Scott Bores
OPC's 1 st Request for Production of Documents No. 13 - Supplemental	002297 - 002306	RBC Capital Research 27OCT20*	10	All	Entire document	(e)	Scott Bores
OPC's 1st Request for Production of Documents No. 13 - Supplemental	002282 - 002296	Credit Suisse Research 22OCT20*	15	All	Entire document	(e)	Scott Bores

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OPC's 1st Request for Production of Documents No. 13 - Supplemental	002269 - 002281	Credit Suisse Research 27JAN21*	13	All	Entire document	(e)	Scott Bores
OPC's 1 st Request for Production of Documents No. 13 - Supplemental	002264	Argus Research 30JAN20*	5	All	Entire document	(e)	Scott Bores
OPC's 1 st Request for Production of Documents No. 13 - Supplemental	002254	Scotia Bank Research 21OCT20*	10	All	Entire document	(e)	Scott Bores
OPC's 1st Request for Production of Documents No. 13 - Supplemental	002244	Scotia Bank Research 26JAN21*	10	All	Entire document	(e)	Scott Bores
OPC's 1 st Request for Production of Documents No. 13 - Supplemental	002232	Credit Suisse Research 06JAN21*	12	All	Entire document	(e)	Scott Bores
OPC's 1 st Request for Production of Documents No. 13 - Supplemental	002630 - 002647	UBS Research 24JAN20*	18	All	Entire document	(e)	Scott Bores
OPC's 1 st Request for Production of Documents No. 13 - Supplemental	002767	RBC Capital Research 22APR20*	1	All	Entire document	(e)	Scott Bores
OPC's 1st Request for Production of Documents No. 13 - Supplemental	002748	RBC Capital Research 24JAN20*	1	All	Entire document	(e)	Scott Bores

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OPC's 1st Request for Production of Documents No. 13 - Supplemental	002749	RBC Capital Research 26JAN21*	1	All	Entire document	(e)	Scott Bores
OPC's 1st Request for Production of Documents No. 13 - Supplemental	002768	RBC Capital Research 24JUL20*	1	All	Entire document	(e)	Scott Bores
OPC's 1st Request for Production of Documents No. 13 - Supplemental	002715	RBC Capital Research 02NOV20*	1	All	Entire document	(e)	Scott Bores
OPC's 1 st Request for Production of Documents No. 13 - Supplemental	002769	RBC Capital Research 21OCT20*	1	All	Entire document	(e)	Scott Bores
OPC's 1 st Request for Production of Documents No. 13 - Supplemental	002889 - 002894	Seaport Global Research 16NOV20*	6	All	Entire document	(e)	Scott Bores
OPC's 1st Request for Production of Documents No. 13 - Supplemental	002905 - 002913	Seaport Global Research 06OCT20*	9	All	Entire document	(e)	Scott Bores
OPC's 1st Request for Production of Documents No. 13 - Supplemental	002900 - 002904	Seaport Global Research 16OCT20*	5	All	Entire document	(e)	Scott Bores
OPC's 1st Request for Production of Documents No. 13 - Supplemental	002895 - 002899	Seaport Global Research 16NOV23*	5	All	Entire document	(e)	Scott Bores

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OPC's 1st Request for Production of Documents No. 13 - Supplemental	002859 - 002869	UBS Research 22APR20*	11	All	Entire document	(e)	Scott Bores
OPC's 1st Request for Production of Documents No. 13 - Supplemental	002793 - 002804	UBS Research 11FEB20*	11	All	Entire document	(e)	Scott Bores
OPC's 1 st Request for Production of Documents No. 13 - Supplemental	002782	UBS Research 26FEB21*	11	All	Entire document	(e)	Scott Bores
OPC's 1st Request for Production of Documents No. 13 - Supplemental	002870 - 002880	UBS Research 12MAR21*	11	All	Entire document	(e)	Scott Bores
OPC's 1 st Request for Production of Documents No. 13 - Supplemental	002848 - 002858	UBS Research 24JUL20*	11	All	Entire document	(e)	Scott Bores
OPC's 1st Request for Production of Documents No. 13 - Supplemental	02836- 02847	UBS Research 21OCT20*	12	All	Entire document	(e)	Scott Bores
OPC's 1st Request for Production of Documents No. 13 - Supplemental	002816 - 002827	UBS Research 14SEP20*	12	All	Entire document	(e)	Scott Bores
OPC's 1st Request for Production of Documents No. 13 - Supplemental	001996 - 002019	UBS Research 14DEC20*	24	All	Entire document	(e)	Scott Bores

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OPC's 1st Request for Production of Documents No. 13 - Supplemental	002020	UBS Research 16APR20*	24	All	Entire document	(e)	Scott Bores
OPC's 1st Request for Production of Documents No. 13 - Supplemental	02044- 002113	UBS Research 24MAR20*	70	All	Entire document	(e)	Scott Bores
OPC's 1st Request for Production of Documents No. 13 - Supplemental	002114	UBS Research 07JUL20*	49	All	Entire document	(e)	Scott Bores
OPC's 1 st Request for Production of Documents No. 13 - Supplemental	001964 - 001995	UBS Research 11MAR20*	32	All	Entire document	(e)	Scott Bores
OPC's 1 st Request for Production of Documents No. 13 - Supplemental	002723	Vertical Partners Research 24FEB20*	10	All	Entire document	(e)	Scott Bores
OPC's 1 st Request for Production of Documents No. 14 - Supplemental	00998- 001030	Amend. No. 1 to Term Loan Agreement*	33	All	Entire document	(d)	Scott Bores
OPC's 1 st Request for Production of Documents No. 14 - Supplemental	001031 - 001129	Term Loan Agreement 25NOV15*	99	All	Entire document	(d)	Scott Bores
OPC's 1st Request for Production of Documents No. 14 - Supplemental	001130 - 001228	Term Loan Agreement 03NOV15*	99	All	Entire document	(d)	Scott Bores

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OPC's 1st Request for Production of Documents No. 14 - Supplemental	001328 - 001426	Term Loan Agreement 24NOV15*	99	All	Entire document	(d)	Scott Bores
OPC's 1 st Request for Production of Documents No. 14 - Supplemental	001427 - 001450	Amend. No. 1 to Term Loan Agreement*	24	All	Entire document	(d)	Scott Bores
OPC's 1 st Request for Production of Documents No. 14 - Supplemental	001451 - 001481	Amend. No. 1 to Term Loan Agreement*	31	All	Entire document	(d)	Scott Bores
OPC's 1 st Request for Production of Documents No. 14 - Supplemental	001482 - 001487	Amendment to Term Loan Agreement*	6	All	Entire document	(d)	Scott Bores
OPC's 1st Request for Production of Documents No. 14 - Supplemental	001488 - 001586	Term Loan Agreement 31MAR16*	99	All	Entire document	(d)	Scott Bores
OPC's 1 st Request for Production of Documents No. 14 - Supplemental	001587 - 001611	Amend. No. 1 to Term Loan Agreement*	25	All	Entire document	(d)	Scott Bores
OPC's 1st Request for Production of Documents No. 14 - Supplemental	001612 - 001710	Loan Agreement 31MAR16*	99	All	Entire document	(d)	Scott Bores

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OPC's 1 st Request for Production of Documents	001711	Amend. No. 1 to Term Loan Agreement*	31	All	Entire document	(d)	Scott Bores
No. 14 - Supplemental	001711						
OPC's 1st							
Request for	001742						
Production of	-	Fitch Credit Ratings	14	All	Entire	(e)	Scott
Documents No. 15 -	001755	26JUL19*			document	, ,	Bores
Supplemental							
OPC's 1st							
Request for	001556						
Production of	001756	Fitch Credit Ratings	7	A 11	Entire	(-)	Scott
Documents	001762	26FEB19*	/	All	document	(e)	Bores
No. 15 -	001/02						
Supplemental							
OPC's 1st							
Request for Production of	001763	Fital Cualit Datings			Datina		Coo44
Documents	-	Fitch Credit Ratings 26MAR19*	7	All	Entire document	(e)	Scott Bores
No. 15 -	001769	201/14/19			document		Dores
Supplemental							
OPC's 1st							
Request for	001770						
Production of	001770	Fital Cualit Datings*	7	A 11	Entire	(-)	Scott
Documents	001776	Fitch Credit Ratings*	/	All	document	(e)	Bores
No. 15 -	001770						
Supplemental							
OPC's 1st							
Request for	001777	First G. U.B. d			.		G 44
Production of	_	Fitch Credit Ratings	7	All	Entire	(e)	Scott
Documents No. 15 -	001783	06MAY19*			document	` /	Bores
Supplemental							
OPC's 1st							
Request for	001501						
Production of	001784	Fitch Credit Ratings	4	A 11	Entire	()	Scott
Documents	001797	07JAN19*	4	All	document	(e)	Bores
No. 15 -	001787						
Supplemental							
OPC's 1st							
Request for	001788	T. 1 a			. .		a
Production of	-	Fitch Credit Ratings	15	All	Entire	(e)	Scott
Documents No. 15 -	001802	01NOV19*			document		Bores
No. 15 - Supplemental							
Supplemental	<u> </u>				<u> </u>		

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OPC's 1st Request for Production of Documents No. 15 - Supplemental	001803 - 001806	Fitch Credit Ratings 07JAN19 *	4	All	Entire document	(e)	Scott Bores
OPC's 1st Request for Production of Documents No. 15 - Supplemental	001807 - 001819	Fitch Credit Ratings 09OCT20*	13	All	Entire document	(e)	Scott Bores
OPC's 1st Request for Production of Documents No. 15 - Supplemental	001820 - 001830	Fitch Credit Ratings 25OCT19*	11	All	Entire document	(e)	Scott Bores
OPC's 1st Request for Production of Documents No. 15 - Supplemental	001831 - 001834	Moody's Credit Ratings 04NOV19*	4	All	Entire document	(e)	Scott Bores
OPC's 1st Request for Production of Documents No. 15 - Supplemental	001835 - 001838	Moody's Credit Ratings 13OCT20*	4	All	Entire document	(e)	Scott Bores
OPC's 1st Request for Production of Documents No. 15 - Supplemental	001839 - 001848	Moody's Credit Ratings 02AUG19*	10	All	Entire document	(e)	Scott Bores
OPC's 1 st Request for Production of Documents No. 15 - Supplemental	001849 - 001860	Moody's Credit Ratings 19APR19*	12	All	Entire document	(e)	Scott Bores
OPC's 1st Request for Production of Documents No. 15 - Supplemental	001860 - 001871	Moody's Credit Ratings 21OCT20*	11	All	Entire document	(e)	Scott Bores

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OPC's 1 st Request for Production of Documents No. 15 - Supplemental	001872 - 001885	Moody's Credit Ratings 25JAN19*	14	All	Entire document	(e)	Scott Bores
OPC's 1st Request for Production of Documents No. 15 - Supplemental	001886 - 001898	Moody's Credit Ratings 25JUL19*	13	All	Entire document	(e)	Scott Bores
OPC's 1st Request for Production of Documents No. 15 - Supplemental	001899 - 001912	Moody's Credit Ratings 28JAN20*	14	All	Entire document	(e)	Scott Bores
OPC's 1st Request for Production of Documents No. 15 - Supplemental	001913 - 001929	Moody's Credit Ratings 28JUL20*	17	All	Entire document	(e)	Scott Bores
OPC's 1 st Request for Production of Documents No. 15 - Supplemental	001930 - 001936	SP Credit Ratings 24DEC19*	7	All	Entire document	(e)	Scott Bores
OPC's 1st Request for Production of Documents No. 15 - Supplemental	001937 - 001944	SP Credit Ratings 03JAN19*	8	All	Entire document	(e)	Scott Bores
OPC's 1st Request for Production of Documents No. 15 - Supplemental	001945 - 001947	SP Credit Ratings 17SEP20*	4	All	Entire document	(e)	Scott Bores
OPC's 1st Request for Production of Documents No. 15 - Supplemental	001948 - 001950	SP Credit Ratings 06SEP19*	7	All	Entire document	(e)	Scott Bores

OPC's 1st							
Request for	001951						
Production of	001931	SP Credit Ratings	6	All	Entire	(e)	Scott
Documents	001956	02FEB20*	U	All	document	(6)	Bores
No. 15 -	001930						
Supplemental							
OPC's 1st							
Request for	001057						
Production of	001957	Fitch Credit Ratings	7	A 11	Entire	(-)	Scott
Documents	001062	24DEC19	7	All	document	(e)	Bores
No. 16 -	001963						
Supplemental							
OPC's 1st							
Request for							
Production of	002480				Entire		Scott
Documents	-	Aon Assumption Review	4	All	document	(e)	Bores
No. 17 -	002483						
Supplemental							
OPC's 1st							
Request for							
Production of	002484				Entire		Scott
Documents	-	Rocaton Presentation	9	All	document	(e)	Bores
No. 17 -	002492				document		Dores
Supplemental							
OPC's 1st							
Request for							
Production of	015644	FPL Consol MFR B-19			Entire	(e)	_
Documents	-	"line 10-FTSA Billing	2	All	document	(0)	Liz Fuentes
No. 35 -	015645	Projection"			document		
Supplemental							
OPC's 1 st							
Request for		FPL Consol					Liz Fuentes
Production of	015646	MFR C-17			Entire	(e)	and
Documents	-	"Working File- Consolidated	3	All	document	(6)	Kathleen
No. 35 -	015648	with CONFID TABS"			document		Slattery
Supplemental	013010	with Colvins Tribs					Stattery
OPC's 1st							
Request for		FPL Consol					Liz Fuentes
Production of	015649	SYA			Entire	(e)	and
Documents	-	MFR C-17 "SYA C17	3	All	document	(3)	Kathleen
No. 35 -	015651	Working File- Consolidated			accament		Slattery
Supplemental		with CONFID TABS"					Similary
OPC's 1st							
Request for							
Production of		FPL Consol				(e)	
Documents	015652	MFR C-28 "Copy of C-28"	2	1	11 / G-I	(0)	Liz Fuentes
No. 35 -		1711 K C-20 Copy of C-20					
Supplemental							
OPC's 1 st		FPL Consol			17-20 /	(a)	
Request for	015652	MFR C-28 "Copy of C-28"	2	1	17-207 K-L	(e)	Liz Fuentes
Request 101		1VII K C-20 Copy 01 C-20	1 CD		K-L		

Production of							
Documents							
No. 35 -							
Supplemental							
OPC's 1st							
Request for							
Production of		FPL Consol				(e)	
Documents	015653	MFR C-28 "Copy of C-28"	2	2	11 / G-L	(0)	Liz Fuentes
No. 35 -		WII K C-28 Copy of C-28					
Supplemental OPC's 1st							
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Production of	015653	FPL Consol	2	2	34-40 /	(e)	Liz Fuentes
Documents		MFR C-28 "Copy of C-28"			M-R		
No. 35 -							
Supplemental							
OPC's 1st							
Request for		FPL Consol					
Production of	015654	MFR C-28 "Copy of	1	1	19-20 / A-	(e)	Liz Fuentes
Documents	013034	Taxable Income - MFR C-28	1	1	D		Liz Fuellies
No. 35 -		- Part 6"					
Supplemental							
OPC's 1st							
Request for		FPL Consol					
Production of	015654	MFR C-28 "Copy of	1	1	22 / 4	(e)	T . E
Documents No.	015654	Taxable Income - MFR C-28	1	1	22 / A	()	Liz Fuentes
35 -		- Part 6"					
Supplemental		2 332 2					
OPC's 1st							
Request for							
Production of	015655	FPL Consol MFR C-28			Entire	(e)	
Documents	-	"Federal Distributions	3	All	document	(6)	Liz Fuentes
No. 35 -	015657	Summary – FPL"			document		
Supplemental							
OPC's 1st							
Request for		FPL Consol MFR C-28					
Production of		"Federal Distributions			Entire	(e)	
Documents	015658	Summary – Gulf'	1	All	document	(6)	Liz Fuentes
No. 35 -		Summary – Gun			document		Liz Fuellies
Supplemental OPC's 1st							
		"MFR D2 SYA					
Request for		Consolidated with RSAM			20-45 /	(a)	Scott
Production of	015659	Support File –	8	1		(e)	Bores
Documents		CONFIDENTIAL"			F-K		
No. 35 -							
Supplemental		(2.55)					
OPC's 1st		"MFR D2 SYA					Scott
Request for	015660	Consolidated with RSAM	8	2	5-10 /	(e)	Bores
Production of	12000	Support File –	J	_	C-F		
Documents		CONFIDENTIAL"					

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No. 35 -							
Supplemental							
OPC's 1st		(2.555.5.2.1)					
Request for		"MFR D2 SYA			- 10 /		Scott
Production of	015660	Consolidated with RSAM	8	2	5-10 /	(e)	Bores
Documents	01000	Support File –	Ü	_	J-M		20105
No. 35 -		CONFIDENTIAL"					
Supplemental							
OPC's 1st		"MFR D2 SYA					
Request for		Consolidated with RSAM			5 02 /	()	Scott
Production of	015662	Support File –	8	4	5-93 /	(e)	Bores
Documents		CONFIDENTIAL"			B-D		
No. 35 -							
Supplemental							
OPC's 1 st		"MFR D2 SYA					
Request for		Consolidated with RSAM			5.02 /	(-)	Scott
Production of	015663	Support File –	8	5	5-93 /	(e)	Bores
Documents		CONFIDENTIAL"			B-D		
No. 35 -							
Supplemental OPC's 1st							
Request for		"MFR D2 SYA					
Production of		Consolidated with RSAM			8-9 /	(e)	Scott
Documents	015664	Support File –	8	6	B-D	(C)	Bores
No. 35 -		CONFIDENTIAL"			D-D		
Supplemental							
OPC's 1st							
Request for		"MFR D2 SYA					
Production of		Consolidated without RSAM			20-45 /	(e)	Scott
Documents	015905	Support File –	8	1	F-K	(6)	Bores
No. 35 -		CONFIDENTIAL"			1 11		
Supplemental							
OPC's 1st							
Request for		"MFR D2 SYA					G 44
Production of	015006	Consolidated without RSAM	0	2	5-10 /	(e)	Scott
Documents	015906	Support File –	8	2	C-F	` ′	Bores
No. 35 -		CONFIDENTIAL"					
Supplemental							
OPC's 1st							
Request for		"MFR D2 SYA					Scott
Production of	015906	Consolidated without RSAM	8	2	5- 10 /	(e)	Bores
Documents	013300	Support File –	o		J-M		Dores
No. 35 -		CONFIDENTIAL"					
Supplemental							

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Request for		"MFR D2 SYA			7 00 /		Scott
Production of	015908	Consolidated without RSAM	8	4	5-93 /	(e)	Bores
Documents	010,00	Support File –	Ü		B-D		20100
No. 35 -		CONFIDENTIAL"					
Supplemental							
OPC's 1st							
Request for		"MFR D2 SYA					Scott
Production of	015909	Consolidated without RSAM	8	5	5-93 /	(e)	Bores
Documents		Support File –	o	3	B-D		Dores
No. 35 -		CONFIDENTIAL"					
Supplemental							
OPC's 1st							
Request for		"MFR D2 SYA					g ,,
Production of	015910	Consolidated without RSAM	0		8-9 /	(e)	Scott
Documents		Support File –	8	6	B-D		Bores
No. 35 -		CONFIDENTIAL"			_		
Supplemental							
OPC's 1st							
Request for							
Production of		"MFR D2 Test Combined			20-45 /	(e)	Scott
Documents	015668	with RSAM Support File –	8	1	B-C	(C)	Bores
No. 35 -		CONFIDENTIAL"			D-C		
Supplemental OPC's 1st							
Request for		"MFR D2 Test Combined			4.10 /	(-)	Scott
Production of	015669	with RSAM Support File –	8	2	4-10 /	(e)	Bores
Documents		CONFIDENTIAL"			C-F		
No. 35 -							
Supplemental							
OPC's 1st							
Request for		"MFR D2 Test Combined			.	, .	Scott
Production of	015671	with RSAM Support File –	8	4	5- 93 /	(e)	Bores
Documents	0150/1	CONFIDENTIAL"	U	'	B-D		20103
No. 35 -							
Supplemental							
OPC's 1st							
Request for		"MFR D2 Test Combined					Scott
Production of	015672	with RSAM Support File –	8	5	8-9 / B	(e)	Bores
Documents	013072	CONFIDENTIAL"	o		0-7 / D		Dores
No. 35 -		CONFIDENTIAL					
Supplemental							
OPC's 1st							
Request for		WATER DOT 1 C 1 1 1					G 44
Production of	015653	"MFR D2 Test Combined	0		5- 93 /	(e)	Scott
Documents	015673	with RSAM Support File –	8	6	B-D	(-)	Bores
No. 35 -		CONFIDENTIAL"			_ _		
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Request for Production of Documents No. 35 - "MFR D2 Test Combined without RSAM Support File – CONFIDENTIAL" 8 6 Scott Bores								
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Documents No. 35 - OT3681 Without RSAM Support File 8 O B-D		015601		0		50-93 /	(e)	
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OPC's 1st Request for Production of Documents No. 35 - Supplemental	015684	FPL Consol MFR D-8 "LT Debt Interest Rates_Test- CONFIDENTIAL"*	1	1	Entire document	(e)	Scott Bores
OPC's 1st Request for Production of Documents No. 35 - Supplemental	015685 - 015689	FPL Consol MFR F-8 "Int Rate assumptions Test and SYA"	5	All	Entire document	(e)	Scott R. Bores
OPC's 1st Request for Production of Documents No. 35 - Supplemental	015692 - 015693	FPL SA MFR B-19 "BU manual input support - FPL Pension CONFIDENTIAL"*	2	All	Entire document	(e)	Liz Fuentes
OPC's 1st Request for Production of Documents No. 35 - Supplemental	015690 - 015691	FPL SA MFR B-19 "BU manual input support - FPL Pension SYA CONFIDENTIAL"*	2	All	Entire document	(e)	Liz Fuentes
OPC's 1st Request for Production of Documents No. 35 - Supplemental	015694 - 015696	FPL SA "MFR C17 Working File- FPL Stand alone with CONFID TABS"*	3	All	Entire document	(e)	Liz Fuentes and Kathleen Slattery
OPC's 1st Request for Production of Documents No. 35 - Supplemental	015697 - 015699	FPL SA "MFR SYA C17 Working File- FPL Stand alone with CONFID TABS"*	3	All	Entire document	(e)	Liz Fuentes and Kathleen Slattery
OPC's 1st Request for Production of Documents No. 35 - Supplemental	015700	FPL SA " MFR D2 SYA FPLSA_Support File – CONFIDENTIAL"	12	1	20-45 / F- K	(e)	Scott Bores
OPC's 1st Request for Production of Documents No. 35 - Supplemental	015704	FPL SA " MFR D2 SYA FPLSA_Support File – CONFIDENTIAL"	12	5	6-11 / B- E, I- L, P- S	(e)	Scott Bores

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OPC's 1st Request for Production of Documents No. 35 - Supplemental	015707	FPL SA " MFR D2 SYA FPLSA_Support File – CONFIDENTIAL"	12	8	5-33 / B-D	(e)	Scott Bores
OPC's 1st Request for Production of Documents No. 35 - Supplemental	015707	FPL SA " MFR D2 SYA FPLSA_Support File – CONFIDENTIAL"	12	8	48-93 / B-D	(e)	Scott Bores
OPC's 1st Request for Production of Documents No. 35 - Supplemental	015708	FPL SA " MFR D2 SYA FPLSA_Support File – CONFIDENTIAL"	12	9	5-34 / B-D	(e)	Scott Bores
OPC's 1st Request for Production of Documents No. 35 - Supplemental	015708	FPL SA " MFR D2 SYA FPLSA_Support File – CONFIDENTIAL"	12	9	50-93 / B-D	(e)	Scott Bores
OPC's 1 st Request for Production of Documents No. 35 - Supplemental	015709	FPL SA " MFR D2 SYA FPLSA_Support File – CONFIDENTIAL"	12	10	14-15 / B-D	(e)	Scott Bores
OPC's 1st Request for Production of Documents No. 35 - Supplemental	015712	FPL SA "MFR D2 Test FPLSA_Support File – CONFIDENTIAL"	12	1	20-45 / H-K	(e)	Scott Bores
OPC's 1st Request for Production of Documents No. 35 - Supplemental	015713	FPL SA "MFR D2 Test FPLSA_Support File – CONFIDENTIAL"	12	2	56-181 / C-D	(e)	Scott Bores
OPC's 1st Request for Production of Documents No. 35 - Supplemental	015716	FPL SA "MFR D2 Test FPLSA_Support File – CONFIDENTIAL"	12	5	6-11 / B- E, I- L, P- S	(e)	Scott Bores

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Production of	015719	"MFR D2 Test	12	8	48-93 /	(e)	Scott
Documents	013/17	FPLSA_Support File –	12		В-С		Bores
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Request for		FPL SA					
Production of		"MFR D2 Test			5-34 /	(e)	Scott
Documents	015720	FPLSA Support File –	12	9	В-С	(-)	Bores
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OPC's 1 st							
Request for		FPL SA					
Production of	015721	" MFR D2 SYA	12	10	13-31 /	(e)	Scott
Documents	013/21	FPLSA_Support File –	12	10	B-F		Bores
No. 35 -		CONFIDENTIAL"					
Supplemental OPC's 1st							
Request for		FPL SA					
Production of	015724	MFR D-8			Entire	(e)	Scott
Documents	- 015740	" 11.2020 Blue Chip –	19	All	document	(0)	Bores
No. 35 -	015742	CONFIDENTIAL****					
Supplemental							
OPC's 1st							
Request for	015743	FPL SA			г.:		g
Production of Documents	-	MFR D-8 " 11.2019 Blue Chip –	19	All	Entire document	(e)	Scott Bores
No. 35 -	015761	CONFIDENTIAL"*			document		Dores
Supplemental							
OPC's 1 st		EDI CA					
Request for	015762	FPL SA MFR D-8					
Production of	013/02	"Interest Rates - (2020 Oct	3	All	Entire	(e)	Scott
Documents	015764	LRF) 10 26 curve-		7 111	document		Bores
No. 35 -		CONFIDENTIAL"*					
Supplemental			1				

OPC's 1st Request for Production of Documents No. 35 - Supplemental	015766	FPL SA MFR D-8 " LT Debt Interest Rates_Test- CONFIDENTIAL"*	1	All	Entire document	(e)	Scott Bores
OPC's 1st Request for Production of Documents No. 35 - Supplemental	015765	FPL SA MFR D-8 "LT Debt Interest Rates_SYA- CONFIDENTIAL"*	1	All	Entire document	(e)	Scott Bores
OPC's 1 st Request for Production of Documents No. 35 - Supplemental	015767 - 015771	FPL SA MFR F-8 "Int Rate assumptions Test and SYA – CONFIDENTIAL"*	5	All	Entire document	(e)	Scott R. Bores
OPC's 1st Request for Production of Documents No. 35 - Supplemental	015772 - 015774	Gulf SA MFR B-19 "BU manual input support - Gulf Pension SYA"	3	All	Entire document	(e)	Liz Fuentes
OPC's 1st Request for Production of Documents No. 35 - Supplemental	015775	Gulf SA MFR B-19 "BU manual input support - Gulf Pension Test"	3	All	Entire document	(e)	Liz Fuentes
OPC's 1st Request for Production of Documents No. 35 - Supplemental	015778 - 015779	Gulf SA MFR B-19 "LTSA Billing Projection SYA"	2	All	Entire document	(e)	Liz Fuentes
OPC's 1st Request for Production of Documents No. 35 - Supplemental	015780 - 015781	Gulf SA MFR B-19 "LTSA Billing Projection Test"	2	All	Entire document	(e)	Liz Fuentes
OPC's 1st Request for Production of Documents No. 35 - Supplemental	015782 - 015784	Gulf SA "MFR C17 Working File- Gulf Stand alone CONFID TABS"*	3	All	Entire document	(e)	Liz Fuentes and Kathleen Slattery

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OPC's 1 st Request for Production of Documents No. 35 - Supplemental	015785 - 015789	Gulf SA MFR F-8 "Int Rate assumptions Test and SYA – CONFIDENTIAL"*	5	All	Entire document	(e)	Scott Bores
OPC's 1st Request for Production of Documents No. 36 - Supplemental	005561	2021 IRP OCEC Heat Rate Sensitivity_CONFIDENTIA L*	2	All	Entire document	(e)	Scott Bores
OPC's 1 st Request for Production of Documents No. 36 - Supplemental	005563 - 005568	Gross Capex PPE replenishment CONFIDENTIAL*	6	All	Entire document	(e)	Scott Bores
OPC's 1 st Request for Production of Documents No. 36 - Supplemental	005569 - 005571	Item 8_SP_CreditConditionsNort hAmerica – CONFIDENTIAL*	3	All	Entire document	(e)	Scott Bores
OPC's 1 st Request for Production of Documents No. 36 - Supplemental	005572	Item 11_Fitch U.S. Commercial Paper Monitor - August 2020 – CONFIDENTIAL*	6	All	Entire document	(e)	Scott Bores
OPC's 1st Request for Production of Documents No. 36 - Supplemental	005578 - 005696	Item 21_DefaultTransitionandRec overy – CONFIDENTIAL*	119	All	Entire document	(e)	Scott Bores
OPC's 1 st Request for Production of Documents No. 36 - Supplemental	005697 - 005698	Item 21_Rating Transition Summary – CONFIDENTIAL*	2	All	Entire document	(e)	Scott Bores
OPC's 1 st Request for Production of Documents No. 36 - Supplemental	005699 - 005700	Item 28_2020 FPL Customers by County – CONFIDENTIAL*	3	All	Entire document	(e)	Scott Bores

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OPC's 1st Request for Production of Documents No. 36 - Supplemental	005702	Item 29_Nuclear Generation_Proxy Group v2 – CONFIDENTIAL*	1	All	Entire document	(e)	Scott Bores
OPC's 1st Request for Production of Documents No. 36 - Supplemental	005704 - 005708	Moodys_FPLUpgraded_Jan 2014 – CONFIDENTIAL*	5	All	Entire document	(e)	Scott Bores
OPC's 1 st Request for Production of Documents No. 36 - Supplemental	005709 - 005717	SP_NorthAmericanRegulate dUtilities_1.20.2021 – CONFIDENTIAL*	9	All	Entire document	(e)	Scott Bores
OPC's 1 st Request for Production of Documents No. 36 - Supplemental	005718 - 005756	Exhibit JMC-9 RRA Adjustment Clauses 11-12- 19 [CONFIDENTIAL]*	39	All	Entire document	(e)	Jim Coyne
OPC's 1 st Request for Production of Documents No. 36 - Supplemental	005757	Workpaper 1_Proxy Group Screen [CONFIDENTIAL]*	4	All	Entire document	(e)	Jim Coyne
OPC's 1 st Request for Production of Documents No. 36 - Supplemental	005761	Workpaper 2_US Risk Premium Analysis [CONFIDENTIAL]*	3	All	Entire document	(e)	Jim Coyne
OPC's 1 st Request for Production of Documents No. 36 - Supplemental	005764	Workpaper 3_Capital Structure [CONFIDENTIAL]*	5	All	Entire document	(e)	Jim Coyne
OPC's 1st Request for Production of Documents No. 36 – Supplemental	005769	Workpaper 12_Nuclear Comparison [CONFIDENTIAL]*	1	All	Entire document	(e)	Jim Coyne

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OPC's 1st Request for Production of Documents No. 36 - Supplemental	016001 - 016045	Exhibit JJR-3, JJR-4, JJR-6, JJR-7, JJR-8, JJR-9 Workpapers	45	All	Entire document	(e)	John Reed
OPC's 1st Request for Production of Documents No. 36 - Supplemental	005772 - 005776	Exhibit JJR-10 Workpaper	5	All	Entire document	(e)	John Reed
OPC's 1 st Request for Production of Documents No. 36 - Supplemental	005777	Exhibit JJR-14 Workpaper	7	All	Entire document	(e)	John Reed
OPC's 1st Request for Production of Documents No. 36 - Supplemental	005770 - 005771	Rate Case Frequency	2	All	Entire document	(e)	John Reed
OPC's 1st Request for Production of Documents No. 36 - Supplemental	015899 - 015903	latest-quarterly-and-annual- u-s-pv-data-release-q4-2020	5	All	Entire document	(e)	Timothy Oliver
OPC's 1st Request for Production of Documents No. 36 - Supplemental	015904	Module Procurement Proxy (to RAP 12172020) with Flowers Creek	1	All	12, 14, 19- 22, 24-27 / B-H	(d)	Timothy Oliver
OPC's 1st Request for Production of Documents No. 36 - Supplemental	019198 - 019202	2019 TYSP 181203 2018 - 2100 LONG-TERM FORECAST FPL METHODOLOGY- CONFIDENTIAL*	All	All	Entire document	(e)	Andrew Whitley
OPC's 1st Request for Production of Documents No. 36 - Supplemental	019203 - 019223	2019 TYSP GULF POWER CURVES 020419 OFFICIAL- CONFIDENTIAL*	All	All	Entire document	(e)	Andrew Whitley

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OPC's 1 st Request for Production of Documents No. 36 - Supplemental	016065 - 016066	2021 Capital Replacement Rev Req - CC 3x1- CONFIDENTIAL*	All	All	Entire document	(e)	Andrew Whitley
OPC's 1st Request for Production of Documents No. 36 – Supplemental	016067 - 016068	2021 Capital Replacement Rev Req - Daniel OM- CONFIDENTIAL*	All	All	Entire document	(e)	Andrew Whitley
OPC's 1st Request for Production of Documents No. 36 - Supplemental	019224	2021 Crist CT Capital Costs R2-CONFIDENTIAL*	All	All	Entire document	(e)	Andrew Whitley
OPC's 1st Request for Production of Documents No. 36 - Supplemental	019225 - 019227	2021 Crist Simple Cycle OM RAP Inputs- CONFIDENTIAL*	All	All	Entire document	(e)	Andrew Whitley
OPC's 1st Request for Production of Documents No. 36 - Supplemental	019228 - 019236	2021 Daniel OM- CONFIDENTIAL*	All	All	Entire document	(e)	Andrew Whitley
OPC's 1st Request for Production of Documents No. 36 - Supplemental	016144 - 016154	2021 EDM (2025 Gulf Tracker Solar)- CONFIDENTIAL*	All	All	Entire document	(e)	Andrew Whitley
OPC's 1st Request for Production of Documents No. 36 - Supplemental	016155 - 016165	2021 EDM (Gulf 1x0 CT)- CONFIDENTIAL*	All	All	Entire document	(e)	Andrew Whitley
OPC's 1st Request for Production of Documents No. 36 - Supplemental	019237 - 019269	2021 FCV Battery FCV Duration Calculation- CONFIDENTIAL*	All	All	Entire document	(e)	Andrew Whitley

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OPC's 1 st Request for Production of Documents No. 36 - Supplemental	019270	2021 FL Future Battery Cost_Estimate- CONFIDENTIAL*	All	All	Entire document	(e)	Andrew Whitley
OPC's 1st Request for Production of Documents No. 36 - Supplemental	019271	2021 Florida Proxy Solar Cost-CONFIDENTIAL*	All	All	Entire document	(e)	Andrew Whitley
OPC's 1st Request for Production of Documents No. 36 - Supplemental	016166 - 016176	2021 FPL EDM - 2.5 hr 100 MW Battery- CONFIDENTIAL*	All	All	Entire document	(e)	Andrew Whitley
OPC's 1 st Request for Production of Documents No. 36 - Supplemental	016177 - 016187	2021 FPL EDM - 3 hr 100 MW Battery- CONFIDENTIAL*	All	All	Entire document	(e)	Andrew Whitley
OPC's 1st Request for Production of Documents No. 36 - Supplemental	016188 - 016198	2021 FPL EDM - 3.5 hr 100 MW Battery- CONFIDENTIAL*	All	All	Entire document	(e)	Andrew Whitley
OPC's 1st Request for Production of Documents No. 36 - Supplemental	016199 - 016206	2021 FPL EDM - 3x0 CT - Updated 11-4-2020- CONFIDENTIAL*	All	All	Entire document	(e)	Andrew Whitley
OPC's 1st Request for Production of Documents No. 36 - Supplemental	016207 - 016217	2021 FPL EDM - 4 hr 100 MW Battery- CONFIDENTIAL*	All	All	Entire document	(e)	Andrew Whitley
OPC's 1st Request for Production of Documents No. 36 - Supplemental	016218 - 016228	2021 FPL EDM - 2022 Fixed Generic Solar- CONFIDENTIAL*	All	All	Entire document	(e)	Andrew Whitley

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OPC's 1st Request for Production of Documents No. 36 - Supplemental	016229 - 016239	2021 FPL EDM - 2022 Tracker Generic Solar- CONFIDENTIAL*	All	All	Entire document	(e)	Andrew Whitley
OPC's 1st Request for Production of Documents No. 36 - Supplemental	016240 - 016250	2021 FPL EDM - 2023 Fixed Generic Solar- CONFIDENTIAL*	All	All	Entire document	(e)	Andrew Whitley
OPC's 1st Request for Production of Documents No. 36 - Supplemental	016251 - 016261	2021 FPL EDM - 2023 Tracker Generic Solar- CONFIDENTIAL*	All	All	Entire document	(e)	Andrew Whitley
OPC's 1st Request for Production of Documents No. 36 - Supplemental	016262 - 016272	2021 FPL EDM - 2024 Fixed Generic Solar- CONFIDENTIAL*	All	All	Entire document	(e)	Andrew Whitley
OPC's 1st Request for Production of Documents No. 36 - Supplemental	016273 - 016283	2021 FPL EDM - 2024 Tracker Generic Solar- CONFIDENTIAL*	All	All	Entire document	(e)	Andrew Whitley
OPC's 1st Request for Production of Documents No. 36 - Supplemental	016284 - 016294	2021 FPL EDM - 2025 Fixed Generic Solar- CONFIDENTIAL*	All	All	Entire document	(e)	Andrew Whitley
OPC's 1st Request for Production of Documents No. 36 - Supplemental	016295 - 016305	2021 FPL EDM - 2025 Tracker Generic Solar- CONFIDENTIAL*	All	All	Entire document	(e)	Andrew Whitley
OPC's 1st Request for Production of Documents No. 36 - Supplemental	016306 - 016316	2021 FPL EDM - 2026 Fixed Generic Solar- CONFIDENTIAL*	All	All	Entire document	(e)	Andrew Whitley

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OPC's 1st Request for Production of Documents No. 36 - Supplemental	016317 - 016327	2021 FPL EDM - 2026 Tracker Generic Solar- CONFIDENTIAL*	All	All	Entire document	(e)	Andrew Whitley
OPC's 1st Request for Production of Documents No. 36 - Supplemental	016328 - 016338	2021 FPL EDM - 2027 Fixed Generic Solar- CONFIDENTIAL*	All	All	Entire document	(e)	Andrew Whitley
OPC's 1st Request for Production of Documents No. 36 - Supplemental	016339 - 016349	2021 FPL EDM - 2027 Tracker Generic Solar- CONFIDENTIAL*	All	All	Entire document	(e)	Andrew Whitley
OPC's 1st Request for Production of Documents No. 36 - Supplemental	016350 - 016360	2021 FPL EDM - 2028 Fixed Generic Solar- CONFIDENTIAL*	All	All	Entire document	(e)	Andrew Whitley
OPC's 1st Request for Production of Documents No. 36 - Supplemental	016361 - 016371	2021 FPL EDM - 2028 Tracker Generic Solar- CONFIDENTIAL*	All	All	Entire document	(e)	Andrew Whitley
OPC's 1st Request for Production of Documents No. 36 - Supplemental	016372 - 016382	2021 FPL EDM - 2029 Fixed Generic Solar- CONFIDENTIAL*	All	All	Entire document	(e)	Andrew Whitley
OPC's 1st Request for Production of Documents No. 36 - Supplemental	016383 - 016393	2021 FPL EDM - 2029 Tracker Generic Solar- CONFIDENTIAL*	All	All	Entire document	(e)	Andrew Whitley
OPC's 1st Request for Production of Documents No. 36 - Supplemental	016394 - 016404	2021 FPL EDM - 2030 Fixed Generic Solar- CONFIDENTIAL*	All	All	Entire document	(e)	Andrew Whitley

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OPC's 1st Request for Production of Documents No. 36 - Supplemental	016405 - 016415	2021 FPL EDM - 2030 Tracker Generic Solar- CONFIDENTIAL*	All	All	Entire document	(e)	Andrew Whitley
OPC's 1st Request for Production of Documents No. 36 - Supplemental	016416 - 016423	2021 FPL EDM v1 - 2026 3x1 CC -CONFIDENTIAL*	All	All	Entire document	(e)	Andrew Whitley
OPC's 1 st Request for Production of Documents No. 36 - Supplemental	019272 - 019273	2021 FPL Fixed Maintenance Costs - Startup (Houfek)- CONFIDENTIAL*	All	All	Entire document	(e)	Andrew Whitley
OPC's 1 st Request for Production of Documents No. 36 - Supplemental	016424 - 016427	2021 FPL Storage CapEx and OM_RAP- CONFIDENTIAL*	All	All	Entire document	(e)	Andrew Whitley
OPC's 1st Request for Production of Documents No. 36 - Supplemental	019274 - 019275	2021 FPL_IRP 2021_Fossil_Inputs to PV- CONFIDENTIAL*	All	All	Entire document	(e)	Andrew Whitley
OPC's 1st Request for Production of Documents No. 36 - Supplemental	019276 - 019277	2021 FPL_IRP 2021_Inputs to PV-CC 3x1- CONFIDENTIAL*	All	All	Entire document	(e)	Andrew Whitley
OPC's 1st Request for Production of Documents No. 36 - Supplemental	016428 - 016438	2021 Gulf EDM (2022 Gulf Fixed Solar)- CONFIDENTIAL*	All	All	Entire document	(e)	Andrew Whitley
OPC's 1st Request for Production of Documents No. 36 - Supplemental	016439 - 016449	2021 Gulf EDM (2022 Gulf Tracker Solar)- CONFIDENTIAL*	All	All	Entire document	(e)	Andrew Whitley

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OPC's 1st Request for Production of Documents No. 36 - Supplemental	016450 - 016460	2021 Gulf EDM (2023 Gulf Fixed Solar)- CONFIDENTIAL*	All	All	Entire document	(e)	Andrew Whitley
OPC's 1st Request for Production of Documents No. 36 - Supplemental	016461 - 016471	2021 Gulf EDM (2023 Gulf Tracker Solar)- CONFIDENTIAL*	All	All	Entire document	(e)	Andrew Whitley
OPC's 1st Request for Production of Documents No. 36 - Supplemental	016472 - 016482	2021 Gulf EDM (2024 Gulf Fixed Solar)- CONFIDENTIAL*	All	All	Entire document	(e)	Andrew Whitley
OPC's 1st Request for Production of Documents No. 36 - Supplemental	016483 - 016493	2021 Gulf EDM (2024 Gulf Tracker Solar)- CONFIDENTIAL*	All	All	Entire document	(e)	Andrew Whitley
OPC's 1st Request for Production of Documents No. 36 - Supplemental	016494 - 016504	2021 Gulf EDM (2025 Gulf Fixed Solar)- CONFIDENTIAL*	All	All	Entire document	(e)	Andrew Whitley
OPC's 1st Request for Production of Documents No. 36 - Supplemental	016505 - 016515	2021 Gulf EDM (2026 Gulf Fixed Solar)- CONFIDENTIAL*	All	All	Entire document	(e)	Andrew Whitley
OPC's 1st Request for Production of Documents No. 36 - Supplemental	016516 - 016526	2021 Gulf EDM (2026 Gulf Tracker Solar)- CONFIDENTIAL*	All	All	Entire document	(e)	Andrew Whitley
OPC's 1st Request for Production of Documents No. 36 - Supplemental	016527 - 016537	2021 Gulf EDM (2027 Gulf Fixed Solar)- CONFIDENTIAL*	All	All	Entire document	(e)	Andrew Whitley

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OPC's 1st Request for Production of Documents No. 36 - Supplemental	016538 - 016548	2021 Gulf EDM (2027 Gulf Tracker Solar)- CONFIDENTIAL*	All	All	Entire document	(e)	Andrew Whitley
OPC's 1st Request for Production of Documents No. 36 - Supplemental	016549 - 016559	2021 Gulf EDM (2028 Gulf Fixed Solar)- CONFIDENTIAL*	All	All	Entire document	(e)	Andrew Whitley
OPC's 1 st Request for Production of Documents No. 36 - Supplemental	016560 - 016570	2021 Gulf EDM (2028 Gulf Tracker Solar)- CONFIDENTIAL*	All	All	Entire document	(e)	Andrew Whitley
OPC's 1st Request for Production of Documents No. 36 - Supplemental	016571 - 016581	2021 Gulf EDM (2029 Gulf Fixed Solar)- CONFIDENTIAL*	All	All	Entire document	(e)	Andrew Whitley
OPC's 1st Request for Production of Documents No. 36 - Supplemental	016582 - 016592	2021 Gulf EDM (2029 Gulf Tracker Solar)- CONFIDENTIAL*	All	All	Entire document	(e)	Andrew Whitley
OPC's 1st Request for Production of Documents No. 36 - Supplemental	016593 - 016603	2021 Gulf EDM (2030 Gulf Fixed Solar)- CONFIDENTIAL*	All	All	Entire document	(e)	Andrew Whitley
OPC's 1st Request for Production of Documents No. 36 - Supplemental	016604 - 016614	2021 Gulf EDM (2030 Gulf Tracker Solar)- CONFIDENTIAL*	All	All	Entire document	(e)	Andrew Whitley
OPC's 1st Request for Production of Documents No. 36 - Supplemental	016615 - 016625	2021 Gulf EDM (Gulf 2x0 CT)-CONFIDENTIAL*	All	All	Entire document	(e)	Andrew Whitley

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OPC's 1st Request for Production of Documents No. 36 - Supplemental	016626 - 016636	2021 Gulf EDM (Gulf 3x0 CT)-CONFIDENTIAL*	All	All	Entire document	(e)	Andrew Whitley
OPC's 1st Request for Production of Documents No. 36 - Supplemental	016637 - 016647	2021 Gulf EDM (Gulf 4x0 CT)-CONFIDENTIAL*	All	All	Entire document	(e)	Andrew Whitley
OPC's 1st Request for Production of Documents No. 36 - Supplemental	016648 - 016658	2021 Gulf EDM (Gulf 20 MW 2 Hour Battery)- CONFIDENTIAL*	All	All	Entire document	(e)	Andrew Whitley
OPC's 1st Request for Production of Documents No. 36 - Supplemental	016659 - 016669	2021 Gulf EDM (Gulf 20 MW 3 Hour Battery)- CONFIDENTIAL*	All	All	Entire document	(e)	Andrew Whitley
OPC's 1st Request for Production of Documents No. 36 - Supplemental	016670 - 016680	2021 Gulf EDM (Gulf 20 MW 4 Hour Battery)- CONFIDENTIAL*	All	All	Entire document	(e)	Andrew Whitley
OPC's 1st Request for Production of Documents No. 36 - Supplemental	016681 - 016691	2021 Gulf EDM 1x1 Escambia CC- CONFIDENTIAL*	All	All	Entire document	(e)	Andrew Whitley
OPC's 1st Request for Production of Documents No. 36 - Supplemental	019278 - 019283	2021 GULF IRP Item 1 2 3 IRP DATA TABLES (Grant)-CONFIDENTIAL*	All	All	Entire document	(e)	Andrew Whitley
OPC's 1st Request for Production of Documents No. 36 - Supplemental	019284 - 019290	2021 IRP (Issue REV3) Heat Rates-CONFIDENTIAL*	All	All	Entire document	(e)	Andrew Whitley

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OPC's 1 st Request for Production of Documents No. 36 - Supplemental	019291 - 019292	2021 IRP Combined and Simple Cycle OPEX- CONFIDENTIAL*	All	All	Entire document	(e)	Andrew Whitley
OPC's 1st Request for Production of Documents No. 36 - Supplemental	019293 - 019298	2021 IRP Item 1 2 3 IRP DATA TABLES (Grant)- CONFIDENTIAL*	All	All	Entire document	(e)	Andrew Whitley
OPC's 1 st Request for Production of Documents No. 36 - Supplemental	019299 - 019300	2021 IRP Item 8 OandM- CONFIDENTIAL*	All	All	Entire document	(e)	Andrew Whitley
OPC's 1 st Request for Production of Documents No. 36 - Supplemental	016060	2021 IRP Martin_Solar_2021- CONFIDENTIAL*	All	All	Entire document	(e)	Andrew Whitley
OPC's 1 st Request for Production of Documents No. 36 - Supplemental	019301 - 019306	2021 IRP Purchased Power Tables-CONFIDENTIAL*	All	All	Entire document	(e)	Andrew Whitley
OPC's 1st Request for Production of Documents No. 36 - Supplemental	016069	2021 Item 1 planned outage days-CONFIDENTIAL*	All	All	Entire document	(e)	Andrew Whitley
OPC's 1 st Request for Production of Documents No. 36 - Supplemental	019307	2021 Item 5 and 6 Summer Winter MW heat rate PSL and PTN- CONFIDENTIAL*	All	All	Entire document	(e)	Andrew Whitley
OPC's 1 st Request for Production of Documents No. 36 - Supplemental	016061 - 016064	2021 Nuc Fuel Fcst for 2021 NCRC Feasibility Analysis and 2021 IRP Model- CONFIDENTIAL*	All	All	Entire document	(e)	Andrew Whitley

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OPC's 1st Request for Production of Documents No. 36 - Supplemental	019308 - 019316	2021 TYSP Combined FPL-Gulf Solar FCV Calculator-RAP-CONFIDENTIAL*	All	All	Entire document	(e)	Andrew Whitley
OPC's 1st Request for Production of Documents No. 36 - Supplemental	019317 - 019326	2021 TYSP Gulf Solar Stand Alone FCV Calculator- CONFIDENTIAL*	All	All	Entire document	(e)	Andrew Whitley
OPC's 1 st Request for Production of Documents No. 36 - Supplemental	016692 - 016703	2022-2023 Solar Anhinga (Sandri B)_EDM- CONFIDENTIAL*	All	All	Entire document	(e)	Andrew Whitley
OPC's 1 st Request for Production of Documents No. 36 - Supplemental	016704 - 016715	2022-2023 Solar Apalachee_EDM- CONFIDENTIAL*	All	All	Entire document	(e)	Andrew Whitley
OPC's 1st Request for Production of Documents No. 36 - Supplemental	019326	2022-2023 Solar Apalachee_FL_ncf_2020100 8-CONFIDENTIAL*	All	All	Entire document	(e)	Andrew Whitley
OPC's 1st Request for Production of Documents No. 36 - Supplemental	016716 - 016727	2022-2023 Solar Blackwater_EDM- CONFIDENTIAL*	All	All	Entire document	(e)	Andrew Whitley
OPC's 1st Request for Production of Documents No. 36 - Supplemental	019327	2022-2023 Solar Blackwater_FL_ncf_202010 08-CONFIDENTIAL*	All	All	Entire document	(e)	Andrew Whitley
OPC's 1 st Request for Production of Documents No. 36 - Supplemental	016982 - 016993	2022-2023 Solar Bluefield_EDM- CONFIDENTIAL*	All	All	Entire document	(e)	Andrew Whitley

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OPC's 1st Request for Production of Documents No. 36 - Supplemental	019328	2022-2023 Solar Bluefield_FL CONFIDENTIAL*	All	All	Entire document	(e)	Andrew Whitley
OPC's 1st Request for Production of Documents No. 36 - Supplemental	016728 - 016739	2022-2023 Solar Cavendish_EDM- CONFIDENTIAL*	All	All	Entire document	(e)	Andrew Whitley
OPC's 1 st Request for Production of Documents No. 36 - Supplemental	019329	2022-2023 Solar Cavendish_FLncf_202010 08-CONFIDENTIAL*	All	All	Entire document	(e)	Andrew Whitley
OPC's 1 st Request for Production of Documents No. 36 - Supplemental	016740 - 016751	2022-2023 Solar Chipola_EDM- CONFIDENTIAL*	All	All	Entire document	(e)	Andrew Whitley
OPC's 1st Request for Production of Documents No. 36 - Supplemental	019330	2022-2023 Solar Chipola_FL_ncf_20201008- CONFIDENTIAL*	All	All	Entire document	(e)	Andrew Whitley
OPC's 1st Request for Production of Documents No. 36 - Supplemental	016752 - 016763	2022-2023 Solar Elder Branch_EDM- CONFIDENTIAL*	All	All	Entire document	(e)	Andrew Whitley
OPC's 1st Request for Production of Documents No. 36 - Supplemental	019331	2022-2023 Solar Elder Branch_FL_ncf_20201217- CONFIDENTIAL*	All	All	Entire document	(e)	Andrew Whitley
OPC's 1st Request for Production of Documents No. 36 - Supplemental	016764 - 016775	2022-2023 Solar Everglades_EDM- CONFIDENTIAL*	All	All	Entire document	(e)	Andrew Whitley

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OPC's 1st Request for Production of Documents No. 36 - Supplemental	019332	2022-2023 Solar Everglades_FL_ncf_202010 08-CONFIDENTIAL*	All	All	Entire document	(e)	Andrew Whitley
OPC's 1st Request for Production of Documents No. 36 - Supplemental	016776 - 016787	2022-2023 Solar First City_EDM- CONFIDENTIAL*	All	All	Entire document	(e)	Andrew Whitley
OPC's 1 st Request for Production of Documents No. 36 - Supplemental	019333	2022-2023 Solar First City_FL_ncf_20201008- CONFIDENTIAL*	All	All	Entire document	(e)	Andrew Whitley
OPC's 1 st Request for Production of Documents No. 36 - Supplemental	016788 - 016799	2022-2023 Solar Flowers Creek_EDM- CONFIDENTIAL*	All	All	Entire document	(e)	Andrew Whitley
OPC's 1st Request for Production of Documents No. 36 - Supplemental	019334	2022-2023 Solar Flowers_Creek_FL_ncf_202 10205-CONFIDENTIAL*	All	All	Entire document	(e)	Andrew Whitley
OPC's 1st Request for Production of Documents No. 36 - Supplemental	019335 - 019336	2022-2023 Solar FPL - LATEST 74.5MW Solar PV OPEX Fixed and Tracker_RAP- CONFIDENTIAL*	All	All	Entire document	(e)	Andrew Whitley
OPC's 1 st Request for Production of Documents No. 36 - Supplemental	019337	2022-2023 Solar Ghost Orchid FS_FL_ncf_20201217- CONFIDENTIAL*	All	All	Entire document	(e)	Andrew Whitley
OPC's 1st Request for Production of Documents No. 36 - Supplemental	016800 - 016811	2022-2023 Solar Ghost Orchid_EDM- CONFIDENTIAL*	All	All	Entire document	(e)	Andrew Whitley

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OPC's 1 st Request for Production of Documents No. 36 - Supplemental	019338	2022-2023 Solar Grove FS_FL_ncf_20201217- CONFIDENTIAL*	All	All	Entire document	(e)	Andrew Whitley
OPC's 1st Request for Production of Documents No. 36 - Supplemental	016812 - 016823	2022-2023 Solar Grove_EDM- CONFIDENTIAL*	All	All	Entire document	(e)	Andrew Whitley
OPC's 1st Request for Production of Documents No. 36 - Supplemental	019338	2022-2023 Solar Immokalee FS_FL_ncf_20201217- CONFIDENTIAL*	All	All	Entire document	(e)	Andrew Whitley
OPC's 1st Request for Production of Documents No. 36 - Supplemental	016824 - 016835	2022-2023 Solar Immokalee_EDM- CONFIDENTIAL*	All	All	Entire document	(e)	Andrew Whitley
OPC's 1st Request for Production of Documents No. 36 - Supplemental	019340	2022-2023 Solar Module Procurement Proxy (to RAP 12172020)- CONFIDENTIAL*	All	All	Entire document	(e)	Andrew Whitley
OPC's 1st Request for Production of Documents No. 36 - Supplemental	019341	2022-2023 Solar Sandri B_FL_ncf_20201008- CONFIDENTIAL*	All	All	Entire document	(e)	Andrew Whitley
OPC's 1 st Request for Production of Documents No. 36 - Supplemental	019342	2022-2023 Solar Sawgrass FS_FL_ncf_20201217- CONFIDENTIAL*	All	All	Entire document	(e)	Andrew Whitley
OPC's 1 st Request for Production of Documents No. 36 - Supplemental	016836 - 016847	2022-2023 Solar Sawgrass_EDM- CONFIDENTIAL*	All	All	Entire document	(e)	Andrew Whitley

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OPC's 1st Request for Production of Documents No. 36 - Supplemental	019343	2022-2023 Solar Sundew FS_FL_ncf_20201217- CONFIDENTIAL*	All	All	Entire document	(e)	Andrew Whitley
OPC's 1st Request for Production of Documents No. 36 - Supplemental	016848 - 016859	2022-2023 Solar Sundew_EDM- CONFIDENTIAL*	All	All	Entire document	(e)	Andrew Whitley
OPC's 1 st Request for Production of Documents No. 36 - Supplemental	016860 - 016871	2022-2023 Solar Whitetail_EDM- CONFIDENTIAL*	All	All	Entire document	(e)	Andrew Whitley
OPC's 1st Request for Production of Documents No. 36 - Supplemental	019344	2022-2023 Solar Whitetail_FL_ncf_20201008 -CONFIDENTIAL*	All	All	Entire document	(e)	Andrew Whitley
OPC's 1st Request for Production of Documents No. 36 - Supplemental	016070 - 016071	Capital Replacement Rev Req - Transmission Line - CONFIDENTIAL*	All	All	Entire document	(e)	Andrew Whitley
OPC's 1st Request for Production of Documents No. 36 - Supplemental	019345 - 019347	Capital Replacementand OM Forecast Transmission Line5162019 - CONFIDENTIAL*	All	All	Entire document	(e)	Andrew Whitley
OPC's 1st Request for Production of Documents No. 36 - Supplemental	016872 - 016880	FPL 2020 EDM (NFRC Line) (FPL Pmts to Southern) v1- CONFIDENTIAL*	All	All	Entire document	(e)	Andrew Whitley
OPC's 1st Request for Production of Documents No. 36 - Supplemental	016881 - 016890	Gulf 2020 EDM (NFRC Line) (Gulf Pmts to Southern) v1- CONFIDENTIAL*	All	All	Entire document	(e)	Andrew Whitley

OPC's 1 st Request for Production of Documents No. 36 - Supplemental	016891 - 016911	Gulf 2020 EDM (NFRC Line) (No Southern Payments)- CONFIDENTIAL*	All	All	Entire document	(e)	Andrew Whitley
OPC's 1st Request for Production of Documents No. 36 - Supplemental	019348 - 019349	Initial and Current Battery Inputs for Gulf Model 2-8- 19-CONFIDENTIAL*	All	All	Entire document	(e)	Andrew Whitley
OPC's 1st Request for Production of Documents No. 36 - Supplemental	016901 - 016911	Initial Step 1 and 2 1x0 CT EDM-CONFIDENTIAL*	All	All	Entire document	(e)	Andrew Whitley
OPC's 1 st Request for Production of Documents No. 36 - Supplemental	016912 - 016922	Initial Step 1 and 2 1x1 Escambia CC EDM- CONFIDENTIAL*	All	All	Entire document	(e)	Andrew Whitley
OPC's 1st Request for Production of Documents No. 36 - Supplemental	016923 - 016933	Initial Step 1 and 2 1x1 Shoal River CC EDM- CONFIDENTIAL*	All	All	Entire document	(e)	Andrew Whitley
OPC's 1st Request for Production of Documents No. 36 - Supplemental	016934 - 016944	Initial Step 1 and 2 2x0 CT EDM-CONFIDENTIAL*	All	All	Entire document	(e)	Andrew Whitley
OPC's 1st Request for Production of Documents No. 36 - Supplemental	016945 - 016955	Initial Step 1 and 2 3x0 CT EDM-CONFIDENTIAL*	All	All	Entire document	(e)	Andrew Whitley
OPC's 1st Request for Production of Documents No. 36 - Supplemental	016956 - 016966	Initial Step 1 and 2 2020 Solar Fixed EDM- CONFIDENTIAL*	All	All	Entire document	(e)	Andrew Whitley

OPC's 1st Request for Production of Documents No. 36 - Supplemental	016967 - 016977	Initial Step 1 and 2 2020 Solar Tracker EDM- CONFIDENTIAL*	All	All	Entire document	(e)	Andrew Whitley
OPC's 1st Request for Production of Documents No. 36 - Supplemental	016978 - 016988	Initial Step 1 and 2 2021 Solar Fixed EDM- CONFIDENTIAL*	All	All	Entire document	(e)	Andrew Whitley
OPC's 1 st Request for Production of Documents No. 36 - Supplemental	015913 - 015923	Initial Step 1 and 2 2021 Solar Tracker EDM- CONFIDENTIAL*	All	All	Entire document	(e)	Andrew Whitley
OPC's 1 st Request for Production of Documents No. 36 - Supplemental	015924 - 015934	Initial Step 1 and 2 2022 Solar Fixed EDM- CONFIDENTIAL*	All	All	Entire document	(e)	Andrew Whitley
OPC's 1st Request for Production of Documents No. 36 - Supplemental	015935 - 015945	Initial Step 1 and 2 2022 Solar Tracker EDM- CONFIDENTIAL*	All	All	Entire document	(e)	Andrew Whitley
OPC's 1st Request for Production of Documents No. 36 - Supplemental	015946 - 015956	Initial Step 1 and 2 2023 Solar Fixed EDM- CONFIDENTIAL*	All	All	Entire document	(e)	Andrew Whitley
OPC's 1st Request for Production of Documents No. 36 - Supplemental	015957 - 015967	Initial Step 1 and 2 2023 Solar Tracker EDM- CONFIDENTIAL*	All	All	Entire document	(e)	Andrew Whitley
OPC's 1st Request for Production of Documents No. 36 - Supplemental	015968 - 015978	Initial Step 1 and 2 2024 Solar Fixed EDM- CONFIDENTIAL*	All	All	Entire document	(e)	Andrew Whitley

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OPC's 1st Request for Production of Documents No. 36 - Supplemental	015979 - 015989	Initial Step 1 and 2 2024 Solar Tracker EDM- CONFIDENTIAL*	All	All	Entire document	(e)	Andrew Whitley
OPC's 1st Request for Production of Documents No. 36 - Supplemental	015990 - 016000	Initial Step 1 and 2 2025 Solar Fixed EDM- CONFIDENTIAL*	All	All	Entire document	(e)	Andrew Whitley
OPC's 1st Request for Production of Documents No. 36 - Supplemental	018961 - 018971	Initial Step 1 and 2 2025 Solar Tracker EDM- CONFIDENTIAL*	All	All	Entire document	(e)	Andrew Whitley
OPC's 1st Request for Production of Documents No. 36 - Supplemental	018972 - 018982	Initial Step 1 and 2 2026 Solar Fixed EDM- CONFIDENTIAL*	All	All	Entire document	(e)	Andrew Whitley
OPC's 1 st Request for Production of Documents No. 36 - Supplemental	018983 - 018993	Initial Step 1 and 2 2026 Solar Tracker EDM- CONFIDENTIAL*	All	All	Entire document	(e)	Andrew Whitley
OPC's 1st Request for Production of Documents No. 36 - Supplemental	018994 - 019004	Initial Step 1 and 2 2027 Solar Fixed EDM- CONFIDENTIAL*	All	All	Entire document	(e)	Andrew Whitley
OPC's 1st Request for Production of Documents No. 36 - Supplemental	019005 - 019015	Initial Step 1 and 2 2027 Solar Tracker EDM- CONFIDENTIAL*	All	All	Entire document	(e)	Andrew Whitley
OPC's 1st Request for Production of Documents No. 36 - Supplemental	019016 - 019026	Initial Step 1 and 2 2028 Solar Fixed EDM- CONFIDENTIAL*	All	All	Entire document	(e)	Andrew Whitley

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OPC's 1st Request for Production of Documents No. 36 - Supplemental	019027 - 019037	Initial Step 1 and 2 2028 Solar Tracker EDM- CONFIDENTIAL*	All	All	Entire document	(e)	Andrew Whitley
OPC's 1st Request for Production of Documents No. 36 - Supplemental	019038 - 019048	Initial Step 1 and 2 2029 Solar Fixed EDM- CONFIDENTIAL*	All	All	Entire document	(e)	Andrew Whitley
OPC's 1st Request for Production of Documents No. 36 - Supplemental	019049 - 019059	Initial Step 1 and 2 2029 Solar Tracker EDM- CONFIDENTIAL*	All	All	Entire document	(e)	Andrew Whitley
OPC's 1st Request for Production of Documents No. 36 - Supplemental	019060 - 019070	Initial Step 1 and 2 2030 Solar Fixed EDM- CONFIDENTIAL*	All	All	Entire document	(e)	Andrew Whitley
OPC's 1 st Request for Production of Documents No. 36 - Supplemental	019071 - 019081	Initial Step 1 and 2 2030 Solar Tracker EDM- CONFIDENTIAL*	All	All	Entire document	(e)	Andrew Whitley
OPC's 1st Request for Production of Documents No. 36 - Supplemental	019350 - 019362	Initial Step 1 and 2 B19_Gulf Unit Aurora Input Assumptions- CONFIDENTIAL*	All	All	Entire document	(e)	Andrew Whitley
OPC's 1st Request for Production of Documents No. 36 - Supplemental	019082 - 019092	Initial Step 1 and 2 Battery 20 MW 2 Hour EDM- CONFIDENTIAL*	All	All	Entire document	(e)	Andrew Whitley
OPC's 1st Request for Production of Documents No. 36 - Supplemental	019093 - 019103	Initial Step 1 and 2 Battery 20 MW 3 Hour EDM- CONFIDENTIAL*	All	All	Entire document	(e)	Andrew Whitley

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OPC's 1 st Request for Production of Documents No. 36 - Supplemental	019104 - 019114	Initial Step 1 and 2 Battery 20 MW 4 Hour EDM- CONFIDENTIAL*	All	All	Entire document	(e)	Andrew Whitley
OPC's 1st Request for Production of Documents No. 36 - Supplemental	019363 - 019366	Initial Step 1 and 2 Capital and OM Forecast Transmission Line- CONFIDENTIAL*	All	All	Entire document	(e)	Andrew Whitley
OPC's 1st Request for Production of Documents No. 36 - Supplemental	019115 - 019125	Initial Step 1 and 2 Crist Conversion EDM- CONFIDENTIAL*	All	All	Entire document	(e)	Andrew Whitley
OPC's 1 st Request for Production of Documents No. 36 - Supplemental	019367	Initial Step 1 and 2 Crist OM Coal to Gas- CONFIDENTIAL*	All	All	Entire document	(e)	Andrew Whitley
OPC's 1st Request for Production of Documents No. 36 - Supplemental	019368 - 019376	Initial Step 1 and 2 Daniel OM-CONFIDENTIAL*	All	All	Entire document	(e)	Andrew Whitley
OPC's 1st Request for Production of Documents No. 36 - Supplemental	019126 - 019137	Initial Step 1 and 2 Gulf Power 1x1 CC GE7H.02 OPEX 20181214_tabs- CONFIDENTIAL*	All	All	Entire document	(e)	Andrew Whitley
OPC's 1st Request for Production of Documents No. 36 - Supplemental	019377	Initial Step 1 and 2 Gulf Power IRP Analysis Summary of Assumptions- CONFIDENTIAL*	All	All	Entire document	(e)	Andrew Whitley
OPC's 1st Request for Production of Documents No. 36 - Supplemental	019378	Initial Step 1 and 2 Gulf Solar Cost Projection- CONFIDENTIAL*	All	All	Entire document	(e)	Andrew Whitley

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OPC's 1st Request for Production of Documents No. 36 - Supplemental	019379	Initial Step 1 and 2 Gulf Solar Fixed Profile- CONFIDENTIAL*	All	All	Entire document	(e)	Andrew Whitley
OPC's 1st Request for Production of Documents No. 36 - Supplemental	019380	Initial Step 1 and 2 Gulf Solar Tracker Profile- CONFIDENTIAL*	All	All	Entire document	(e)	Andrew Whitley
OPC's 1st Request for Production of Documents No. 36 - Supplemental	019138 - 019148	Initial Step 1 and 2 Lansing Smith Upgrade EDM- CONFIDENTIAL*	All	All	Entire document	(e)	Andrew Whitley
OPC's 1st Request for Production of Documents No. 36 - Supplemental	019149 - 019167	Initial Step 1 and 2 NFRC EDM-CONFIDENTIAL*	All	All	Entire document	(e)	Andrew Whitley
OPC's 1st Request for Production of Documents No. 36 - Supplemental	016072 - 016087	Inititial Step 1 and 2 GN59_NEE Request Items 1-10-CONFIDENTIAL*	All	All	Entire document	(e)	Andrew Whitley
OPC's 1st Request for Production of Documents No. 36 - Supplemental	019381	Intial Step 1 and 2 Gulf Fossil Inputs to RAP 2-6-19- CONFIDENTIAL*	All	All	Entire document	(e)	Andrew Whitley
OPC's 1st Request for Production of Documents No. 36 - Supplemental	019382	Manatee 1and2 Summary using 2009-2018 historical avg v4-CONFIDENTIAL*	All	All	Entire document	(e)	Andrew Whitley
OPC's 1st Request for Production of Documents No. 36 - Supplemental	019168	Manatee 408.8MW- 2.2hr_10cyc 3YAug BESS_40yrsplit_ OPEX 20190530_RAP- CONFIDENTIAL*	All	All	Entire document	(e)	Andrew Whitley

OPC's 1 st Request for Production of Documents No. 36 - Supplemental	019177 - 019184	Manatee Capital EDM - 2021 469 MW Battery with ITC- 2.2 hour- CONFIDENTIAL*	All	All	Entire document	(e)	Andrew Whitley
OPC's 1st Request for Production of Documents No. 36 - Supplemental	019169 - 019176	Manatee Capital EDM - 2028 469 MW Battery with ITC- 2.2 hour- CONFIDENTIAL*	All	All	Entire document	(e)	Andrew Whitley
OPC's 1st Request for Production of Documents No. 36 - Supplemental	016088 - 016115	Manatee Fixed Cost Spreadsheet - MN retire in 2022 and 469 BAT in 2022- CONFIDENTIAL*	All	All	Entire document	(e)	Andrew Whitley
OPC's 1 st Request for Production of Documents No. 36 - Supplemental	016116 - 016143	Manatee Fixed Cost Spreadsheet - MN retire in 2029 and 469 BAT in 2029- CONFIDENTIAL*	All	All	Entire document	(e)	Andrew Whitley
OPC's 1st Request for Production of Documents No. 36 - Supplemental	019185	Manatee FL 30MW- 2.2hr_10cyc 3YAug BESS OPEX 20190516_RAP- CONFIDENTIAL*	All	All	Entire document	(e)	Andrew Whitley
OPC's 1st Request for Production of Documents No. 36 - Supplemental	019383	Manatee Storage Rev 070319(P80 to RAP)- CONFIDENTIAL*	All	All	Entire document	(e)	Andrew Whitley
OPC's 1st Request for Production of Documents No. 36 - Supplemental	019186 - 019197	Manatee Trans Proj 2019 FPL EDM v3- CONFIDENTIAL*	All	All	Entire document	(e)	Andrew Whitley
OPC's 1st Request for Production of Documents No. 36 - Supplemental	005784	2021 Gulf Step 1 Case 1a_Archive- CONFIDENTIAL(Bates 005784)*	All	All	Entire document	(e)	Andrew Whitley
OPC's 1st Request for	005785	2021 Gulf Step 1 Case 1b_Archive-	All	All	Entire document	(e)	Andrew Whitley

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OPC's 1st Request for Production of Documents No. 36 - Supplemental	016047	OutputDB_Initial_Step1_Ca se_2- CONFIDENTIAL(Bates 016047).xdb*	All	All	Entire document	(e)	Andrew Whitley
OPC's 1st Request for Production of Documents No. 36 - Supplemental	016048	OutputDB_Initial_Step1_Ca se_3- CONFIDENTIAL(Bates 016048).xdb*	All	All	Entire document	(e)	Andrew Whitley
OPC's 1 st Request for Production of Documents No. 36 - Supplemental	016049	OutputDB_Initial_Step1_Ca se_4- CONFIDENTIAL(Bates 016049).xdb*	All	All	Entire document	(e)	Andrew Whitley
OPC's 1 st Request for Production of Documents No. 36 - Supplemental	016050	OutputDB_Initial_Step1_Ca se_6- CONFIDENTIAL(Bates 016050).xdb*	All	All	Entire document	(e)	Andrew Whitley
OPC's 1 st Request for Production of Documents No. 36 - Supplemental	016051	OutputDB_Initial_Step1_Ca se_7- CONFIDENTIAL(Bates 016051).xdb*	All	All	Entire document	(e)	Andrew Whitley
OPC's 1 st Request for Production of Documents No. 36 - Supplemental	016052	with 2022-2023 Solar AURORA OutputDB- CONFIDENTIAL(Bates 016052).xdb*	All	All	Entire document	(e)	Andrew Whitley
OPC's 1st Request for Production of Documents No. 36 - Supplemental	016053	with 2022-2023 Solar AURORA_Archive- CONFIDENTIAL(Bates 016053)*	All	All	Entire document	(e)	Andrew Whitley
OPC's 1st Request for Production of Documents No. 36 - Supplemental	016054	without 2022-2023 Solar AURORA OutputDB- CONFIDENTIAL(Bates 016054)*	All	All	Entire document	(e)	Andrew Whitley

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OPC's 1 st Request for Production of		without 2022-2023 Solar AURORA Archive-			Entire		Andrew
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Request for	003309						Liz Fuentes
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Request for	003311						Liz Fuentes
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Supplemental							

OPC's 1st Request for Production of Documents No. 44 - Supplemental	003315	2021 YTD 3-19-21Audits - FPL – CONFIDENTIAL*	1	All	Entire document	(b)	Liz Fuentes and Antonio Maceo
OPC's 1st Request for Production of Documents No. 45 - Supplemental	003316	2019 Audits - Gulf Audits – CONFIDENTIAL*	1	All	Entire document	(b)	Liz Fuentes and Antonio Maceo
OPC's 1st Request for Production of Documents No. 45 - Supplemental	003317	2020 Audits - Gulf Audits – CONFIDENTIAL*	1	All	Entire document	(b)	Liz Fuentes and Antonio Maceo
OPC's 1st Request for Production of Documents No. 45 - Supplemental	003318	2021 YTD 3-19-21 Audits - Gulf Power – CONFIDENTIAL*	1	All	Entire document	(b)	Liz Fuentes and Antonio Maceo
OPC's 1st Request for Production of Documents No. 48 - Supplemental	007499	FPL's Response to OPC's 1st POD No. 48 - Supplemental - CONFIDENTIAL	1	1	32-39	(e)	Kathleen Slattery
OPC's 1st Request for Production of Documents No. 48 - Supplemental	027026 - 027027	20210015 - OPC's 1st POD No. 48 - Attachment No. 2a. 2013 FPL Compensation Manual - Leader_Redacted EX CONFIDENTIAL	2	All	Entire document	(e)	Kathleen Slattery
OPC's 1st Request for Production of Documents No. 48 - Supplemental	027028 - 027029	20210015 - OPC's 1st POD No. 48 - Attachment No. 2b. 2019 FPL Compensation Manual - Leader_Redacted EX CONFIDENTIAL	2	All	Entire document	(e)	Kathleen Slattery
OPC's 1st Request for Production of Documents No. 48 – Supplemental	027030 - 027032	20210015 - OPC's 1st POD No. 48 - Attachment No. 3. FPL Performance Dollar LTIP - EX CONFIDENTIAL	3	All	Entire document	(e)	Kathleen Slattery

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OPC's 1st Request for Production of Documents No. 48 - Supplemental	027033 - 027036	20210015 - OPC's 1st POD No. 48 - Attachment No. 4. Employee Invention Award Program - Revised 4-15_16 EX CONFIDENTIAL	4	All	Entire document	(e)	Kathleen Slattery
OPC's 1st Request for Production of Documents No. 49 - Supplemental	004991	FPL's Response to OPC's 1 st POD No. 49 - Supplemental	1	1	35-36	(e)	Kathleen Slattery
OPC's 1st Request for Production of Documents No. 49 - Supplemental	027037 - 027039	20210015 - OPC's 1st POD No. 49 - Attachment No. 2. 2019 Gulf Compensation Manual - Leader_Redacted EX CONFIDENTIAL	3	All	Entire document	(e)	Kathleen Slattery
OPC's 1st Request for Production of Documents No. 49 - Supplemental	027040 - 027042	20210015 - OPC's 1st POD No. 49 - Attachment No. 3. Gulf Perf Dollar LTI Plan - EX CONFIDENTIAL	3	All	Entire document	(e)	Kathleen Slattery
OPC's 1 st Request for Production of Documents No. 50 - Supplemental	003319	CONFIDENTIAL OPC 1st POD 50 Pension Plan Actuarial Study - FPL and Gulf*	91	All	Entire document	(e)	Scott Bores
OPC's 1st Request for Production of Documents No. 50 - Supplemental	003410	CONFIDENTIAL OPC 1st POD 50 Post Retirement Plan Actuarial Study - FPL and Gulf*	51	All	Entire document	(e)	Scott Bores
OPC's 1st Request for Production of Documents No. 52 - Supplemental	003463 - 003470	Fitch_Gulf PowerUpgrade_04.13.2020_ CONFIDENTIAL*	8	All	Entire document	(e)	Scott Bores
OPC's 1st Request for Production of Documents No. 52 - Supplemental	003471 1- 003471 8	Fitch_GulfCP_06.24.2019_ CONFIDENTIAL*	8	All	Entire document	(e)	Scott Bores

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OPC's 1 st Request for Production of Documents No. 52 - Supplemental	003479 - 003492	Fitch_GulfPower_07.26.201 9_CONFIDENTIAL*	14	All	Entire document	(e)	Scott Bores
OPC's 1st Request for Production of Documents No. 52 - Supplemental	003493 - 003496	Fitch_GulfPowerNavigator_ 01.07.2019_CONFIDENTI AL*	4	All	Entire document	(e)	Scott Bores
OPC's 1 st Request for Production of Documents No. 52 - Supplemental	003497 - 003505	Moodys_Gulf-Power- Company - 17Jun20_CONFIDENTIAL *	9	All	Entire document	(e)	Scott Bores
OPC's 1 st Request for Production of Documents No. 52 - Supplemental	003506	Moodys_Gulf-Power- Company - 25Jun19_CONFIDENTIAL *	8	All	Entire document	(e)	Scott Bores
OPC's 1st Request for Production of Documents No. 52 - Supplemental	003514	SP_GulfPowerCo_12.24.201 9_CONFIDENTIAL*	6	All	Entire document	(e)	Scott Bores
OPC's 1st Request for Production of Documents No. 52 - Supplemental	003520 - 003527	SP_GulfPowerCosCPProgra m_06.24.2019_CONFIDEN TIAL*	8	All	Entire document	(e)	Scott Bores
OPC's 1st Request for Production of Documents No. 57 - Supplemental	004523 - 004524	2019 and 2020 FPL Corporate Services Charges billed to Affiliates - Partially Confidential	3	3	282-339/ B-P	(e)	Keith Ferguson
OPC's 1st Request for Production of Documents No. 57 - Supplemental	004523 - 004524	2019 and 2020 FPL Corporate Services Charges billed to Affiliates - Partially Confidential	3	3	282-339 /B-P	(e)	Keith Ferguson

OPC's 1st							
Request for	007892	2018 Cons. Federal 1120					
Production of	00/892	Tax Return 16MAR21 -	219	A 11	Entire	(a)	Liz Fuentes
Documents	000110		219	All	Document	(e)	Liz Fuentes
No. 64 -	008110	Confidential					
Supplemental							
OPC's 1st							
Request for							
Production of	007775	2018 Cons. Florida F-1120			Entire		Liz Fuentes
Documents	-	16MAR21 - Confidential	70	All	Document	(e)	Elz i dentes
No. 64 -	007844	101VII IN21 - Confidential			Document		
Supplemental							
OPC's 1 st							
Request for Production of	007845	2019 C16 1120 T P			Entire		Liz Fuentes
	-	2018 Gulf 1120 Tax Return	47	All		(e)	Liz Fuentes
Documents	007891	25JUN19 - Confidential			Document	. ,	
No. 64 -							
Supplemental							
OPC's 1st							
Request for	007686	2018 Gulf FL Corporate					
Production of	-	Income/Franchise Tax return	89	All	Entire	(e)	Liz Fuentes
Documents	007774	- Confidential	0,	1 111	Document		
No. 64 -	007771	Commentum					
Supplemental							
OPC's 1st							
Request for	008110	Private Letter Ruling					
Production of	.1-	Request	67	All	Entire	(e)	Liz Fuentes
Documents	008176	10FEB20 -	07	All	document	(0)	Liz i delites
No. 67 -	000170	Confidential					
Supplemental							
OPC's 1st							
Request for	004960						
Production of	004900	Office of Chief Counsel, IRS	12	A 11	Entire	(-)	Liz Fuentes
Documents	004971	11AUG17 - Confidential	1.2	All	document	(e)	Liz Fuentes
No. 67 -	0049/1						
Supplemental							
OPC's 1st							
Request for	004072				Eudius		
Production of	004972	Revised pages Provided by	2	A 11	Entire	(e)	Liz Fuentes
Documents	- 004072	IRS after PLR was Issued	2	All	document	` /	
No. 67 -	004973						
Supplemental							
OPC's 1st Set of							
Interrogatories	004535	FPL's Response to OPC's 1st	1		17.21./		Kathleen
No. 48 -	004535	INT No. 48 - Supplemental	1	1	17-31 /	(e)	Slattery
Supplemental		- 17			A- C		-
OPC's 1st Set of							
Interrogatories		FPL's Response to OPC's 1st					Kathleen
No. 49 -	004536	INT No. 49 - Supplemental -	1	1	26-42 /	(e)	Slattery
Supplemental		CONFIDENTIAL			A -C		Stattery
	1	an * denotes that the file is provide		l	l		

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OPC's 1st Set of Interrogatories No. 54 -	004537	FPL's Response to OPC's 1st INT No. 54 - Supplemental - CONFIDENTIAL	1	1	15-23 / A-D	(e)	Kathleen Slattery
Supplemental							
OPC's 1st Set of		FPL's Response to OPC's 1st			26-34 /		
Interrogatories	004538	INT No. 55 - Supplemental -	1	1	A-D	(e)	Kathleen
No. 55 -	007336	CONFIDENTIAL	1	1	A-D	(C)	Slattery
Supplemental		CONFIDENTIAL					
OPC's 1st Set of		EDI 1 D (ODC) 1st					
Interrogatories	004530	FPL's Response to OPC's 1st	1		26.27	()	Kathleen
No. 55 -	004538	INT No. 55 - Supplemental -	1	1	36-37	(e)	Slattery
Supplemental		CONFIDENTIAL					
OPC's 1st Set of		20210015 - OPC's 1st INT					
Interrogatories	005554	No. 56 - Supplemental -			Entire		Kathleen
No. 56 -	-	Attachment No. 1 –	All	All	document	(e)	Slattery
Supplemental	005556	CONFIDENTIAL*					Stattery
OPC's 1st Set of		20210015 - OPC's 1st INT					
Interrogatories	005557	No. 56 - Supplemental -			Il Entire document	(e)	Kathleen Slattery
No. 56 -	-	Attachment No. 2 –	All	All			
Supplemental	005558	CONFIDENTIAL*					
OPC's 1 st Set of		20210015 - OPC's 1st INT					
	005559		All		Entire document		Kathleen Slattery
Interrogatories No. 56 -	-	No. 56 - Supplemental -		All		(e)	
	005560	Attachment No. 3 –					
Supplemental		CONFIDENTIAL*					
OPC's 1st Set of	004539	20210015 – OPC's 1st INT	_		Entire document	(e)	Kathleen
Interrogatories	-	Supplemental No. 67 -		All			
No. 67 -	004546	Attachment No. 1 –					Slattery
Supplemental	00.0.0	CONFIDENTIAL*					
OPC's 1 st Set of	004547	Supplemental No. 68 -		All	(e)	Kathleen	
Interrogatories	-		Δ11				
No. 68 -	004556	Attachment No 1 –	All All	AII	document	(C)	Slattery
Supplemental	004330	CONFIDENTIAL*					
OPC's 1st Set of		20210015 – OPC's 1st INT					Liz Fuentes
Interrogatories	004002	No. 93 - Supplemental -	1	1	22 / 4 17	(-)	and
No. 93 -	004992	Attachment No. 1 -	1 1	1	23 / A-K	(e)	Scott
Supplemental		Confidential					Bores
OPC's 1st Set of		20210015 – OPC's 1st INT					Liz Fuentes
Interrogatories	004005	No. 93 - Supplemental -			20/:		and
No. 93 -	004992	Attachment No. 1 -	1	1	28 / A-K	(e)	Scott
Supplemental		Confidential					Bores
OPC's 1st Set of		20210015 – OPC's 1st INT					Liz Fuentes
Interrogatories		No. 94 - Supplemental -					and
No. 94 -	004993	Attachment No. 1 -	1	1	19 / A-G	(e)	Scott
Supplemental		Confidential					Bores
OPC's 1st Set of	-			1			+
		20210015 – OPC's 1st INT					Liz Fuentes
Interrogatories	004993	No. 94 - Supplemental -	1	1	22 / A-G	(e)	and
No. 94 -		Attachment No. 1 -				. /	Scott
Supplemental	<u> </u>	Confidential		<u> </u>			Bores

OPC's 1st Set of Interrogatories No. 95 - Supplemental	004557	20210015 – OPC's 1st INT Supplemental No. 95 - Confidential Attachment No 1*	All	1	Entire document	(e)	Liz Fuentes and Scott Bores
OPC's 1 st Set of Interrogatories No. 96 - Supplemental	004561	20210015 – OPC's 1st INT Supplemental No. 96 – Confidential Attachment No 1*	All	1	Entire document	(e)	Liz Fuentes and Scott Bores
OPC's 1 st Set of Interrogatories No. 111- Supplemental	004559	20210015 - OPC's 1st INT No. 111 - Supplemental - CONFIDENTIAL	1	1	16 / A-C, E	(e)	Liz Fuentes
OPC's 1 st Set of Interrogatories No. 111- Supplemental	004559	20210015 - OPC's 1st INT No. 111 - Supplemental - CONFIDENTIAL	1	1	17 / A-E	(e)	Liz Fuentes
OPC's 1 st Set of Interrogatories No. 111- Supplemental	004559	20210015 - OPC's 1st INT No. 111 - Supplemental - CONFIDENTIAL	1	1	24-25	(e)	Liz Fuentes
OPC's 1 st Set of Interrogatories No. 112 - Supplemental	004560	20210015 - OPC's 1st INT No. 112 - Supplemental - CONFIDENTIAL	1	1	15 / B-G	(e)	Liz Fuentes
OPC's 1 st Set of Interrogatories No. 112 - Supplemental	004560	20210015 - OPC's 1st INT No. 112 - Supplemental - CONFIDENTIAL	1	1	16-17 / A-G	(e)	Liz Fuentes
OPC's 1 st Set of Interrogatories No. 112 - Supplemental	004560	20210015 - OPC's 1st INT No. 112 - Supplemental - CONFIDENTIAL	1	1	21-22	(e)	Liz Fuentes
OPC's 1 st Set of Interrogatories No. 115 - Supplemental	004561	20210015 - OPC's 1st INT No. 115 - Supplemental - Attachment No. 2 - CONFIDENTIAL	1	1	15-18 / B-D 24 / B-D	(e)	Liz Fuentes

Docket No. 20210015-EI 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 SCOTT BORES

- 1. My name is Scott Bores. I am currently employed by Florida Power & Light Company ("FPL") as Vice-President, Finance. 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 Public Counsel's First Request for Production of Documents Nos. 12-17, 35, 36, 50 and 52 and First Set of Interrogatories, Nos. 93-96. The documents or materials that I have reviewed and which are asserted by FPL to be proprietary confidential business information contain competitive business information the disclosure of which would impair the competitive business of the provider of the information, as well as information concerning bids or other contractual data, the disclosure of which would impair the efforts of FPL to contract for goods or services on favorable terms. Specifically, the information relates to credit agency ratings, loan agreements and insurance contracts. 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. 0283 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.

Scott Bores

Date: 1-27-2023

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 JAMES COYNE

- 1. My name is James. I am employed by Concentric Energy Advisors, Inc. as a Senior Vice President. 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 Public Counsel's First Request for Production of Documents No. 36. 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, the information is data that is proprietary to a third party vendor who provided it to Concentric Energy Advisors, Inc, pursuant to a subscription agreement. To the best of my knowledge, Concentric Energy Advisors, Inc. and FPL have maintained the confidentiality of these documents and materials.
- 3. Nothing has occurred since the issuance of Order No. PSC-2021-0283-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.
- 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.

	Sucape
	James Coyne
Date:	January 26, 2023

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 KEITH FERGUSON

- 1. My name is Keith Ferguson. I am currently employed by Florida Power & Light Company ("FPL") as Vice President, Accounting and Controller. 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 Public Counsel's First Request for Production of Documents No. 57. The documents or materials that I have reviewed and which are asserted by FPL to be proprietary confidential business information contain competitive business information the disclosure of which would impair the competitive business of FPL. Specifically, the information contains information related to executive compensation which, if made public, could make it more difficult for FPL to hire and retain talented executives. 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-2021-0283-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.

Keith Ferguson

Date: 1/27/2023

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 LIZ FUENTES

- 1. My name is Liz Fuentes. I am currently employed by Florida Power & Light Company ("FPL") as Senior Director, Regulatory Accounting. 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 Public Counsel's First Request for Production of Documents Nos. 35, 44, 45, 64 and 67 and First Set of Interrogatories Nos. 93-96, 111, 112 and 115. The documents or materials that I have reviewed and which are asserted by FPL to be proprietary confidential business information contain information concerning bids or other contractual data (insurance contracts), the disclosure of which would impair the efforts of FPL to contract for goods or services on favorable terms. The responses also contain proprietary confidential business information regarding corporate income taxes. Specifically, the material contains tax returns and schedules, including pro forma tax documentation incorporated into Nextera Energy's tax return, which is confidential pursuant to 26 U.S.C. § 6103. 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-2021-0283-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.

Liz Fuentes

Date: 1/27/2023

EXHIBIT D

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

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

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 written declaration.
- I have reviewed the documents referenced and incorporated in FPL's Request for Confidential Classification, specifically the materials provided in response OPC's First Request for Production of Documents No. 44. 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.
- Consistent with the provisions of the Florida Administrative Code, such materials 3. should remain confidential for a period of not less than 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.

Antonio Maceo

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

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

DECLARATION OF JOHN REED

- 1. My name is John Reed. I am the Chairman and Chief Executive Officer of Concentric Energy Advisors, Inc. 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 Office of Public Counsel's First Request for Production of Documents No. 36. 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, the documents contain data that is proprietary to a third party vendor who provided it to Concentric EnergyAdvisors, Inc. pursuant to a subscription agreement. To the best of my knowledge, Concentric EnergyAdvisors, Inc. and FPL have maintained the confidentiality of these documents and materials.
- 3. Nothing has occurred since the issuance of Order No. PSC-2021-0283-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.
- 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.

John Reed

Docket No: 20210015-EI

Date: _____January 27, 2023

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 KATHLEEN SLATTERY

- 1. My name is Kathleen Slattery. I am currently employed by Florida Power & Light Company ("FPL") as Senior Director, Executive Services and Compensation. 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 Public Counsel's First Request for Production of Documents Nos. 35 and 36, and OPC's First Set of Interrogatories Nos. 48, 49, 54-56, 67 and 68. The documents or materials that I have reviewed and which are asserted by FPL to be proprietary confidential business information contain competitive business information the disclosure of which would impair the competitive business of FPL. Specifically, the information contains employee salary and benefit information which, if made public, could make it more difficult for FPL to hire and retain talented employees. 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-2021-0283-CFO-EI to render the designated information stale or public, 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. 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.
- 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.

Kathleen Slattery

Date: 1/27/23

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 Public Counsel's First Request for Production of Documents No. 36. 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, the information contains heat rates and outage schedules. Additionally 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-2021-0283-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 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

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

Docket No: 20210015-EI

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

DECLARATION OF TIMOTHY OLIVER

- 1. My name is Timothy Oliver. I am currently employed by Florida Power & Light Company ("FPL") as Vice President, Development. 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 Public Counsel's First Request for Production of Documents No. 36. The documents or materials that I have reviewed and which are asserted by FPL to be proprietary confidential business information contain information concerning bids or other contractual data, the disclosure of which would impair the efforts of FPL to contract for goods or services on favorable terms. Specifically, the information pertains to pricing information related to solar panels. 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-2021-0283-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.

Timothy Oliver

Date: