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October 21, 2019

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
2019 OCT 21 AM 11:11
COMMISSION CLERK

Re: Docket No. 20190061-EI **REDACTED**

Dear Mr. Teitzman:

I enclose for filing in the above docket Florida Power & Light Company's ("FPL's") Request for Confidential Classification of Information Provided in the Response to the Office of Public Counsel's Eleventh Request for Production of Documents, No. 52. The request includes Exhibits A, B (two copies), C and D.

Exhibit A consists of the confidential document, which is confidential in its entirety and is provided on a disc. Exhibit B is an edited version of Exhibit A, consisting of an identifying cover page. Exhibit C is a justification table in support of FPL's Request for Confidential Classification. Exhibit D contains a declaration in support of FPL's request.

Please contact me if you or your Staff has any questions regarding this filing.

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

Sincerely,

Maria Jose Moncada
Florida Bar No. 0773301

Enclosure

cc: Counsel for Parties of Record (w/ copy of FPL's Request for Confidential Classification)

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Petition for approval of FPL SolarTogether Program and Tariff, by Florida Power & Light Company

Docket No.: 20190061-EI

Date: October 21, 2019

**FLORIDA POWER & LIGHT COMPANY'S
REQUEST FOR CONFIDENTIAL CLASSIFICATION OF
INFORMATION PROVIDED IN RESPONSE TO THE OFFICE OF PUBLIC
COUNSEL'S ELEVENTH REQUEST FOR PRODUCTION OF DOCUMENTS (No. 52)**

Pursuant to Section 366.093, Florida Statutes ("Section 366.093"), and Rule 25-22.006, Florida Administrative Code, Florida Power & Light Company ("FPL") hereby requests confidential classification of certain information provided in response to the Office of Public Counsel's Eleventh Request for Production of Documents, No. 52 (collectively, the "Confidential Documents"). In support of this Request, FPL states as follows:

1. FPL served its response to the Office of Public Counsel's Eleventh Request for Production of Documents, No. 52 on October 18, 2019. This Request is being filed in order to request confidential classification of certain information contained in its responses to Request, No. 52, consistent with Rule 25-22.006, Florida Administrative Code.

2. The following exhibits are attached to and made a part of this Request:

- a. Exhibit A consists of a copy of the Confidential Document. The Confidential Document that comprises Exhibit A is confidential in its entirety and is provided on a disc.
- b. Exhibit B consists of an edited version of the Confidential Document on which all information that FPL asserts is entitled to confidential treatment is redacted. Because the document is confidential in its entirety, only an identifying cover page is provided.

- c. Exhibit C is a table that identifies the information highlighted 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 declaration of Juan Enjamio in support of this Request.

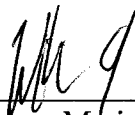
3. As described in the declaration in Exhibit D, the confidential business information contains or constitutes proprietary information the disclosure of which would impair the FPL's competitive interests. The proprietary confidential business information contains or constitutes a spreadsheet-based model that FPL considers to be related to competitive interests, the disclosure of which would impair FPL's competitive business. Specifically, the document is FPL's Reserve Margin Spreadsheet Model which was developed by FPL, and which, if used by others, could harm FPL's interests. FPL has maintained the confidentiality of this information. This information is protected by Section 366.093(3)(e), Fla. Stat.

4. Upon a finding by the Commission that the information contained in the Confidential Documents is proprietary and confidential business information, the information should not be declassified for at least 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, Florida Power & Light Company respectfully requests that its Request for Confidential Classification be granted.

Respectfully submitted this 21st day of October 2019.

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By:  for Maria Jose Moncada

Maria Jose Moncada
Florida Bar No. 0773301

CERTIFICATE OF SERVICE
Docket No. 20190061-EI

I HEREBY CERTIFY that a true and correct copy of the foregoing has been furnished by electronic service on this 21st day of October 2019 to the following:

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Maria Jose Moncada
Florida Bar No. 0773301

EXHIBIT B

REDACTED

**FPL's response to
OPC's Eleventh Request for Production of
Documents**

No. 52

Bates No. 009309 – 009325

is confidential in its entirety

EXHIBIT C

JUSTIFICATION TABLE

EXHIBIT C

COMPANY: Florida Power & Light Company
TITLE: List of Confidential Documents
DOCKET NO.: 20190061-EI
DOCKET TITLE: FPL Petition for approval of FPL SolarTogether Program and
Tariff
SUBJECT: FPL's Response to the Office of Public Counsel's Eleventh
Request for Production of Documents, Request No. 52
DATE: October 18, 2019

Discovery Request	Bates Number	Description	Line No./ Col. No.	Florida Statute 366.093(3) Subsection	Declarant
FPL's Response to the Office of Public Counsel's 11th Request for Production of Documents, No. 52	FPL 009309-009325 (On CD)	Reserve Margin Spreadsheet for Exhibit JE-5	All	(e)	Juan Enjamio

EXHIBIT D

DECLARATION

EXHIBIT D

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Petition by Florida Power & Light
Company for Approval of FPL
SolarTogether Program and Tariff

Docket No: 20190061-EI

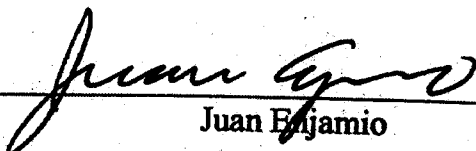
DECLARATION OF JUAN ENJAMIO

1. My name is Juan Enjamio. I am currently employed by Florida Power & Light Company ("FPL") as the Manager of Analytics in the Finance and Resource Planning department. 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 document that I have reviewed and which is asserted by FPL to be proprietary confidential business information contain or constitute information concerning a spreadsheet-based model that FPL considers to be a trade secret and related to competitive interests, the disclosure of which would impair FPL's competitive business. Specifically the document is FPL's Reserve Margin Spreadsheet Model which was developed by FPL, and which, if used by others, could harm FPL's interests. 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.



Juan Enjamio
Date: 10/17/2019