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July 28, 2021

-VIA HAND DELIVERY -

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

REDACTED

Re: Docket No. 20210001-EI

Dear Mr. Teitzman:

I enclose for filing in the above docket Florida Power & Light Company's ("FPL") First Request for Extension of Confidential Classification of Materials Provided Pursuant to Audit No. 2018-019-4-2. 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 consists of the declarations in support of FPL's Request for Confidential Classification.

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

COM
AFD 1 Exh B
APA
ECO
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Sincerely,

s/ David M. Lee
David M. Lee

RECEIVED-FPSC
2021 JUL 28 PM 3:44
COMMISSION CLERK

Enclosure
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 purchase power cost recovery
clause with generating performance incentive
factor

Docket No: 20210001-EI

Date: July 28, 2021

**FLORIDA POWER & LIGHT COMPANY'S FIRST REQUEST
FOR EXTENSION OF CONFIDENTIAL CLASSIFICATION OF
MATERIALS PROVIDED PURSUANT TO AUDIT NO. 2018-019-4-2**

Pursuant to Section 366.093, Florida Statutes ("Section 366.093") and Rule 25-22.006, Florida Administrative Code, Florida Power & Light Company ("FPL") hereby submits its First Request for Extension of Confidential Classification of Information Provided Pursuant to Audit No. 2018-019-4-2 ("Confidential Information"). In support of this request, FPL states as follows:

1. On May 24, 2018, FPL filed a Request for Confidential Classification of the Confidential Information, which included Exhibits A, B, C and D ("May 24, 2018 Request"). By Order No. PSC-2018-0380-CFO-EI, dated August 1, 2018 ("Order 0380"), the Commission granted FPL's May 24, 2018 Request. FPL adopts and incorporates by reference the May 24, 2018 Request and Order 0380.

2. The period of confidential treatment granted by Order 0380 will soon expire. Some of the Confidential Information that was the subject of FPL's May 24, 2018 Request and Order 0380 warrants continued treatment as proprietary and confidential business information within the meaning of Section 366.093(3). Accordingly, FPL hereby submits its First Request for Extension of Confidential Classification.

3. Included with this request are First Revised Exhibit A, First Revised Exhibit B, together with First Revised Exhibit C to reduce the number of pages for which confidential treatment is sought. FPL has identified in First Revised Exhibits A, B and C all the information

in work papers that warrants continued confidential treatment. First Revised Exhibit C is a table that identifies the specific pages, lines or columns that remain confidential. The table also references the specific statutory basis for confidentiality and the declarants who support the requested classification.

4. Also included as First Revised Exhibit D is the declarations of Antonio Maceo and Gerard J. Yupp in support of this request.

5. The Confidential Information is intended to be and has been treated by FPL as private, its confidentiality has been maintained, and its disclosure would cause harm to FPL 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.

6. As explained more fully in the declaration included as First Revised Exhibit D, certain documents contain information concerning internal auditing controls and reports of internal auditors. This information is protected by Section 366.093(3)(b), Fla. Stat.

7. As explained more fully in the declaration included as First Revised Exhibit D, certain documents contain 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. This information is protected by Section 366.093(3)(d), Fla. Stat.

8. Also, certain documents contain information relating to competitive interests, the disclosure of which would impair the competitive business of FPL and its vendors. This information is protected by Section 366.093(3)(e), Fla. Stat.

9. Nothing has changed since the Commission entered Order 0380 to render the Confidential Information identified in First Revised Exhibit C stale or public, such that continued confidential treatment would not be appropriate.

10. Pursuant to Section 366.093(4), F.S., the information for which confidential classification is granted remains protected from disclosure up to 18 months unless good cause is shown to grant protection from disclosure for a longer period. Currently, the Commission retains audit reports for period of seven years at which time the audit materials are returned to FPL unless Commission staff or another affected person requests that these audit materials continue to be retained. The nature of these materials will not change in the next three years. Therefore, to promote administrative efficiency, FPL requests confidential classification for a period of thirty-six (36) months. Upon a finding by the Commission that the Confidential Information remains proprietary and confidential business information, the information should not be declassified for at least an additional thirty-six (36) 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 included with or incorporated in this Request, Florida Power & Light Company respectfully requests that its First Request for Extension of Confidential Classification be granted.

Respectfully submitted,

David M. Lee
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By: s/ David M. Lee
David M. Lee
Florida Bar No. 103152

CERTIFICATE OF SERVICE
Docket No. 20210001-EI

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

by electronic service on this 28th day of July 2021 to the following:

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By: s/ David M. Lee
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Florida Bar No. 103152

20210001-EI

FPL's First Request for Extension of Confidential
Classification Audit No. 2018-019-4-2

EXHIBIT "B"

REDACTED VERSION OF CONFIDENTIAL DOCUMENTS

Capacity Audit Workpaper Number 9.0

[Page 1]

INTERNAL AND EXTERNAL AUDITS

REDACTED VERSION OF CONFIDENTIAL DOCUMENTS

Capacity Audit Workpaper Number 9.1

[Page 1]

INTERNAL AND EXTERNAL AUDITS

5/10
3/10

FLORIDA POWER & LIGHT COMPANY

Billing Statement
 For Purchased Power From
WHEELABRATOR SOUTH BROWARD
 For Transaction Period:

MAY 1, 2017 through MAY 31, 2017

<u>GENERATION</u>	<u>AMOUNT</u>
1 [REDACTED]	\$ [REDACTED]
2 [REDACTED]	
3 [REDACTED]	[REDACTED]
4 [REDACTED]	
3,539.637 Total MWH	Monthly Energy Payment <i>46-21</i> 73,341.09 <i>PO</i>
<i>PO, P3</i> Amount Due for Capacity Payment	('91 CONTRACT) 110,600.00 <i>PO</i>
	Monthly Capacity Payment 110,600.00
FPL Customer Charge ⁴¹	(2,000.00) <i>PO</i>
TOTAL	\$ 181,941.09 <i>PO</i>

⁴¹ GSLDT-3 Rate Schedule effective 1/01/2017

INVOICE NO: 2691

CONFIDENTIAL

46-21 P1

SOURCE: DR #14

JK
3/18

Qualifying Facility Monthly Billing Statement

	A	B	C
Facility Name:	BROWARD RESOURCE RECOVERY SOUTH		
Region:	Southeast		
Billing Month:	May, 2017		
Number of Hours in Month:	744		
Number of Peak Hours in Month:	279		
Committed Capacity:	3.500 MW		
1 Energy Received, All Hours:			
2 Energy Received, All Peak Hours:			
3 Sales (Wheeled):			
4 Net Energy Received, All Hours:			
5 Maximum Hourly Energy:			
Committed Capacity:	3.500 MW ('91)		
6 Monthly Billing Capacity Factor:			
7 Monthly Peak Capacity Factor:			
8 Annual Capacity Factor:			
9 Annual Peak Capacity Factor:			
10 Billing Capacity Factor:			
11 Unit Energy Cost:			
12 Monthly Energy Payment:			Total \$73,239.46
13 Monthly Capacity Payment:		\$110,600.00 =	\$110,600.00
	<div style="position: absolute; top: 5px; left: 5px; font-size: 1.2em;"> 46-2/1 ME P 46-2/1.5 </div> <div style="position: absolute; top: 5px; right: 5px; font-size: 1.2em;"> 46-2 46-1.2 </div> <div style="position: absolute; top: 50px; left: 50px; font-size: 1.5em;"> D </div>		

Execution Date/Time: 06/01/17 at 13:56:55
 Invoice ID: 2673

CONFIDENTIAL

SOURCE: DR #14

46-2-1 9/6

REDACTED VERSION OF CONFIDENTIAL DOCUMENTS

Capacity Audit Workpaper Number 46-2/1

[Page 1]

PURCHASED POWER

REDACTED VERSION OF CONFIDENTIAL DOCUMENTS

Capacity Audit Workpaper Number 46-2/1.1

[Page 1]

PURCHASED POWER

REDACTED VERSION OF CONFIDENTIAL DOCUMENTS

Capacity Audit Workpaper Number 46-2/1.2

[Page 1]

PURCHASED POWER

REDACTED VERSION OF CONFIDENTIAL DOCUMENTS

Capacity Audit Workpaper Number 46-2/1.3

[Page 1]

PURCHASED POWER

REDACTED VERSION OF CONFIDENTIAL DOCUMENTS

Capacity Audit Workpaper Number 46-2/1.4

[Page 1]

PURCHASED POWER

REDACTED VERSION OF CONFIDENTIAL DOCUMENTS

Capacity Audit Workpaper Number 46-2/1.5

[Page 1]

PURCHASED POWER

REDACTED VERSION OF CONFIDENTIAL DOCUMENTS

Capacity Audit Workpaper Number 46-2/1.6

[Page 1]

PURCHASED POWER

FIRST REVISED EXHIBIT C

COMPANY: Florida Power & Light Company
TITLE: List of Confidential Workpapers
AUDIT: FPL, Capacity Audit
AUDIT CONTROL NO: 2018-019-4-2
DOCKET NO: 20210001-EI
DATE: July 28, 2021

Bold denotes revision to reduce the amount of confidential classification previously requested or a new affiant

Workpaper No.	Description	No. of Pages	Conf Y/N	Column No./Line No.	Florida Statute 366.093 (3) Subsection	Declarant
9.0	INTERNAL AND EXTERNAL AUDITS	1	Y	ALL	(b)	A. Maceo
9.1	INTERNAL AND EXTERNAL AUDITS	1	Y	ALL	(b)	A. Maceo
9.2	INTERNAL AND EXTERNAL AUDITS	1	N			
9.3	INTERNAL AND EXTERNAL AUDITS	1	N			
16-7/3.1	INCREMENTAL SECURITY	1	N			
45-1	TRANSMISSION REVENUE	1	N			
45-1.1	TRANSMISSION REVENUE	1	N			
45-1/1	TRANSMISSION REVENUE	1	N			
45-1/1.1	TRANSMISSION REVENUE	1	N			
45-1/2	TRANSMISSION REVENUE	1	N			
45-1/2.1	TRANSMISSION REVENUE	1	N			
45-1/2.2	TRANSMISSION REVENUE	1	N			
45-1/2.3	TRANSMISSION REVENUE	1	N			
45-1/3	TRANSMISSION REVENUE	1	N			
45-1/3.1	TRANSMISSION REVENUE	1	N			
45-1/3.2	TRANSMISSION REVENUE	1	N			
45-1/3.3	TRANSMISSION REVENUE	1	N			
45-1/3.4	TRANSMISSION REVENUE	1	N			
45-1/3.5	TRANSMISSION REVENUE	1	N			
45-1/3.6	TRANSMISSION REVENUE	1	N			
45-1/3.7	TRANSMISSION REVENUE	1	N			
45-1/4	TRANSMISSION REVENUE	1	N			
45-1/4.1	TRANSMISSION REVENUE	1	N			
45-1/4.2	TRANSMISSION REVENUE	1	N			
45-1/5	TRANSMISSION REVENUE	1	N			
45-1/5.1	TRANSMISSION REVENUE	1	N			
45-1/5.2	TRANSMISSION REVENUE	1	N			
45-1/5.3	TRANSMISSION REVENUE	1	N			
46-2	PURCHASED POWER	1	Y	Lns. 1-4	(d), (e)	G. Yupp
46-2.1	PURCHASED POWER	1	Y	Col. A, Lns.1-13 Col. B, Lns.1, 2, 5, 12 and 13 Col. C, Lns. 1 and 2 Col. D	(d), (e)	G. Yupp
46-2/1	PURCHASED POWER	1	Y	ALL	(d)	G. Yupp
46-2/1.1	PURCHASED POWER	1	Y	ALL	(d)	G. Yupp
46-2/1.2	PURCHASED POWER	1	Y	ALL	(d)	G. Yupp

Workpaper No.	Description	No. of Pages	Conf Y/N	Column No./Line No.	Florida Statute 366.093 (3) Subsection	Declarant
46-2/1.3	PURCHASED POWER	1	Y	ALL	(d)	G. Yupp
46-2/1.4	PURCHASED POWER	1	Y	ALL	(d)	G. Yupp
46-2/1.5	PURCHASED POWER	1	Y	ALL	(d)	G. Yupp
46-2/1.6	PURCHASED POWER	1	Y	ALL	(d)	G. Yupp
46-3	PURCHASED POWER	1	N			
46-3.1	PURCHASED POWER	1	N			
46-3.2	PURCHASED POWER	1	N			

FIRST REVISED EXHIBIT D

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

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

Docket No. 20210001-EI

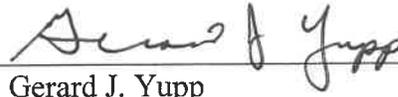
DECLARATION OF GERARD J. YUPP

1. My name is Gerard J. Yupp. I am currently employed by Florida Power & Light Company ("FPL") as Senior Director of Wholesale Operations in the Energy Marketing and Trading business unit. I have personal knowledge of the matters stated in this declaration.

2. I have reviewed Exhibit C and the documents that are included in Exhibit A to FPL's First Request for Extension of Confidential Classification of Information Obtained in Connection with Audit No. 2018-019-4-2 for which I am identified as the declarant. The documents or materials that I have reviewed and which are asserted by FPL to be proprietary confidential business information contain or constitute contractual data such as pricing formulas and other terms, payment records, and supplier rates for capacity and energy transactions, the disclosure of which would impair the efforts of FPL to contract for capacity and energy on favorable terms for the benefit of its customers, and would impair the competitive interests of FPL and its vendors. Certain information in these documents and materials would also place FPL at a disadvantage when coupled with other information that is publicly available. To the best of my knowledge, FPL has maintained the confidentiality of these documents and materials.

3. Nothing has occurred since the issuance of Order No. PSC-2018-0380-CFO-EI to render the information stale or public, such that continued confidential treatment would not be appropriate. Therefore, the information should remain confidential for a period of not less than 36 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.


Gerard J. Yupp

Date: 7/26/21

FIRST REVISED EXHIBIT D
BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

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

Docket No: 20210001-EI

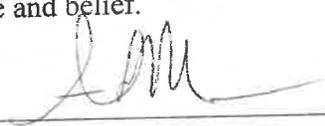
DECLARATION OF ANTONIO MACEO

1. My name is Antonio Maceo. I am currently employed by Florida Power & Light Company ("FPL") as Senior Manager of Internal Auditing. I have personal knowledge of the matters stated in this declaration.

2. I have reviewed the documents referenced and incorporated in FPL's First Request for Extension of Confidential Classification of Information Obtained in Connection with Audit No. 2018-019-4-2, for which I am listed as the declarant. Such documents or materials that I have reviewed and which, in whole or in part, are asserted by FPL to be proprietary confidential business information, contain or constitute internal auditing controls, reports or notes of internal auditors, or information relating to internal auditing reports issued in 2017. Full and frank disclosure of information to the Internal Auditing department is essential for the department to fulfill its role, and the confidential status of internal auditing scope, process, findings, and reports supports such disclosure. The release of information related to reports of internal auditors would be harmful to FPL and its customers because it may impact the effectiveness of the Internal Auditing department itself. To the best of my knowledge, FPL has maintained the confidentiality of these documents and materials.

3. Nothing has occurred since the issuance of Order No. PSC-2018-0380-CFO-EI to render the information stale or public, such that continued confidential treatment would not be appropriate. Therefore, the information should remain confidential for a period of not less than 36 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.



Antonio Maceo

Date: _____

7/27/21