

**REDACTED** BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Commission Review of Numeric ) DOCKET NO. 20190020-EG  
Conservation Goals )  
JEA ) Dated: July 26, 2019  
\_\_\_\_\_ )

**JEA'S FIRST REQUEST FOR CONFIDENTIAL CLASSIFICATION**

JEA, pursuant to Section 366.093, Florida Statutes (F.S.), and Rule 25-22.006, Florida Administrative Code (F.A.C.), submits this First Request for Confidential Classification of certain information provided in its responses to Staff's Twelfth Set of Interrogatories (Nos. 88-94).

1. On July 26, 2019, JEA responded to Staff's Twelfth Set of Interrogatories (Nos. 88-94). Information responsive to Interrogatory No. 90b contains confidential information.

2. The following exhibits are included with this request:

(a) Exhibit A is a package containing redacted versions of the documents for which Seminole requests confidential classification. The specific information for which confidential treatment is requested has been blocked out by opaque marker or other means.

(b) Exhibit B is a package containing un-redacted copies of the documents for which Seminole seeks confidential treatment. Exhibit B is being submitted separately in a sealed envelope labeled "CONFIDENTIAL." In the un-redacted version, the information asserted to be confidential is highlighted in yellow.

2. The response to Interrogatory No. 90b contains, among other things, JEA's actual and estimated expenses for consultant fees, along with the total expenses from which the

COM \_\_\_\_\_ consultant fees could be determined. The disclosure of this information would impair the efforts of  
AFD \_\_\_\_\_  
APA \_\_\_\_\_ JEA to contract for goods or services on favorable terms. See Section 366.093(3)(d), F.S. Without  
ECO \_\_\_\_\_ assurances of non-disclosure, potential consultants might choose not to provide services to JEA.

ENG Redacted

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IDM \_\_\_\_\_  
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Accordingly, the information identified in Attachment A qualifies for confidential classification under Section 366.093(3)(d), Florida Statutes. Likewise, the information relates to competitive business interests, the disclosure of which would impair the competitive business of the consultants who provided the services to JEA. As such, the information also qualifies for confidential classification under Section 366.093(3)(e), Florida Statutes.

3. Attachment 1 to this Request is a matrix identifying specific information within these responses and documents which are considered confidential, along with the specific statutory justification for seeking confidential classification.

4. The information for which JEA seeks confidential treatment is intended to be and is treated as confidential by JEA. The information has not been disclosed to the public.

5. JEA requests that the information identified above be classified as “proprietary confidential business information” within the meaning of section 366.093(3), F.S., that the information remain confidential for a period of at least 18 months as provided in section 366.093(4), F.S., and that the information be returned as soon as it is no longer necessary for the Commission to conduct its business.

WHEREFORE, for the foregoing reasons, JEA respectfully requests that this First Request for Confidential Classification be granted.

Respectfully submitted this 26<sup>h</sup> day of July, 2019.



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*Attorneys for JEA*

**CERTIFICATE OF SERVICE**

I hereby certify that a copy of the foregoing Request for Confidential Classification was served upon the following by hand delivery on this 26<sup>th</sup> day of July, 2019:

Ashley Weisenfeld  
Margo DuVal  
Office of the General Counsel  
2540 Shumard Oak Blvd  
Tallahassee, FL 32399-0850

Brooke E. Lewis

90. Regarding JEA's expenses for participation in the FEECA Goalsetting proceeding, please answer the following questions.

- a. What are JEA's actual expenses as of the filing of the rebuttal testimony, in total and by category (such as consultant fees, legal expenses, and salaries)?

**RESPONSE:** JEA's approximate<sup>1</sup> expenses are as follows:

Consultant Fees	[REDACTED]
Legal Expenses	\$101,600
Salaries	\$154,400
Total	[REDACTED]

<sup>1</sup> Note: Not all of JEA's expenses are as of the filing of the rebuttal testimony (July 12). Some expenses are only through June 30, because JEA has not been invoiced since then.

- b. What are JEA's estimated expenses for the full FEECA Goalsetting proceeding, in total and by category (such as consultant fees, legal expenses, and salaries)?

**RESPONSE:** JEA's estimated expenses in total for the full Goalsetting proceeding are as follows:

Consultant Fees	[REDACTED]
Legal Expenses	\$159,700
Salaries	\$185,200
Total	[REDACTED]

- c. Does JEA intend to recover expenses associated with the FEECA Goalsetting proceeding? If so, please explain how. If no, explain why not.

**RESPONSE:** JEA is a municipal utility and as such must pay for these expenses through collected revenues from electric sales.