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June 21, 2024

-VIA HAND DELIVERY-

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

REDACTED

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RECEIVED FPSC
COMMISSION CLERK

RE: Docket 20240012-EG

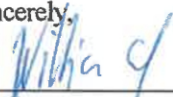
Dear Mr. Teitzman:

I enclose for filing in the above docket Florida Power & Light Company's ("FPL") Request for Confidential Classification of Information Provided in its Supplemental Responses to Florida Rising, Environmental Confederation of Southwest Florida, and League of United Latin American Citizens' First Request for Production of Documents (Nos. 1 and 2). The request includes Exhibits A, B (two copies), C, and D.

Exhibit A consists of the confidential documents, which due to their volume, are provided in electronic format on disk. Because the documents in Exhibit A are in electronic format, FPL has included only identifying cover pages in Exhibit B. Exhibit C is a justification table in support of FPL's Request for Confidential Classification. Exhibit D contains the declarations in support of FPL's request.

If there are any questions regarding this transmittal, please contact me at (561)304-5662.

Sincerely,



William P. Cox
Senior Counsel
Fla. Bar No. 0093531

COM _____
AFD _____
APA _____
ECO _____
ENG 1 Exh "B"
GCL _____
IDM _____
CLK _____

Enclosure
cc: Parties of Record
Florida Power & Light Company

700 Universe Boulevard, Juno Beach, FL 33408

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Commission Review of numeric
conservation goals of (Florida Power & Light
Company)

Docket No. 20240012-EG

Filed: June 21, 2024

**FLORIDA POWER & LIGHT COMPANY’S REQUEST FOR
CONFIDENTIAL CLASSIFICATION OF INFORMATION PROVIDED
IN RESPONSE TO FLORIDA RISING, ENVIRONMENTAL CONFEDERATION OF
SOUTHWEST FLORIDA AND LEAGUE OF UNITED LATIN AMERICAN CITIZENS’
FIRST REQUEST FOR PRODUCTION OF DOCUMENTS (NOS. 1 AND 2)**

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 provided in its supplemental responses to Florida Rising, Environmental Confederation of Southwest Florida and League of United Latin American Citizens’ (collectively, “FEL”) First Request for Production of Documents (Nos. 1 and 2) (“Supplemental Confidential Discovery Responses”). In support of its Request, FPL states as follows:

1. On April 25, 2024, FEL served its First Request for Production of Documents (Nos. 1-2) on FPL. On May 15, 2024, FPL served its responses to FEL’s First Request for Production of Documents (Nos. 1-2).

2. On June 21, 2024, FPL served FPL’s supplemental responses to FEL’s First Request for Production of Documents (Nos. 1-2), which contain information of a confidential nature within the meaning of Section 366.093(3), Florida Statutes. This request is being filed to request confidential classification of the Supplemental Confidential Discovery Responses consistent with Rule 25-22.006, Florida Administrative Code.

3. The following exhibits are included with and made a part of this request:

a. Exhibit A consists of a copy of the confidential material on which all the information that FPL asserts is entitled to confidential treatment has been highlighted. The

attachment to FPL's response to FEL's First Request for Production of Documents, Nos. 1 and 2, is voluminous, and it is being provided electronically on disk.

b. Exhibit B consists of identifying cover pages with all confidential information removed.

c. Exhibit C is a table containing a page-and-line identification of the information highlighted in Exhibit A and a brief description of the Confidential Information. Exhibit C also references the specific statutory bases for the claim of confidentiality and identifies the declarants who support the requested classification.

d. Exhibit D contains the declarations of Andrew W. Whitley, John Floyd, John Herndon, and David Hughes in support of this Request.

4. FPL submits that the highlighted information in Exhibit A is proprietary confidential business information within the meaning of Section 366.093(3), Florida Statutes. This information is intended to be and is treated by FPL as private, and its confidentiality has been maintained. Pursuant to Section 366.093, such information is entitled to confidential treatment and is exempt from the disclosure provisions of the public records law. Thus, once the Commission determined 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.

5. As the description included in Exhibit C and the declarations included in Exhibit D indicate, the Supplemental Confidential Discovery Responses provided by FPL contain information concerning information relating to competitive interests of FPL or its vendors, the disclosure of which would impair the competitive business of FPL. This information is protected by Section 366.093(3)(e), Fla. Stat.

6. The Supplemental Confidential Discovery Responses provided by FPL also contain information concerning bids or other contractual data, the disclosure of which would impair the efforts of FPL or its affiliates to contract for goods or services on favorable terms. This information is protected by Section 366.093(3)(d). Fla. Stat.


7. Upon a finding by the Commission that the Confidential Information remains proprietary and confidential business information, the information should not be declassified for at least an additional eighteen (18) month period and should be returned to FPL as soon as it 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 and affidavits included herewith, Florida Power & Light Company respectfully requests that its Request for Confidential Classification be granted.

Respectfully submitted,

Christopher T. Wright
Managing Attorney
William P. Cox
Senior Counsel
Florida Power & Light Company
700 Universe Boulevard
Juno Beach, FL 33408
Telephone: (561) 567-7144
Facsimile: (561) 691-7135

By: _____


William P. Cox
Fla. Bar No. 0093531

**CERTIFICATE OF SERVICE
DOCKET NO. 20240012-EG**

I HEREBY CERTIFY that a true and correct copy of the foregoing was served by electronic delivery this 21st day of June, 2024 to the following:

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United Latin American Citizens of
Florida, and Environmental
Confederation of Southwest Florida**

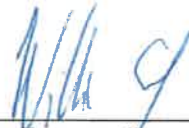
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By: 

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Fla. Bar No. 0093531

EXHIBIT B

REDACTED

FPL's response to
FEL's 1st POD Nos. 1 and 2

Documents with the following Bates numbers are confidential in their entirety:

Bates No. Begin	Bates No. End
000062	000063
000064	000068
000069	000073
000075	000086
000087	000091
000093	000104
000105	000122
000123	000140
000141	000158
000159	000176
000177	000181
000183	000194
000195	000199
000201	000212
000213	000217
000219	000230
000231	000235
000237	000248
000249	000253
000255	000266
000267	000271
000273	000284
000285	000289
000291	000302
000303	000307
000309	000320
000321	000325
000327	000338
000339	000343
000345	000356
000357	000361
000363	000374

Bates No. Begin	Bates No. End
000375	000379
000381	000392
000393	000397
000399	000410
000411	000415
000417	000428
000429	000433
000435	000446
000447	000451
000453	000464
000465	000469
000471	000482
000483	000487
000489	000500
000501	000505
000507	000518
000519	000523
000525	000536
000537	000541
000543	000554
000555	000559
000561	000572
000573	000577
000579	000590
000591	000595
000597	000608
000609	000611
000614	000616
000619	000621
000624	000626
000629	000631
000634	000636
000639	000641
000644	000646
000649	000651
000654	000656
000659	000661
000664	000666
000669	000671
000674	000676
000679	000681
000684	000686
000689	000691
000694	000696

Bates No. Begin	Bates No. End
000699	000701
000704	000706
000709	000711
000714	000716
000719	000721
000724	000726
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000730	000730
000731	000731
000732	000732
002844	002845
002854	002866
002867	002879
002880	002892
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002911	002911
002960	002961
002995	002996
003026	003027
003067	003068
003071	003071
003072	003072
003073	003073
003074	003074
003075	003075
003076	003076
003077	003077

Bates No. Begin	Bates No. End
003078	003086
003087	003095
003096	003096
003097	003097
003098	003098
003099	003099
003100	003100
003101	003101
003102	003102
003103	003104
003105	003105
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003139	003139
003140	003140
003175	003175
003176	003176
003177	003177
003178	003178
003179	003179
003180	003180
003182	003182

Bates No. Begin	Bates No. End
003183	003183
003184	003184
003185	003185
003186	003186
003218	003218
003317	003317
003318	003319
003219	003230
003231	003239
003240	003246
003247	003253
003321	003321
003323	003324
003329	003330

EXHIBIT C

JUSTIFICATION TABLE

EXHIBIT C

COMPANY: Florida Power & Light Company
TITLE: List of Confidential Documents
DOCKET TITLE: Commission review of numeric conservation goals (Florida Power & Light Company)
DOCKET NO.: 20240012-EG

Set	Bates No. Begin	Bates No. End	Description	Conf Y/N	Line/Column	Florida Statute 366.093(3) Subsection	Declarant
FEL 1 st POD Supplemental No. 1	000062	000063	2022 ICF Q3 CO2 Cost Projection w Extension 09 28 2022 - CONFIDENTIAL.xlsx	Y	ALL	(d)(e)	Andrew Whitley
FEL 1 st POD Supplemental No. 1	000064	000068	2023-2100 LONG-TERM FORECAST FPL METHODOLOGY-CONFIDENTIAL.xlsx	Y	ALL	(d)(e)	Andrew Whitley
FEL 1 st POD Supplemental No. 1	000069	000073	CPF Model_2033CC_91fuel - ROC AC - Standard kW - Updated Part.xlsx	Y	ALL	(d)(e)	Andrew Whitley
FEL 1 st POD Supplemental No. 1	000075	000086	CPF Model_2033CC_91fuel - ROC AC - Standard kW - Updated Part.xlsx	Y	ALL	(d)(e)	Andrew Whitley
FEL 1 st POD Supplemental No. 1	000087	000091	CPF Model_2033CC_91fuel n-Bill - AC - Updated Part - 02 27 2024.xlsx	Y	ALL	(d)(e)	Andrew Whitley
FEL 1 st POD Supplemental No. 1	000093	000104	CPF Model_2033CC_91fuel n-Bill - AC - Updated Part - 02 27 2024.xlsx	Y	ALL	(d)(e)	Andrew Whitley

Set	Bates No. Begin	Bates No. End	Description	Conf Y/N	Line/Column	Florida Statute 366.093(3) Subsection	Declarant
FEL 1 st POD Supplemental No. 1	000105	000122	CPF Model - 2023 - 2033 3x1 CC- Final- 9-1-23- FF - w100MTX no CO2 High Fuel	Y	ALL	(d)(e)	Andrew Whitley
FEL 1 st POD Supplemental No. 1	000123	000140	CPF Model - 2023 - 2033 3x1 CC- Final- 9-1-23- FF - w100MTX no CO2 Low Fuel	Y	ALL	(d)(e)	Andrew Whitley
FEL 1 st POD Supplemental No. 1	000141	000158	CPF Model - 2023 - 2033 3x1 CC- Final- 9-1-23- FF - w100MTX no CO2 Medium Fuel	Y	ALL	(d)(e)	Andrew Whitley
FEL 1 st POD Supplemental No. 1	000159	000176	CPF Model - 2023 - 2033 3x1 CC- Final- 9-1-23- FF - w100MTX with CO2 Medium Fuel	Y	ALL	(d)(e)	Andrew Whitley
FEL 1 st POD Supplemental No. 1	000177	000181	CPF Model - 2023 - Proposed Business HVAC without CO2	Y	ALL	(d)(e)	Andrew Whitley
FEL 1 st POD Supplemental No. 1	000183	000194	CPF Model - 2023 - Proposed Business HVAC without CO2	Y	ALL	(d)(e)	Andrew Whitley
FEL 1 st POD Supplemental No. 1	000195	000199	CPF Model - 2023 - Proposed Business Lighting without CO2	Y	ALL	(d)(e)	Andrew Whitley
FEL 1 st POD Supplemental No. 1	000201	000212	CPF Model - 2023 - Proposed Business Lighting without CO2	Y	ALL	(d)(e)	Andrew Whitley

Set	Bates No. Begin	Bates No. End	Description	Conf Y/N	Line/Column	Florida Statute 366.093(3) Subsection	Declarant
FEL 1 st POD Supplemental No. 1	000213	000217	CPF Model - 2023 - Proposed Residential Air Conditioning without CO2	Y	ALL	(d)(e)	Andrew Whitley
FEL 1 st POD Supplemental No. 1	000219	000230	CPF Model - 2023 - Proposed Residential Air Conditioning without CO2	Y	ALL	(d)(e)	Andrew Whitley
FEL 1 st POD Supplemental No. 1	000231	000235	CPF Model - 2023 - Proposed Residential Ceiling Insulation without CO2.xlsx	Y	ALL	(d)(e)	Andrew Whitley
FEL 1 st POD Supplemental No. 1	000237	000248	CPF Model - 2023 - Proposed Residential Ceiling Insulation without CO2.xlsx	Y	ALL	(d)(e)	Andrew Whitley
FEL 1 st POD Supplemental No. 1	000249	000253	CPF Model - 2023 - Proposed Residential Low Income Renter Pilot without CO2	Y	ALL	(d)(e)	Andrew Whitley
FEL 1 st POD Supplemental No. 1	000255	000266	CPF Model - 2023 - Proposed Residential Low Income Renter Pilot without CO2	Y	ALL	(d)(e)	Andrew Whitley
FEL 1 st POD Supplemental No. 1	000267	000271	CPF Model - 2023 - Proposed Residential Low Income Renter without CO2	Y	ALL	(d)(e)	Andrew Whitley
FEL 1 st POD Supplemental No. 1	000273	000284	CPF Model - 2023 - Proposed Residential Low Income Renter without CO2	Y	ALL	(d)(e)	Andrew Whitley

Set	Bates No. Begin	Bates No. End	Description	Conf Y/N	Line/Column	Florida Statute 366.093(3) Subsection	Declarant
FEL 1 st POD Supplemental No. 1	000285	000289	CPF Model - 2023 - Proposed Residential New Construction without CO2	Y	ALL	(d)(e)	Andrew Whitley
FEL 1 st POD Supplemental No. 1	000291	000302	CPF Model - 2023 - Proposed Residential New Construction without CO2	Y	ALL	(d)(e)	Andrew Whitley
FEL 1 st POD Supplemental No. 1	000303	000307	CPF Model - 2023 - TRC Business Cooking without CO2	Y	ALL	(d)(e)	Andrew Whitley
FEL 1 st POD Supplemental No. 1	000309	000320	CPF Model - 2023 - TRC Business Cooking without CO2	Y	ALL	(d)(e)	Andrew Whitley
FEL 1 st POD Supplemental No. 1	000321	000325	CPF Model - 2023 - TRC Business HVAC without CO2	Y	ALL	(d)(e)	Andrew Whitley
FEL 1 st POD Supplemental No. 1	000327	000338	CPF Model - 2023 - TRC Business HVAC without CO2	Y	ALL	(d)(e)	Andrew Whitley
FEL 1 st POD Supplemental No. 1	000339	000343	CPF Model - 2023 - TRC Business Lighting without CO2	Y	ALL	(d)(e)	Andrew Whitley
FEL 1 st POD Supplemental No. 1	000345	000356	CPF Model - 2023 - TRC Business Lighting without CO2	Y	ALL	(d)(e)	Andrew Whitley

Set	Bates No. Begin	Bates No. End	Description	Conf Y/N	Line/Column	Florida Statute 366.093(3) Subsection	Declarant
FEL 1 st POD Supplemental No. 1	000357	000361	CPF Model - 2023 - TRC Business Motors-Drives without CO2	Y	ALL	(d)(e)	Andrew Whitley
FEL 1 st POD Supplemental No. 1	000363	000374	CPF Model - 2023 - TRC Business Motors-Drives without CO2	Y	ALL	(d)(e)	Andrew Whitley
FEL 1 st POD Supplemental No. 1	000375	000379	CPF Model - 2023 - TRC Business Refrigeration without CO2	Y	ALL	(d)(e)	Andrew Whitley
FEL 1 st POD Supplemental No. 1	000381	000392	CPF Model - 2023 - TRC Business Refrigeration without CO2	Y	ALL	(d)(e)	Andrew Whitley
FEL 1 st POD Supplemental No. 1	000393	000397	CPF Model - 2023 - TRC Business Water Heating without CO2	Y	ALL	(d)(e)	Andrew Whitley
FEL 1 st POD Supplemental No. 1	000399	000410	CPF Model - 2023 - TRC Business Water Heating without CO2	Y	ALL	(d)(e)	Andrew Whitley
FEL 1 st POD Supplemental No. 1	000411	000415	CPF Model - 2023 - TRC Custom without CO2	Y	ALL	(d)(e)	Andrew Whitley
FEL 1 st POD Supplemental No. 1	000417	000428	CPF Model - 2023 - TRC Custom without CO2	Y	ALL	(d)(e)	Andrew Whitley

Set	Bates No. Begin	Bates No. End	Description	Conf Y/N	Line/Column	Florida Statute 366.093(3) Subsection	Declarant
FEL 1 st POD Supplemental No. 1	000429	000433	CPF Model - 2023 - TRC Residential Building Envelope without CO2	Y	ALL	(d)(e)	Andrew Whitley
FEL 1 st POD Supplemental No. 1	000435	000446	CPF Model - 2023 - TRC Residential Building Envelope without CO2	Y	ALL	(d)(e)	Andrew Whitley
FEL 1 st POD Supplemental No. 1	000447	000451	CPF Model - 2023 - TRC Residential HVAC without CO2	Y	ALL	(d)(e)	Andrew Whitley
FEL 1 st POD Supplemental No. 1	000453	000464	CPF Model - 2023 - TRC Residential HVAC without CO2	Y	ALL	(d)(e)	Andrew Whitley
FEL 1 st POD Supplemental No. 1	000465	000469	CPF Model - 2023 - TRC Residential Retail without CO2	Y	ALL	(d)(e)	Andrew Whitley
FEL 1 st POD Supplemental No. 1	000471	000482	CPF Model - 2023 - TRC Residential Retail without CO2	Y	ALL	(d)(e)	Andrew Whitley
FEL 1 st POD Supplemental No. 1	000483	000487	CPF Model - 2023 - TRC Residential Whole Home without CO2	Y	ALL	(d)(e)	Andrew Whitley
FEL 1 st POD Supplemental No. 1	000489	000500	CPF Model - 2023 - TRC Residential Whole Home without CO2	Y	ALL	(d)(e)	Andrew Whitley

Set	Bates No. Begin	Bates No. End	Description	Conf Y/N	Line/Column	Florida Statute 366.093(3) Subsection	Declarant
FEL 1 st POD Supplemental No. 1	000501	000505	CPF Model - BOC - without CO2	Y	ALL	(d)(e)	Andrew Whitley
FEL 1 st POD Supplemental No. 1	000507	000518	CPF Model - BOC - without CO2	Y	ALL	(d)(e)	Andrew Whitley
FEL 1 st POD Supplemental No. 1	000519	000523	CPF Model - EE - Proposed Portfolio for T+D - 03 15 2024	Y	ALL	(d)(e)	Andrew Whitley
FEL 1 st POD Supplemental No. 1	000525	000536	CPF Model - EE - Proposed Portfolio for T+D - 03 15 2024	Y	ALL	(d)(e)	Andrew Whitley
FEL 1 st POD Supplemental No. 1	000537	000541	CPF Model - EE - RIM Portfolio for T+D - 03 15 2024	Y	ALL	(d)(e)	Andrew Whitley
FEL 1 st POD Supplemental No. 1	000543	000554	CPF Model - EE - RIM Portfolio for T+D - 03 15 2024	Y	ALL	(d)(e)	Andrew Whitley
FEL 1 st POD Supplemental No. 1	000555	000559	CPF Model - EE - TRC Portfolio for T+D - 03 15 2024	Y	ALL	(d)(e)	Andrew Whitley
FEL 1 st POD Supplemental No. 1	000561	000572	CPF Model - EE - TRC Portfolio for T+D - 03 15 2024	Y	ALL	(d)(e)	Andrew Whitley

Set	Bates No. Begin	Bates No. End	Description	Conf Y/N	Line/Column	Florida Statute 366.093(3) Subsection	Declarant
FEL 1 st POD Supplemental No. 1	000573	000577	CPF Model - ROC - without CO2	Y	ALL	(d)(e)	Andrew Whitley
FEL 1 st POD Supplemental No. 1	000579	000590	CPF Model - ROC - without CO2	Y	ALL	(d)(e)	Andrew Whitley
FEL 1 st POD Supplemental No. 1	000591	000595	CPF Model -CDR - without CO2	Y	ALL	(d)(e)	Andrew Whitley
FEL 1 st POD Supplemental No. 1	000597	000608	CPF Model -CDR - without CO2	Y	ALL	(d)(e)	Andrew Whitley
FEL 1 st POD Supplemental No. 1	000609	000611	cpfbatch2023 - Commercial_V13 - 2033 CC - 9-1Fuel - no CO2 1-year payback	Y	ALL	(d)(e)	Andrew Whitley
FEL 1 st POD Supplemental No. 1	000614	000616	cpfbatch2023 - Commercial_V13 - 2033 CC - 9-1Fuel - no CO2 3-years payback	Y	ALL	(d)(e)	Andrew Whitley
FEL 1 st POD Supplemental No. 1	000619	000621	cpfbatch2023 - Commercial_V13 - 2033 CC - 9-1Fuel - no CO2 High Fuel	Y	ALL	(d)(e)	Andrew Whitley
FEL 1 st POD Supplemental No. 1	000624	000626	cpfbatch2023 - Commercial_V13 - 2033 CC - 9-1Fuel - no CO2 Low Fuel	Y	ALL	(d)(e)	Andrew Whitley

Set	Bates No. Begin	Bates No. End	Description	Conf Y/N	Line/Column	Florida Statute 366.093(3) Subsection	Declarant
FEL 1 st POD Supplemental No. 1	000629	000631	cpfbatch2023 - Commercial_V13 - 2033 CC - 9-1Fuel - no CO2 Medium Fuel	Y	ALL	(d)(e)	Andrew Whitley
FEL 1 st POD Supplemental No. 1	000634	000636	cpfbatch2023 - Commercial_V13 - 2033 CC - 9-1Fuel with CO2 Medium Fuel	Y	ALL	(d)(e)	Andrew Whitley
FEL 1 st POD Supplemental No. 1	000639	000641	cpfbatch2023 - DR v2 - 2033 CC - 9-1Fuel - no CO2 1-year payback	Y	ALL	(d)(e)	Andrew Whitley
FEL 1 st POD Supplemental No. 1	000644	000646	cpfbatch2023 - DR v2 - 2033 CC - 9-1Fuel - no CO2 3-years payback	Y	ALL	(d)(e)	Andrew Whitley
FEL 1 st POD Supplemental No. 1	000649	000651	cpfbatch2023 - DR v2 - 2033 CC - 9-1Fuel - no CO2 High Fuel	Y	ALL	(d)(e)	Andrew Whitley
FEL 1 st POD Supplemental No. 1	000654	000656	cpfbatch2023 - DR v2 - 2033 CC - 9-1Fuel - no CO2 Low Fuel	Y	ALL	(d)(e)	Andrew Whitley
FEL 1 st POD Supplemental No. 1	000659	000661	cpfbatch2023 - DR v2 - 2033 CC - 9-1Fuel - no CO2 Medium Fuel	Y	ALL	(d)(e)	Andrew Whitley
FEL 1 st POD Supplemental No. 1	000664	000666	cpfbatch2023 - DR v2 - 2033 CC - 9-1Fuel with CO2 Medium Fuel	Y	ALL	(d)(e)	Andrew Whitley

Set	Bates No. Begin	Bates No. End	Description	Conf Y/N	Line/Column	Florida Statute 366.093(3) Subsection	Declarant
FEL 1 st POD Supplemental No. 1	000669	000671	cpfbatch2023 - Industrial_V3 - 2033 CC - 9-1Fuel - no CO2 1-year payback	Y	ALL	(d)(e)	Andrew Whitley
FEL 1 st POD Supplemental No. 1	000674	000676	cpfbatch2023 - Industrial_V3 - 2033 CC - 9-1Fuel - no CO2 3-years payback	Y	ALL	(d)(e)	Andrew Whitley
FEL 1 st POD Supplemental No. 1	000679	000681	cpfbatch2023 - Industrial_V3 - 2033 CC - 9-1Fuel - no CO2 High Fuel	Y	ALL	(d)(e)	Andrew Whitley
FEL 1 st POD Supplemental No. 1	000684	000686	cpfbatch2023 - Industrial_V3 - 2033 CC - 9-1Fuel - no CO2 Low Fuel	Y	ALL	(d)(e)	Andrew Whitley
FEL 1 st POD Supplemental No. 1	000689	000691	cpfbatch2023 - Industrial_V3 - 2033 CC - 9-1Fuel - no CO2 Medium Fuel	Y	ALL	(d)(e)	Andrew Whitley
FEL 1 st POD Supplemental No. 1	000694	000696	cpfbatch2023 - Industrial_V3 - 2033 CC - 9-1Fuel with CO2 Medium Fuel	Y	ALL	(d)(e)	Andrew Whitley
FEL 1 st POD Supplemental No. 1	000699	000701	cpfbatch2023 - Res_V8 - 2033 CC - 9-1Fuel - no CO2 1-year payback	Y	ALL	(d)(e)	Andrew Whitley
FEL 1 st POD Supplemental No. 1	000704	000706	cpfbatch2023 - Res_V8 - 2033 CC - 9-1Fuel - no CO2 3-years payback	Y	ALL	(d)(e)	Andrew Whitley

Set	Bates No. Begin	Bates No. End	Description	Conf Y/N	Line/Column	Florida Statute 366.093(3) Subsection	Declarant
FEL 1 st POD Supplemental No. 1	000709	000711	cpfbatch2023 - Res_V8 - 2033 CC - 9-1Fuel - no CO2 High Fuel	Y	ALL	(d)(e)	Andrew Whitley
FEL 1 st POD Supplemental No. 1	000714	000716	cpfbatch2023 - Res_V8 - 2033 CC - 9-1Fuel - no CO2 Low Fuel	Y	ALL	(d)(e)	Andrew Whitley
FEL 1 st POD Supplemental No. 1	000719	000721	cpfbatch2023 - Res_V8 - 2033 CC - 9-1Fuel - no CO2 Medium Fuel	Y	ALL	(d)(e)	Andrew Whitley
FEL 1 st POD Supplemental No. 1	000724	000726	cpfbatch2023 - Res_V8 - 2033 CC - 9-1Fuel with CO2 Medium Fuel	Y	ALL	(d)(e)	Andrew Whitley
FEL 1 st POD Supplemental No. 1	000729	000729	TIGER 2024_TYSP_Updated_Adjusted_Assisted	Y	ALL	(d)(e)	Andrew Whitley
FEL 1 st POD Supplemental No. 1	000730	000730	TIGER 2024_TYSP_Updated_Adjusted_Isolated	Y	ALL	(d)(e)	Andrew Whitley
FEL 1 st POD Supplemental No. 1	000731	000731	TIGER 2024TYSP_Output_Updated_Adjusted_Assisted	Y	ALL	(d)(e)	Andrew Whitley
FEL 1 st POD Supplemental No. 1	000732	000732	TIGER 2024TYSP_Output_Updated_Adjusted_Isolated	Y	ALL	(d)(e)	Andrew Whitley

Set	Bates No. Begin	Bates No. End	Description	Conf Y/N	Line/Column	Florida Statute 366.093(3) Subsection	Declarant
FEL 1 st POD Supplemental No. 1	002844	002845	RI Files\Confidential\FPL - AC Equipment Cost by EER (2018 PIC Survey) adjusted(FPL CONFIDENTIAL)	Y	ALL	(d)(e)	James Herndon
FEL 1 st POD Supplemental No. 1	002854	002866	RI Initial Data Request\Confidential\FPL2021) E11 Workpaper v6	Y	ALL	(d)(e)	James Herndon
FEL 1 st POD Supplemental No. 1	002867	002879	RI Initial Data Request\Confidential\FPLC2021) E11 Workpaper 2021 v2	Y	ALL	(d)(e)	James Herndon
FEL 1 st POD Supplemental No. 1	002880	002892	RI Initial Data Request\Confidential\GE2021) E11 Workpaper v4	Y	ALL	(d)(e)	James Herndon
FEL 1 st POD Supplemental No. 1	002893	002893	RI Initial Data Request\Confidential\1-6 North 2021	Y	ALL	(d)(e)	James Herndon
FEL 1 st POD Supplemental No. 1	002894	002894	RI Initial Data Request\Confidential\1-6 East (dist 70's) 2020	Y	ALL	(d)(e)	James Herndon
FEL 1 st POD Supplemental No. 1	002895	002895	RI Initial Data Request\Confidential\1-6 East (dist 70's) 2021	Y	ALL	(d)(e)	James Herndon
FEL 1 st POD Supplemental No. 1	002896	002896	RI Initial Data Request\Confidential\1-6 North 2020 (Bates No. 2896)	Y	ALL	(d)(e)	James Herndon

Set	Bates No. Begin	Bates No. End	Description	Conf Y/N	Line/Column	Florida Statute 366.093(3) Subsection	Declarant
FEL 1 st POD Supplemental No. 1	002897	002897	RI Initial Data Request\Confidential\1-6 North East (dist 40's) 2021 (Bates No. 2897)	Y	ALL	(d)(e)	James Herndon
FEL 1 st POD Supplemental No. 1	002898	002898	RI Initial Data Request\Confidential\1-6 NorthEast (dist 40's) 2020 (Bates No. 2898)	Y	ALL	(d)(e)	James Herndon
FEL 1 st POD Supplemental No. 1	002899	002899	RI Initial Data Request\Confidential\1-6 South (dist 80's) 2020 (Bates No. 2899)	Y	ALL	(d)(e)	James Herndon
FEL 1 st POD Supplemental No. 1	002900	002900	RI Initial Data Request\Confidential\1-6 South (dist 80's) 2021 (Bates No. 2900)	Y	ALL	(d)(e)	James Herndon
FEL 1 st POD Supplemental No. 1	002901	002901	RI Initial Data Request\Confidential\1-6 West (dist 50's) 2020 (Bates No. 2901)	Y	ALL	(d)(e)	James Herndon
FEL 1 st POD Supplemental No. 1	002902	002902	RI Initial Data Request\Confidential\1-6 West (dist 50's) 2021 (Bates No. 2902)	Y	ALL	(d)(e)	James Herndon
FEL 1 st POD Supplemental No. 1	002903	002903	RI Initial Data Request\Confidential\7-12 East (dist 70's) 2020 (Bates No. 2903)	Y	ALL	(d)(e)	James Herndon
FEL 1 st POD Supplemental No. 1	002904	002904	RI Initial Data Request\Confidential\7-12 East (dist 70's) 2021 (Bates No. 2904)	Y	ALL	(d)(e)	James Herndon

Set	Bates No. Begin	Bates No. End	Description	Conf Y/N	Line/Column	Florida Statute 366.093(3) Subsection	Declarant
FEL 1 st POD Supplemental No. 1	002905	002905	RI Initial Data Request\Confidential\7-12 North 2020 (Bates No. 2905)	Y	ALL	(d)(e)	James Herndon
FEL 1 st POD Supplemental No. 1	002906	002906	RI Initial Data Request\Confidential\7-12 North 2021 (Bates No. 2906)	Y	ALL	(d)(e)	James Herndon
FEL 1 st POD Supplemental No. 1	002907	002907	RI Initial Data Request\Confidential\7-12 North East (dist 40's) 2021 (Bates No. 2907)	Y	ALL	(d)(e)	James Herndon
FEL 1 st POD Supplemental No. 1	002908	002908	RI Initial Data Request\Confidential\7-12 NorthEast (dist 40's) 2020 (Bates No. 2908)	Y	ALL	(d)(e)	James Herndon
FEL 1 st POD Supplemental No. 1	002909	002909	RI Initial Data Request\Confidential\7-12 South (dist 80's) 2021 (Bates No. 2909)	Y	ALL	(d)(e)	James Herndon
FEL 1 st POD Supplemental No. 1	002910	002910	RI Initial Data Request\Confidential\7-12 West (dist 50's) 2020 (Bates No. 2910)	Y	ALL	(d)(e)	James Herndon
FEL 1 st POD Supplemental No. 1	002911	002911	RI Initial Data Request\Confidential\7-12 West (dist 50's) 2021 (Bates No. 2911)	Y	ALL	(d)(e)	James Herndon
FEL 1 st POD Supplemental No. 1	002960	002961	RI Initial Data Request\Confidential\2018 HVAC costs	Y	ALL	(d)(e)	James Herndon

Set	Bates No. Begin	Bates No. End	Description	Conf · Y/N	Line/Column	Florida Statute 366.093(3) Subsection	Declarant
FEL 1 st POD Supplemental No. 1	002995	002996	RI Initial Data Request\Confidential\2020 HVAC costs	Y	ALL	(d)(e)	James Herndon
FEL 1 st POD Supplemental No. 1	003026	003027	RI Initial Data Request\Confidential\2021 HVAC costs	Y	ALL	(d)(e)	James Herndon
FEL 1 st POD Supplemental No. 1	003067	003068	RI Initial Data Request\Confidential\2022 HVAC costs	Y	ALL	(d)(e)	James Herndon
FEL 1 st POD Supplemental No. 1	003071	003071	RI Initial Data Request\Confidential\ALACHUA	Y	ALL	(d)(e)	James Herndon
FEL 1 st POD Supplemental No. 1	003072	003072	RI Initial Data Request\Confidential\BAKER	Y	ALL	(d)(e)	James Herndon
FEL 1 st POD Supplemental No. 1	003073	003073	RI Initial Data Request\Confidential\BAY	Y	ALL	(d)(e)	James Herndon
FEL 1 st POD Supplemental No. 1	003074	003074	RI Initial Data Request\Confidential\BRADFORD	Y	ALL	(d)(e)	James Herndon
FEL 1 st POD Supplemental No. 1	003075	003075	RI Initial Data Request\Confidential\BREVARD (Bates No. 3076)	Y	ALL	(d)(e)	James Herndon

Set	Bates No. Begin	Bates No. End	Description	Conf Y/N	Line/Column	Florida Statute 366.093(3) Subsection	Declarant
FEL 1 st POD Supplemental No. 1	003076	003076	RI Initial Data Request\Confidential\BROWARD_1 (Bates No. 3077)	Y	ALL	(d)(e)	James Herndon
FEL 1 st POD Supplemental No. 1	003077	003077	RI Initial Data Request\Confidential\BROWARD_2 (Bates No. 3077)	Y	ALL	(d)(e)	James Herndon
FEL 1 st POD Supplemental No. 1	003078	003086	RI Initial Data Request\Confidential\Ceiling Insulation PIC Cost SQFT 2018-2022 Final	Y	ALL	(d)(e)	James Herndon
FEL 1 st POD Supplemental No. 1	003087	003095	RI Initial Data Request\Confidential\Ceiling Insulation PIC Cost SQFT 2018-2022 Final_RI	Y	ALL	(d)(e)	James Herndon
FEL 1 st POD Supplemental No. 1	003096	003096	RI Initial Data Request\Confidential\CHARLOTTE(Bates No. 3096)	Y	ALL	(d)(e)	James Herndon
FEL 1 st POD Supplemental No. 1	003097	003097	RI Initial Data Request\Confidential\CLAY	Y	ALL	(d)(e)	James Herndon
FEL 1 st POD Supplemental No. 1	003098	003098	RI Initial Data Request\Confidential\Collier	Y	ALL	(d)(e)	James Herndon
FEL 1 st POD Supplemental No. 1	003099	003099	RI Initial Data Request\Confidential\Columbia	Y	ALL	(d)(e)	James Herndon

Set	Bates No. Begin	Bates No. End	Description	Conf Y/N	Line/Column	Florida Statute 366.093(3) Subsection	Declarant
FEL 1 st POD Supplemental No. 1	003100	003100	RI Initial Data Request\Confidential\DADE_1 (Bates No. 3100).csv	Y	ALL	(d)(e)	James Herndon
FEL 1 st POD Supplemental No. 1	003101	003101	RI Initial Data Request\Confidential\DADE_2 (Bates No. 3101).csv	Y	ALL	(d)(e)	James Herndon
FEL 1 st POD Supplemental No. 1	003102	003102	RI Initial Data Request\Confidential\Desoto	Y	ALL	(d)(e)	James Herndon
FEL 1 st POD Supplemental No. 1	003103	003104	RI Initial Data Request\Confidential\DSM Commercial Data	Y	ALL	(d)(e)	James Herndon
FEL 1 st POD Supplemental No. 1	003105	003105	RI Initial Data Request\Confidential\DSM_2019_data_All Districts (Bates Number 003105).xlsx	Y	ALL	(d)(e)	James Herndon
FEL 1 st POD Supplemental No. 1	003106	003106	RI Initial Data Request\Confidential\Duval	Y	ALL	(d)(e)	James Herndon
FEL 1 st POD Supplemental No. 1	003107	003107	RI Initial Data Request\Confidential\ESCAMBIA (Bates No. 3107)	Y	ALL	(d)(e)	James Herndon
FEL 1 st POD Supplemental No. 1	003108	003108	RI Initial Data Request\Confidential\FLAGLER (Bates No. 3108)	Y	ALL	(d)(e)	James Herndon

Set	Bates No. Begin	Bates No. End	Description	Conf Y/N	Line/Column	Florida Statute 366.093(3) Subsection	Declarant
FEL 1 st POD Supplemental No. 1	003109	003109	RI Initial Data Request\Confidential\FPL - AC Equipment Cost by SEER (2018 PIC Survey)	Y	ALL	(d)(e)	James Herndon
FEL 1 st POD Supplemental No. 1	003115	003115	RI Initial Data Request\Confidential\FPLC-GSD22_8760_FINAL	Y	ALL	(d)(e)	James Herndon
FEL 1 st POD Supplemental No. 1	003116	003116	RI Initial Data Request\Confidential\FPLC-RS22_8760_FINAL	Y	ALL	(d)(e)	James Herndon
FEL 1 st POD Supplemental No. 1	003117	003117	RI Initial Data Request\Confidential\FPLC-GS22_8760_FINAL	Y	ALL	(d)(e)	James Herndon
FEL 1 st POD Supplemental No. 1	003118	003118	RI Initial Data Request\Confidential\Glades	Y	ALL	(d)(e)	James Herndon
FEL 1 st POD Supplemental No. 1	003119	003119	RI Initial Data Request\Confidential\Hardee	Y	ALL	(d)(e)	James Herndon
FEL 1 st POD Supplemental No. 1	003120	003120	RI Initial Data Request\Confidential\Henry	Y	ALL	(d)(e)	James Herndon
FEL 1 st POD Supplemental No. 1	003121	003121	RI Initial Data Request\Confidential\Holmes	Y	ALL	(d)(e)	James Herndon

Set	Bates No. Begin	Bates No. End	Description	Conf Y/N	Line/Column	Florida Statute 366.093(3) Subsection	Declarant
FEL 1 st POD Supplemental No. 1	003122	003122	RI Initial Data Request\Confidential\Highlands	Y	ALL	(d)(e)	James Herndon
FEL 1 st POD Supplemental No. 1	003123	003124	RI Initial Data Request\Confidential\HVAC cost 2019	Y	ALL	(d)(e)	James Herndon
FEL 1 st POD Supplemental No. 1	003127	003127	RI Initial Data Request\Confidential\JACKSON	Y	ALL	(d)(e)	James Herndon
FEL 1 st POD Supplemental No. 1	003128	003128	RI Initial Data Request\Confidential\LEE (Bates No. 3128)	Y	ALL	(d)(e)	James Herndon
FEL 1 st POD Supplemental No. 1	003129	003129	RI Initial Data Request\Confidential\MANATEE (Bates No. 3129).csv	Y	ALL	(d)(e)	James Herndon
FEL 1 st POD Supplemental No. 1	003130	003130	RI Initial Data Request\Confidential\MARTIN (Bates No. 3130)	Y	ALL	(d)(e)	James Herndon
FEL 1 st POD Supplemental No. 1	003131	003131	RI Initial Data Request\Confidential\Monroe	Y	ALL	(d)(e)	James Herndon
FEL 1 st POD Supplemental No. 1	003132	003132	RI Initial Data Request\Confidential\Nassau	Y	ALL	(d)(e)	James Herndon

Set	Bates No. Begin	Bates No. End	Description	Conf . Y/N	Line/Column	Florida Statute 366.093(3) Subsection	Declarant
FEL 1 st POD Supplemental No. 1	003133	003133	RI Initial Data Request\Confidential\Okaloosa	Y	ALL	(d)(e)	James Herndon
FEL 1 st POD Supplemental No. 1	003134	003134	RI Initial Data Request\Confidential\OKEECHOBEE	Y	ALL	(d)(e)	James Herndon
FEL 1 st POD Supplemental No. 1	003136	003136	RI Initial Data Request\Confidential\Orange	Y	ALL	(d)(e)	James Herndon
FEL 1 st POD Supplemental No. 1	003137	003137	RI Initial Data Request\Confidential\OSCEOLA	Y	ALL	(d)(e)	James Herndon
FEL 1 st POD Supplemental No. 1	003138	003138	RI Initial Data Request\Confidential\PALM BEACH_1 (Bates No. 3138).csv	Y	ALL	(d)(e)	James Herndon
FEL 1 st POD Supplemental No. 1	003139	003139	RI Initial Data Request\Confidential\PALM BEACH_2 (Bates No. 3139)	Y	ALL	(d)(e)	James Herndon
FEL 1 st POD Supplemental No. 1	003140	003140	RI Initial Data Request\Confidential\Putnam	Y	ALL	(d)(e)	James Herndon
FEL 1 st POD Supplemental No. 1	003175	003175	RI Initial Data Request\Confidential\Santa Rosa	Y	ALL	(d)(e)	James Herndon

Set	Bates No. Begin	Bates No. End	Description	Conf . Y/N	Line/Column	Florida Statute 366.093(3) Subsection	Declarant
FEL 1 st POD Supplemental No. 1	003176	003176	RI Initial Data Request\Confidential\Seminole	Y	ALL	(d)(e)	James Herndon
FEL 1 st POD Supplemental No. 1	003177	003177	RI Initial Data Request\Confidential\SARASOTA (Bates No. 3177)	Y	ALL	(d)(e)	James Herndon
FEL 1 st POD Supplemental No. 1	003178	003178	RI Initial Data Request\Confidential\ST JOHNS (Bates No. 3178)	Y	ALL	(d)(e)	James Herndon
FEL 1 st POD Supplemental No. 1	003179	003179	RI Initial Data Request\Confidential\ST LUCIE (Bates No. 3179)	Y	ALL	(d)(e)	James Herndon
FEL 1 st POD Supplemental No. 1	003180	003180	RI Initial Data Request\Confidential\SUWANEE	Y	ALL	(d)(e)	James Herndon
FEL 1 st POD Supplemental No. 1	003182	003182	RI Initial Data Request\Confidential\Thermal Energy Storage Project List - Incremental Cost Calculation	Y	ALL	(d)(e)	James Herndon
FEL 1 st POD Supplemental No. 1	003183	003183	RI Initial Data Request\Confidential\UNION	Y	ALL	(d)(e)	James Herndon
FEL 1 st POD Supplemental No. 1	003184	003184	RI Initial Data Request\Confidential\VOLUSIA	Y	ALL	(d)(e)	James Herndon

Set	Bates No. Begin	Bates No. End	Description	Conf . Y/N	Line/Column	Florida Statute 366.093(3) Subsection	Declarant
FEL 1 st POD Supplemental No. 1	003185	003185	RI Initial Data Request\Confidential\WALTON	Y	ALL	(d)(e)	James Herndon
FEL 1 st POD Supplemental No. 1	003186	003186	RI Initial Data Request\Confidential\WASHINGTON	Y	ALL	(d)(e)	James Herndon
FEL 1 st POD Supplemental No. 1	003218	003218	RI Initial Data Request\Confidential\Indian Fiver	Y	ALL	(d)(e)	James Herndon
FEL 1 st POD Supplemental No. 2	003317	003317	Utility Bills for ROG 52	Y	ALL	(d)(e)	John Floyd
FEL 1 st POD Supplemental No. 2	003318	003319	HVAC DSM - vF CONFIDENTIAL	Y	ALL	(d)(e)	David Hughes
FEL 1 st POD Supplemental No. 2	003219	003230	TES All Rates (2033 CC)	Y	ALL	(d)(e)	John Floyd
FEL 1 st POD Supplemental No. 2	003231	003239	2025 - BOC (2033 CC)	Y	ALL	(d)(e)	John Floyd
FEL 1 st POD Supplemental No. 2	003240	003246	2025 - CDR (2033 CC)	Y	ALL	(d)(e)	John Floyd

Set	Bates No. Begin	Bates No. End	Description	Conf Y/N	Line/Column	Florida Statute 366.093(3) Subsection	Declarant
FEL 1 st POD Supplemental No. 2	003247	003253	2025 - ROC (2033 CC)	Y	ALL	(d)(e)	John Floyd
FEL 1 st POD Supplemental No. 2	003321	003321	HVAC DSM - vF CONFIDENTIAL	Y	ALL	(d)(e)	David Hughes
FEL 1 st POD Supplemental No. 2	003323	003324	HVAC DSM - vF CONFIDENTIAL	Y	ALL	(d)(e)	David Hughes
FEL 1 st POD Supplemental No. 2	003329	003330	HVAC DSM - vF CONFIDENTIAL	Y	ALL	(d)(e)	David Hughes

EXHIBIT D

DECLARATIONS

EXHIBIT D

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Commission review of numeric
conservation goals (Florida Power & Light
Company)

Docket No. 20240012-EG

DECLARATION OF JAMES HERNDON

1. My name is James Herndon. I am currently employed by Resource Innovations, Inc. as a Vice President in the Advisory Services Practice. I have personal knowledge of the matters stated in this written declaration.

2. I have reviewed the documents and information included in Exhibit A to FPL's Request for Confidential Classification filed this date, for which I am listed as the declarant on Exhibit C. The documents that FPL seeks to have protected contain proprietary programs and processes used in FPL's Integrated Resource Planning. FPL developed these programs and processes for its internal use. These programs and processes are not commercially available, but they would have commercial value if they were disclosed, and FPL should be compensated for any such disclosure. FPL has a proprietary, competitive interest in these programs and processes it has developed, and it has chosen not to make them commercially available, but to use them solely internally. The disclosure of these proprietary materials would impair the value of these programs and processes and harm FPL's competitive business interests. Additionally, the information contains software and information that is proprietary to a third-party vendor. FPL treats these programs and processes as confidential and proprietary and has previously successfully sought confidential treatment of these materials at the Commission.

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.



James Herndon

Date: June 21, 2024

EXHIBIT D

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Commission review of numeric
conservation goals (Florida Power & Light
Company)

Docket No. 20240012-EG

DECLARATION OF ANDREW W. WHITLEY

1. My name is Andrew W. Whitley. I am currently employed by Florida Power & Light Company ("FPL") as Engineering Manager, Finance. I have personal knowledge of the matters stated in this written declaration.

2. I have reviewed the documents and information included in Exhibit A to FPL's Request for Confidential Classification filed this date, for which I am listed as the declarant on Exhibit C. The documents that FPL seeks to have protected contain proprietary programs and processes used in FPL's Integrated Resource Planning. FPL developed these programs and processes for its internal use. These programs and processes are not commercially available, but they would have commercial value if they were disclosed, and FPL should be compensated for any such disclosure. FPL has a proprietary, competitive interest in these programs and processes it has developed, and it has chosen not to make them commercially available, but to use them solely internally. The disclosure of these proprietary materials would impair the value of these programs and processes and harm FPL's competitive business interests. Additionally, the information contains software and information that is proprietary to a third party vendor. FPL treats these programs and processes as confidential and proprietary and has previously successfully sought confidential treatment of these materials at the Commission.

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.



Andrew W. Whitley

Date: 06/19/2024

EXHIBIT D

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Commission review of numeric
conservation goals (Florida Power & Light
Company)

Docket No. 20240012-EG

DECLARATION OF DAVID HUGHES

1. My name is David Hughes. I am currently employed by Florida Power & Light Company ("FPL") as Senior Director, Finance. I have personal knowledge of the matters stated in this written declaration.

2. I have reviewed the documents and information included in Exhibit A to FPL's Request for Confidential Classification filed this date, for which I am listed as the declarant on Exhibit C. The documents that FPL seeks to have protected contain proprietary programs and processes used in FPL's Integrated Resource Planning. FPL developed these programs and processes for its internal use. These programs and processes are not commercially available, but they would have commercial value if they were disclosed, and FPL should be compensated for any such disclosure. FPL has a proprietary, competitive interest in these programs and processes it has developed, and it has chosen not to make them commercially available, but to use them solely internally. The disclosure of these proprietary materials would impair the value of these programs and processes and harm FPL's competitive business interests. Additionally, the information contains software and information that is proprietary to a third party vendor. FPL treats these programs and processes as confidential and proprietary and has previously successfully sought confidential treatment of these materials at the Commission.

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.


David Hughes

Date: 6/19/2024

EXHIBIT D

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Commission review of numeric
conservation goals (Florida Power & Light
Company)

Docket No. 20240012-EG

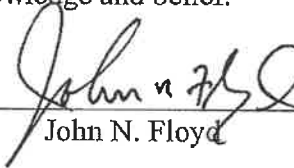
DECLARATION OF JOHN N. FLOYD

1. My name is John N. Floyd. I am currently employed by Florida Power & Light Company ("FPL") as Director of Demand-Side Management Strategy. I have personal knowledge of the matters stated in this written declaration.

2. I have reviewed the documents and information included in Exhibit A to FPL's Request for Confidential Classification filed this date, for which I am listed as the declarant on Exhibit C. The documents that FPL seeks to have protected contain proprietary programs and processes used in FPL's Integrated Resource Planning. FPL developed these programs and processes for its internal use. These programs and processes are not commercially available, but they would have commercial value if they were disclosed, and FPL should be compensated for any such disclosure. FPL has a proprietary, competitive interest in these programs and processes it has developed, and it has chosen not to make them commercially available, but to use them solely internally. The disclosure of these proprietary materials would impair the value of these programs and processes and harm FPL's competitive business interests. Additionally, the information contains software and information that is proprietary to a third party vendor. FPL treats these programs and processes as confidential and proprietary and has previously successfully sought confidential treatment of these materials at the Commission.

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.



John N. Floyd

Date: 6/20/24