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COMMISSION
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Florida Power & Light Company
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E-mail:
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November 12, 2021

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

REDACTED

DKT 20210178

Re: **Docket No. 2020 _____ -EI**
Florida Power & Light Company's Request for Confidential Classification of Information Provided in Support of Florida Power & Light Company's Notice of Filing Confidential Supporting Materials in Support of its Petition for Evaluation of Hurricane Isaias and Tropical Storm Eta Storm Costs

Dear Mr. Teitzman:

I enclose for filing in the above referenced docket Florida Power & Light Company's ("FPL") Request for Confidential Classification of Information ("Request") provided in support of FPL's Notice of Filing Confidential Supporting Materials in Support of its Petition for Evaluation of Hurricane Isaias and Tropical Storm Eta Storm Costs ("Petition"). The documents for which the enclosed request seeks confidential protection are those specified in FPL's Notice of Filing, which, along with the Petition, is being filed contemporaneously with this Request.

The enclosed filing includes Exhibits A, B, C, and D. Exhibit A consists of the confidential documents, all of which are provided on a disc, and FPL asserts that all the information contained therein is entitled to confidential treatment. 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 FPL's Request for Confidential Classification. Exhibit D contains two declarations in support of FPL'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

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AFD 1
APA
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ExhB

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Evaluation of storm costs for Florida
Power & Light Company related to Hurricane
Isaias and Tropical Storm Eta

Docket No: 2021____-EI

Date: November 12, 2021

**FLORIDA POWER & LIGHT COMPANY'S REQUEST
FOR CONFIDENTIAL CLASSIFICATION OF INFORMATION
IDENTIFIED IN FLORIDA POWER & LIGHT COMPANY'S NOTICE OF FILING
CONFIDENTIAL SUPPORTING MATERIALS IN SUPPORT OF ITS PETITION FOR
EVALUATION OF HURRICANE ISAIAS AND TROPICAL STORM ETA STORM
COSTS**

Pursuant to Section 366.093, Florida Statutes ("F.S."), and Rule 25-22.006, Florida Administrative Code ("F.A.C."), Florida Power & Light Company ("FPL") hereby files its Request for Confidential Classification ("RFCC") and requests confidential treatment of certain documents and information specified in FPL's Notice of Filing ("Notice"), which is being filed contemporaneously with this request in support of FPL's Petition for Evaluation of Hurricane Isaias and Tropical Storm Eta Storm Costs:

1. This Request is being filed in accordance with Rule 25-22.006, F.A.C., in order to request confidential classification of certain information related to FPL's Hurricane Isaias and Tropical Storm Eta costs. The materials identified in FPL's Notice and which are the subject of this RFCC are the categories of materials that would normally be produced in response to discovery requests, but which in this case are being provided contemporaneously with FPL's Petition for Evaluation of Hurricane Isaias and Tropical Storm Eta Storm Costs in accordance with the Hurricane Irma Settlement Agreement approved by the Commission in Order No. PSC-2019-0319-S-EI. Specifically, FPL seeks confidential classification of the materials and information specified in the Notice, which are: (i) searchable spreadsheets that provide data documenting the receipt, review, adjustment where appropriate, and payment of FPL's Hurricane Isaias and

Tropical Storm Eta costs incurred for line contractors and vegetation contractors; (ii) contractor travel logs¹; and (iii) additional information identified in paragraph 16 of the Hurricane Irma Stipulation and Settlement (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, FPL has not highlighted the entirety of the information contained on the CDs, in accordance with Rule 25-22.006(4)(b), F.A.C.
 - 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 RFCC.

¹ The term “travel log” refers to a compilation of data extracted from FPL’s iStormed App (FPL’s internal system used for managing resources working on storm restoration) together with information developed by the Cost Finalization Team.

3. FPL submits that the information in Exhibit A is proprietary and confidential business information, and its disclosure would cause harm to FPL and its customers. Pursuant to Section 366.093, F.S. 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), F.S. 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), F.S.

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 FPL as soon as it is no longer necessary for the Commission to conduct its business. *See* Section 366.093(4), F.S.

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. Additionally, FPL respectfully requests that the Commission, the Office of Public Counsel, and any other party subject to the public records law

treat the materials as confidential pending a formal ruling by the Commission or the return of the materials, consistent with Section 366.093(2).

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 2020 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
Florida Power & Light Company
700 Universe Boulevard (JB/LAW)
Juno Beach, Florida 33408

EXHIBIT B

REDACTED

The documents marked with Bates Nos. 000001-000584 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 Evaluation of Hurricane Isaias and Tropical Storm Eta Storm Costs, By Florida Power & Light 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	ARBOR EXPERTS Labor Exp - Final Pay Macro Ready JH	All	(d), (e)	Clare Gerard
N/A	000005	000008	Arc American Labor Exp - Final Pay Macro Ready JH	All	(d), (e)	Clare Gerard
N/A	000009	000012	ASPLUNDH CONSTRUCTION Labor Exp - Final Pay Macro Ready JH	All	(d), (e)	Clare Gerard
N/A	000013	000016	ASPLUNDH TS 062221	All	(d), (e)	Clare Gerard
N/A	000017	000020	BB ELECTRICAL Labor Exp - Final Pay Macro JH	All	(d), (e)	Clare Gerard
N/A	000021	000024	BHI Labor Exp - Final Pay Macro Ready JH	All	(d), (e)	Clare Gerard
N/A	000025	000028	BIRD ELECTRIC Labor Exp - Final Pay Macro JH	All	(d), (e)	Clare Gerard
N/A	000029	000032	BLACKOUT POWER Labor Exp - Final Pay Macro JH	All	(d), (e)	Clare Gerard
N/A	000033	000036	BOWLIN Labor Exp - Final Pay Macro Ready JH	All	(d), (e)	Clare Gerard
N/A	000037	000040	BURFORD Labor Exp - Final Pay Macro Ready JH	All	(d), (e)	Clare Gerard
N/A	000041	000044	CONCURRENT Labor Exp - Final Pay Macro Ready JH	All	(d), (e)	Clare Gerard
N/A	000045	000048	CW WRIGHT Labor Exp - Ready JH	All	(d), (e)	Clare Gerard
N/A	000049	000052	DANELLA Labor Exp - Final Pay Macro Ready JH	All	(d), (e)	Clare Gerard

N/A	000053	000056	DAVEY TREE Labor Exp - Final Pay Macro Ready JH	All	(d), (e)	Clare Gerard
N/A	000057	000060	DAVIS H ELLIOT Labor Exp - Final Pay Macro Ready JH	All	(d), (e)	Clare Gerard
N/A	000061	000064	DIAMOND D Labor Exp - Final Pay Macro Ready JH	All	(d), (e)	Clare Gerard
N/A	000065	000068	EDISON EMBED Final Ready JH	All	(d), (e)	Clare Gerard
N/A	000069	000072	EDISON NON-EMBED Labor Exp Ready JH	All	(d), (e)	Clare Gerard
N/A	000073	000076	GRAYS POWER Labor Exp - Final Pay Macro Ready JH	All	(d), (e)	Clare Gerard
N/A	000077	000080	GREAT LAKES Labor Exp - Final Pay Macro JH	All	(d), (e)	Clare Gerard
N/A	000081	000084	GUNNISON TREE Labor Exp - Final Pay Macro JH	All	(d), (e)	Clare Gerard
N/A	000085	000088	HAUGLAND Labor Exp - Final Pay Macro Ready JH	All	(d), (e)	Clare Gerard
N/A	000089	000092	HYDAKER WHEATLAKE Labor Exp - Final Pay Macro JH	All	(d), (e)	Clare Gerard
N/A	000093	000096	Ib Abel Labor Exp - Final Pay Macro Ready JH	All	(d), (e)	Clare Gerard
N/A	000097	000100	INTREN Labor Exp - Final Pay Macro Ready JH	All	(d), (e)	Clare Gerard
N/A	000101	000104	Irby Labor Exp READY JH REV	All	(d), (e)	Clare Gerard
N/A	000105	000108	JAFLO Labor Exp - Final Pay Macro Ready JH	All	(d), (e)	Clare Gerard
N/A	000109	000112	JF ELECTRIC Labor Exp - Final Pay Macro Ready JH	All	(d), (e)	Clare Gerard
N/A	000113	000116	JORDAN HIGH VOLTAGE Labor Exp-Final READY JH	All	(d), (e)	Clare Gerard
N/A	000117	000120	KENT Labor Exp - Final Pay Macro Ready JH	All	(d), (e)	Clare Gerard
N/A	000121	000124	KV Power Labor Exp - Final Pay Macro - JH	All	(d), (e)	Clare Gerard
N/A	000125	000128	LEWIS TREE Labor Exp - Final Pay Macro Ready JH	All	(d), (e)	Clare Gerard

N/A	000129	000132	LINETEC Labor Exp - Final Pay Macro Ready JH	All	(d), (e)	Clare Gerard
N/A	000133	000136	MASTEC Labor Exp - Final Pay Macro Ready JH	All	(d), (e)	Clare Gerard
N/A	000137	000140	MATRIX Labor Exp - Final Pay Macro Ready JH	All	(d), (e)	Clare Gerard
N/A	000141	000144	MCCOY TREE Labor Exp - Final Pay Macro Ready JH	All	(d), (e)	Clare Gerard
N/A	000145	000148	Musgrove - Final Pay Macro Ready JH	All	(d), (e)	Clare Gerard
N/A	000149	000152	NELSON TREE Labor Exp - Final Pay Macro V2	All	(d), (e)	Clare Gerard
N/A	000153	000156	OCONNELL ELECTRIC Labor Exp - Final Pay Macro Ready JH	All	(d), (e)	Clare Gerard
N/A	000157	000160	ONE SOURCE Labor Exp - Final Pay Macro Ready JH	All	(d), (e)	Clare Gerard
N/A	000161	000164	OVERHEAD LINES Labor Exp - Final Pay Macro Ready JH	All	(d), (e)	Clare Gerard
N/A	000165	000168	ALLIANCE Labor Exp - Final Pay Macro JH	All	(d), (e)	Clare Gerard
N/A	000169	000172	PIKE Labor Exp - Final Pay Macro JH	All	(d), (e)	Clare Gerard
N/A	000173	000176	POWERGRID VEG Labor Exp - Final Pay Macro Ready JH	All	(d), (e)	Clare Gerard
N/A	000177	000180	POWERGRID-OH Labor Exp - Final Pay Macro Ready JH	All	(d), (e)	Clare Gerard
N/A	000181	000184	Powerline Labor Exp - Final Pay Macro - JH	All	(d), (e)	Clare Gerard
N/A	000185	000188	POWERTOWN Labor Exp - Final Pay Macro JH	All	(d), (e)	Clare Gerard
N/A	000189	000192	PRIMARY SOURCE ELECTRIC Labor Exp - Final Pay Macro JH	All	(d), (e)	Clare Gerard
N/A	000193	000196	PRIMORIS Labor Exp - Final Pay Macro Ready JH	All	(d), (e)	Clare Gerard
N/A	000197	000200	RIGGS DISTLER Labor Exp - Final Pay Macro Ready JH	All	(d), (e)	Clare Gerard
N/A	000201	000204	RIVER CITY Labor Exp - Final Pay Macro Ready JH	All	(d), (e)	Clare Gerard

N/A	000205	000208	SERVICE ELECTRIC Labor Exp - Final Pay Macro Ready JH	All	(d), (e)	Clare Gerard
N/A	000209	000212	SOUTHERN Labor Exp - Final Pay Macro Ready JH	All	(d), (e)	Clare Gerard
N/A	000214	000224	STATE ELECTRIC Labor Exp - Final Pay Macro Ready JH	All	(d), (e)	Clare Gerard
N/A	000225	000228	SUMTER UTILITIES Ready JH	All	(d), (e)	Clare Gerard
N/A	000229	000232	TEMPEST Labor Exp - Final Pay Macro Ready JH	All	(d), (e)	Clare Gerard
N/A	000233	000236	THOMPSON ELECTRIC Labor Exp - Final Pay Macro Ready JH	All	(d), (e)	Clare Gerard
N/A	000237	000240	TREES INC Labor Exp - Final Pay Macro Ready JH	All	(d), (e)	Clare Gerard
N/A	000241	000244	Utility Lines Construction - Non Emb Ready OH - Final Pay	All	(d), (e)	Clare Gerard
N/A	000245	000248	UTILITY LINES EMBED Labor Exp - Final Pay Macro Ready JH	All	(d), (e)	Clare Gerard
N/A	000249	000252	VOLT Labor Exp - Final Pay Macro Ready JH	All	(d), (e)	Clare Gerard
N/A	000253	000256	WA KENDALL Labor Exp - Final Pay Macro Ready JH	All	(d), (e)	Clare Gerard
N/A	000257	000260	WAMPOLE Labor Exp -Updated Final Pay Macro Ready JH	All	(d), (e)	Clare Gerard
N/A	000261	000264	WEST TREE SERVICE Labor Exp - Final Pay Macro JH	All	(d), (e)	Clare Gerard
N/A	000265	000268	WILCO Labor Exp - Final Pay Macro Ready JH	All	(d), (e)	Clare Gerard
N/A	000269	000272	WRIGHT TREE Labor Exp - Final Pay Macro Ready JH	All	(d), (e)	Clare Gerard
N/A	000273	000276	XTREME Labor Exp - Final Pay Macro Ready JH	All	(d), (e)	Clare Gerard
N/A	000277	000280	XYLEM Labor Exp - Final Pay Macro JH	All	(d), (e)	Clare Gerard
N/A	000281	000284	ABC PROFESSIONAL Labor Exp - Final Pay Macro (2) V2	All	(d), (e)	Clare Gerard
N/A	000285	000288	5 STAR ELECTRIC Labor Exp - Final Pay Macro Ready JH	All	(d), (e)	Clare Gerard

N/A	000289	000292	ABC PROFESSIONAL Labor Exp - Ready JH	All	(d), (e)	Clare Gerard
N/A	000293	000296	AMPCO Labor Exp - Final Pay Macro JH	All	(d), (e)	Clare Gerard
N/A	000297	000300	ARC AMERICAN Final Dispute Adjusted Ready JH	All	(d), (e)	Clare Gerard
N/A	000301	000304	ASPLUNDH CONSTRUCTION Labor Exp Ready JH	All	(d), (e)	Clare Gerard
N/A	000305	000308	ASPLUNDH TREE FINAL READY JH REV1	All	(d), (e)	Clare Gerard
N/A	000309	000312	BB Electrical Labor Exp - Final Payment Macro JH	All	(d), (e)	Clare Gerard
N/A	000313	000316	Blackout Labor Exp - Final Pay Macro Ready JH	All	(d), (e)	Clare Gerard
N/A	000317	000320	Bobcat Final Pay Macro Ready JH	All	(d), (e)	Clare Gerard
N/A	000321	000324	Bowlin Labor Exp - Final Payment Macro JH	All	(d), (e)	Clare Gerard
N/A	000325	000328	BURFORD TREE Labor Exp - Final Pay Macro JH	All	(d), (e)	Clare Gerard
N/A	00329	000332	CHAIN Labor Exp - Final Pay Macro JH	All	(d), (e)	Clare Gerard
N/A	000333	000336	Concurrent Labor Exp - Final Pay Macro JH	All	(d), (e)	Clare Gerard
N/A	000337	000340	DAVEY TREE Labor Exp - Final Pay Ready JH	All	(d), (e)	Clare Gerard
N/A	000341	000344	Davis H Elliot Labor Exp - Final Pay Macro Ready JH	All	(d), (e)	Clare Gerard
N/A	000345	000348	DIAMOND D TREE Labor Exp Macro Ready JH	All	(d), (e)	Clare Gerard
N/A	000349	000352	Edison Power Labor Exp Emb - Final Pay Macro Ready JH	All	(d), (e)	Clare Gerard
N/A	000353	000356	Edison Power Labor Exp Non-Emb - Final Pay Macro Ready JH	All	(d), (e)	Clare Gerard
N/A	000357	000360	Grays Power Supply Labor Exp - Final Pay Macro Ready JH	All	(d), (e)	Clare Gerard
N/A	000361	000364	Great Southwestern Labor Exp - Final Pay Macro Ready JH	All	(d), (e)	Clare Gerard

N/A	000369	000372	Heart Labor Exp - Final Pay Macro JH	All	(d), (e)	Clare Gerard
N/A	000373	000376	HIGH POWER Labor Exp - Final Pay Macro JH	All	(d), (e)	Clare Gerard
N/A	000377	000380	Irby Labor Exp - Final Pay Macro Ready JH	All	(d), (e)	Clare Gerard
N/A	000381	000384	JAFLO Labor Exp - Final Pay Macro Ready JH	All	(d), (e)	Clare Gerard
N/A	000385	000388	JORDAN HIGH VOLTAGE Labor Exp - Final Pay Macro Ready JH	All	(d), (e)	Clare Gerard
N/A	000389	00392	KV POWER Labor Exp - Final Pay Macro JH	All	(d), (e)	Clare Gerard
N/A	000393	000396	LE Myers Labor Exp - Final Pay Macro Ready JH	All	(d), (e)	Clare Gerard
N/A	000397	000400	LEE ELECTRICAL Labor Exp - Final Pay Macro Ready JH	All	(d), (e)	Clare Gerard
N/A	000401	000404	LEWIS TREE Labor Exp - Final Pay Macro Ready JH REV1	All	(d), (e)	Clare Gerard
N/A	000405	000408	Linetec Labor Exp - Final Pay Macro_Ready JH	All	(d), (e)	Clare Gerard
N/A	000409	000412	Mastec Updated Labor Exp - Final Pay Macro Ready JH	All	(d), (e)	Clare Gerard
N/A	000413	000416	MDR CONSTRUCTION Labor Exp - Final Pay Macro Ready JH	All	(d), (e)	Clare Gerard
N/A	000417	000420	MJ Electric Labor Exp - Final Pay Macro REV Ready JH	All	(d), (e)	Clare Gerard
N/A	000421	000424	Mohawk Final Pay Macro	All	(d), (e)	Clare Gerard
N/A	000425	000428	MUSGROVE Labor Exp - Final Pay Macro Ready JH	All	(d), (e)	Clare Gerard
N/A	000429	000432	NELSON TREE Labor Exp - Final Pay Macro Ready JH	All	(d), (e)	Clare Gerard
N/A	000433	000436	OCONNELL ELECTRIC Labor Exp - Final Pay Macro Ready JH	All	(d), (e)	Clare Gerard
N/A	000437	000440	One Source - CF Ready JH	All	(d), (e)	Clare Gerard
N/A	000441	000444	PAR Labor Exp - Final Payment JH	All	(d), (e)	Clare Gerard

N/A	000445	000448	PIKE ELECTRIC Labor Exp - READY JH	All	(d), (e)	Clare Gerard
N/A	000449	000452	POWERGRID Final Ready JH	All	(d), (e)	Clare Gerard
N/A	000453	000456	Powerline Final Payment Macro JH	All	(d), (e)	Clare Gerard
N/A	000457	000460	Powertown Labor Exp - Final Pay Macro Ready JH	All	(d), (e)	Clare Gerard
N/A	000461	000464	PRIMORIS Labor Exp - Final Pay Macro - Ready JH	All	(d), (e)	Clare Gerard
N/A	000465	000468	Robert Henry Final Payment Macro JH	All	(d), (e)	Clare Gerard
N/A	000469	000472	SOUTHERN ELECTRIC Labor Exp - Ready JH	All	(d), (e)	Clare Gerard
N/A	000473	000476	SUMTER UTILITIES Labor Exp - Final Pay Macro Ready JH	All	(d), (e)	Clare Gerard
N/A	000477	000480	Thayer Labor Exp - Final Pay Macro Ready JH	All	(d), (e)	Clare Gerard
N/A	000481	000484	TREES INC - Final Pay Macro Ready JH Adj Exp	All	(d), (e)	Clare Gerard
N/A	000485	000488	TREES INC Labor Exp - Final Pay Macro Ready JH	All	(d), (e)	Clare Gerard
N/A	000489	000492	UTILITY LINES CONSTRU - EMBED Labor Exp - Final Pay Macro Ready JH	All	(d), (e)	Clare Gerard
N/A	000493	000496	UTILITY LINES NON EMBED Labor Exp - Final Pay Macro Ready JH	All	(d), (e)	Clare Gerard
N/A	000497	000500	Volt Labor Exp - Final Pay Macro Ready JH	All	(d), (e)	Clare Gerard
N/A	000501	000504	WA KENDALL Labor Exp - Final Pay Macro - Ready JH	All	(d), (e)	Clare Gerard
N/A	000505	000508	Wampole Labor Exp - Final Pay Macro Ready JH	All	(d), (e)	Clare Gerard
N/A	000509	000512	WILCO Labor Exp - Final Pay Macro Ready JH	All	(d), (e)	Clare Gerard
N/A	000513	000516	Isaias ans Eta	All	(d), (e)	Clare Gerard
N/A	000517	000520	WILLBROS TD Labor Exp - Final Pay Macro Ready JH	All	(d), (e)	Clare Gerard

N/A	000521	000524	WILLIAMS ELECTRIC Labor Exp - Final Pay Macro Ready JH	All	(d), (e)	Clare Gerard
N/A	000525	000528	WRIGHT TREE Labor Exp - Final Pay Macro - Ready JH	All	(d), (e)	Clare Gerard
N/A	000529	000532	XTREME Labor Exp - Final Pay Macro Ready JH	All	(d), (e)	Clare Gerard
N/A	000533	00536	Xylem Labor Exp Final Pay Macro Ready JH	All	(d), (e)	Clare Gerard
N/A	000537	000540	MP Technologies Time Exp Review - Final Payment	All	(d), (e)	Clare Gerard
N/A	000541	000562	DH-2 Eta Final Costs as of July 2021	All	(d), (e)	David Hughes
N/A	000563	000582	DH-1 Isaias Final Costs as of July 2021.xlsx	All	(d), (e)	David Hughes
N/A	000583	000583	Eta Travel Orders	All	(d), (e)	Clare Gerard
N/A	000584	000584	Isaias Travel Orders	All	(d), (e)	Clare Gerard

EXHIBIT D

DECLARATIONS

EXHIBIT D

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Evaluation of storm costs for
Florida Power & Light Company related to
Hurricane Isaias and Tropical Storm Eta

Docket No: 2021 _____-EI

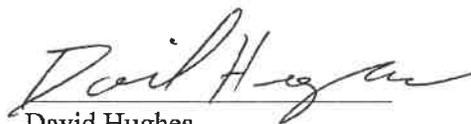
DECLARATION OF DAVID HUGHES

1. My name is David Hughes. I am currently employed by Florida Power & Light Company ("FPL") 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 FPL'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 FPL to contract for goods or services on favorable terms. Additionally, the documents and files that I have reviewed, and which are asserted by FPL 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, 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.



David Hughes

Date: 11/11/2021

EXHIBIT D

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Evaluation of storm costs for
Florida Power & Light Company related to
Hurricane Isaias and Tropical Storm Eta

Docket No: 2021 ____ -EI

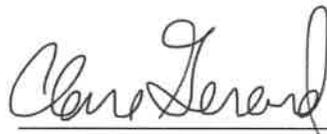
DECLARATION OF CLARE GERARD

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 Florida Power & Light Company's ("FPL'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 FPL to contract for goods or services on favorable terms. Additionally, the documents and files that I have reviewed, and which are asserted by FPL 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, 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.



Clare Gerard

Date:

11-11-21