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July 27, 2023

VIA HAND DELIVERY

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

**REDACTED**

RECEIVED-FPSC  
2023 JUL 27 AM 3:51  
COMMISSION  
CLERK

Re: Docket No. 20230001-EI

Dear Mr. Teitzman:

I enclose for filing in the above docket Florida Power & Light Company's ("FPL") Request for Confidential Classification of Certain Information included in FPL's 2024 Risk Management Plan, which is being filed contemporaneously with this request as part of FPL's 2023 Actual/Estimated True-up Petition in Docket 20230001-EI. The request includes Exhibits A, B (two copies), C and D.

Exhibit A consists of the confidential documents, wherein all the information that FPL asserts is entitled to confidential treatment has been highlighted. Exhibit B is an edited version of Exhibit A, in which the information FPL asserts is confidential has been redacted. Exhibit C is a justification table in support of FPL's Request for Confidential Classification. Exhibit D contains the declaration in support of FPL's Request.

Please contact me if you or your staff has any questions regarding this filing.

- COM
  - AFD  1 Exh 'B'
  - APA
  - ECO
  - ENG
  - GCL
  - IDM
  - CLK
- Enclosure

Sincerely,  
  
David M. Lee

cc: Counsel for Parties of Record (w/ copy of FPL's Request for Confidential Classification)

**BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION**

In re: Fuel and Purchased Power Cost Recovery Clause with Generating Performance Incentive Factor	Docket No: 20230001-EI Date: July 27, 2023
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**FLORIDA POWER & LIGHT COMPANY’S REQUEST FOR  
CONFIDENTIAL CLASSIFICATION OF MATERIALS  
PROVIDED IN ITS 2024 RISK MANAGEMENT PLAN**

Pursuant to Section 366.093, Florida Statutes, and Rule 25-22.006, Florida Administrative Code, Florida Power & Light Company (“FPL”) requests confidential classification of certain information (the “Confidential Information”) contained in FPL’s 2024 Risk management Plan, which is being filed contemporaneously with this request as part of FPL’s 2023 Actual/Estimated True-up Petition. In support of this Request, FPL states as follows:

1. FPL is filing its 2024 Risk Management Plan (Exhibit GJY-2) contemporaneously with this request. Portions of the Risk Management Plan contain confidential information.
2. The following exhibits are included with and made a part of this request:
  - a. Exhibit A is a copy of the Risk Management Plan in which all the Confidential Information has been highlighted.
  - b. Exhibit B consists of two copies of the Risk Management Plan in which all the Confidential Information has been redacted. As the documents in Exhibit A are confidential in their entirety, FPL is including only identifying cover pages in Exhibit B.
  - c. Exhibit C is a table that identifies the specific line and page references to the Confidential Information for which FPL seeks confidential treatment and provides a brief description of the Confidential Information. The table also

references the specific statutory basis for confidentiality and the declarant who supports the requested classification.

d. Exhibit D is the declaration of Manuel P. Acosta.

3. The Confidential Information is intended to be and has been treated by pre-consolidation 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 information is entitled to confidential treatment and is 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.

4. As explained in more detail in the declaration included as Exhibit D, and described in Exhibit C, the Confidential Information relates to bids or other contractual data, the disclosure of which would impair the efforts of FPL to contract for goods on favorable terms, to the detriment of FPL and its customers. Specifically, this information includes data pertinent to FPLs procurement activities. This information is protected by Sections 366.093(3)(d), Fla. Stat.

5. Additionally, the Confidential Information contained in the Risk Management Plan also relates to competitive interests of FPL, and its disclosure would impair the competitive business of FPL. Specifically, the confidential information contained in the 2024 Risk Management Plan relates to competitive interests and internal policy and procedures of FPL, the disclosure of which would impair the competitive business as well as the efforts of FPL to contract for goods and services on favorable terms, also to the detriment of FPL and its customers. This information is protected by Sections 366.093(3)(e), Fla. Stat.

5. Upon a finding by the Commission that the Confidential Information highlighted in Exhibit A and referenced in Exhibit C is proprietary confidential business information, the confidential Information should not be declassified for at least eighteen (18) months and should be returned to FPL as soon as the information is no longer necessary for the Commission to conduct its business. See § 366.093(4), Fla. Stat.

**WHEREFORE**, for the above and foregoing reasons, as more fully set forth in the supporting materials, Florida Power & Light Company respectfully requests that its Request for Extension of Confidential Classification be granted.

Respectfully submitted,

Maria Jose Moncada  
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By: \_\_\_\_\_



David M. Lee  
Florida Bar No. 103152

**CERTIFICATE OF SERVICE**

**Docket No. 20230001-EI**

I HEREBY CERTIFY that a true and correct copy of the foregoing\* has been furnished by electronic mail on this 27th day of July 2023 to the following:

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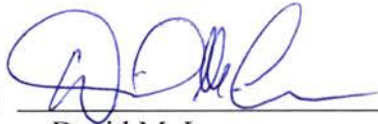


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By:   
\_\_\_\_\_  
David M. Lee  
Florida Bar No. 103152

\* Copies of Attachments B and C are available upon request

**Docket No. 20230001-EI**

**EXHIBIT “B”**

**REDACTED**

**FPL’s RISK MANAGEMENT PLAN  
(ATTACHMENT NOS. 1 AND 2 TO  
EXHIBIT GJY-2)**

REDACTED VERSION OF CONFIDENTIAL DOCUMENTS

[Pages 2 through 26]

Attachment 1 to GJY-2 (NextEra Energy, Inc., Risk and Credit  
Exposure Management Policy)



REDACTED VERSION OF CONFIDENTIAL DOCUMENTS

[Pages 2 through 61]

Attachment 2 to GJY-2 (FPL Risk and Credit Exposure  
Management Procedures Manual)

**Docket No. 20230001-EI**

**EXHIBIT “C”**

**FPL’s RISK MANAGEMENT PLAN  
(ATTACHMENT NOS. 1 AND 2 TO  
EXHIBIT GJY-2)**

EXHIBIT C

COMPANY: Florida Power & Light Company  
TITLE: List of Confidential Exhibits  
DOCKET TITLE: Fuel and Purchased Power Cost Recovery Clause with Generating Performance Incentive Factor  
DOCKET NO: 20230001-EI  
DATE: July 27, 2023

Description	Page Nos.	Column No./Line No.	Florida Statute 366.093 (3) Subsection	Declarant
Attachment 1 to GJY-2 (NEE Risk and Credit Exposure Management Policy - January 2023)	2 through 26	ALL	(d), (e)	M. Acosta
Attachment 2 to GJY-2 (EMT/FPL Risk and Credit Exposure Management Procedures Manual - January 2023)	2 through 61	ALL	(d), (e)	M. Acosta

**Docket No. 20230001-EI**

**EXHIBIT “D”**

**FPL’s RISK MANAGEMENT PLAN  
(ATTACHMENT NOS. 1 AND 2 TO  
EXHIBIT GJY-2)**

**EXHIBIT D**

**BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION**

In re: Fuel and purchased power cost recovery clause with generating performance incentive factor.

Docket No: 20230001-EI

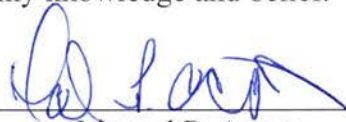
**DECLARATION OF MANUEL P. ACOSTA**

1. My name is Manuel P. Acosta. I am currently employed by Florida Power & Light Company ("FPL") as – Physical Trading Manager. I have personal knowledge of the matters stated in this written declaration.

2. I have reviewed Exhibit C and the documents and information included in Exhibit A of FPL's Request for Confidential Classification of its 2024 Risk Management Plan. The documents and materials in Exhibit A which are asserted by FPL to be proprietary confidential business information contain or constitute data pertinent to FPL's procurement activities. Additionally, the confidential information contained in the 2024 Risk Management Plan relates to competitive interests and internal policy and procedures of FPL, the disclosure of which would impair the competitive business as well as the efforts of FPL to contract for goods and services on favorable terms, also to the detriment of FPL and its customers. To the best of my knowledge, FPL has maintained the confidentiality of this information.

3. Consistent with the provisions of the Florida Administrative Code, such materials should remain confidential for a period of 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 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.



Manuel P. Acosta

Date: 7/26/2023