

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 21, 2025

**FLORIDA POWER & LIGHT COMPANY'S SECOND REQUEST
FOR EXTENSION OF CONFIDENTIAL CLASSIFICATION OF
MATERIALS PROVIDED PURSUANT TO AUDIT NO. 2018-019-4-1**

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. 2018-019-4-1 ("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-2018-0381-CFO-EI, dated August 1, 2018 ("Order 0381"), the Commission granted FPL's May 24, 2018 Request. FPL adopts and incorporates by reference the May 24, 2018 Request and Order 0381.

2. On July 28, 2021, FPL filed a First Request for Extension of Confidential Classification of the Confidential Information, which included First Revised Exhibits A, B, C and D ("July 28, 2021 Request"). By Order No. PSC-2022-0083-CFO-EI, dated February 21, 2022 ("Order 0083"), the Commission granted FPL's July 28, 2021 Request. FPL adopts and incorporates by reference the July 28, 2021 Request and Order 0083.

3. The period of confidential treatment granted by Order 0083 will soon expire. of the Confidential Information that was the subject of FPL's July 28, 2021 Request and Order 0083 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 Michael V. Cashman and Amy Marante 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 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 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 or payment amounts for energy and capacity-related goods or services as well as purchase or sale of energy and capacity, natural gas, and natural gas storage, 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. Disclosure of this information 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. Nothing has changed since the Commission entered Order 0083 to render the Confidential Information identified in Second Revised Exhibit C stale or public, such that continued confidential treatment would not be appropriate.

10. 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

David M. Lee
Florida Bar No. 103152

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 21st day of February 2025 to the following:

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By: /s/ David M. Lee
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Florida Bar No. 103152

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SECOND REVISED EXHIBIT “C”

**FPL’s MATERIALS PROVIDED PURSUANT
TO AUDIT NO. 2018-019-4-1**

SECOND REVISED EXHIBIT C

COMPANY: Florida Power & Light Company
TITLE: List of Confidential Workpapers
AUDIT: FPL, Fuel Audit
AUDIT CONTROL NO: 2018-019-4-1
DOCKET NO: 20250001-EI
DATE: February 21, 2021

Bold denotes new declarant

Workpaper No.	Description	No. of Pages	Conf Y/N	Column No./Line No.	Florida Statute 366.093 (3) Subsection	Declarant
9	LIST OF INTERNAL AUDITS	2	Y	ALL	(b)	A. Marante
9-1	NOTES	1	Y	ALL	(b)	A. Marante
9-2	NOTES	1	Y	ALL	(b)	A. Marante
9-3	NOTES	1	Y	ALL	(b)	A. Marante
43-1	SAMPLE	1	N			
43-1.1	FUEL REQUISITION	1	N			
43-1.2	FUEL RECEIPTS	1	N			
43-2	SAMPLE	1	N			
43-2.1	GAS RECEIVING REPORT	1	N			
43-2.2	GAS COMPUTATION REPORT	1	N			
43-2.3	GAS PRICE COMPUTATIONS	1	N			
43-5	FILE OF FUEL TRANSACTIONS	1	N			
43-5.1	FUEL USED RECONCILIATION	1	N			
44-1	SCHEDULE A NOTES	1	N			
44-2	FUEL INVENTORY	1	N			
44-2.1	INVENTORY RECONCILIATION	1	N			
44-2.2	INVENTORY RECONCILIATION	1	N			
44-2.3	FUEL REQUISITION	2	N			
44-3	ADJUSTMENT	1	N			
44-3.1	COAL INVENTORY	1	N			
45-1	INVENTORY ANALYSIS	2	N			
45-2	OIL PURCHASES	1	N			
45-2.1	FOSSIL FUEL INVENTORY	1	N			
45-3	SJRPP	1	N			
45-4	SCHERER	1	N			
45-8	FORM 423-2	1	N			
45-9	LFARS FUEL USED	2	N			
46-1	TRANS SERVICE	1	N			
46-1.1	DEAL JOURNAL	1	N			
46-2	PURCHASE STATEMENT	3	N			
46-2.1	DEAL INFORMATION	1	N			

Workpaper No.	Description	No. of Pages	Conf Y/N	Column No./Line No.	Florida Statute 366.093 (3) Subsection	Declarant
46-2.2	DEAL INFORMATION	1	N			
46-3	INVOICE	14	N			
46-4	INVOICE	1	N			
47-1	BILLING SUMMARY	1	N			
47-1.1	BILLING SUMMARY	1	N			
47-1.2	BILLING SUMMARY	1	N			
47-1.3	BILLING STATEMENT	1	N			
47-1.4	BILLING STATEMENT	1	N			
47-2	INVOICE	1	N			
47-2.1	BILLING REPORT	1	N			
47-2.2	SJRPP REPORT	1	N			
47-2.3	INVOICE	1	N			
47-2.4	BILLING REPORT	1	N			
47-2.5	SALEBACK BILLING	1	N			
47-2.6	PURCHASES	1	N			
47-2.7	INVOICE	1	N			
47-3	CONTRACT REVIEW	1	N			
48-1 p.2	BILLING STATEMENT	1	Y	Col. A, Lns. 1-15 Col. B, Lns. 1-4, 7, 14 and 15 Col. C, Lns. 1-4	(d), (e)	M. Cashman
48-1.1	BILLING STATEMENT	1	N			
48-1.2	BILLING STATEMENT	1	N			
48-2 p. 2	BILLING STATEMENT	1	N			
48-2.1	BILLING STATEMENT	1	N			
48-2.2	BILLING STATEMENT	1	N			
48-2.2.1	MONTHLY BILLING STATEMENT	1	N			
48-2.2.2	DAILY ENERGY PAYMENT SUMMARY	1	N			
48-2.2.3	HOURLY AS AVAILABLE ENERGY PAYMENT	1	N			
48-4	TARIFF	1	N			
50-2	ASSET OPTIMIZATION DETAIL	2	Y	Pg. 1, Cols. B-H, Lns. 10, 12, 14, 16, 18, 20, 22, 24, 26, 28, 30, 32 Pg. 2, Cols. A-J	(e)	M. Cashman
50-2.1	ASSET OPTIMIZATION DETAIL	1	Y	ALL	(d), (e)	M. Cashman
50-2.1.1	ASSET OPTIMIZATION DETAIL	1	Y	ALL	(d), (e)	M. Cashman
50-2.1.2	ASSET OPTIMIZATION DETAIL	1	Y	ALL	(d), (e)	M. Cashman
50-2.1.3	ASSET OPTIMIZATION DETAIL	1	Y	ALL	(d), (e)	M. Cashman
50-2.1.4	ASSET OPTIMIZATION DETAIL	1	Y	ALL	(d), (e)	M. Cashman
50-2.1.5	ASSET OPTIMIZATION DETAIL	1	Y	ALL	(d), (e)	M. Cashman
50-2.1.6	ASSET OPTIMIZATION DETAIL	1	Y	ALL	(d), (e)	M. Cashman
50-2.2	ASSET OPTIMIZATION DETAIL	1	Y	ALL	(d), (e)	M. Cashman

Workpaper No.	Description	No. of Pages	Conf Y/N	Column No./Line No.	Florida Statute 366.093 (3) Subsection	Declarant
50-2.2.1	ASSET OPTIMIZATION DETAIL	1	Y	ALL	(d), (e)	M. Cashman
50-2.2.2	ASSET OPTIMIZATION DETAIL	1	Y	ALL	(d), (e)	M. Cashman
50-2.2.3	ASSET OPTIMIZATION DETAIL	1	Y	ALL	(d), (e)	M. Cashman
50-2.2.4	ASSET OPTIMIZATION DETAIL	1	Y	ALL	(d), (e)	M. Cashman
50-2.3	ASSET OPTIMIZATION DETAIL	1	Y	ALL	(d), (e)	M. Cashman
50-2.3.1	ASSET OPTIMIZATION DETAIL	1	Y	ALL	(d), (e)	M. Cashman
50-2.3.2	ASSET OPTIMIZATION DETAIL	1	Y	ALL	(d), (e)	M. Cashman
50-2.3.3	ASSET OPTIMIZATION DETAIL	1	Y	ALL	(d), (e)	M. Cashman
50-2.3.4	ASSET OPTIMIZATION DETAIL	1	Y	ALL	(d), (e)	M. Cashman
50-2.4	ASSET OPTIMIZATION DETAIL	1	Y	ALL	(d), (e)	M. Cashman
50-2.4.1	ASSET OPTIMIZATION DETAIL	1	Y	ALL	(d), (e)	M. Cashman
50-2.4.2	ASSET OPTIMIZATION DETAIL	1	Y	ALL	(d), (e)	M. Cashman
50-2.4.3	ASSET OPTIMIZATION DETAIL	1	Y	ALL	(d), (e)	M. Cashman
50-2.4.4	ASSET OPTIMIZATION DETAIL	1	Y	ALL	(d), (e)	M. Cashman
50-2.5	ASSET OPTIMIZATION DETAIL	2	Y	ALL	(d), (e)	M. Cashman
50-2.5.1	ASSET OPTIMIZATION DETAIL	1	Y	ALL	(d), (e)	M. Cashman
50-2.5.2	ASSET OPTIMIZATION DETAIL	1	Y	ALL	(d), (e)	M. Cashman
50-2.5.3	ASSET OPTIMIZATION DETAIL	1	Y	ALL	(d), (e)	M. Cashman
50-2.5.4	ASSET OPTIMIZATION DETAIL	1	Y	ALL	(d), (e)	M. Cashman
50-2.5.5	ASSET OPTIMIZATION DETAIL	1	Y	ALL	(d), (e)	M. Cashman
50-2.5.6	ASSET OPTIMIZATION DETAIL	1	Y	ALL	(d), (e)	M. Cashman
50-2.5.7	ASSET OPTIMIZATION DETAIL	1	Y	ALL	(d), (e)	M. Cashman
50-3.1	INCREMENTAL OPTIMIZATION COSTS	1	Y	Col. A, except Line 1, Line 2, Line 3, Line 4	(e)	M. Cashman
51	INVOICE LIST	1	Y	Cols. A-F	(d), (e)	M. Cashman
51-1	INVOICE	2	Y	Pg. 1, Cols. A-C Lns. 1-28 Pg. 2, Lns. 29-40 Cols. A-D	(d), (e)	M. Cashman
53	GAS REPORT	1	Y	Cols. A-C Lns. 1-3	(d), (e)	M. Cashman

Workpaper No.	Description	No. of Pages	Conf Y/N	Column No./Line No.	Florida Statute 366.093 (3) Subsection	Declarant
53-1	PURCHASE STATEMENT	2	N			
53-2	INVOICE	1	N			
53-3	INVOICE	1	N			
53-4	RATE SCHEDULE	1	N			
53-5	INVOICE EXPLANATION	2	N			

Docket No. 20250001-EI

SECOND REVISED EXHIBIT “D”

**FPL’s MATERIALS PROVIDED PURSUANT
TO AUDIT NO. 2018-019-4-1**

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

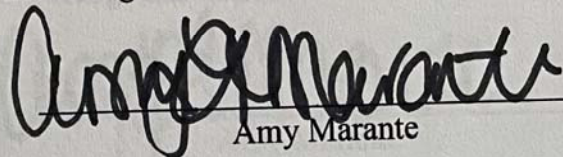
DECLARATION OF AMY MARANTE

1. My name is Amy Marante. I am currently employed by Florida Power & Light Company ("FPL") as Director, Internal Audit. 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. 2018-019-4-1 for which I am identified 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-2022-0083-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. 2018-019-4-1 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 data such as pricing and other terms, payment records, and vendor and supplier rates. Specifically, the documents include information related to the purchase or sale of energy and capacity, natural gas, and natural gas storage. The disclosure of this information would impair the efforts of FPL to contract for energy and capacity-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-2022-0083-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