

Maria Jose Moncada Senior Attorney Florida Power & Light Company 700 Universe Boulevard Juno Beach, FL 33408-0420 (561) 304-5795 (561) 691-7135 (Facsimile) E-mail: maria.moncada@fpl.com

August 26, 2019

### 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

Re: Docket No. 20190061-EI

Dear Mr. Teitzman:

I enclose for filing in the above docket Florida Power & Light Company's ("FPL's") Request for Confidential Classification of Information Provided in Response to Staff's Second Set of Interrogatories, Nos. 166 and 186. The request includes Exhibits A, B (two copies), C and D.

Exhibit A consists of the confidential documents, and all the information that FPL asserts is entitled to confidential treatment has been highlighted. 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 declaration in support of FPL's request.

AFD Please conta	ct me if you or your Staff has any questions regarding this filing.
APA ECO	Sincerely,
GCL	My of for Maria Jose Moncada
IDM	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 approval of FPL SolarTogether program and tariff, by Florida Power & Light

Company

Docket No: 20190061-EI

Date: August 26, 2019

FLORIDA POWER & LIGHT COMPANY'S REQUEST FOR CONFIDENTIAL CLASSIFICATION OF INFORMATION PROVIDED IN RESPONSE TO STAFF'S SECOND SET OF INTERROGATORIES (Nos. 166 and 186)

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 response to Staff's Second Set of

Interrogatories, Nos. 166 and 186 (collectively, the "Confidential Documents"). In support of

this Request, FPL states as follows:

1. FPL served its responses to Staff's Second Set of Interrogatories, Nos. 160-198,

on August 26, 2019. This Request is being filed contemporaneously with service of those

responses in order to request confidential classification of certain information contained in its

response to Interrogatories Nos. 166 and 186, consistent with Rule 25-22.006, Florida

Administrative Code.

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 on which all

information that FPL asserts is entitled to confidential treatment is

highlighted.

b. Exhibit B consists of an edited version of the Confidential Documents on

which all information that FPL asserts is entitled to confidential treatment

is redacted.

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- c. Exhibit C is a table that identifies the information highlighted 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 Jill Dvareckas in support of this Request.
- 3. FPL submits that the highlighted information in Exhibit A are documents or materials that I have reviewed and which are asserted by FPL to be proprietary confidential business information contain or constitute customer-specific information. It is FPL's corporate policy not to disclose customer-specific information. This policy includes, but is not limited to: customer names, addresses, telephone numbers, account numbers, rates, billing determinants (kW and kWh usage), conservation savings in kW, kWh and bills. FPL treats such information as confidential and does not disclose it, except as required by law, to entities or persons other than the customer absent the customer's consent.
- 4. As described in the declaration in Exhibit D, some of the confidential business information contain or constitute customer-specific information, 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), Fla. Stat.
- 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 § 366.093(4), Fla. Stat.

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 26th day of August 2019.

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

Facsimile: (561) 691-7135

By:

Maria Jose Moncada Florida Bar No. 0773301

## CERTIFICATE OF SERVICE Docket No. 20190061-EI

I HEREBY CERTIFY that a true and correct copy of the foregoing has been furnished by

electronic service on this 26th day of August 2019 to the following:

Walter Trierweiler

Office of the General Counsel
Florida Public Service Commission
2540 Shumard Oak Blvd.
Tallahassee, Florida 32399-0850
wtrierwe@psc.state.fl.us

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Attorneys for Walmart, Inc.

By:

Maria Jose Moncada Florida Bar No. 0773301

# **EXHIBIT B**

# **REDACTED**

Florida Power & Light Company Docket No. 20190061-EI Staff's Second Set of Interrogatories Interrogatory No. 166 - Redacted Page 1 of 2

### QUESTION:

Please refer to Witness Valle's direct testimony, page 12, lines 4 through 5. Please provide dates for these discussions, along with a list of attendees, customers, and method of communication (in-person, telephonic).

### RESPONSE:

A detailed list of customer meetings is not available. FPL has received numerous requests and had many discussions about solar with our customers over the years. The primary efforts and discussions FPL undertook to create FPL SolarTogether are described below.

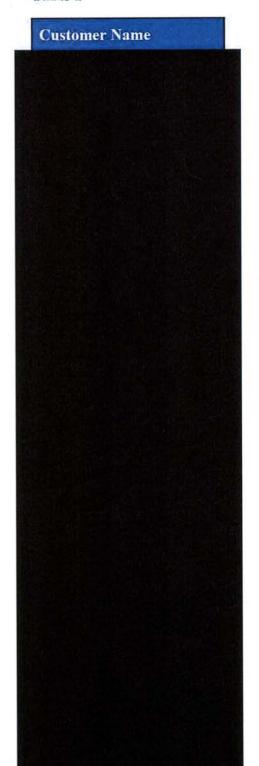
In the early design phases of the program, FPL conducted numerous in-person discussions with customers at the Edison Electric Institute Spring National Key Accounts Workshop, April 9-12, 2017. FPL did not retain detailed documentation on the specific customer meetings, but the registration list for the workshops is available at the following link: <a href="https://www.eei.org/about/meetings/Meeting">https://www.eei.org/about/meetings/Meeting</a> Documents/Registrants.pdf

In fall 2018, just prior to the C&I-G pre-registration, FPL conducted numerous in-person discussions with customers at the Smart Energy Decisions Renewable Energy Sourcing Forum ("Forum"), October 1-3, 2018 and the Edison Electric Institute Fall National Key Accounts Workshop, October 21-24, 2018. See Table 1 below for the list of customer.

The purpose of these meetings was to test the program's value proposition, test marketing and messaging materials, understand program viability, gauge customer interest level, and identify common questions and/or concerns.

Florida Power & Light Company Docket No. 20190061-EI Staff's Second Set of Interrogatories Interrogatory No. 166 - Redacted Page 2 of 2

Table 1



See also Staff's First Request for Production of Documents No. 2.

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į	Attackment No. 1 - Re	relacted										
i '	Tab 1 of 1											
				Reserved	Coffi Previous 42	Colic Hounddown Collb 2543.00						
1	Preregistration		Customer	Subscription	pro Usage	Max Subscription Calculation Based	Reserved Subscription	Reservation Time	Number of Meters	Subscription Size per	Reserved Subscription	
	Continuation No.			(617)	8.11 h	or 12 m / LW6	Max. Subscription	Stroop	Militier of Arters	Meter (IAV)	per Mefer I verials 2 AIM	Nutes
	74		Commercial 1	2,330	5,908,080 ′	2,330	No	2018-11-29 09:03:37	2	1165	No	
7	94		Commercial 2	153	388,320	153	No	2018-11-29 09:56:24	î	153	No No	
1	95		Commercial 3	33	R5.838	33	No	2018-11-29 10:00:50	1	33	No	
2	96		Commercial 4	62 41	157,777	62	No	2018-11-29 10:40:43	i	62	No	
	97 116		Commercial 5	41	3,300,054	1,301	No	2018-11-29 10:45:02	2	21	No	
:	136		Commardal 6	76 I	195,178	76	No	2018-11-29 11:03:27	1	76	No	
K	136		Commercial 7 Commercial 8	£00	172,260 21,263,071	67 8.387	No	2018-11-29 11:39:52	1.	. 1	No	
7	176		Commercial 9	500 16	41,220	16	No No	2018-11-29 12:18:15 2018-11-29 01:41:09	24	21 16	No No	
3	177		Commercial 10	141	359,640	(4)	No No	2018-11-29 01:49:30	3	47	No No	
9	178		Commercial 11	31	78,862	31	No	2018-11-29 01:53:28	i	31	No	
D	179		Commercial 12	1,314	3,331,402	1,314	No	2018-11-29 01:57:25	3	438	No	
<u>.</u>	180		Commercial 13	6	25,875	10	No	2018-11-29 01:58:33	1	6	No	
	181		Commercial 14	21	54,902	21	No	2018-11-29 01:59:12	3	7	No	
,	182 183		Commercial 15 Commercial 16	67 29	172,260 76,017	67	No	2018-11-29 02:04:53	1	67	No	
	216		Commercial 17	962	76,017 2,438,800	29 962	No	2018-11-29 02:09:41	1	29	No	
, 6	236		Commercial 18	601	1,524,266	601	No No	2018-11-29 04:00:42 2018-11-29 06:09:33	<u>;</u>	962 86	No No	
,	296		Commercial 19	56	142,620	56	No	2018-11-30 08:08:30	· '	56	No	
3	297		Commercial 20	11	28,543	11	No	2018-11-30 08:08:44	í	11	No	
•	298		Commercial 21	31	80,783	31	No	2018-11-30 08:17:39	1	31	No	
)	299		Commercial 22	200	967,200	381	No	2018-11-30 08:33:52	1	200	No	
!	300		Commercial 23	112	285,360	112	No	2018-11-30 09:07:30	1	112	No	
i i	301 303		Commercial 24	18	46,952	18	No	2018-11-30 09:36:42	1	18	No	
	305		Commercial 25 Commercial 26	50 3,418	128,409 8,666,880	50 3,418	No	2018-11-30 01:19:28 2018-11-30 01:51:54	5	10 684	No	
	306		Commercial 27	4,590	11,637,320	3,418 4,590	No No		3		No	
Š	307		Commercial 28	100	255,348	100	No No No	2018-11-30 03:44:41 2018-11-30 03:49:24	1	765 100	No No	
,	310		Commercial 29	29	74,524	29	No	2018-12-02 01:46:45	í	29	No	
3	311		Commercial 30	6	17,475	6	No	2018-12-02 01:57:55	i	6	No	
)	312		Commercial 31	30	77,668	30	No No	2018-12-02 03:31:06	į	30	No	
)	313		Commercial 32	. 14	37,719	14	No	2018-12-03 09:30:41	1	14	No	
	314		Commercial 33	706	1,791,360	706	No	2018-12-03 10:95:44	t	706	No	
	315 316		Commercial 34 Commercial 35	200,000 95	686,173,020 243,060	270,679 95	No	2018-12-03 11:00:21	175	1143	No	
í	317		Commercial 36	93 61	243,060 156,213	95 61	No	2018-12-03 11:04:17	2	48	No	
i	318		Commercial 37	27	69,615	27	No No	2018-12-04 02:05:43 2018-12-04 02:08:29	1	20 27	No No	
•	319		Commercial 38	23	60,292	23	No	2018-12-04 11:34:19	1	23	No No	
	320		Commercial 39	19	49,249	19	No No	2018-12-04 11:39:56	ī	19	No	
l	321		Commercial 40	102	258,780	102	No	2018-12-04 03:45:21	ī	102	No	
•	322		Commercial 41	30	78,293	30	No	2018-12-04 07:13:44	2	1.5	No	
?	323		Communici 42	29	92,414	36	No No	2018-12-05 07:47:32	ı	29	No	
	324 325		Commercial 43 Commercial 44	16 60	40,591 152,880	16	No	2018-12-05 08:55:43	1	16	No	
	326		Commercial 45	208	528,840	60 208	No No	2018-12-05 11:37:03 2018-12-05 12:25:27	3	20 208	No No	
í	328		Commercial 46	20	52,536	20	NO.	2018-12-05 12:23:27	;	208	No No	
	329		Commercial 47	65	166,055	65	No No	2018-12-06 10:36:16	1	63	No	
i	330		Commercial 48	35	90,673	35	No	2018-12-06 11:57:35	i	35	No	
,	331		Commercial 49	23	59,649	23	No No No	2018-12-06 12:38:15	i	23	No	
!	332		Commercial 50	12	32.874	[2	No	2018-12-06 12:41:37	1	12	No	
	334 335		Comparcial 5]	5,414	13,726,755	5,414	No	2018-12-06 03:45:27	85	64	No	
	336		Commercial 52	2,998	7,600,120	2,998	No	2018-12-07 11:18:36	2	1499	No	
;	337		Commercial 53 Commercial 54	1,300 800	4,837,691 2,064,182	1,908 814	No No	2018-12-07 04:30:34	3	433	No	
	338		Commercial 55	550	4,837,691	1,908	No No	2018-12-07 04:35:58 2018-12-07 04:38:27	•	133 138	No No	
1	340		Commercial 56	29	75,199	29	No No No	2018-12-08 10:14:34	ï	29	No No	
i	346		Commercial 57	172	437,640	172	No	2018-12-10 11:57:37	i	172	No	
i	347		Commercial 58	93	236,100	93	No	2018-12-10 12:09:14	1	93	No	
	348 349		Commercial 59	92	234,840	92	No	2018-12-10 12:15:18	1	92	No	
	349 350		Commercial 60	63	161,590	63	No	2018-12-10 01:02:31	1	63	No	
,	351		Commercial 61 Commercial 62	33	85,241 74,098	33	No No	2018-12-10 01:19:04	2	17	No	
	352		Commercial 62	29 32	74.098 81.369	29 32	No ·	2018-12-10 02:53:26 2018-12-11 09:23:42	i	29 32	No No	
	353		Commercial 64	33	85,903	32	No No	2018-12-11 11:31:45	;	32	No No	
1	354		Commercial 65	12	30,501	12	No	2018-12-11 08:57:05	i	12	No	
1	355		Commercial 66	42	108,540	42	No No	2018-12-11 09:09:09	ī	42	No	
;	356		Commercial 67	22	56,672	22	No	2018-12-13 02:40:43	2	11	No	
•	357		Commercial 68	1.5	39,731	15	No No No	2018-12-13 02:44:05	2	. 8	No	
,	358 360		Commercial 69 Commercial 70	132 86	354,180 253,260	139	No	2018-12-13 04:14:41	1	132	No	
;	361		Commercial 70	86 184	253,260 468,360	99 184	No No	2018-12-14 09:40:54 2018-12-14 10:46:02	i i	86 184	Na Na	
ı	362		Commercial 72	38	97,177	38	No No	2018-12-14 11:56:10	;	38	No No	
	363		Commercial 73	284	721,920	284	No.	2018-12-14 04:01:38	ż	41	No	
:	364		Commercial 74	43	111,320	43	No No	2018-12-15 12:07:15	ż	22	No	
;	365		Commercial 75	18	46,568	18	No	2018-12-15 01:26:37	ı	18	No	
ļ.	366		Commercial 76	29	89,837	35	No	2018-12-16 09:35:58	ı	29	No	
	367 368		Commercial 77	23	59,356	23	No Yes	2018-12-16 09:25:45	1	23	No	
	308 370		Commercial 78	13,891	34,214,030	13,496	Yes	2018-12-17 01:13:32	231	60	No	See subpart B of this data request
	371		Commercial 79 Commercial 80	44 74	113,111 189,180	44 74	No No	2018-12-18 08:55:36 2018-12-18 09:49:35	1	44 74	No No	
,	373		Commercial 81	24	61,454	/4 24	No No	2018-12-18 09:49:35	, 1	74 24	No No	
i	374		Commercial 82	240	837,600	330	No .	2018-12-20 10:49:11	1	240	No No	
	375		Commercial 83	190	514,980	203	No	2018-12-20 11:18:05	i ·	190	No	
	378		Communicial 84	168	428,160	168	No	2018-12-27 06:47:43	i	168	No	
	379		Commercial 85	82	208,947	82	No	2018-12-27 05:33;13	1	82	No	

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189	424	City of Sanusota	Governmental 12	11.802	29.919.267	11.802	M-	2010 01 12 as 42 a			
190	426	City of Delray Beach	Governmental 13	8.706	22,071,202	8.706	No No	2019-01-15 02:53:34	45	262	No
191	432	City of West Palm Beack	Governmental 14	12,305	80,814,788	31,879	No No	2019-01-16 12:27:59	82	106	No
192	433	Palm Beach County	Governmental 15	83	258,462,689			2019-01-17 04:18:27	88	140	No
193	440	City of Oukland Park	Governmental 16	1.610	4.083.327	101.957	No	2019-01-18 08:01:26	394	0	No
194	445	City of Coral Springs	Governmental 17	680		1.610	No	2019-01-22 10:01:09	28	58	No
195	447	City of Cocoa Bench			1,726,320	680	No	2019-01-23 01:40:11	i	680	No
196	457	Misuri Dade County	Governmental 18	3,234	8,200,652	3,234	No	2019-01-23 03:35:40	12	270	No
197	461	STATE OF FL. BROWARD COUNTY HEALTH DEPT.	Governmental 19	106,000	1,079,286,136	425,753	No	2019-01-24 01:07:49	97	1093	No
198	462		Governmental 20	528	28,997,015	11,438	No	2019-01-24 02:39:24	1	528	No
199	472	State of FL - Broward County Health Dept.	Governmental 21	622	28,997,015	11,438	No	2019-01-24 03:05:24	1	622	No
199		City of Cooss	Governmental 22	3,125	7,923.911	3,125	No	2019-01-24 05:19:46	22	142	No.
201	477	City of Ormand Beach	Governmental 23	7,366	18,674,776	7_366	No	2019-01-25 08:50:37	50	147	No
	478	City of Satellite Beach, Florida	Governmental 24	417	1,057,791	417	No	2019-01-25 09:20:56	ñ	52	No
202	486	Broward College	Governmentai 25	10,000	33,791,743	13,330	No	2019-01-25 11:40:48	28	357	No
203	487	Canaveral Port Authority	Governmental 26	8,950	22,688,979	8,950	No	2019-01-25 12-01:40	42	213	No.
204	489	Broward County Board of County Commissioners	Governmental 27	26,076	66,104,890	26,076	No	2019-01-25 01:13:19	214	122	No
205	490	PAU Solar Project	Governmental 28	42,000	133.014.747	52.471	No	2019-01-25 01:16:03	43	977	No No
206	492	City of Falm Bay	Governmental 29	6.976	17,684,230	6.976	No	2019-01-25 02:12:49	43	120	No No
207	493	Manalee County Water Treatment Plant	Governmental 30	7,307	96,091,853	37,906	No.	2019-01-25 02:40:22	186	120 39	
208	496	State of FL - Broward County Health Dept.	Ocvernmental 31	180	28,997,015	11.438	No	2019-01-25 03:31:10	160		No
209	497	State of FL - Broward County Health Dept.	Governmental 33	180	28,997,015	11,438	No.	2019-01-25 03:35:38	1	180	No
210	499	City of Cape Canaveral	Clovernmental 33	1.092	2,770,271	1.092	No	2019-01-25 04:50:43	1	180	No
211	502	City of Melbourne	Governmental 34	12,736	32,287,438	12.736	No	2019-01-25 07:50:05	<u>.</u> .	137	No
212	377		Industrial I	2.031	5,150,601	2.031	No No		54	236	No
213	403		Industrial 2	23,003	58.314.073	23.003		2018-12-26 06:55:31	4	508	No
214	459		Industrial 3	6,000	77,964,144		No	2019-01-10 12:52:01	5	4601	Yes
			diviniting 2	0,000	77,7U%,144	30,755	No	2019-01-24 02:30:38	4	1500	No

## **EXHIBIT C**

# JUSTIFICATION TABLE

### **EXHIBIT C**

COMPANY:

SUBJECT:

Florida Power & Light Company List of Confidential Documents

TITLE: DOCKET NO.:

20190061-EI

DOCKET TITLE:

FPL Petition for approval of FPL SolarTogether Program and Tariff FPL's Responses to Staff's Second Set of Interrogatories, Nos. 166 &

186

DATE:

August 26, 2019

Set	Bates Number	Description	Line No./ Col. No.	Florida Statute 366.093(3) Subsection	Declarant
Staff's Second Set of Interrogatories	000326	Customer-specific information	Lines 9-39	(e)	J. Dvareckas
	000324	Customer-specific information	Lines 9-177 and 212-214	(e)	J. Dvareckas

## **EXHIBIT D**

## **DECLARATIONS**

#### EXHIBIT D

### BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Petition by Florida Power & Light Company for Approval of FPL SolarTogether Program and Tariff Docket No: 20190061-EI

### **DECLARATION OF JILL DVARECKAS**

1. My name is Jill Dvareckas. I am currently employed by Florida Power & Light Company ("FPL") as a Director of Development. I have personal knowledge of the matters stated in this declaration.

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 or materials that I have reviewed and which are asserted by FPL to be proprietary confidential business information contain or constitute customer-specific information. It is FPL's corporate policy not to disclose customer-specific information. This policy includes, but is not limited to: customer names, addresses, telephone numbers, account numbers, rates, billing determinants (kW and kWh usage), conservation savings in kW, kWh and bills. FPL treats such information as confidential and does not disclose it, except as required by law, to entities or persons other than the customer absent the customer's consent. To the best of my knowledge, FPL has maintained the confidentiality of this information.

- 2. 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.
- 3. 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.

Jill Dvareckas
Date: 8 23 19