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June 22, 2021

VIA HAND DELIVERY

Mr. Adam Teitzman
Commission Clerk
Florida Public Service Commission
2540 Shumard Oak Blvd.
Tallahassee, FL 32399-0850

REDACTED

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2021 JUN 22 PM 4:06
COMMISSION
CLERK

Re: Docket No. 20160021-EI

Dear Mr. Teitzman:

I enclose for filing in the above docket Florida Power & Light Company's ("FPL") Second Request for Extension of Confidential Classification of certain material provided to the Staff of the Florida Public Service Commission ("Staff") pursuant to Audit Control No. 16-095-4-1 ("the Audit") The request includes Exhibits A, B (two copies), C and D.

Exhibit A consists of the documents containing confidential information. Exhibit A is submitted for filing in an envelope marked "EXHIBIT A" – CONFIDENTIAL. Some responses are voluminous and are being provided on disk. Exhibit B is an edited version of Exhibit A, in which the information FPL asserts is confidential has been redacted.. Exhibit C is a justification table in support of FPL's Request for Confidential Classification. Exhibit D contains the declarations in support of FPL's Request. In accordance with Rule 25-22.006(3)(d), FPL requests confidential treatment of the information in Exhibit A pending disposition of FPL's Request for Confidential Classification.

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

- COM _____
- AFD _____
- APA _____
- ECO _____
- ENG _____
- GCL** _____
- IDM _____
- CLK _____

1 Exh B & 2 redacted CDs

Sincerely,

Maria Jose Moncada

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 Increase in Rates by Florida
Power & Light Company

Docket No. 160021-EI

June 22, 2021

**FLORIDA POWER & LIGHT COMPANY'S SECOND
REQUEST FOR EXTENSION OF CONFIDENTIAL CLASSIFICATION**

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 certain material provided to the Staff of the Florida Public Service Commission (“Staff”) pursuant to Audit Control No. 16-095-4-1 (“the Audit”). In support of this request, FPL states as follows:

1. On July 7, 2016, FPL filed a Request for Confidential Classification of the Confidential Information, which included Exhibits A, B, C and D (“July 7, 2016 Request”). By Order No. PSC-16-0317-CFO-EI, dated August 5, 2016 (“Order 0317”), the Commission granted FPL’s July 7, 2016 Request. FPL adopts and incorporates by reference the July 7, 2016 Request and Order 0317.

2. On February 1, 2018 (“February 1, 2018 Request”), FPL filed a request for extension of confidential classification for portions of the Commission staff’s Audit Control No. 16-095-4-1 (Audit). By Order No. PSC-2018-0206-CFO-EI (“Order 0206”), dated April 23, 2018, the Commission granted FPL’s February 1, 2018 request. FPL adopts and incorporates by reference the February 1, 2018 Request and Order 0206.

3. Some of the Confidential Information that was the subject of FPL’s February 1, 2018 Request and Order 0206 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. Included with this request are First Revised Exhibit A, First Revised Exhibit B, together with First Revised Exhibit C to reduce the number of pages for which confidential treatment is sought. FPL has identified in First Revised Exhibits A, B and C all of the information in work papers that warrants continued confidential treatment. First Revised Exhibit C is a table that identifies the specific pages, lines or columns that remain confidential. The table also references the specific statutory basis for confidentiality and the declarants who support the requested classification.

5. Also included with this Request is First Revised Exhibit D, which consists of the declarations of Elizabeth Fuentes, Cesar Mendoza, Ed Benson, and Elizabeth Martin in support of this Request.

6. The Confidential Information is intended to be and have 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 described more fully in the declarations included as Second Revised Exhibit D, certain documents contain information concerning bids or other contractual data, the disclosure of which would impair the efforts of FPL to contract for goods or services on favorable terms. This information is protected by Section 366.093(3)(d), Fla. Stat.

8. Additionally, certain information in these documents concern FPL's 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.

9. 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 and declarations included herewith, Florida Power & Light Company respectfully requests that its Second Request for Extension of Confidential Classification be granted.

Respectfully submitted,

Maria Jose Moncada
Senior Attorney
Florida Power & Light Company
700 Universe Boulevard
Juno Beach, FL 33408
Telephone: (561) 304-5795
Facsimile: (561) 691-7135
Email: maria.moncada@fpl.com

By: 

Maria Jose Moncada
Florida Bar No. 0773301

CERTIFICATE OF SERVICE

Docket No. 160021-EI

I HEREBY CERTIFY that a true and correct copy of the foregoing First Request for Extension of Confidential Classification has been furnished by electronic mail this 22nd day of June 2021 to:

Suzanne Brownless
Florida Public Service Commission
Office of the General Counsel
2540 Shumard Oak Boulevard
Tallahassee, FL 32399-1400
sbrownle@psc.state.fl.us

By: _____



Maria Jose Moncada
Florida Bar No. 0773301

EXHIBIT B

REDACTED

The documents comprising Exhibit B are voluminous and have been provided in electronic format on disk.

EXHIBIT C

JUSTIFICATION TABLE

FIRST REVISED EXHIBIT C

COMPANY: Florida Power & Light Company
 TITLE: List of Confidential Work Papers
 AUDIT: Rate Case Audit
 AUDIT CONTROL NO.: 16-095-4-1
 DOCKET NO.: 160021-EI

Bold denotes revision to reduce the amount of confidential classification previously requested or a new declarant

Work Paper No.	Description	No. of Pages	Conf. Y/N	Line No. Column No.	Florida Statute 366.093 (3) Subsection	Declarant
9-1, Pgs 1 to 8 9-2, Pgs 1 to 13	#1 D&T Review	21	Y	All	(e)	Elizabeth Fuentes
10-11	#2 Long and short term debt	1	Y	Lines 28 to 30, Col A	(e)	Elizabeth Martin
10-49	#3 Officer's Salaries	1	N			
10-51	#4 Officer's Salaries	1	N			
10-76 Pgs 1 - 5	#5 Employee information	5	N			
10-77 to 10-77.4	#6 Officer's job descriptions	5	N			

Work Paper No.	Description	No. of Pages	Conf. Y/N	Line No. Column No.	Florida Statute 366.093 (3) Subsection	Declarant
16-8.1	#7 Plant Support	1	Y	Line 2, Col A Lines 5 & 6, Col A Line 14, Col A	(d)	Cesar Mendoza
16-8.2		1	Y	Line 1, Col A Line 3, Col A	(d)	Cesar Mendoza
16-8.3		1	Y	Lines 15 & 17, Cols E & F Lines 25 & 27, Col F Line 28, Col G	(d)	Cesar Mendoza
16-8.4		1	Y	Line 1, Col A Lines 9 to 11, Col A	(d)	Cesar Mendoza
16-8.5		1	Y	Lines 9, 10, & 18, Col G Lines 11to14, Col H Lines 15 to18, Col I	(d)	Cesar Mendoza
16-8.6		1	Y	Cols C to E	(d)	Cesar Mendoza
16-8.7		1	Y	Cols F & H	(d)	Cesar Mendoza
16-8.8		1	Y	Cols F, H & J	(d)	Cesar Mendoza
16-8.9		1	Y	Cols F& H	(d)	Cesar Mendoza
16-8.10		1	Y	Cols F, H & J	(d)	Cesar Mendoza
16-8.11		1	Y	Cols F, H & J	(d)	Cesar Mendoza
16-8.12		1	Y	Cols F, H & J	(d)	Cesar Mendoza
16-8.13		1	Y	Cols F, H & J	(d)	Cesar Mendoza

Work Paper No.	Description	No. of Pages	Conf. Y/N	Line No. Column No.	Florida Statute 366.093 (3) Subsection	Declarant
16-8.14	#7 Plant Support (continued)	1	Y	Cols F & H	(d)	Cesar Mendoza
16-8.15		1	Y	Lines 11 & 16, Col F Lines 12 to 16, Col G	(d)	Cesar Mendoza
16-8.16		1	Y	Line 14, Cols F & G Line 21, Col G	(d)	Cesar Mendoza
16-8.17		1	Y	Line 18, Cols A & B Lines 26 to 29, Col A	(d)	Cesar Mendoza
16-8.18		1	Y	Line 15, Cols A & B Lines 17, 19 to 20, Col A	(d)	Cesar Mendoza
16-8.19		1	Y	Line 1, Col A Line 4, Col A	(d)	Cesar Mendoza
16-8.20		1	Y	Line 1, Col A Lines 7 to 11, Col D	(d)	Cesar Mendoza
16-8.21		1	Y	Line 8, Col A Line 12, Col A	(d)	Cesar Mendoza
16-8.22-26		4	Y	Col C	(d)	Cesar Mendoza
16-8.27		1	Y	Line 12, Cols D, F & G Line 19, Cols F, G & H Line 21, Col F Lines 24 & 25, Col H	(d)	Cesar Mendoza
16-8.28		1	Y	Line 7, Col A	(d)	Cesar Mendoza
16-8.29		1	Y	Lines 9 to 18, Col A	(d)	Cesar Mendoza
16-8.30		1	Y	Lines 32 & 37, A & B Line 42, A	(d)	Cesar Mendoza
16-8.31		1	Y	Lines 31 & 36, A & B Line 41, Col A	(d)	Cesar Mendoza
16-8.32		1	Y	Line 14, Col A Line 22, Cols D & E Lines 23 & 25, Col E Lines 26 to 29, Col A Lines 31 & 35, Col A	(d)	Cesar Mendoza
16-8.33		1	Y	Lines 15, 16, 21, 22 to 24, Col A	(d)	Cesar Mendoza
16-9.1		1	Y	Lines 15 & 19, Col A	(d)	Cesar Mendoza
16-9.2		1	Y	Lines 5 & 7, Col A	(d)	Cesar Mendoza
16-9.3		1	Y	Lines 14 & 18, Col A	(d)	Cesar Mendoza
16-9.4		1	Y	Lines 5 to 11, Col A	(d)	Cesar Mendoza
16-9.5	1	N	N/A	N/A	N/A	N/A
16-9.6	1	Y	Lines 5 & 6, Col A	(d)	Cesar Mendoza	
16-9.7	1	Y	Lines 15 & 19, Col A	(d)	Cesar Mendoza	
16-9.8	1	Y	Lines 5 & 6, Col A	(d)	Cesar Mendoza	

Work Paper No.	Description	No. of Pages	Conf. Y/N	Line No. Column No.	Florida Statute 366.093 (3) Subsection	Declarant
16-10.1		1	Y	Lines 15 & 19, Col A	(d)	Cesar Mendoza
16-10.2		1	Y	Lines 5, 7 to 10, Cols G & K	(d)	Cesar Mendoza
16-10.3		1	Y	Lines 12-15, Col A	(d)	Cesar Mendoza

Work Paper No.	Description	No. of Pages	Conf. Y/N	Line No. Column No.	Florida Statute 366.093 (3) Subsection	Declarant
16-10.4	#7 Plant Support (continued)	1	Y	Lines 12 to 20, Col A	(d)	Cesar Mendoza
16-10.5		1	Y	Lines 15 & 19, Col A	(d)	Cesar Mendoza
16-10.6		1	Y	Lines 5 to 8, Col A	(d)	Cesar Mendoza
16-10.7		1	Y	Lines 14 to 15, Col A	(d)	Cesar Mendoza
16-10.8		1	Y	Lines 14 & 19, Col A	(d)	Cesar Mendoza
16-10.9		1	Y	Lines 5, 9, 11 to 13, Col G	(d)	Cesar Mendoza
16-10.10		1	Y	Lines 13 to 17, Col A	(d)	Cesar Mendoza
16-10.11		1	Y	Lines 15 & 19, Col A	(d)	Cesar Mendoza
16-10.12		1	Y	Lines 5 to 7, Col G	(d)	Cesar Mendoza
16-10.13		1	Y	Lines 19 to 20, Col A	(d)	Cesar Mendoza
19-5	#8 CWIP support	1	N	N/A	N/A	N/A

Work Paper No.	Description	No. of Pages	Conf. Y/N	Line No. Column No.	Florida Statute 366.093 (3) Subsection	Declarant
19-6 to 19-6.5	#9 CWIP Support	6	N	N/A	N/A	N/A
19-6.6		1	Y	Lines 22, 23 & 25, Col A Lines 27 to 30 & 32, 36, 38, 40, & 42, Col C	(d)	Elizabeth Fuentes
19-6.7		1	Y	Lines 21, 22 & 24, Col A Lines 26 to 29 & 31, 35, 37 to 39, & 41, Col C	(d)	Elizabeth Fuentes
19-7		1	N	N/A	N/A	N/A
19-7.1		1	Y	Col G	(d)	Elizabeth Fuentes
19-7.2		1	Y	Col H	(d)	Elizabeth Fuentes
19-7.3		1	Y	Lines 13, 15 & 16, Col A Line 29, Cols G & H Lines 31 to 40, Col D Line 41, Col H	(d)	Elizabeth Fuentes
19-7.4		1	Y	Lines 8 & 11, Col A	(d)	Elizabeth Fuentes
19-8		1	N	N/A	N/A	N/A
19-8.1		1	Y	Lines 9, 10, 18 & 20, Col G	(d) (e)	Ed Benson
19-8.2		1	Y	Lines 9 to 12, Col F	(d) (e)	Ed Benson
19-8.3		1	Y	Col H	(d) (e)	Ed Benson
19-8.4		1	Y	Col H	(d) (e)	Ed Benson
19-8.5		1	Y	Lines 6, 9, & 10, Col A Lines 13 & 20, Col C	(d) (e)	Ed Benson
19-8.6 to 19-8.18		13	Y	All	(d) (e)	Ed Benson
19-8.19		1	Y	Lines 4 & 6 to 8, Col A	(d) (e)	Ed Benson
19-8.20		1	Y	Lines 2 & 3, Col B	(d) (e)	Ed Benson
19-9 to 19-9.4		5	N	N/A	N/A	N/A
19-9.5		1	Y	Line 18, Cols D & E Lines 27 to 29 & 31, Col C Lines 32 & 35, Col E	(d)	Elizabeth Fuentes
19-9.6		1	Y	Lines 10, 12 to 15, & 17, Col C	(d)	Elizabeth Fuentes

Work Paper No.	Description	No. of Pages	Conf. Y/N	Line No. Column No.	Florida Statute 366.093 (3) Subsection	Declarant
19-10	#9 CWIP Support (continued)	1	N	N/A	N/A	N/A
19-10.1		1	Y	Col H	(d) (e)	Ed Benson
19-10.2		1	Y	Col H	(d) (e)	Ed Benson
19-10.3		1	Y	Lines, 5, 6, 25, & 26, Col C	(d) (e)	Ed Benson
19-10.4		1	Y	Col C	(d) (e)	Ed Benson
19-10.5		1	Y	Col H	(d) (e)	Ed Benson
19-10.6		1	Y	Lines 9, 12 & 13, Col A Lines 16 & 23, Col C	(e)	Ed Benson
19-10.7		1	Y	Lines 5, 7 to 9, Col A	(e)	Ed Benson
19-10.8		1	Y	Line 7, Col A & B Line 18, Cols G to I Line 20, Col I	(e)	Ed Benson
19-11 to 19-11.6		7	N	N/A	N/A	N/A
19-11.7		1	Y	Lines 14, 16 to 18, 20 to 24, Col B	(d)	Elizabeth Fuentes
19-11.8		1	Y	Lines 16 to 30, Cols D to L	(d)	Elizabeth Fuentes
19-12.1		#10 CWIP Support	1	Y	Lines 8 & 9, Col A Lines 30, 32, 34 to 36, Col B Line 38, Col C	(d)
19-12.2 to .4	3		N	N/A	N/A	N/A
19-12.5	1		Y	Lines 19 to 21, Col A	(e)	Elizabeth Fuentes
19-12.6	1		N	N/A	N/A	N/A
19-12.7	1		Y	Lines 23, 24, & 26, Col A	(e)	Elizabeth Fuentes
19-12.8 to .9	2		N	N/A	N/A	N/A
19-12.10	1		Y	Lines 13,15,25,29 & 30, Col G	(d)	Elizabeth Fuentes
19-12.11	1		Y	Lines 13 to 55, cols B3, C & H	(d)	Elizabeth Fuentes
19-12.12 to .13	2	N	N/A	N/A	N/A	
19-12, 19-13 to 19-13.3	#11 CWIP Support	5	N	N/A	N/A	N/A
19-13.4		1	Y	Lines 18 to 35.5, Cols D to G Line 36, Col G	(d)	Elizabeth Fuentes
19-13.5		1	Y	Lines 8 & 15, Col H	(d)	Elizabeth Fuentes
19-13.6		1	N	N/A	N/A	N/A
19-13.7		1	Y	Lines 21 to 24, Cols B & E Lines 25 to 28, Col F	(d)	Elizabeth Fuentes
33-3 P 1 & 2	#12 Long-term Debt	2	N	N/A	N/A	N/A

Work Paper No.	Description	No. of Pages	Conf. Y/N	Line No. Column No.	Florida Statute 366.093 (3) Subsection	Declarant
42-3	#13 Unbilled Revenue	1	N			
42-3.1		1	N			
42-3.1.1		1	N			
42-3.2 to 42-3.3.1		4	N			
42-3.4		1	N			
42-3.4.1		1	N			
42-3.5		1	N			
42-3.5.1		1	N			
42-3.6		1	N			
42-3.7		1	N			
42-3.8		1	N			
43-10/1-7	#14 Fuel Spill					
Page 1		1	Y	Lines 13 to 29 & 32, Col D	(d)	Cesar Mendoza
Page 2		1	Y	Cols C, E and F	(d)	Cesar Mendoza
Page 3		1	N	N/A	N/A	N/A
Page 4		1	Y	Line 26, Col A	N/A	N/A
Page 5	1	Y	Line 29, Cols C, F and G Line 30, Col F Line 34, Col G	(d)	Cesar Mendoza	

Work Paper No.	Description	No. of Pages	Conf. Y/N	Line No. Column No.	Florida Statute 366.093 (3) Subsection	Declarant	
44 – 44-2.2	#15 Affiliate Transactions	11	Y	All	(e)	Elizabeth Fuentes	
45-1 to 45-1.14		15	N	N/A	N/A	N/A	
45-2		1	Y	Lines 26 to 28, Cols C, E, F, and N	(e)	Elizabeth Fuentes	
45-2.1		1	Y	Lines 9 to 26.5	(e)	Elizabeth Fuentes	
45-2.2		1	Y	Lines 10 to 24	(e)	Elizabeth Fuentes	
45-2.3		1	Y	Lines 10 to 25	(e)	Elizabeth Fuentes	
45-2.4		1	Y	Lines 10 to 23	(e)	Elizabeth Fuentes	
45-2.5		1	Y	Lines 10 to 24	(e)	Elizabeth Fuentes	
45-2.6		1	Y	Lines 10 to 24	(e)	Elizabeth Fuentes	
45-2.7		1	Y	Lines 10 to 18	(e)	Elizabeth Fuentes	
45-2.8 to 45-2.16		9	N	N/A	N/A	N/A	
45-2.17		1	Y	Lines 13 to 16 Line 17, Col C Line 18, Cols B & C	(e)	Elizabeth Fuentes	
45-2.18		#15 Affiliate Transactions (continued)	1	Y	Lines 3 to 28, Cols C & D Lines 8, 9, 15, 16, 22, 28, 34, Cols A & B Lines 29 to 33, Cols D & E Lines 34 & 37	(e) (e)	Elizabeth Fuentes Elizabeth Fuentes
45-2.19			1	N	N/A	N/A	N/A
48-2	#16 Officer's Salaries	1	N	N/A	N/A	N/A	

EXHIBIT D

DECLARATIONS

EXHIBIT D

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Petition for Increase in Rates by
Florida Power & Light Company

Docket No. 160021-EI

DECLARATION OF ED BENSON

1. My name is Ed Benson. I am currently employed by Florida Power & Light Company ("FPL") as Manager of Asset Management. I have personal knowledge of the matters stated in this written declaration.

2. I have reviewed the documents that are included in FPL's Request for a Second Extension of Confidential Classification regarding the Rate Case MFR Audit No. 16-095-4-1, for which I am listed as the declarant on Exhibit C. The documents or materials that I have reviewed and which are asserted by FPL to be proprietary confidential business information constitute contractual data, the disclosure of which would impair the efforts of FPL to contract for goods and services on favorable terms. The documents or materials also contain or constitute information relating to competitive interests, the disclosure of which would impair FPL's competitive business. Specifically, the material consists of contractual terms related to the acquisition of land and pricing information related to property services. 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-2018-0206-CFO-EI to render the designated information stale or public, such that continued confidential treatment would not be appropriate. Therefore, consistent with the provisions of the Florida Administrative Code, such materials should remain confidential for a period of at least an additional thirty-six (36) months. In addition, these materials 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.



Ed Benson

Date: 4/21/2021

EXHIBIT D

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Petition for Increase in Rates by
Florida Power & Light Company

Docket No. 160021-EI

DECLARATION OF LIZ FUENTES

1. My name is Elizabeth Fuentes. I am currently employed by Florida Power & Light Company ("FPL") as Senior Director of Regulatory Accounting. I have personal knowledge of the matters stated in this written declaration.

2. I have reviewed the documents that are included in FPL's Second Request for Extension of Confidential Classification regarding the Rate Case MFR Audit No. 16-095-4-1, for which I am listed as the declarant on Exhibit C. The documents or materials that I have reviewed and which are asserted by FPL to be proprietary confidential business information constitute contractual data, the disclosure of which would impair the efforts of FPL to contract for goods and services on favorable terms. Specifically, the information consists of terms included in contracts with providers of construction services and pricing data identifying amounts paid to those providers. The materials also include proprietary information belonging to an audit service provider whose agreement with FPL contains a confidentiality clause. These documents or materials also contain or constitute information relating to competitive interests, the disclosure of which would impair FPL's competitive business. Additional documents relating to competitive interests, the disclosure of which would impair NEER, consist of megawatt allocation forecasts. 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-18-0206-CFO-EI to render the designated information stale or public, such that continued confidential treatment would not be appropriate. Therefore, consistent with the provisions of the Florida Administrative Code, such materials should remain confidential for a period of at least an additional thirty-six (36) months. In addition, these materials 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.


Elizabeth Fuentes

Date: April 23, 2021

EXHIBIT D

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Petition for Increase in Rates by
Florida Power & Light Company

Docket No. 160021-EI

DECLARATION OF ELIZABETH MARTIN

1. My name is Elizabeth Martin. I am currently employed by Florida Power & Light Company ("FPL") as Principal Corporate Finance and Credit Analyst. I have personal knowledge of the matters stated in this written declaration.

2. I have reviewed the documents that are included in FPL's Second Request for Extension of Confidential Classification regarding the Rate Case MFR Audit No. 16-095-4-1, for which I am listed as the declarant on Exhibit C. The information that FPL asserts is proprietary and confidential business information which includes contractual data and competitive interests, the disclosure of which would impair the efforts of the public utility to contract for goods or services on favorable terms. Specifically, the material consists of contractual term loan information. 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-18-0206-CFO-EI to render the designated information stale or public, such that continued confidential treatment would not be appropriate. Therefore, consistent with the provisions of the Florida Administrative Code, such materials should remain confidential for a period of at least an additional thirty-six (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.



Elizabeth Martin

Date: April 23, 2021

EXHIBIT D

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Petition for Increase in Rates by
Florida Power & Light Company

Docket No. 160021-EI

DECLARATION OF CESAR MENDOZA

1. My name is Cesar Mendoza. I am currently employed by Florida Power & Light Company ("FPL") as Manager of Regulatory Services, Distribution. I have personal knowledge of the matters stated in this written declaration.

2. I have reviewed the documents that are included in FPL's Second Request for Extension of Confidential Classification regarding the Rate Case MFR Audit No. 16-095-4-1, for which I am listed as the declarant on Exhibit C. The information that FPL asserts is proprietary and confidential business information includes contractual data and competitive interests, the disclosure of which would impair the efforts of the public utility to contract for goods or services on favorable terms. Specifically, the information includes invoices from vendors that disclose pricing information and rates paid for goods and services. 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-2018-0206-CFO-EI to render the designated information stale or public, such that continued confidential treatment would not be appropriate. Therefore, consistent with the provisions of the Florida Administrative Code, such materials should remain confidential for a period of at least an additional thirty-six (36) months. In addition, these materials 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.

Cesar Mendoza

Digitally signed by Cesar Mendoza
DN: cn=Cesar Mendoza, o=Florida Power &
Light Company, ou,
email=cesar.mendoza@fpl.com, c=US
Date: 2021.04.21 16:43:25 -04'00'

Cesar Mendoza

Date: _____

4/22/21