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September 8, 2023

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

RECEIVED-FPSC
2023 SEP --8 PM 4: 26
COMMISSION
CLERK

Re: **Docket No. 20230001-EI**
Florida Power & Light Company Request for Confidential Classification

Dear Mr. Teitzman:

Enclosed for filing in the above docket is Florida Power & Light Company's ("FPL") Request for Confidential Classification of certain information provided in its corrected response to the Staff of Florida Public Service Commission's ("Staff") Third Set of Interrogatories, No. 8. The request includes Exhibits A, B (two copies), C and D.

Exhibit A consists of the confidential documents with all the information that FPL asserts is entitled to confidential treatment highlighted in yellow. 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 declarations in support of FPL's request.

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

Sincerely,

William P. Cox

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Enclosures

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

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Fuel and purchased power cost recovery
clause with generating performance incentive
factor.

Docket No. 20230001-EI

Filed: September 8, 2023

**FLORIDA POWER & LIGHT COMPANY’S REQUEST FOR CONFIDENTIAL
CLASSIFICATION OF INFORMATION PROVIDED IN ITS CORRECTED RESPONSE
TO THE STAFF OF THE FLORIDA PUBLIC SERVICE COMMISSION’S
THIRD SET OF INTERROGATORIES (No. 8)**

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 its corrected response to the Staff of the Florida Public Service Commission’s (“Staff”) Third Set of Interrogatories (No. 8) (the “Confidential Document”). In support of this Request, FPL states as follows:

1. On May 4, 2023, Staff served its Third Set of Interrogatories on FPL.
2. FPL served its response to Staff’s Third Set of Interrogatories, No. 8 on June 5, 2023. FPL’s Response to Staff’s Third Set of Interrogatories, No. 8, contained information of a confidential nature within the meaning of Section 366.093(3), Florida Statutes, and FPL filed a Request for Confidential Classification of that information on June 5, 2023. Subsequently, FPL learned that some of the data contained in the Confidential Document was erroneous. Thus, FPL hereby requests confidential classification of the Corrected Confidential Document consistent with Rule 25-22.006, Florida Administrative Code.
3. The following exhibits are attached to and made a part of this Request:
 - a. Exhibit A consists of the corrected confidential document in which all the information that FPL asserts is entitled to confidential treatment is highlighted in yellow.

- b. Exhibit B is an edited version of Exhibit A, in which all the information FPL asserts is entitled to confidential treatment has been redacted.
- c. Exhibit C is a table that identifies the confidential 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 declaration of Kelly Fagan in support of this Request.

4. FPL submits that the highlighted information in Exhibit A is proprietary confidential business information within the meaning of Section 366.093(3), Florida Statutes. This information is intended to be and is treated by FPL as private, and its confidentiality has been maintained. Pursuant to Section 366.093, Florida Statutes (“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.

5. As the descriptions included in Exhibit C and the declaration included in Exhibit D indicate, the Corrected Confidential Document contains information that if made public, would impair the efforts of FPL to contract for goods or services on favorable terms. Specifically, the information contains vendor bids for goods and services related to construction projects. This information is protected by Section 366.093(3)(d), F.S.

6. Upon a finding by the Commission that the information contained in the Corrected Confidential Document is proprietary and confidential business information, the information should not be declassified for at least eighteen (18) months and should be returned to FPL as soon

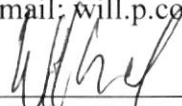
as it is no longer necessary for the Commission to conduct its business. *See* Section 366.093(4),
F.S.

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.

Respectfully submitted,

Maria J. Moncada, Esq.
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By: _____


William P. Cox
Florida Bar No. 0093531

CERTIFICATE OF SERVICE
Docket 20230001-EI

I **HEREBY CERTIFY** that a true and correct copy of the foregoing has been furnished by electronic delivery on this 8th day of September 2023 to the following:

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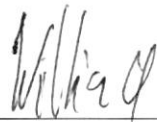
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Phosphate – White Springs**

By: 

William P. Cox
Florida Bar No. 0093531

EXHIBIT B

REDACTED

	2024											
DC/AC Ratio	1.37	1.28	1.40	1.45	1.38	1.40	1.20	1.34	1.43	1.40	1.33	1.36
AC Voltage	74.5	74.5	74.5	74.5	74.5	74.5	74.5	74.5	74.5	74.5	74.5	74.5
DC Voltage	102.1	95.4	104.3	108.025	102.8	104.3	89.4	99.8	106.5	104.3	99.1	101.3
GCR	0.40	0.40	0.40	0.32	0.40	0.40	0.40	0.40	0.40	0.40	0.40	0.40
Racking	Tracker	Tracker	Tracker	Tracker	Tracker	Tracker	Tracker	Tracker	Tracker	Tracker	Tracker	Tracker
Module Eff (run)	530	650/655	650/655	650/655	530	530	530	530	530	530	530	530
Module Vendor/Type	Longi	Trina	Trina	Trina	Adani	Adani	Adani	Longi	BYD	BYD	BYD	BYD
NCF												
Site	Terrill Creek	Silver Palm	Ibis	Orchard	Beautyberry	Turnpike	Monarch	Caloosahatchee	White Tail	Prairie Creek	Pineapple	Canoe
COD	1/31/2024	1/31/2024	1/31/2024	1/31/2024	1/31/2024	1/31/2024	1/31/2024	1/31/2024	1/31/2024	1/31/2024	1/31/2024	1/31/2024
Capital cost \$millions												
Land	\$5,646,031	\$9,610,455	\$5,035,713	\$2,975,579	\$15,565,000	\$3,259,409	\$7,061,600	\$4,138,432	\$7,824,425	\$5,772,368	\$2,966,578	\$6,630,123
Easements	\$500,000	\$0	\$0	\$0	\$0	\$0	\$0	\$1,800,000	\$0	\$800,000	\$0	\$0
AFUDC	\$4,860,352	\$4,860,352	\$4,860,352	\$5,173,761	\$4,860,352	\$4,860,352	\$4,860,352	\$4,860,352	\$4,860,352	\$4,860,352	\$4,860,352	\$4,860,352
Total	\$121,737,098	\$121,956,189	\$115,995,846	\$117,407,803	\$127,665,392	\$113,801,692	\$110,786,467	\$136,143,025	\$129,051,985	\$130,777,713	\$112,718,350	\$122,699,188
\$/KW =	\$1,634	\$1,637	\$1,557	\$1,576	\$1,714	\$1,528	\$1,487	\$1,827	\$1,732	\$1,755	\$1,513	\$1,647

EXHIBIT C

JUSTIFICATION TABLE

EXHIBIT C

COMPANY: Florida Power & Light Company
TITLE: List of Confidential Documents
DOCKET NO.: 20230001-EI
DOCKET TITLE: Fuel and Purchased Power Cost Recovery Clause with Generating Performance Incentive Factor
SUBJECT: FPL's Corrected Response to Staff's Third Set of Interrogatories, (No. 8)
DATE: September 8, 2023

Item No.	Bates Nos. / Page Nos.	Description	Line No./ Col. No.	Florida Statute 366.093(3) Subsection	Declarant
Staff 3 rd INT, No. 8	N/A	CORRECTED Att. 1 - SoBRA Cost Detail	Rows 14, 20-23, and 25-28; Cols. A-M	(d)	Kelly Fagan

EXHIBIT D

DECLARATIONS

EXHIBIT D

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Fuel and Purchase Power Cost Recovery
Clause with Generating Performance Incentive
Factor

Docket No. 20230001-EI


DECLARATION OF KELLY FAGAN

1. My name is Kelly Fagan. I am currently employed by Florida Power & Light Company ("FPL") as Projector Director, Engineering and Construction. I have personal knowledge of the matters stated in this declaration.

2. I have reviewed Exhibit C and the documents that are included in FPL's Request for Confidential Classification of Information provided in the corrected response to Staff's Third Set of Interrogatories, No. 8 for which I am designated as the declarant. The documents or materials that I have reviewed and which are asserted by FPL to be proprietary confidential business information contain information concerning bids, the disclosure of which would impair the efforts of FPL to contract for goods or services on favorable terms (Section 366.093(3)(d), F.S.). Specifically, the information contains vendor bids for goods and services related to construction projects. To the best of my knowledge, FPL has maintained the confidentiality of these documents and materials.

3. Consistent with the provisions of the Florida Administrative Code, such materials should remain confidential for a period of least 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.



Kelly Fagan

Date: 9/7/2023