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Florida Authorized House Counsel;  
Admitted in Pennsylvania

March 30, 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**

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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. 04118-2021.

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 Base Rate Increase and Rate  
Unification

Docket No. 20210015-EI

Filed: March 30, 2023

**FLORIDA POWER & LIGHT COMPANY’S FIRST REQUEST FOR EXTENSION OF  
CONFIDENTIAL CLASSIFICATION OF CERTAIN INFORMATION PROVIDED IN  
ITS RESPONSES TO FLORIDA RISING’S, LEAGUE OF UNITED LATIN AMERICAN  
CITIZENS’ AND ENVIRONMENTAL CONFEDERATION OF SOUTHWEST  
FLORIDA’S FIRST REQUEST FOR PRODUCTION OF DOCUMENTS NOS. 4 AND 18.**

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 for certain information provided in its responses to Florida Rising, League of United Latin American Citizens and Environmental Confederation of Southwest Florida’s First Request for Production of Documents Nos. 4 and 18 (the “Confidential Information”). In support of its Request, FPL states as follows:

1. On May 17, 2021, FPL filed a Request for Confidential Classification of the Confidential Information (Document No. 04118-2021). By Order No. PSC-2021-0383-CFO-EI issued September 30, 2021, the Commission granted FPL’s May 17, 2021 Request for Confidential Classification. FPL herein adopts and incorporates by reference the May 17, 2021 Request for Confidential Classification and Order No. PSC-2021-0383-CFO-EI.

2. The period of confidential treatment granted by Order No. PSC-2021-0383-CFO-EI will expire on March 30, 2023. The Confidential Information that was the subject of FPL’s May 17, 2021 Request and Order No. PSC-2021-0383-CFO-EI warrants 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 May 17, 2021 Request remains confidential. Accordingly, those exhibits will not be reproduced or reattached here.

4. Regarding First Revised Exhibit C, all of the information listed in the May 17, 2021 Request remains confidential; the Exhibit is revised only to identify Andrew Whitley and Timothy Oliver as new declarants, who are sponsoring information that was previously sponsored by Steve Sim and Matt Valle, respectively.

5. Also included is First Revised Exhibit D, which consists of the declarations of Christopher Chapel, Andrew Whitley 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 May 17, 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, and 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, some information contains data related to projected system loads and pricing information relating to the purchase of solar panels. To the best of my knowledge, FPL has maintained the confidentiality of

these documents and materials. 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, FPL respectfully requests that its First Request for Extension of 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

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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 30<sup>th</sup> 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 Base Rate Increase and Rate Unification Company  
**DOCKET NO.:** 20210015-EI  
**DATE:** March 30, 2021

**Bold indicates a new declarant.**

Int/POD No.	Begin Bates Number	End Bates Number	Description	No. of Pages	Confidential	Line/Col	Florida Statute 366.093 (3) Subsection	Declarant
LULAC 1 <sup>st</sup> Request for Production of Documents, No. 4			FPL Shared Solar Conjoint Report	85	Y	All	(d)(e)	<b>Timothy Oliver</b>
LULAC 1 <sup>st</sup> Request for Production of Documents, No. 4			FPL Shareholder Offset Price Report	52	Y	All	(d)(e)	<b>Timothy Oliver</b>
LULAC 1 <sup>st</sup> Request for Production of Documents, No. 4			Burke Data Offset Price Point	99	Y	All	(d)(e)	<b>Timothy Oliver</b>

Int/POD No.	Begin Bates Number	End Bates Number	Description	No. of Pages	Confidential	Line/Col	Florida Statute 366.093 (3) Subsection	Declarant
LULAC 1 <sup>st</sup> Request for Production of Documents, No. 4			FPL Shared Solar DCM Report	33	Y	All	(d)(e)	<b>Timothy Oliver</b>
LULAC 1 <sup>st</sup> Request for Production of Documents, No. 4			2020 BPO Profiling Matrix	12	Y	All	(d)	Christopher Chapel
LULAC 1 <sup>st</sup> Request for Production of Documents, No. 4			Gulf Power Brand Research Report	1	Y	All	(d)	Christopher Chapel
LULAC 1 <sup>st</sup> Request for Production of Documents, No. 4			FPL Brand Research Report	1	Y	All	(d)	Christopher Chapel
LULAC 1 <sup>st</sup> Request for Production of Documents, No. 18	026780	026780	2021 Ten-Year Site Plan Projections	N/A	Y	All	(e)	<b>Andrew Whitley</b>
LULAC 1 <sup>st</sup> Request for Production of Documents, No. 18	026781	026781	2021 Ten-Year Site Plan Projections	N/A	Y	All	(e)	<b>Andrew Whitley</b>

<b>Int/POD No.</b>	<b>Begin Bates Number</b>	<b>End Bates Number</b>	<b>Description</b>	<b>No. of Pages</b>	<b>Confidential</b>	<b>Line/Col</b>	<b>Florida Statute 366.093 (3) Subsection</b>	<b>Declarant</b>
LULAC 1 <sup>st</sup> Request for Production of Documents, No. 18	026782	026782	2021 Ten-Year Site Plan Projections	N/A	Y	All	(e)	<b>Andrew Whitley</b>
LULAC 1 <sup>st</sup> Request for Production of Documents, No. 18	026783	026783	2021 Ten-Year Site Plan Projections	N/A	Y	All	(e)	<b>Andrew Whitley</b>
LULAC 1 <sup>st</sup> Request for Production of Documents, No. 18	026784	026784	2021 Ten-Year Site Plan Projections	N/A	Y	All	(e)	<b>Andrew Whitley</b>
LULAC 1 <sup>st</sup> Request for Production of Documents, No. 18	026785	026785	2021 Ten-Year Site Plan Projections	N/A	Y	All	(e)	<b>Andrew Whitley</b>
LULAC 1 <sup>st</sup> Request for Production of Documents, No. 18	026786	026786	2021 Ten-Year Site Plan Projections	N/A	Y	All	(e)	<b>Andrew Whitley</b>



<b>Int/POD No.</b>	<b>Begin Bates Number</b>	<b>End Bates Number</b>	<b>Description</b>	<b>No. of Pages</b>	<b>Confidential</b>	<b>Line/Col</b>	<b>Florida Statute 366.093 (3) Subsection</b>	<b>Declarant</b>
LULAC 1 <sup>st</sup> Request for Production of Documents, No. 18	026787	026787	2021 Ten-Year Site Plan Projections	N/A	Y	All	(e)	<b>Andrew Whitley</b>
LULAC 1 <sup>st</sup> Request for Production of Documents, No. 18	026788	026788	2021 Ten-Year Site Plan Projections	N/A	Y	All	(e)	<b>Andrew Whitley</b>
LULAC 1 <sup>st</sup> Request for Production of Documents, No. 18	026789	026789	2021 Ten-Year Site Plan Projections	N/A	Y	All	(e)	<b>Andrew Whitley</b>
LULAC 1 <sup>st</sup> Request for Production of Documents, No. 18	026790	026790	2021 Ten-Year Site Plan Projections	N/A	Y	All	(e)	<b>Andrew Whitley</b>
LULAC 1 <sup>st</sup> Request for Production of Documents, No. 18	026791	026791	2021 Ten-Year Site Plan Projections	N/A	Y	All	(e)	<b>Andrew Whitley</b>

**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 responses to Florida Rising, League of United Latin American Citizens and Environmental Confederation of Southwest Florida's First Request for Production of Documents Nos. 4 and 18. The documents or materials that I have reviewed and which are proprietary confidential business 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 pricing information related to the purchase of solar 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-2021-0383-CFO-EI issued September 30, 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: \_\_\_\_\_

3.27.23

**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 of 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 responses to Florida Rising, League of United Latin American Citizens and Environmental Confederation of Southwest Florida’s First Request for Production of Documents Nos. 4 and 18. The documents or materials that I have reviewed and which are proprietary confidential business 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 pricing information related to the purchase of solar 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-2021-0383-CFO-EI issued September 30, 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: 3/28/23

**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 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 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 responses to Florida Rising, League of United Latin American Citizens and Environmental Confederation of Southwest Florida’s First Request for Production of Documents Nos. 4 and 18. 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 projected system peak loads. 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-2021-0383-CFO-EI issued September 30, 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.



\_\_\_\_\_  
Andrew Whitley

Date: 03/24/2023