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February 21, 2025

-VIA HAND DELIVERY -

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

Re: Docket No. 20250001-EI

Dear Mr. Teitzman:

I enclose for filing in the above docket Florida Power & Light Company's ("FPL") Request for Extension of Confidential Classification of Materials Provided Pursuant to Audit No. 2023-010-4-2. The request includes First Revised Exhibits A, B (two copies), C and D.

Revised Exhibit A consists of the confidential documents, and all the information that FPL asserts is entitled to confidential treatment has been highlighted. Revised Exhibit B is an edited version of Exhibit A, in which the information FPL asserts is confidential has been redacted. Revised Exhibit C is a justification table in support of FPL's Request for Extension Confidential Classification. Revised Exhibit D consists of the declarations in support of FPL's Request for Extension Confidential Classification

Please contact me if you or your Staff has any questions regarding this filing.	COM
	AFD EXHL! B
Sincerely,	APA
11 clls	ECO
David M. Lee	ENG
	GCL
Enclosure	IDM
cc: Counsel for Parties of Record (w/ copy of FPL's Request for Confidential Classific	ation)k

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

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

Date: February 21, 2025

Docket No: 20250001-EI

FLORIDA POWER & LIGHT COMPANY'S REQUEST FOR EXTENSION OF CONFIDENTIAL CLASSIFICATION OF MATERIALS PROVIDED PURSUANT TO AUDIT NO. 2023-010-4-2

Pursuant to Section 366.093, Florida Statutes, and Rule 25-22.006, Florida Administrative Code, Florida Power & Light Company ("FPL") submits its Request for Extension of Confidential Classification of certain material provided to the Staff of the Florida Public Service Commission ("Staff") pursuant to Audit Control No. 2023-010-4-2 ("the Audit"). In support of this request, FPL states as follows:

- 1. On June 2, 2023, FPL filed a Request for Confidential Classification of the Confidential Information, which included Exhibits A, B, C and D ("June 2, 2023 Request"). By Order No. PSC-2023-0263-CFO-EI, dated August 22, 2023 ("Order 0263"), the Commission granted FPL's June 2, 2023 Request. FPL adopts and incorporates by reference the June 2, 2023 Request and Order 0263.
- 2. The period of confidential treatment granted by Order 0263 will soon expire, some of the Confidential Information that was the subject of FPL's June 2, 2023 Request and Order 0263 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. The following exhibits are included with and made a part of this request:
- a. Revised Exhibit A consists of a copy the confidential documents, on which all information that is entitled to confidential treatment under Florida law has been highlighted.

- b. Revised Exhibit B consists of two copies of the confidential documents, on which all the information that is entitled to confidential treatment under Florida law has been redacted. For the documents that are confidential in their entirety, FPL has included only identifying cover pages in Exhibit B.
- c. Revised Exhibit C is a table containing an identification of the information highlighted in Exhibit A by page and line. Exhibit C also references the specific statutory basis for the claim of confidentiality and identifies the declarant who supports the requested classification.
- d. Revised Exhibit D is the declarations of Michael Cashman and Luisa Santacoloma in support of this Request.
- 4. FPL submits that the highlighted information in First Revised 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, such information is entitled to confidential treatment and is 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 stated in FPL's June 2, 2023 Request, revised Exhibit C, and the declaration of Michael Cashman in Revised Exhibit D, certain documents contain information concerning pricing and other terms, payment records and vendor and supplier rates or other contractual data, the disclosure of which would impair the efforts of FPL to contract for energy and capacity-related

goods or services on favorable terms for the benefit of FPL's customers. This information is protected by Section 366.093(3)(d), Fla. Stat.

- 6. Also as stated in FPL's June 2, 2023 Request, revised Exhibit C, and the declaration of Luisa Santacoloma in Revised Exhibit D, certain information in these documents concern FPL's competitive interests as well as the competitive interests of its counterparties and its customers, the disclosure of which would impair the competitive business of FPL and its customers and vendors. Certain information in these documents and materials would also place FPL and its customers or vendors at a disadvantage when coupled with other information that is publicly available. This information is protected by Section 366.093(3)(e), Fla. Stat.
- 7. 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, Florida Power & Light Company respectfully requests that its Request for Confidential Classification be granted.

Respectfully submitted,

Maria Jose Moncada Managing Attorney David M. Lee Senior Attorney Florida Power & Light Company 700 Universe Boulevard Juno Beach, FL 33408

Telephone: (561) 691-7263 Facsimile: (561) 691-7135 Email: David.lee@fpl.com

By:

David M. Lee

Florida Bar No. 103152

CERTIFICATE OF SERVICE Docket No. 20250001-EI

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

by electronic mail on this 21st day of February 2025 to the following:

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^{*}Copies of Attachments B, C and D are available upon request.

Docket No. 20250001-EI

REVISED EXHIBIT "B"

FPL's MATERIALS PROVIDED PURSUANT TO AUDIT NO. 2023-010-4-2

Fuel Audit Workpaper Number 42-1
[Page 1]

Fuel Audit Workpaper Number 42-1.1 [Page 1]

Fuel Audit Workpaper Number 42-1.2 [Page 1]

Fuel Audit Workpaper Number 42-1.3
[Page 1]

REDACTED Florida Power & Light Company Capacity Cost Recovery Clause Docket No. 20230001, EI, ACN: 2023-010-4-2 TYE 1/1/2022 - 12/31/2022 Title: Purchased Power



Florida Power & Light Company

Billing Statement

For Purchased Power From

For Transaction Period:

May 1, 2022 through May 31, 2022

QF ID GENERATION COST AMOUNT 5417 27,847.970 MWH ENERGY PAYMENT May 2022 **CUSTOMER CHARGE** Monthly Capacity Payment **Amount Previously Billed Total Due**

Execution Date/Time: 06/17/22 at 09:54:10

Invoice ID: 722740

CONFIDENTIAL

PBC

SOURCE DR #6

46

Florida Power & Light Company
Capacity Cost Recovery Clause
Docket No. 20230001, EI, ACN: 2023-010-4-2
TYE 1/1/2022 - 12/31/2022

Qualifying Facility Capacity Factor

Facility Name: Region: South 78/23

	All Periods			Or	Peak Periods			
Year/ Month	# of Hours	Total 3	Monthly CP.FAC	Yearly CP.FAC	# of Hours	Total C	Monthly. CP.FAC	Yearly CP.FAC
2021-05	720		90.883	95.012	198		95.771	99.246
2021-07	744		91.126	94.874	198	11 - 1	94,987	99.019 🦸
2021-0B	744		93.164	94.481	198		94.604	98.381 🐇
2021-09	720	1. 7	101.605	95.611	189		107.097	99,597 5
2021-10	744	100	88.156	95. 169	189	V 20 54.50	88.761	98,904 💪
2021-11	721		92.714	94.937	168		98.914	98,997 7
2021-12	744		97,824	95.016	184		103,517	99,099
2022-01	744	1000	66.638	94.779	168		87.653	98.981 9
2022-02	672		63.129	93.873	160		83.229	97.893 /0
2022-03	743		98.542	93.998	184		101.557	97.954
2022-04	720	(A K	99.363	93,725	189		105.756	97.632 /2
2022-05	4744	1	89.888	92,753	189	The second second	94.452	96,358 / 3
Total	760	320,644,603			2,214	82,485,818	116-	46.

PBC

CONFIDENTIAL

SOURCE DR HG

46.2

Florida Power & Light Company Capacity Cost Recovery Clause

Daily Energy Payment Summary

QF ID: 5417

Title: Purchased Power

Facility Name: Report Month: May, 2022 13 Date **Payment** Energy (MWH) 2 05/01/22 3 05/02/22 4 05/03/22 5 05/04/22 05/05/22 7 05/06/22 8 05/07/22 9 05/08/22 10 05/09/22 11 05/10/22 12 05/11/22 13 05/12/22 14 05/13/22 15 05/14/22 16 05/15/22 17 05/16/22 18 05/17/22 19 05/18/22 20 05/19/22 21 05/20/22 22 05/21/22 23 05/22/22 24 05/23/22 25 05/24/22 26 05/25/22 27 05/26/22 28 **PBC** 05/27/22 29 05/28/22 30 05/29/22 CONFIDENTIAL 91 05/30/22 32 05/31/22 33 Monthly total

7173

SOURCE DRAG

Florida Power & Light Company
Capacity Cost Recovery Clause
Docket No. 20230001, EJ, ACN: 2023-010-4-2
TYE 1/1/2022 - 12/31/2022
Title: Purchased Power

Month	May-2022
Year	2022
Month ADO	5
Contract Month	month_12
GULF ENERGY PAYMENTS	
Availability Bonus Payment	Name of the last o
Fired Hour True Up Payment to Shell	
Capacity Payments	122
VOM Energy Payment Alternate Delivered Energy	2000
	\$0.00
Oil-Generated Energy Surcharge Payment	\$0,00
Power Aug Surcharge Payment	345
Steam Turbine Start Charges Fired Hour Payment	4
Adjusted Fired Hour Payment to Shell	
Adjusted Filed Hour Payment to Shell	
Heat Rate Payments to Shell	\$0.00
Provisional Off Peak Availability Refund to Shell	\$0.00
Provisional Oil Peak Availability Refund to Shell	\$0.00
Start Up Energy Payment to Shell	\$0.00
Alabama Power Demand Charge (Overpayment)	
Total Payments to Shell	
Total Faymente to ones	A STATE OF THE PARTY OF THE PAR
SHELL ENERGY PAYMENTS	1
Fired Hour True Up Payment to Gulf	
Heat Rate Payments to Gulf	\$0.QD
Provisional Off Peak Availability Payment to Gulf	
Provisional Peak Availability Payment to Gulf	\$0.00
Start Up Energy Payment to Gulf	
Cover Payment	\$0.00
Excess Duct Fired Energy Payment to Gulf	\$0.00
Excess Power Aug Energy Payment to Gulf	\$0.00
Withholding Payment	\$0.00
Testing Reimbursement	\$0.00
Financial Settlement	\$0.00
Total Payments to Gulf	\$0.00
Handala Tona Ha Bata	60.00
Monthly True-Up Data Invoice Total	\$0.00
Invoice Total	
	34
	
	-
	\$0
*	+
	422,520
Monthly Generation	444,344

PBC



Florida Power & Light Company

Capacity Cost Recovery Clause

Docket No. 20230001, EI, ACN: 2023-010-4-2

TYE 1/1/2022 - 12/31/2022

Title: Purch as all Power

71/23

Florida Power & Light Company

Billing Statement

For Purchased Power From

For Transaction Period:

May 1, 2022 through May 31, 2022

B

QF ID	GENERATION		AMOUNT	
5420	2604 MWH (' 91, Contract)			2
May 2022	1698.0820 MWH (* 09, AA)			3
	4302.0820 MWH	ENERGY PAYMENT BRS VARIABLE O&M - PER FPSO ORDER DATED JANUARY 1, 2022 BRS	(13.) (14.21)	45
		Monthly Capacity Payment	CIR	6
		CUSTOMER CHARGE		7
		Amount Previously Billed	*************************************	
		Total Due	···· BUREAU	8

Execution Date/Time: 06/17/22 at 09:56:56

Invoice ID: 222743

CONFIDENTIAL

SOURCE DRING

26-2

Florida Power & Light Company
Capacity Cost Recovery Clause

Qualifying Facility Manthly Billing Statement Title: Purchased Power QF ID: 5420 **Facility Name:** Region: Southeast Billing Month: May, 2022 744 **Number of Hours in Month:** Number of Peak Hours in Month: 198 **Committed Capacity:** 3.50 MW 2 **Energy Received, All Hours:** HWM MWH (AA) MWH ('91) **Energy Received, All Peak Hours:** HWM (AA) ('91) Sales (Wheeled): **Net Energy Received, All Hours: Maximum Hourly Energy:** Committed Capacity: **Monthly Billing Capacity Factor:** 97.342 % ('91) **Monthly Peak Capacity Factor:** 100.000 % ('91) **Annual Capacity Factor:** 105,502 % ('91) **Annual Peak Capacity Factor** 107.683 % ('91) **Billing Capacity Factor:** 105.502 % ('91) **Monthly Energy Payment:** (As (191) Total Available's

PBC

CONFIDENTIAL

Monthly Capacity Payment:

SOURCE DR 46

Execution Date/Time:06/17/22 at 09:56:56
Invoice ID: 722743

116-2.1

Qualifying Facility Energy Payment Calculation FID: 5420

QF ID: 5420

FACILITY NAME

DATE: 05/02/22

Hour	Energy (muh)	Avoided cost (\$/MWH)	87AS AVALIBLE ENERGY	91 Energy (MWH)	As Avalible87 Payment(\$)	91 Payment (\$)	Payment(\$)	Note	
	13	<u> </u>	(MWH)		D	E	H		_
1	100	3 To 1 1	20,802	3.500			a di di		2
2	THE REAL PROPERTY.	3.5	20.291	3.500	ELECTION OF				3
3		100	20,723	3.500			15 (1)		4
4			20.484	3,600					5
5	100	V. H. W.	21,098	3,500					6
€.	U.S.	-4-	21.278	3.600					7
7	(Size	1	21.422	3.500					8
8	Market .	110	19.730	3.500					p 9
9			19,809	3.500	7 . 14				Ma 10
10			19.010	3.500					TYE
11			0.000	3.500	0.00	BES			Power 1/1/1/2
12			0.000	3.500	0.00				of 221
13	45		0.000	3.500	0,00		1000	ON	Floridg: Power & Light Company Capacity Cost Recovery Clause Docket No. 2023-0001, EI, ACN: 2023-010-4-2 TYE 1/12/027 - 12/51/2022
14-			0.000	3,500	0.00	1380	Ferrel	ON	Const Y Cla
15	(E)	4.50	0.000	3.500	0.00			ON	12 Case 16 16
18	A Ten		0.000	3. 500	0.00	200		ON	<u>?</u> /7
17			0.000	3.500-	0.00		500	ON	18
18			000.0	3.500	0.00	. N. I. H.		ON	19
19			0.000	3,500	0.00	100	51.50	ON	20
20			0.000	3.500	0.00		1111	ON	21
21			0,000	3,500	-0.00			ON	22
22	100		0.000	3.500	0,00				23
23			4.057	3.500	174.81				24
24	To be		0.000	3.500	0.00	1 6			25
Daily Total	EE		208.884	84,000	THE RESERVE	111	THE REAL PROPERTY.		26
Month Total		DB4	331.101	188.000					27

PBC

Unit Energy Cost: 30,9610 \$/MWH ('91)

CONFIDENTIAL

Execution Date: 06/17/22 at 09:56:58

Hb-9.2

SOURCE_DRAG

Florida Power & Light Company Capacity Cost Recovery Clause

Daily Energy Payment Summary Title: Purchased Power QF ID: 5420 Facility Name: Report Month: May, 2022 Payment Date Energy (MWH) 05/01/22 Z 05/02/22 4 05/03/22 5 05/04/22 05/05/22 7 05/06/22 8 05/07/22 9 05/08/22 05/09/22 10 05/10/22 11 12 05/11/22 13 05/12/22 05/13/22 14 15 05/14/22 16 05/15/22 05/16/22 17 18 05/17/22 05/18/22 19 05/19/22 10 05/20/22 21 ده 05/21/22 23 05/22/22 24 05/23/22 15 05/24/22 05/25/22 26 05/26/22 الھ 05/27/22 05/28/22 29 30 05/29/22 05/30/22 CONFIDENTIAL 05/31/22 Monthly total & haved to Raily schedule of Of Energy Pougnit

Invoice 1D: 722743

SOURCE

PBC

SOURCE DRILLE

116-9.3

Docket No. 20250001-EI

REVISED EXHIBIT "C"

FPL's MATERIALS PROVIDED PURSUANT TO AUDIT NO. 2023-010-4-2

REVISED EXHIBIT C

COMPANY: Florida Power & Light Company List of Confidential Workpapers

AUDIT: FPL, Capacity Audit

AUDIT CONTROL NO: 2023-010-4-2
DOCKET NO: 20250001-EI
DATE: February 21, 2025

^{*} Bold denotes change in confidential status or new declarant.

Workpaper No.	Description	No. of Pages	Y/N	Column No./Line No.	Florida Statute 366.093 (3) Subsection	Declarant
42-1	Revenues	1	Υ	ALL	(e)	Luisa Santacoloma
42-1.1	Revenues	1	Υ	ALL	(e)	Luisa Santacolom
42-1.2	Revenues	1	Y	ALL	(e)	Luisa Santacoloma
42-1.3	Revenues	1	Y	ALL	(e)	Luisa Santacoloma
44	Incremental Security O&M	1	N			
44.1	Incremental Security O&M	1	N			
44.2	Incremental Security O&M	1	N			
44.3	Incremental Security O&M	1	N			
44.4	Incremental Security O&M	1	N			
45	Transmission Sales	1	N			
45.1	Transmission Sales	1	N			
45.2	Transmission Sales	1	N			
45-1	Transmission Sales	1	N			
45-1.1	Transmission Sales	1	N	Cols A-B, as marked	(d)(e)	
45-1.2	Transmission Sales	1	N	Cols A and C, Line 2; Cols B and D, Line 1	(d)(e)	
45-1.3	Transmission Sales	1	N			
46	Purchased Power	1	Y	Col A, Line 1; Col B Lines 2-5	(d)	M. Cashman
46.1	Purchased Power	1	N	Col A, Lines 1-6 and 8; Col B Lines 1 and 7	(d)	
46.2	Purchased Power	1	Y	Col A, Line 1; Cols B-C, Lines 2-13	(d)	M. Cashman
46.3	Purchased Power	1	Υ	Col A, Line 1; Cols B-C, Lines 1-33	(d)	M. Cashman
46-1	Purchased Power	1	Υ	Col A, Lines 1-8	(d)	M. Cashman
46-2	Purchased Power	1	Y	Col A, Line 1; Col B, Lines 2-8	(d)	M. Cashman
46-2.1	Purchased Power	1	Υ	Cols A-B Lines 1-3 and 8- 9; Col A, Lines 4-7	(d)	M. Cashman
46-2.2	Purchased Power	1	Y	Col A, Line 1; Cols B-C, Lines 2-27; Col D, lines 2- 11; Cols E-F, Lines 2-27	(d)	M. Cashman
46-2.3	Purchased Power	1	Υ	Col A, Line 1; Cols B-C, Lines 2-33	(d)	M. Cashman
46-3	Purchased Power	1	N			
46-3.1	Purchased Power	1	N			
53-1	NRC Fees	1	N			
53-1.1	NRC Fees	1	N			
53-1.2	NRC Fees	1	N			

Workpaper No.	Description	No. of Pages	Conf Y/N	Column No./Line No.	Florida Statute 366.093 (3) Subsection	Declarant
53-1.3	NRC Fees	1	N			
53-1.4	NRC Fees	1	N			
53-1.5	NRC Fees	1	N			

Docket No. 20250001-EI

REVISED EXHIBIT "D"

FPL's MATERIALS PROVIDED PURSUANT TO AUDIT NO. 2023-010-4-2

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. 20250001-EI

DECLARATION OF LUISA SANTACOLOMA

- 1. My name is Luisa Santacoloma. I am currently employed by Florida Power & Light Company ("FPL") as Manager, Billing Solutions Support. I have personal knowledge of the matters stated in this declaration.
- 2. I have reviewed Revised Exhibit C and the documents that are included in Revised Exhibit A to FPL's Request for Extension of Confidential Classification of Information Provided Pursuant to Audit No. 2023-010-4-2 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 customer billing information, including pricing and account information. The disclosure of this information would impair the efforts of FPL to contract for energy and capacity-related goods or services 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-2023-0263-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.

Luisa Santacoloma

Date: 2/19/25

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. 20250001-EI

DECLARATION OF MICHAEL V. CASHMAN

- 1. My name is Michael V. Cashman. I am currently employed by Florida Power & Light Company ("FPL") as Executive Director, Wholesale Operations, Energy Marketing and Trading. I have personal knowledge of the matters stated in this declaration.
- 2. I have reviewed Revised Exhibit C and the documents that are included in Revised Exhibit A to FPL's Request for Extension of Confidential Classification of Information Provided Pursuant to Audit No. 2023-010-4-2 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 or constitute data such as pricing and other terms, payment records, and vendor and supplier rates. The disclosure of this information would impair the efforts of FPL to contract for energy and capacity-related goods or services 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-2023-0263-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.

Michael V. Cashman

Date: