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November 20, 2023

REDACTED

- VIA HAND DELIVERY -

Mr. Adam Teitzman
Division of the Commission Clerk and Administrative Services
Florida Public Service Commission
2540 Shumard Oak Blvd.
Tallahassee, FL 32399-0850

RECEIVED-FPSC
2023 NOV 20 PM 3:38
COMMISSION
CLERK

**Re: Docket No. 20230017-EI
Petition for Limited Proceeding for Recovery of Incremental Storm
Restoration Costs Related to Hurricanes Ian and Nicole, by Florida Power &
Light Company**

Dear Mr. Teitzman:

I enclose for filing Florida Power & Light Company's ("FPL") Request for Confidential Classification of information provided with FPL's Notice of Filing Confidential Materials in Support of its Petition for Approval of the Actual Incremental Storm Restoration Costs Associated with Hurricanes Ian and Nicole and Associated True-Up Process, which is being filed contemporaneously with this Request in Docket No. 20230017-EI.

The enclosed filing includes Exhibits A, B, C, and D. Exhibit A consists of a copy of the Confidential Documents, which, because the information is voluminous and stored electronically, is being provided in electronic format on a CD. Exhibit B is an edited version of Exhibit A, containing identifying cover pages that correspond to the confidential electronic files. Exhibit C is a justification table in support of FPL's Request for Confidential Classification. Exhibit D contains declarations in support of FPL's filing.

Please contact me if you or your Staff has any questions regarding this filing at (561) 691-7255 or joel.baker@fpl.com.

Sincerely,

/s/ Joel T. Baker
Joel T. Baker
Fla. Bar No. 0108202

COM _____
AFD 1 Exh "B"
APA _____
ECO _____
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BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Petition for limited proceeding for recovery of incremental storm restoration costs related to Hurricanes Ian and Nicole, by Florida Power & Light Company

Docket No: 20230017-EI

Date: November 20, 2023

FLORIDA POWER & LIGHT COMPANY'S REQUEST FOR CONFIDENTIAL CLASSIFICATION OF INFORMATION PROVIDED WITH ITS NOTICE OF FILING CONFIDENTIAL MATERIALS IN SUPPORT OF ITS PETITION FOR APPROVAL OF THE ACTUAL INCREMENTAL STORM RESTORATION COSTS ASSOCIATED WITH HURRICANES IAN AND NICOLE AND ASSOCIATED TRUE-UP PROCESS

Pursuant to Section 366.093, Florida Statutes ("F.S."), and Rule 25-22.006, Florida Administrative Code ("F.A.C."), Florida Power & Light Company ("FPL") hereby requests confidential classification of certain documents and information specified in FPL's Notice of Filing Confidential Materials in Support of its Petition for Approval of the Actual Incremental Storm Restoration Costs Associated with Hurricanes Ian and Nicole and Associated True-Up Process ("Notice of Filing"), which is being filed contemporaneously with this Request in Docket No. 20230017-EI.

1. This Request is being filed in accordance with Rule 25-22.006, F.A.C., to request confidential classification of certain information provided with the Notice of Filing related to FPL's restoration costs associated with Hurricanes Ian and Nicole. Specifically, FPL seeks confidential classification of: (i) searchable spreadsheets that provide data documenting the receipt, review, adjustment where appropriate, and payment of FPL's Hurricanes Ian and Nicole costs incurred for line and vegetation contractors; (ii) contractor travel logs for Hurricanes Ian and Nicole; and (iii) additional information identified in paragraph 16 of the Hurricane Irma Stipulation and Settlement Agreement approved by the Commission in Order No. PSC-2019-0319-S-EI (together, the "Confidential Documents").

2. The following exhibits are attached to and made a part of this Request:
 - a. Exhibit A consists of a copy of the Confidential Documents, provided in electronic format on CDs, wherein all the information contained is entitled to confidential treatment. Because the confidential materials are being provided in electronic format and are voluminous, and therefore cannot be readily highlighted, FPL has not highlighted the entirety of the information contained on the CDs.
 - b. Exhibit B consists of summary pages that identify the Confidential Documents, which are entitled to confidential treatment in their entirety.
 - c. Exhibit C is a table that identifies the information in Exhibit A and references the specific statutory basis for the claim of confidentiality and identifies the Declarant who supports the requested classification.
 - d. Exhibit D consists of the declarations of Amber De Lucenay and Keith Ferguson in support of this Request.

3. FPL submits that the information in Exhibit A is proprietary and confidential business information, and its disclosure would cause harm to FPL and its customers. Pursuant to Section 366.093, F.S., 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.

EXHIBIT B

REDACTED

**Hurricane Ian
Accounting Support
Files are Confidential in
Their Entirety**

**Hurricane Nicole
Accounting Support
Files are Confidential in
Their Entirety**

**Hurricane Ian
Vegetation Flat Files
are Confidential in
Their Entirety**

**Hurricane Ian Dsbn OH
Flat Files are
Confidential in Their
Entirety**

**Hurricane Nicole
Vegetation Flat Files
are Confidential in
Their Entirety**

**Hurricane Nicole Dsbn
OH Flat Files are
Confidential in Their
Entirety**

**Hurricane Ian Pace of
Travel Log is
Confidential in Its
Entirety**

**Hurricane Nicole Pace
of Travel Log is
Confidential in Its
Entirety**

**Hurricane Ian Final
Notice Flat File
Summary is
Confidential in Its
Entirety**

**Hurricane Nicole Final
Invoice Flat File
Summary is
Confidential in Its
Entirety**

EXHIBIT C

JUSTIFICATION TABLE

EXHIBIT C

COMPANY: Florida Power & Light Company
TITLE: In re: Petition for limited proceeding for recovery of incremental storm restoration costs related to Hurricanes Ian and Nicole, by Florida Power & Light Company
DOCKET NO.: 20230017-EI
DATE: November 20, 2023

Document Description	No. of Pages	Conf. Y/N	Line / Column	Florida Statute 366.093(3) Subsection	Declarant(s)
Ian Accounting Support Files	22	Y	All	(d), (e)	Keith Ferguson
Nicole Accounting Support Files	21	Y	All	(d), (e)	Keith Ferguson
Ian Vegetation Flat Files	155	Y	All	(d), (e)	Amber De Lucenay
Ian Dsbn OH Flat Files	380	Y	All	(d), (e)	Amber DeLucenay
Nicole Vegetation Flat Files	80	Y	All	(d), (e)	Amber DeLucenay
Nicole Dsbn OH Flat Files	165	Y	All	(d), (e)	Amber DeLucenay
Ian Pace of Travel Log	1	Y	All	(d), (e)	Amber De Lucenay

Document Description	No. of Pages	Conf. Y/N	Line / Column	Florida Statute 366.093(3) Subsection	Declarant(s)
Nicole Pace of Travel Log	1	Y	All	(d), (e)	Amber De Lucenay
Ian Final Invoice Summary	3	Y	All	(d), (e)	Amber De Lucenay
Nicole Final Invoice Summary	2	Y	All	(d), (e)	Amber De Lucenay

EXHIBIT D

DECLARATIONS

EXHIBIT D

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Petition for limited proceeding for recovery of incremental storm restoration costs related to Hurricanes Ian and Nicole, by Florida Power & Light Company

Docket No: 20230017-EI

DECLARATION OF AMBER DE LUCENAY

1. My name is Amber De Lucenay. I am currently employed by Florida Power & Light Company ("FPL") as Director of Business Services, Power Delivery. I have personal knowledge of the matters stated in this declaration.

2. I have reviewed the documents and information included in Exhibit A to FPL's Request for Confidential Classification, for which I am listed as the declarant on Exhibit C. The documents and files that I have reviewed and which are asserted by FPL to be proprietary confidential business information contain or constitute 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 confidential information includes support files, which include competitive pricing and contractual information related to FPL's vendors. Additionally, the documents and files that I have reviewed, and which are asserted by FPL to be proprietary confidential business information contain or constitute information relating to competitive interests, the disclosure of which would impair the competitive business of the provider of the information. 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.



Amber De Lucenay
Date: 11/17/23

EXHIBIT D

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Petition for limited proceeding for recovery of incremental storm restoration costs related to Hurricanes Ian and Nicole, by Florida Power & Light Company

Docket No: 20230017-EI

DECLARATION OF KEITH FERGUSON

1. My name is Keith Ferguson. I am currently employed by Florida Power & Light Company ("FPL") as Vice President of Accounting and Controller. I have personal knowledge of the matters stated in this declaration.

2. I have reviewed the documents and information included in Exhibit A to FPL's Request for Confidential Classification, for which I am listed as the declarant on Exhibit C. The documents and files that I have reviewed and which are asserted by FPL to be proprietary confidential business information contain or constitute 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 confidential information includes accounting support files, which include competitive pricing and contractual information related to FPL's vendors. Additionally, the documents and files that I have reviewed, and which are asserted by FPL to be proprietary confidential business information contain or constitute information relating to competitive interests, the disclosure of which would impair the competitive business of the provider of the information. 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.



Keith Ferguson

Date: November 17, 2023