

**BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION**

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

Docket No: 20250001-EI

Date: February 18, 2025

**FLORIDA POWER & LIGHT COMPANY'S SECOND REQUEST  
FOR EXTENSION OF CONFIDENTIAL CLASSIFICATION OF  
MATERIALS PROVIDED PURSUANT TO AUDIT NO. 2018-019-4-2**

Pursuant to Section 366.093, Florida Statutes ("Section 366.093") and Rule 25-22.006, Florida Administrative Code, Florida Power & Light Company ("FPL") hereby submits its Second Request for Extension of Confidential Classification of Information Provided Pursuant to Audit No. 2018-019-4-2 ("Confidential Information"). In support of this request, FPL states as follows:

1. On May 24, 2018, FPL filed a Request for Confidential Classification of the Confidential Information, which included Exhibits A, B, C and D ("May 24, 2018 Request"). By Order No. PSC-2018-0380-CFO-EI, dated August 1, 2018 ("Order 0380"), the Commission granted FPL's May 24, 2018 Request. FPL adopts and incorporates by reference the May 24, 2018 Request and Order 0380.

2. On July 28, 2021, FPL filed a First Request for Extension of Confidential Classification of the Confidential Information, which included Exhibits A, B, C and D ("July 28, 2021 Request"). By Order No. PSC-2022-0066-CFO-EI, dated February 18, 2022 ("Order 0066"), the Commission granted FPL's July 28, 2021 Request. FPL adopts and incorporates by reference the July 28, 2021 Request and Order 0066.

3. The period of confidential treatment granted by Order 0066 will soon expire. The Confidential Information that was the subject of FPL's July 28, 2021 Request and Order 0066 warrants continued treatment as proprietary and confidential business information within the

meaning of Section 366.093(3). Accordingly, FPL hereby submits its Second Request for Extension of Confidential Classification.

4. All the information designated in the July 28, 2021 Request remains confidential, and to the knowledge of the undersigned attorney, the Confidential Information has not been publicly disclosed. Accordingly, Exhibits A, and B will not be reproduced or reattached herein. Included is Second Revised Exhibit C to reflect new declarants Michael V. Cashman and Amy Marante, who replace former declarants Gerard Yupp and Antonio Maceo, respectively.

5. Also included as Second Revised Exhibit D are the declarations of Amy Marante and Michael V. Cashman in support of this request.

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, 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 explained more fully FPL's May 24, 2018 Request, Second Revised Exhibit C, and the declaration of Amy Marante contained in Second Revised Exhibit D, certain documents in the Confidential Information contain information concerning internal auditing controls and reports of internal auditors. Disclosure of this information would be harmful to FPL and its customers because it may impact the effectiveness of the Internal Auditing department itself. This information is protected by Section 366.093(3)(b), Fla. Stat

8. As stated in FPL's May 24, 2018 Request, Second Revised Exhibit C and the declarations included as Second Revised Exhibit D, The Confidential Information contains information concerning bids, pricing or other contractual data. Specifically, the documents include negotiated pricing formulas, payment amounts and other terms for capacity and energy transactions, the disclosure of which would impair the efforts of FPL to contract for goods or services on favorable terms for the benefit of FPL's customers. Also, certain documents contain information relating to competitive interests, the disclosure of which would also impair the competitive interests of FPL and its counterparties. This information is protected by Sections 366.093(3)(d) and (e), Fla. Stat.

9. Also, certain documents contain information relating to competitive interests, the disclosure of which would impair the competitive business of FPL and its vendors. This information is protected by Section 366.093(3)(e), Fla. Stat.

10. Nothing has changed since the Commission entered Order 0066 to render the Confidential Information identified in Second Revised Exhibit C stale or public, such that continued confidential treatment would not be appropriate.

11. Pursuant to Section 366.093(4), F.S., the information for which confidential classification is granted remains protected from disclosure up to 18 months unless good cause is shown to grant protection from disclosure for a longer period. Currently, the Commission retains audit reports for period of seven years at which time the audit materials are returned to FPL unless Commission staff or another affected person requests that these audit materials continue to be retained. The nature of these materials will not change in the next three years. Therefore, to promote administrative efficiency, FPL requests confidential classification for a period of thirty-six (36) months. 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 thirty-six (36) 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 included with or incorporated in this Request, Florida Power & Light Company respectfully requests that its Second Request for Extension of Confidential Classification be granted.

Respectfully submitted,

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By: /s/ David M. Lee  
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**CERTIFICATE OF SERVICE**  
**Docket No. 20250001-EI**

I **HEREBY CERTIFY** that a true and correct copy of the foregoing has been furnished by electronic service on this 18th day of February 2025 to the following:

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By: /s/ David M. Lee  
David M. Lee  
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**Docket No. 20250001-EI**

**SECOND REVISED EXHIBIT “C”**

**FPL’s MATERIALS PROVIDED PURSUANT  
TO AUDIT NO. 2018-019-4-2**

**SECOND REVISED EXHIBIT C**

**COMPANY:** Florida Power & Light Company  
**TITLE:** List of Confidential Workpapers  
**AUDIT:** FPL, Capacity Audit  
**AUDIT CONTROL NO:** 2018-019-4-2  
**DOCKET NO:** 20250001-EI  
**DATE:** February 18, 2021

**Bold denotes a new declarant**

<b>Workpaper No.</b>	<b>Description</b>	<b>No. of Pages</b>	<b>Conf Y/N</b>	<b>Column No./Line No.</b>	<b>Florida Statute 366.093 (3) Subsection</b>	<b>Declarant</b>
9.0	INTERNAL AND EXTERNAL AUDITS	1	Y	ALL	(b)	<b>A. Marante</b>
9.1	INTERNAL AND EXTERNAL AUDITS	1	Y	ALL	(b)	<b>A. Marante</b>
9.2	INTERNAL AND EXTERNAL AUDITS	1	N			
9.3	INTERNAL AND EXTERNAL AUDITS	1	N			
16-7/3.1	INCREMENTAL SECURITY	1	N			
45-1	TRANSMISSION REVENUE	1	N			
45-1.1	TRANSMISSION REVENUE	1	N			
45-1/1	TRANSMISSION REVENUE	1	N			
45-1/1.1	TRANSMISSION REVENUE	1	N			
45-1/2	TRANSMISSION REVENUE	1	N			
45-1/2.1	TRANSMISSION REVENUE	1	N			
45-1/2.2	TRANSMISSION REVENUE	1	N			
45-1/2.3	TRANSMISSION REVENUE	1	N			
45-1/3	TRANSMISSION REVENUE	1	N			
45-1/3.1	TRANSMISSION REVENUE	1	N			
45-1/3.2	TRANSMISSION REVENUE	1	N			
45-1/3.3	TRANSMISSION REVENUE	1	N			
45-1/3.4	TRANSMISSION REVENUE	1	N			
45-1/3.5	TRANSMISSION REVENUE	1	N			
45-1/3.6	TRANSMISSION REVENUE	1	N			
45-1/3.7	TRANSMISSION REVENUE	1	N			
45-1/4	TRANSMISSION REVENUE	1	N			
45-1/4.1	TRANSMISSION REVENUE	1	N			
45-1/4.2	TRANSMISSION REVENUE	1	N			
45-1/5	TRANSMISSION REVENUE	1	N			
45-1/5.1	TRANSMISSION REVENUE	1	N			
45-1/5.2	TRANSMISSION REVENUE	1	N			
45-1/5.3	TRANSMISSION REVENUE	1	N			
46-2	PURCHASED POWER	1	Y	Lns. 1-4	(d), (e)	<b>M. Cashman</b>
46-2.1	PURCHASED POWER	1	Y	Col. A, Lns.1-13 Col. B, Lns.1, 2, 5, 12 and 13 Col. C, Lns. 1 and 2 Col. D	(d), (e)	<b>M. Cashman</b>
46-2/1	PURCHASED POWER	1	Y	ALL	(d)	<b>M. Cashman</b>
46-2/1.1	PURCHASED POWER	1	Y	ALL	(d)	<b>M. Cashman</b>
46-2/1.2	PURCHASED POWER	1	Y	ALL	(d)	<b>M. Cashman</b>



<b>Workpaper No.</b>	<b>Description</b>	<b>No. of Pages</b>	<b>Conf Y/N</b>	<b>Column No./Line No.</b>	<b>Florida Statute 366.093 (3) Subsection</b>	<b>Declarant</b>
46-2/1.3	PURCHASED POWER	1	Y	ALL	(d)	<b>M. Cashman</b>
46-2/1.4	PURCHASED POWER	1	Y	ALL	(d)	<b>M. Cashman</b>
46-2/1.5	PURCHASED POWER	1	Y	ALL	(d)	<b>M. Cashman</b>
46-2/1.6	PURCHASED POWER	1	Y	ALL	(d)	<b>M. Cashman</b>
46-3	PURCHASED POWER	1	N			
46-3.1	PURCHASED POWER	1	N			
46-3.2	PURCHASED POWER	1	N			

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**SECOND REVISED EXHIBIT “D”**

**FPL’s MATERIALS PROVIDED PURSUANT  
TO AUDIT NO. 2018-019-4-2**

**SECOND REVISED EXHIBIT D**

**BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION**

In re: Fuel and Purchase Power Cost Recovery  
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Factor

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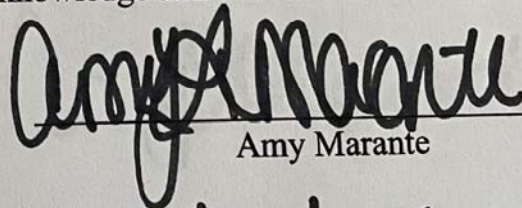
**DECLARATION OF AMY MARANTE**

1. My name is Amy Marante. I am currently employed by Florida Power & Light Company ("FPL") as Director, Internal Auditing. I have personal knowledge of the matters stated in this declaration.

2. I have reviewed Second Revised Exhibit C and the documents that were included in Exhibit A to FPL's First Request for Extension of Confidential Classification of Information Obtained in Connection with Audit No. 2018-019-4-2, for which I am listed as the declarant. Such documents or materials that I have reviewed and which, in whole or in part, are asserted by FPL to be proprietary confidential business information, contain or constitute internal auditing controls, reports or notes of internal auditors, or information relating to internal auditing reports issued in 2017. Full and frank disclosure of information to the Internal Auditing department is essential for the department to fulfill its role, and the confidential status of internal auditing scope, process, findings, and reports supports such disclosure. The release of information related to reports of internal auditors would be harmful to FPL and its customers because it may impact the effectiveness of the Internal Auditing department itself. To the best of my knowledge, FPL has maintained the confidentiality of these documents and materials.

3. Nothing has occurred since the issuance of Order No. PSC-2022-0066-CFO-EI to render the information stale or public, such that continued confidential treatment would not be appropriate. Therefore, the information should remain confidential for a period of not less than 36 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.

  
\_\_\_\_\_  
Amy Marante

Date: \_\_\_\_\_

2/17/25

**SECOND REVISED EXHIBIT D**

**BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION**

In re: Fuel and Purchase Power Cost Recovery  
Clause with Generating Performance Incentive  
Factor

Docket No. 20250001-EI

**DECLARATION OF MICHAEL V. CASHMAN**

1. My name is Michael V. Cashman. I am currently employed by Florida Power & Light Company ("FPL") as Executive Director, Wholesale Operations and Trading. I have personal knowledge of the matters stated in this declaration.

2. I have reviewed Second Revised Exhibit C and the documents that are included in Exhibit A to FPL's First Request for Extension of Confidential Classification of Information Obtained in Connection with Audit No. 2018-019-4-2 for which I am identified as the declarant. The documents or materials that I have reviewed and which are asserted by FPL to be proprietary confidential business information contain or constitute contractual data such as pricing formulas and other terms, payment records, and supplier rates for capacity and energy transactions, the disclosure of which would impair the efforts of FPL to contract for capacity and energy-related goods or services on favorable terms for the benefit of its customers, and would impair the competitive interests of FPL and its vendors. Certain information in these documents and materials would also place FPL at a disadvantage when coupled with other information that is publicly available. To the best of my knowledge, FPL has maintained the confidentiality of these documents and materials.

3. Nothing has occurred since the issuance of Order No. PSC-2022-0066-CFO-EI to render the information stale or public, such that continued confidential treatment would not be appropriate. Therefore, the information should remain confidential for a period of not less than 36 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.

  
Michael V. Cashman

Date: 2/17/2025