



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
Florida Authorized House Counsel;
Admitted in Pennsylvania

March 16, 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. 04603-2021.

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 16, 2023

**FLORIDA POWER & LIGHT COMPANY'S FIRST REQUEST FOR EXTENSION OF
CONFIDENTIAL CLASSIFICATION OF CERTAIN INFORMATION PROVIDED IN
ITS RESPONSES TO STAFF'S THIRD REQUEST FOR PRODUCTION OF
DOCUMENTS, NOS. 11 AND 12, AND THIRD SET OF INTERROGATORIES, NO. 80**

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") Third Request for Production of Documents, Nos. 11 and 12 and Third Set of Interrogatories 80 (the "Confidential Information"). In support of its Request, FPL states as follows:

1. On June 8, 2021 FPL filed a Request for Confidential Classification of the Confidential Information (Document No. 04603-2021). By Order No. PSC-2021-0358-CFO-EI, issued September 16, 2021, the Commission granted FPL's June 8, 2021 Request for Confidential Classification. FPL herein adopts and incorporates by reference the June 8, 2021 Request and Order No. PSC-2021-0358-CFO-EI.

2. The period of confidential treatment granted by Order No. PSC-2021-0358-CFO-EI will expire on March 16, 2023. The Confidential Discovery Responses that were the subject of FPL's June 8, 2021 Request and Order No. PSC-2021-0358-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 June 8, 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 June 8, 2021 Request remains confidential; the Exhibit is revised only to identify Gerard J. Yupp and Timothy Oliver as new declarants, supporting the documents that were previously supported by Sam Forrest and Matthew Valle, respectively.

5. Also included is First Revised Exhibit D, which consists of the declarations of Gerard J. Yupp 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 June 8, 2021 Request and as described in the declarations included as First Revised Exhibit D, the Confidential Information consists of 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, as well as information relating to competitive interests, the disclosure of which would impair the competitive business of FPL. Specifically, some information is related to construction project bids, and fuel prices and fuel price projections. This information is protected by Sections 366.093(3)(d) and (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

CERTIFICATE OF SERVICE
20210015-EI

I HEREBY CERTIFY that a true and correct copy of the foregoing has been furnished by electronic mail this 16th day of March, 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/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 Rate Unification and Base Rate Increase
DOCKET NO.: 20210015-EI
DATE: March 16, 2023

Bold indicates a new declarant

Int/POD No.	Description	No. of Pages	Conf. Y/N	Bates Nos.	Line / Column	Florida Statute 366.093(3) Subsection	Declarants
Staff's 3 rd Interrogatory, No. 80	Request for Proposals Bids	1	Y	063127	1-15/A-C	(d)	Timothy Oliver
Staff's 3 rd POD, No. 11	2013-2020 Fuel Costs and Fuel Cost Projections	8	Y	062027	Page 1 10-32/B-H	(e)	Gerard J. Yupp
Staff's 3 rd POD, No. 11	2013-2020 Fuel Costs and Fuel Cost Projections	8	Y	062028	Page 2 10-32/B-I	(e)	Gerard J. Yupp
Staff's 3 rd POD, No. 11	2013-2020 Fuel Costs and Fuel Cost Projections	8	Y	062029	Page 3 10-32/B-H	(e)	Gerard J. Yupp

Int/POD No.	Description	No. of Pages	Conf. Y/N	Bates Nos.	Line / Column	Florida Statute 366.093(3) Subsection	Declarants
Staff's 3 rd POD, No. 11	2013-2020 Fuel Costs and Fuel Cost Projections	8	Y	062030	Page 4 10-32/B-J	(e)	Gerard J. Yupp
Staff's 3 rd POD, No. 11	2013-2020 Fuel Costs and Fuel Cost Projections	8	Y	062031	Page 5 10-32/B-H	(e)	Gerard J. Yupp
Staff's 3 rd POD, No. 11	2013-2020 Fuel Costs and Fuel Cost Projections	8	Y	062032-062033	Pages 6-7 10-32/B-J	(e)	Gerard J. Yupp
Staff's 3 rd POD, No. 11	2013-2020 Fuel Costs and Fuel Cost Projections	8	Y	062034	Page 8 10-32/B-L	(e)	Gerard J. Yupp
Staff's 3 rd POD, No. 11	YTD Fuel Costs and Fuel Cost Projections	1	Y	062025	12-34/B-K	(e)	Gerard J. Yupp
Staff's 3 rd POD, No. 12	Pike Construction Bid	26	Y	062097-062122	All	(d)	Timothy Oliver
Staff's 3 rd POD, No. 12	Probst Construction Bid	254	Y	062123-062376	All	(d)	Timothy Oliver

Int/POD No.	Description	No. of Pages	Conf. Y/N	Bates Nos.	Line / Column	Florida Statute 366.093(3) Subsection	Declarants
Staff's 3 rd POD, No. 12	EC Source Construction Bid	275	Y	062377-062651	All	(d)	Timothy Oliver
Staff's 3 rd POD, No. 12	Irby Construction Bid	254	Y	062652-062905	All	(d)	Timothy Oliver
Staff's 3 rd POD, No. 12	Pike Construction Bid	194	Y	062906-063099	All	(d)	Timothy Oliver
Staff's 3 rd POD, No. 12	Probst Construction Bid	27	Y	063100-063126	All	(d)	Timothy Oliver

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 Extension of Confidential Classification, for certain information provided in its response to Staff’s Third Request for Production of Documents, No. 12, and Staff’s Third Set of Interrogatories, No. 80. The documents or materials that I have reviewed and which are 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 contains vendor bids relating to construction projects. 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-2021-0358-CFO-EI issued September 16, 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 to maintain the confidentiality of these documents.

4. Under penalties of perjury, I declare that I have read the foregoing declaration and that the facts stated in it are true to the best of my knowledge and belief.



Timothy Oliver

Date: 3/14/23

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

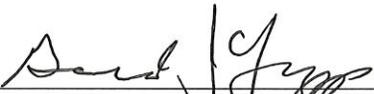
DECLARATION OF GERARD J. YUPP

1. My name is Gerard J. Yupp. I am currently employed by Florida Power & Light Company ("FPL") as Senior Director, Wholesale Operations, Energy Marketing and Trading. 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 Third Request for Production of Documents, No. 11. 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, 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 contains fuel contract pricing and fuel price projections. 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-2021-0358-CFO-EI issued September 16, 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 to maintain the confidentiality of these documents.

4. Under penalties of perjury, I declare that I have read the foregoing declaration and that the facts stated in it are true to the best of my knowledge and belief.



Gerard J. Yupp

Date: 3/13/23