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COMMISSION CLERK

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November 12, 2021

VIA HAND DELIVERY

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

REDACTED

Re: Docket No. 20210179-EI
Gulf Power Company's Request for Confidential Classification of Information Provided in Support of Its Petition for Evaluation of Hurricane Zeta Storm Costs

Dear Mr. Teitzman:

I enclose for filing in the above referenced docket Gulf Power Company's ("Gulf") Request for Confidential Classification of information provided in support of its Petition for Evaluation of Hurricane Zeta Storm Costs. The enclosed filing includes Exhibits A, B, C and D.

Exhibit A consists of the confidential documents, some of which are provided on a disc, and all the information that Gulf asserts is entitled to confidential treatment has been highlighted. Exhibit B is an edited version of Exhibit A, consisting of an identifying cover page and redacted responses. Exhibit C is a justification table in support of Gulf's Request for Confidential Classification. Exhibit D contains a declaration in support of Gulf's filing.

Please contact me if you or your Staff has any questions regarding this filing at (561) 691-7108 or jason.higginbotham@fpl.com.

Sincerely,

/s/ Jason A. Higginbotham
Jason A. Higginbotham

COM _____
AFD 1 Ex B
APA _____
ECO _____
ENG _____
GCL _____
IDM _____
CLK _____

Enclosure

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

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Evaluation of storm costs for Gulf Power
Company related to Hurricane Zeta

Docket No: 2021 _____-EI

Date: November 12, 2021

**GULF POWER COMPANY'S REQUEST
FOR CONFIDENTIAL CLASSIFICATION OF INFORMATION
PROVIDED IN SUPPORT OF GULF POWER COMPANY'S
NOTICE OF FILING CONFIDENTIAL SUPPORTING MATERIALS IN SUPPORT OF
ITS PETITION FOR EVALUATION OF HURRICANE ZETA STORM COSTS**

Pursuant to Section 366.093, Florida Statutes ("Section 366.093"), and Rule 25-22.006, Florida Administrative Code, Gulf Power Company ("Gulf") hereby requests confidential classification of certain documents and information specified in Gulf's Notice of Filing ("Notice"), which is being filed contemporaneously with this request in support of Gulf's Petition for Evaluation of Hurricane Zeta Storm Costs:

1. This Request is being filed in accordance with Rule 25-22.006, Florida Administrative Code, in order to request confidential classification of certain information related to GULF's Hurricane Zeta costs. Specifically, Gulf seeks confidential classification of the information specified in the Notice, which are: (i) searchable spreadsheets that provide data documenting the receipt, review, adjustment where appropriate, and payment of Gulf's Hurricane Zeta costs incurred for line contractors and vegetation contractors; (ii) Hurricane Zeta contractor travel logs; and (iii) additional information identified in paragraph 16 of the Hurricane Irma Stipulation and Settlement approved by the Commission in Order No. PSC-2019-0319-S-EI (together, the "Confidential Documents").

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, provided in electronic format on CDs, wherein all of the information contained is

entitled to confidential treatment. Because the confidential materials are being provided in electronic format and are voluminous, and therefore cannot be readily highlighted, Gulf has not highlighted the entirety of the information contained on the CDs.

- b. Exhibit B consists of summary page that identifies the Bates numbered pages associated with the Confidential Documents, which are entitled to confidential treatment in their entirety.
- c. Exhibit C is a table that identifies the information 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 declarations of David Hughes and Clare Gerard in support of this Request.

3. Gulf submits that the information in Exhibit A is proprietary and confidential business information, and its disclosure would cause harm to Gulf 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.

4. As described in the declarations in Exhibit D, the confidential business information includes: information relating to bids or other contractual data, the disclosure of which would impair the efforts of the public utility or its affiliates to contract for goods or services on favorable terms. This information is protected by Section 366.093(3) (d), Florida Statutes. The confidential

business information further includes: information relating to competitive interests, the disclosure of which would impair the competitive business of the provider of the information. This information is protected by Section 366.093(3)(e), Florida Statutes.

5. 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 Gulf as soon as it is no longer necessary for the Commission to conduct its business. See Section 366.093(4), Florida Statutes.

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 12th day of November 2021.

Jason A. Higginbotham
Senior Attorney
Jason.Higginbotham@fpl.com
Florida Power & Light Company
700 Universe Boulevard
Juno Beach, FL 33408
Telephone: (561) 691-7108
Facsimile: (561) 691-7135

By: /s/ Jason A. Higginbotham
Jason A. Higginbotham
Florida Authorized Counsel No. 1017875

CERTIFICATE OF SERVICE

Docket No. 2021 _____-EI

I HEREBY CERTIFY that a true and correct copy of the foregoing has been furnished by electronic service on this 12th day of November 2021 to the following:

Charles Murphy, Esquire Rachael Dziechciarz, Esquire Florida Public Service Commission 2540 Shumard Oak Boulevard Tallahassee, FL 32399 rdziehc@psc.state.fl.us cmurphy@psc.state.fl.us	Office of Public Counsel J.R. Kelly Patricia A. Christensen c/o The Florida Legislature 111 West Madison Street, Room 812 Tallahassee, FL 32399-1400 kelly.jr@leg.state.fl.us christensen.patty@leg.state.fl.us
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By/s/ Jason A. Higginbotham

Jason A. Higginbotham
Florida Authorized Counsel No. 1017875
700 Universe Boulevard
Juno Beach, FL 33408

EXHIBIT B

REDACTED

The documents marked with Bates Nos. 000001-000122 are
confidential in their entirety.

EXHIBIT C

JUSTIFICATION TABLE

EXHIBIT C

COMPANY: Florida Power & Light Company
TITLE: List of Confidential Documents
DOCKET NO.: 2021XXXX-EI
DOCKET TITLE: Petition for Limited Proceeding for Recovery of Incremental Storm Restoration Costs Related to Hurricane Zeta, By Gulf Power Company.
DATE: November 12, 2021

Set	Bates Number Start	Bates Number End	Description	Page No. / Line No.	Florida Statute 3.66.093(3) Subsection	Declarant
N/A	000001	000004	Arc American 100 Adv Pay OH Zeta 3.8 _v18 TF	All	(d), (e)	Clare Gerard
N/A	000005	000008	Asplundh Tree 100 Final Pay Veg Zeta 4.30 AC-V_2 - Dalia - ELI +Equip	All	(d), (e)	Clare Gerard
N/A	000009	000012	BHI 100 Adv Pay OH Zeta 3.8 _v18 CF K.H.	All	(d), (e)	Clare Gerard
N/A	000013	000016	Burford Tree 100 Final Pay Veg Zeta v_23 TF	All	(d), (e)	Clare Gerard
N/A	000017	000020	Center Phase 100 Adv Pay OH Zeta _v18 TF - TM JF	All	(d), (e)	Clare Gerard
N/A	000021	000024	Concurrent 100% Adv Pay OH Zeta _v18 TF	All	(d), (e)	Clare Gerard
N/A	000025	000028	Davey Tree 100 Final Pay Veg Zeta 3.14 v_23 - GL_AB - ELI-non emb	All	(d), (e)	Clare Gerard
N/A	000029	000032	Davis H Elliott 100 Pay OH Zeta 4.6 _v18 CF_TO	All	(d), (e)	Clare Gerard
N/A	000033	000036	Edison 100% Adv Pay OH Zeta _v18 TF	All	(d), (e)	Clare Gerard
N/A	000037	000040	Heart 100% Adv Pay OH Zeta _v18 TF	All	(d), (e)	Clare Gerard
N/A	000041	000044	Hydaker 100 Adv Pay OH Zeta _v18 CF - AB	All	(d), (e)	Clare Gerard
N/A	000045	000048	Irby 100 Adv Pay OH Zeta 4.13_v18 CF - DW_AB	All	(d), (e)	Clare Gerard
N/A	000049	000052	Lewis Tree 100 Final Pay Veg Zeta 3.9 v_23 tf	All	(d), (e)	Clare Gerard

N/A	000053	000056	Mastec 100 Adv Pay OH Zeta 3.26_v18 CF JF	All	(d), (e)	Clare Gerard
N/A	000057	000060	Musgrove 100 Adv Pay OH Zeta _v18 CF-TO	All	(d), (e)	Clare Gerard
N/A	000061	000064	New River 100 Adv Pay OH Zeta 3.1_v18 CF TF	All	(d), (e)	Clare Gerard
N/A	000065	000068	Pike 100 Adv Pay OH Zeta 2.25 _v18 CF	All	(d), (e)	Clare Gerard
N/A	000069	000072	Primoris 100 Adv Pay OH Zeta _v18 CF TS	All	(d), (e)	Clare Gerard
N/A	000073	000076	Southern Electric 100 Adv Pay OH Zeta 3.22_v18 CF3_Glenn	All	(d), (e)	Clare Gerard
N/A	000077	000080	Trees Inc 100 Final Pay Veg Zeta 6.2.21 + Equip v_23	All	(d), (e)	Clare Gerard
N/A	000081	000084	Utility Lines 100 Adv Pay OH Zeta_v18 CF TS_ Revised Final Pay	All	(d), (e)	Clare Gerard
N/A	000085	000088	Volt 100 Adv Pay OH Zeta_v18 CF - TO_AB_Glenn	All	(d), (e)	Clare Gerard
N/A	000089	000092	Wilco 100 Adv Pay OH Zeta 4.7 _v18 CF Jean Gibson	All	(d), (e)	Clare Gerard
N/A	000093	000096	Wright Tree 100 Final Pay Veg Zeta v_23 - TO_AB - ELI_V2	All	(d), (e)	Clare Gerard
N/A	000097	000100	Xtreme 100% Adv Pay OH Zeta _v18 KH	All	(d), (e)	Clare Gerard
N/A	000101	000122	DH-1 ZETA 07.2021	All	(d), (e)	David Hughes
N/A	000123	000123	Zeta Travel Orders	All	(d), (e)	Clare Gerard

EXHIBIT D

DECLARATIONS

EXHIBIT D

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Petition by Gulf Power Company
for Limited Proceeding for Recovery of
Incremental Storm Restoration Costs
Related to Hurricane Zeta

Docket No: 2021____-EI

DECLARATION OF DAVID HUGHES

1. My name is David Hughes. I am currently employed by Florida Power & Light Company as Assistant Controller. I have personal knowledge of the matters stated in this declaration.

2. I have reviewed the documents and information included in Exhibit A to Gulf Power Company's ("Gulf's") Request for Confidential Classification, for which I am listed as the declarant on Exhibit C. The documents and files that I have reviewed and which are asserted by FPL to be proprietary confidential business information contain or constitute information concerning bids or other contractual data, the disclosure of which would impair the efforts of Gulf to contract for goods or services on favorable terms. Additionally, the documents and files that I have reviewed, and which are asserted by Gulf to be proprietary confidential business information contain or constitute information relating to competitive interests, the disclosure of which would impair the competitive business of the provider of the information. To the best of my knowledge, Gulf 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 Gulf as soon as the information is no longer necessary for the Commission to conduct its business so that Gulf 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.



David Hughes

Date: 11/11/2021

EXHIBIT D

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Petition by Gulf Power Company
for Limited Proceeding for Recovery of
Incremental Storm Restoration Costs
Related to Hurricane Zeta

Docket No: 2021____-EI

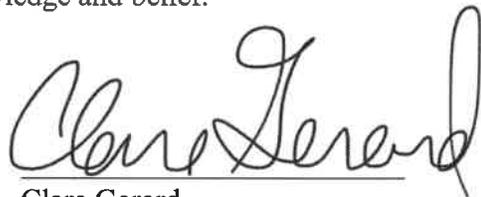
DECLARATION OF CLARE GERARD

1. My name is Clare Gerard. I am currently employed by NextEra Energy Marketing, LLC., a subsidiary of NextEra Energy, Inc., as the Vice President of Risk and Credit Exposure Management. I have personal knowledge of the matters stated in this declaration.

2. I have reviewed the documents and information included in Exhibit A to Gulf Power Company's ("Gulf's") Request for Confidential Classification, for which I am listed as the declarant on Exhibit C. The documents and files that I have reviewed and which are asserted by Gulf to be proprietary confidential business information contain or constitute information concerning bids or other contractual data, the disclosure of which would impair the efforts of Gulf to contract for goods or services on favorable terms. Additionally, the documents and files that I have reviewed, and which are asserted by Gulf to be proprietary confidential business information contain or constitute information relating to competitive interests, the disclosure of which would impair the competitive business of the provider of the information. To the best of my knowledge, Gulf 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 Gulf as soon as the information is no longer necessary for the Commission to conduct its business so that Gulf 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.



Clare Gerard

Date:

11-11-21