

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: July 8, 2024

**FLORIDA POWER & LIGHT COMPANY’S FIRST REQUEST
FOR EXTENSION OF CONFIDENTIAL CLASSIFICATION OF
CERTAIN INFORMATION PROVIDED IN ITS RESPONSES TO
STAFF’S NINTH REQUEST FOR PRODUCTION OF DOCUMENTS, No. 29**

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”) Ninth Request for Production of Documents, No. 29 (the “Confidential Information”). In support of its Request, FPL states as follows:

1. On July 30, 2021, FPL filed a Request for Confidential Classification of the Confidential Information (Document No. 08559-2021). By Order No. PSC-2023-0031-CFO-EI, issued January 10, 2023, the Commission granted FPL’s July 30, 2021 Request for Confidential Classification. FPL herein adopts and incorporates by reference the July 30, 2021 Request and Order No. PSC-2023-0031-CFO-EI.

2. The period of confidential treatment granted by Order No. PSC-2023-0031-CFO-EI will expire on July 10, 2024. The Confidential Discovery Responses that were the subject of FPL’s July 30, 2021 Request and Order No. PSC-2023-0031-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 the information designated in Exhibits A, B and C to the July 30, 2021 Request remain confidential. Accordingly, those exhibits will not be reproduced or reattached here.

4. Included with this Request is First Revised Exhibit D, the declaration of John Reed.

5. 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.

6. As stated in FPL's July 30, 2021 Request and as described in the declaration included as First Revised Exhibit D, the Confidential Information contains competitive business information the disclosure of which would impair the competitive business of the provider of the information. This information is protected by Sections 366.093(3)(e), Fla. Stat.

7. 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 reasons, as more fully set forth in the supporting materials and declaration, FPL respectfully requests that its Request for Extension of Confidential Classification be granted.

Respectfully submitted,

FLORIDA POWER & LIGHT COMPANY

By: s/ Maria Jose Moncada

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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 8th day of July 2024 to the following parties:

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By: s/ Maria Jose Moncada
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EXHIBIT D

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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 JOHN REED

1. My name is John J. Reed. I am the Chairman of Concentric Energy Advisors, Inc. I have personal knowledge of the matters stated in this written declaration.

2. I have reviewed the documents referenced and incorporated in FPL's Request for Confidential Classification, specifically the materials provided in FPL's response to Florida Public Service Commission Staff's Ninth Request for Production of Documents No. 29. 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 rating agency reports which are proprietary to the rating agencies. 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-2023-0031-CFO-EI issued January 10, 2023. To my knowledge, 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.



John J. Reed

Date: July 2, 2024