

**BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION**

In re: Petition for evaluation of Hurricane  
Dorian storm costs, by Florida Power & Light  
Company.

Docket No: 20200172-EI  
Date: October 15, 2020

**FLORIDA POWER & LIGHT COMPANY'S MOTION FOR TEMPORARY  
PROTECTIVE ORDER FOR CERTAIN CONFIDENTIAL INFORMATION  
PROVIDED IN THE OFFICE OF PUBLIC COUNSEL'S FIRST REQUEST  
FOR PRODUCTION OF DOCUMENTS (No. 15)**

Pursuant to Section 366.093(3), Florida Statutes, and Rule 25-22.006(6)(c), Florida Administrative Code, Florida Power & Light Company ("FPL") hereby moves the Florida Public Service Commission (the "Commission") for a temporary protective order to exempt from Section 119.07(1), Florida Statutes, certain confidential information provided by FPL in response to the Office of Public Counsel's ("OPC") First Request for Production of Documents (No. 15).

1. The OPC has requested that it be permitted to inspect or take possession of FPL's confidential, proprietary information in FPL's response to OPC's First Request for Production of Documents, No. 15.

2. Rule 25-22.006(6)(c), Florida Administrative Code, provides in pertinent part, as follows, with respect to a utility allowing OPC to inspect or take possession of the utility's information:

a. [T]he utility may request a temporary protective order exempting the information from Section 119.07(1), Florida Statutes. If the information is to be used in a proceeding before the Commission, then the utility must file a specific request for a protective order under paragraph (a) above. If the information is not to be used in a proceeding before the Commission, the Public Counsel shall return the information to the utility in accordance with the record retention requirements of the Department of State.

3. The confidential information includes, but is not limited to: information concerning bids or other contractual data, the disclosure of which would impair the efforts of the company or its affiliates to contract for goods or services on favorable terms; information related to competitive

interests, the disclosure of which could harm the competitive business of the provider of the information; (exempt from the Public Records Act pursuant to section 366.093(3)(d), (e) Florida Statutes).

4. FPL respectfully requests that the Commission enter a temporary protective order affording FPL the protection that is needed to provide OPC the confidential information specified in this Motion.

WHEREFORE, for the foregoing reasons, FPL respectfully requests that the Commission enter a temporary protective order protecting against public disclosure the confidential information contained in the documents provided by FPL in support of its Petition.

Respectfully submitted this 15<sup>th</sup> day of October, 2020.

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By: /s/ Joel T. Baker  
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**CERTIFICATE OF SERVICE**  
**Docket No. 20200172-EI**

I HEREBY CERTIFY that a true and correct copy of the foregoing was served by electronic mail this 15th day of October 2020 to the following:

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*s/ Joel T. Baker*  
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