



**Christopher T. Wright**  
Senior Counsel  
**Florida Power & Light Company**  
700 Universe Blvd (LAW/JB)  
Juno Beach, FL 33408-0420  
Phone: (561) 691-7144  
E-mail: [Christopher.Wright@fpl.com](mailto:Christopher.Wright@fpl.com)  
Florida Authorized House Counsel;  
Admitted in Pennsylvania

March 15, 2023

*VIA ELECTRONIC FILING*

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

**Re: Docket No. 20210015-EI**  
**In re: Petition by Florida Power & Light Company for**  
**Rate Unification and for Base Rate Increase**

---

Dear Mr. Teitzman:

Enclosed for filing in the above-referenced docket, please find Florida Power & Light Company's First Request for Extension of Confidential Classification of Document No. 09691-2021.

If you or your staff have any question regarding this filing, please contact me at (561) 691-7144.

Respectfully submitted,

By: s/Christopher T. Wright  
Christopher T. Wright  
Fla. Auth. House Counsel No. 1007055

Enclosures

cc: Certificate of Service

**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

Filed: March 15, 2023

**FLORIDA POWER & LIGHT COMPANY’S FIRST REQUEST FOR EXTENSION OF  
CONFIDENTIAL CLASSIFICATION OF CERTAIN INFORMATION PROVIDED IN  
ITS RESPONSES TO STAFF’S FIFTH DATA REQUEST NOS. 19 AND 23**

Pursuant to Section 366.093, Florida Statutes, and Rule 25-22.006, Florida Administrative Code, Florida Power & Light Company (“FPL”) hereby submits its First Request for Extension of Confidential Classification of certain information provided in its responses to Florida Public Service Commission Staff’s (“Staff”) Fifth Data Request Nos. 19 (Part b) and 23 (Parts f and j) (the “Confidential Information”). In support of its Request, FPL states as follows:

1. On August 24, 2021 FPL filed a Request for Confidential Classification of the Confidential Information (Document No. 09691-2021). By Order No. PSC-2021-0346-CFO-EI, issued September 15, 2021, the Commission granted FPL’s August 24, 2021 Request for Confidential Classification. FPL herein adopts and incorporates by reference the August 24, 2021 Request and Order No. PSC-2021-0346-CFO-EI.

2. The period of confidential treatment granted by Order No. PSC-2021-0346-CFO-EI will expire on March 15, 2023. The Confidential Discovery Responses that were the subject of FPL’s August 24, 2021 Request and Order No. PSC-2021-0346-CFO-EI warrant continued treatment as proprietary and confidential business information within the meaning of Section 366.093(3). Accordingly, FPL hereby submits this First Request for Extension of Confidential Classification.

3. All of the information designated in Exhibits A and B to the August 24, 2021 Request remain confidential. Accordingly, those exhibits will not be reproduced or reattached here.

4. Regarding First Revised Exhibit C, all of the information listed in the August 24, 2021 Request remains confidential; the Exhibit is revised only to identify Timothy Oliver as a new declarant, supporting the documents that were previously supported by Matthew Valle.

5. Also included is First Revised Exhibit D, which consists of the declarations of Christopher Chapel and Timothy Oliver.

6. The Confidential Information is intended to be and has been treated by FPL as private, its confidentiality has been maintained, and its disclosure would cause harm to FPL and its customers. Pursuant to Section 366.093, Fla. Stat., such materials are entitled to confidential treatment and are exempt from the disclosure provisions of the public records law. Thus, once the Commission determines that the information in question is proprietary confidential business information, the Commission is not required to engage in any further analysis or review such as weighing the harm of disclosure against the public interest in access to the information.

7. As stated in FPL's August 24, 2021 Request and as described in the declarations included as First Revised Exhibit D, the Confidential Information consists of information relating to competitive interests, the disclosure of which would impair the competitive business of FPL. Specifically, the information contains purchase and removal costs of smart electric panels as well as projected costs associated with electric vehicle program charges and costs. This information is protected by Section 366.093(3)(e), Fla. Stat.

8. Upon a finding by the Commission that the Confidential Information is proprietary confidential business information, the information should not be declassified for a period of at

least eighteen (18) months and should be returned to FPL as soon as the information is no longer necessary for the Commission to conduct its business. See§ 399.093(4), Fla. Stat.

**WHEREFORE**, for the above and foregoing reasons, as more fully set forth in the supporting materials and declarations included herewith, FPL respectfully requests that its Request for Confidential Classification be granted.

Respectfully submitted,

FLORIDA POWER & LIGHT COMPANY

By: s/ Christopher T. Wright  
Christopher T. Wright  
Senior Counsel  
Fla. Auth. House Counsel No. 1007055  
Florida Power & Light Company  
700 Universe Boulevard (LAW/JB)  
Juno Beach, FL 33408-0420  
Phone: 561-691-7144  
Fax: 561-691-7135  
Email: [christopher.wright@fpl.com](mailto:christopher.wright@fpl.com)

**CERTIFICATE OF SERVICE**  
**20210015-EI**

**I HEREBY CERTIFY** that a true and correct copy of the foregoing has been furnished by electronic mail this 15th day of March, 2023 to the following parties:

Suzanne Brownless  
Bianca Lherisson  
Shaw Stiller  
Florida Public Service Commission  
Office of the General Counsel  
2540 Shumard Oak Boulevard  
Tallahassee, Florida 32399-0850  
sbrownle@psc.state.fl.us  
blheriss@psc.state.fl.us  
sstiller@psc.state.fl.us

By: *s/Christopher T. Wright* \_\_\_\_\_  
Christopher T. Wright  
Fla. Auth. House Counsel No. 1007055

**FIRST REVISED EXHIBIT C**

**COMPANY:** Florida Power & Light Company  
**TITLE:** Petition by Florida Power & Light Company for Base Rate Increase and Rate Unification Company  
**DOCKET NO.:** 20210015-EI  
**DATE:** March 15, 2023

**Bold indicates a new declarant.**

Int/POD No.	Begin Bates Number	End Bates Number	Description	Confidential	Page No.	Line/Col	Florida Statute 366.093 (3) Subsection	Declarant
Staff 5 <sup>th</sup> Data Request, No. 19	070641	070641	Response to Staff's 5 <sup>th</sup> Data Request, No. 19, Part b.	Y	2	1-8/A-D	(d), (e)	<b>Timothy Oliver</b>
Staff 5 <sup>th</sup> Data Request, No. 23	N/A	N/A	Response to Staff's 5 <sup>th</sup> Data Request, No. 23, Part f.	Y	3	1/C to 2/A	(e)	Christopher Chapel
Staff 5 <sup>th</sup> Data Request, No. 23	N/A	N/A	Response to Staff's 5 <sup>th</sup> Data Request, No. 23, Part j.	Y	3	3/B	(e)	Christopher Chapel

**FIRST REVISED 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 CHRISTOPHER CHAPEL**

1. My name is Christopher Chapel. I am currently employed by Florida Power & Light Company ("FPL") as Chief Operating Officer. I have personal knowledge of the matters stated in this written declaration.

2. I have reviewed the documents referenced and incorporated in FPL's First Request for Extension of Confidential Classification for certain information provided in its response to Staff's Fifth Data Request, No. 23. The documents or materials that I have reviewed are proprietary confidential business information relating to competitive interests, the disclosure of which would impair the competitive business of the provider of the information. Specifically, the information contains purchase and removal costs of smart electric panels. To the best of my knowledge, FPL has maintained the confidentiality of these documents and materials.

3. Confidential treatment of the above-described information was granted by Commission Order No. PSC-2021-0346-CFO-EI issued September 15, 2021. Nothing has occurred since that time to change the confidential nature of this information and, as such, these materials 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 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.



\_\_\_\_\_  
Christopher Chapel

Date: 3.10.23

**FIRST REVISED 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

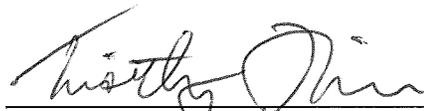
**DECLARATION OF TIMOTHY OLIVER**

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 written declaration.

2. I have reviewed the documents referenced and incorporated in FPL’s First Request for Confidential Classification for certain information provided in its responses to Staff’s Fifth Data Request, No. 19. The documents or materials that I have reviewed and which are asserted by FPL to be proprietary confidential business information contain information relating to competitive interests, the disclosure of which would impair the competitive business of the provider of the information, as well as FPL’s ability to contract for goods or services on favorable terms. Specifically, the information contains projected costs associated with electric vehicle program charges and costs. To the best of my knowledge, FPL has maintained the confidentiality of these documents and materials.

3. Confidential treatment of the above-described information was granted by Commission Order No. PSC-2021-0346-CFO-EI issued September 15, 2021. Nothing has occurred since that time to change the confidential nature of this information and, as such, these materials 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 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: 3/14/23