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October 24, 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 24 PM 1:45
COMMISSION
CLERK

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

Dear Mr. Teitzman:

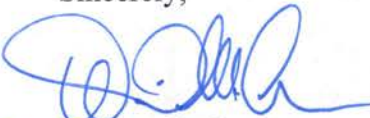
I enclose for filing in the above docket Florida Power & Light Company's ("FPL's") Request for Confidential Classification of Information Provided in the Response to the Office of Public Counsel's Twelfth Request for Production of Documents, No. 56. The request includes Exhibits A, B (two copies), C and D.

Exhibit A consists of the confidential documents, which are confidential in their entirety and are provided on a disc. Exhibit B is an edited version of Exhibit A, consisting of identifying cover pages. 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
- GCL _____
- IDM _____
- CLK _____

Sincerely,


For William P. Cox
Florida Bar No. 0093531

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 24, 2019

**FLORIDA POWER & LIGHT COMPANY'S
REQUEST FOR CONFIDENTIAL CLASSIFICATION OF
INFORMATION PROVIDED IN RESPONSE TO THE OFFICE OF PUBLIC
COUNSEL'S TWELFTH REQUEST FOR PRODUCTION OF DOCUMENTS (No. 56)**

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 Twelfth Request for Production of Documents, No. 56 (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 Twelfth Request for Production of Documents, No. 56 on October 24, 2019. This Request is being filed in order to request confidential classification of certain information contained in its response to Request No. 56, 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 Documents. The Confidential Documents that comprise Exhibit A are confidential in their entirety and are provided on a disc.
- b. Exhibit B consists of a edited versions of the Confidential Documents on which all information that FPL asserts is entitled to confidential treatment is redacted. Because the documents are confidential in their entirety, only an identifying cover pages are 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 confidential business information concerning spreadsheets that FPL considers competitive interests, the disclosure of which would impair FPL's competitive business. Specifically, the documents are FPL's Battery Capital Costs and Ongoing Battery O&M Costs which was developed by FPL, the disclosure of which would impair FPL's competitive business. 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 24th day of October 2019.

William P. Cox
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Telephone: (561) 304-5662
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By: 
For William P. Cox
Florida Bar No. 0093531

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 24th day of October 2019 to the following:

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Office of the General Counsel
Florida Public Service Commission
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Tallahassee, Florida 32399-0850
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By: 
For William P. Cox
Florida Bar No. 0093531

EXHIBIT B

REDACTED

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

**No. 56
Bates No. 009329**

is confidential in its entirety

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

No. 56

Bates No. 009330 to 009333

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. 56
DATE: October 24, 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 12th Request for Production of Documents, No. 56	FPL 009329 (On CD)	Battery Capital Costs Attachment 1	All	(e)	Juan Enjamio
	FPL 009330-009333 (On CD)	Ongoing Battery O&M Costs Attachment 2			

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

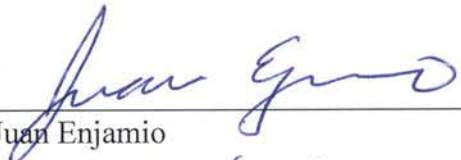
DECLARATION OF JUAN ENJAMIO

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 documents that I have reviewed and which are asserted by FPL to be proprietary confidential business information concerning spreadsheets that FPL considers competitive interests, the disclosure of which would impair FPL's competitive business. Specifically, the documents are FPL's Battery Capital Costs and Ongoing Battery O&M Costs 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: 10/23/2019