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April 11, 2025

**VIA HAND DELIVERY**

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

**REDACTED**

COMMISSION  
CLERK

2025 APR 11 PM 4:29

RECEIVED-FPSC

**Re: Docket No. 20250011-EI**

Dear Mr. Teitzman:

I enclose for filing in the above docket Florida Power & Light Company's ("FPL") Request for Confidential Classification of Information contained in its responses to Florida Rising, League of United Latin American Citizens and Environmental Confederation of Southwest Florida's Second Set of Interrogatories (No. 26) and Second Request for Production of Documents (Nos. 4, 14, 15, 18, 21, 24 & 39). The request includes Exhibits A, B (two copies), C and D.

Exhibit A consists of the documents containing confidential information, on which the confidential information has been highlighted. Exhibit A is submitted for filing in an envelope marked "EXHIBIT A" – CONFIDENTIAL. Exhibit B is an edited version of Exhibit A, in which the information FPL asserts is confidential has been redacted. For those documents in Exhibit A are confidential in their entirety, FPL has included only an identifying cover page in Exhibit B. 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. In accordance with Rule 25-22.006(3)(d), Florida Administrative Code, FPL requests confidential treatment of the information in Exhibit A pending disposition of FPL's Request for Confidential Classification.

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

- COM \_\_\_\_\_
  - AFD 2 redacted
  - APA \_\_\_\_\_
  - ECO \_\_\_\_\_
  - ENG \_\_\_\_\_
  - GCL \_\_\_\_\_ Enclosure
  - IDM \_\_\_\_\_
  - CLK \_\_\_\_\_
- USBS

Sincerely,

/s/ Maria Jose Moncada  
Maria Jose Moncada  
Fla. Bar No. 0773301

cc: Counsel for Parties of Record (w/ copy of FPL's Request for Confidential Classification)

**BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION**

In re: Petition by Florida Power & Light  
Company for Base Rate Increase

Docket No: 20250011-EI

Date: April 11, 2025

**FLORIDA POWER & LIGHT COMPANY'S REQUEST FOR CONFIDENTIAL  
CLASSIFICATION OF INFORMATION PROVIDED IN IT'S RESPONSE TO  
FLORIDA RISING, LEAGUE OF UNITED LATIN AMERICAN CITIZENS  
AND ENVIRONMENTAL CONFEDERATION OF SOUTHWEST  
FLORIDA'S SECOND SET INTERROGATORIES (NO. 26) AND  
SECOND REQUEST FOR PRODUCTION OF DOCUMENTS  
(NOS. 4, 14, 15, 18, 21, 24 AND 39)**

Pursuant to Section 366.093, Florida Statutes, and Rule 25-22.006, Florida Administrative Code, Florida Power & Light Company ("FPL") hereby requests confidential classification of certain documents and information provided in its responses to Florida Rising, League of United Latin American Citizens and Environmental Confederation of Southwest Florida's ("FL Rising") Second Set of Interrogatories (No. 26) and Second Request for Production of Documents (Nos. Nos. 4, 14, 15, 18, 21, 24 & 39) ("Confidential Information"). In support of its request, FPL states as follows:

1. FPL served its responses to FL Rising's Second Set of Interrogatories (No. 26) and Second Request for Production of Documents (Nos. 4, 14, 15, 18, 21, 24 & 39) on April 11, 2025. Consistent with Rule 25-22.006, Florida Administrative Code, this request is being filed contemporaneously with the service of those responses to request confidential classification of certain information contained therein.

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 confidential has been highlighted. Some of

the documents in Exhibit A are being provided on a thumb drive due to the volume and size of the documents.

- b. Exhibit B is a redacted version of the confidential documents. For documents that are confidential in their entirety, FPL has only included identifying cover pages in Exhibit B.
- c. Exhibit C is a table that identifies the information for which confidential treatment is being sought 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 declarations of Daniel DeBoer, Jessica Buttress, Andrew Whitley and Timothy Oliver in support of this Request.

3. FPL submits that the Confidential Information is intended to be and has been treated and maintained by FPL as confidential business information, and its disclosure would cause harm to FPL and its customers. Pursuant to Section 366.093, Florida Statutes, 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.

4. As described more fully in the declaration included in Exhibit D, the Confidential Information contains 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. The documents include bids, pricing or other contractual data the disclosure of which would impair the efforts of FPL to contract for goods or services on favorable terms. Additionally, some of the

documents also contain information relating competitive interests of FPL, the disclosure of which impair the competitive business interests of FPL. Specifically, the information contains pricing terms, purchase orders, Requests for Proposals, lease agreements, solar project cost projections, payroll expenses, and nuclear construction cost projections. The disclosure of this information would impair the competitive business interests of FPL. This information is protected by Sections 366.093(3)(d) and (e), Florida Statutes.

5. Upon a finding by the Commission that the Confidential Information 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* Section 366.093(4), Florida Statutes.

**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 11th day of April, 2025,

By: /s/ Maria Jose Moncada  
John T. Burnett  
Vice President and General Counsel  
Florida Bar No. 173304  
john.t.burnett@fpl.com  
Maria Jose Moncada  
Assistant General Counsel  
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joel.baker@fpl.com  
Florida Power & Light Company  
700 Universe Boulevard  
Juno Beach, FL 33408-0420  
Phone: 561-304-5253

**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that a true and correct copy of the foregoing has been furnished by Electronic Mail to the following parties of record this 11th day of April, 2025:

<p>Shaw Stiller Timothy Sparks <b>Office of General Counsel</b> Florida Public Service Commission 2540 Shumard Oak Blvd. Tallahassee, Florida 32399-0850 sstiller@psc.state.fl.us tsparks@psc.state.fl.us discovery-gcl@psc.state.fl.us</p>	<p>Walt Trierweiler Mary A. Wessling Office of Public Counsel The Florida Legislature 111 W. Madison Street, Room 812 Tallahassee, Florida 32399 trierweiler.walt@leg.state.fl.us wessling.mary@leg.state.fl.us <b>Office of Public Counsel</b></p>
<p>L. Newton/A. George/T. Jernigan/J. Ely/ M. Rivera/E. Payton 139 Barnes Drive, Suite 1 Tyndall AFB FL 32403 (850) 283-6347 Ashley.George.4@us.af.mil ebony.payton.ctr@us.af.mil Leslie.Newton.1@us.af.mil Michael.Rivera.51@us.af.mil thomas.jernigan.3@us.af.mil james.ely@us.af.mil <b>Federal Executive Agencies</b></p>	<p>Bradley Marshall/Jordan Luebkmann 111 S. Martin Luther King Jr. Blvd. Tallahassee FL 32301 (850) 681-0031 (850) 681-0020 bmarshall@earthjustice.org jluebkmann@earthjustice.org flcaseupdates@earthjustice.org <b>Florida Rising, Inc., Environmental Confederation of Southwest Florida, Inc., League of United Latin American Citizens of Florida</b></p>
<p>Danielle McManamon 4500 Biscayne Blvd. Suite 201 Miami, Florida 33137 (786) 224-7031 dmcmanamon@earthjustice.org <b>League of United Latin American Citizens of Florida</b></p>	<p>Jon C. Moyle, Jr./Karen A. Putnal c/o Moyle Law Firm 118 North Gadsden Street Tallahassee FL 32301 (850) 681-3828 (850) 681-8788 jmoyle@moylelaw.com mqualls@moylelaw.com kputnal@moylelaw.com <b>Florida Industrial Power Users Group</b></p>

William C. Garner 3425 Bannerman Road Tallahassee FL 32312 (850) 320-1701 (850) 792-6011 bgarner@wcglawoffice.com <b>Southern Alliance for Clean Energy</b>	
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*/s/ Maria Jose Moncada* \_\_\_\_\_

Maria Jose Moncada  
Assistant General Counsel  
Florida Bar No. 0773301

*Attorney for Florida Power & Light Company*

**EXHIBIT B**

**PUBLIC VERSION OF THE DOCUMENTS**

Public Version(s) of the Document(s) attached \_\_\_\_\_

Public Version(s) of the Document(s) attached via USB   X

**EXHIBIT C**

**JUSTIFICATION TABLE**

### EXHIBIT C

**COMPANY:** Florida Power & Light Company  
**TITLE:** Petition by Florida Power & Light Company for Base Rate Increase  
**DOCKET NO.:** 20250011-EI  
**DATE:** April 11, 2025

Int/POD No.	Begin Bates Number	End Bates Number	Description	No. of Pages	Confidential	Line/Col	F.S. 366.093(3) Subsection	Declarant
FEL 2 <sup>nd</sup> INT, No. 26	034906	034906	Nuclear Cost Projections	1	Y	All	(e)	Daniel DeBoer
FEL 2 <sup>nd</sup> POD, No. 4	034774	034779	RCP Upgrade Project	6	Y	All	(e)	Daniel DeBoer
FEL 2 <sup>nd</sup> POD, No. 14	034907	034915	RCP Upgrade Project	9	Y	All	(e)	Daniel DeBoer
FEL 2 <sup>nd</sup> POD, No. 15	034897	034899	RFP Cover Letter	3	Y	All	(d) & (e)	Timothy Oliver
FEL 2 <sup>nd</sup> POD, No. 15	034903	034905	RFP Cover Letter	3	Y	All	(d) & (e)	Timothy Oliver
FEL 2 <sup>nd</sup> POD, No. 15	034900	034902	RFP Cover Letter	3	Y	All	(d) & (e)	Timothy Oliver
FEL 2 <sup>nd</sup> POD, No. 18	009901	009909	Lease Agreement	9	Y	All	(d) & (e)	Timothy Oliver
FEL 2 <sup>nd</sup> POD, No. 21	033977	033980	Solar Project Cost Projections	4	Y	All	(e)	Timothy Oliver
FEL 2 <sup>nd</sup> POD, No. 24	034916	034919	Purchase Order	4	Y	All	(d)	Andrew Whitley
FEL 2 <sup>nd</sup> POD, No. 39	021119	021150	2021 Final Indicators	32	Y	All	(e)	Jessica Buttress

<b>Int/POD No.</b>	<b>Begin Bates Number</b>	<b>End Bates Number</b>	<b>Description</b>	<b>No. of Pages</b>	<b>Confidential</b>	<b>Line/Col</b>	<b>F.S. 366.093(3) Subsection</b>	<b>Declarant</b>
FEL 2 <sup>nd</sup> POD, No. 39	021091	021118	2022 Final Indicators	28	Y	All	(e)	Jessica Buttress
FEL 2 <sup>nd</sup> POD, No. 39	021065	021090	2023 Final Indicators	26	Y	All	(e)	Jessica Buttress
FEL 2 <sup>nd</sup> POD, No. 39	021036	021064	2024 Final Indicators	29	Y	All	(e)	Jessica Buttress

**EXHIBIT D**  
**DECLARATION(S)**

**FIRST REVISED EXHIBIT D**

**BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION**

In re: Petition by Florida Power & Light Company  
for Base Rate Increase

Docket No: 20250011-EI

**DECLARATION OF TIMOTHY OLIVER**

1. My name is Timothy Oliver. I am currently employed by Florida Power & Light Company ("FPL") as Vice President of Development. I have personal knowledge of the matters stated in this written declaration.

2. I have reviewed the documents referenced and incorporated in FPL's Request for Confidential Classification, specifically the materials provided in FPL's response to FL Rising's Second Request for Production of Documents, Nos. 15, 18 and 21. The documents or materials that I have reviewed and which are asserted by FPL to be proprietary confidential business information contain information concerning bids or other contractual data, the disclosure of which would impair the efforts of the FPL to contract for goods or services on favorable terms, as well as information relating to competitive interests of FPL, the disclosure of which would impair the competitive business interests of FPL. Specifically, the information contains Requests for Proposals, lease agreements, and solar project cost projections. To the best of my knowledge, FPL has maintained the confidentiality of these documents and materials.

3. Consistent with the provisions of the Florida Administrative Code, such materials should remain confidential for a period of not less than 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.

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.



\_\_\_\_\_  
Timothy Oliver

Date: \_\_\_\_\_

**FIRST REVISED EXHIBIT D**

**BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION**

In re: Petition by Florida Power & Light Company  
for Base Rate Increase and Rate Unification

Docket No: 20250011-EI

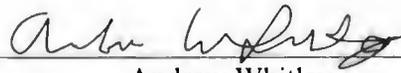
**DECLARATION OF ANDREW WHITLEY**

1. My name is Andrew Whitley. I am currently employed by Florida Power & Light Company ("FPL") as Engineering Manager, FPL Finance. I have personal knowledge of the matters stated in this declaration.

2. I have reviewed the documents referenced and incorporated in FPL's Request for Confidential Classification, specifically the materials provided in my response to FL Rising's Second Request for Production of Documents No. 24. The documents or materials that I have reviewed and which are proprietary confidential business information 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. Specifically, the information contains purchase orders, which includes pricing terms. To the best of my knowledge, FPL has maintained the confidentiality of these documents and materials.

3. Therefore, consistent with the provisions of the Florida Administrative Code, such materials should remain confidential for a period of at least an additional 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 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.



Andrew Whitley

Date: 04/11/2025

**EXHIBIT D**

**BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION**

In re: Petition by Florida Power & Light Company  
for Base Rate Increase

Docket No: 20250011-EI

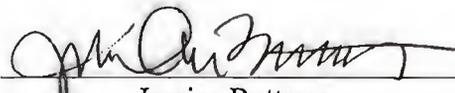
**DECLARATION OF JESSICA BUTTRESS**

1. My name is Jessica Buttress. I am currently employed by Florida Power & Light Company ("FPL") as Senior Director, Executive Services and Compensation. I have personal knowledge of the matters stated in this written declaration.

2. I have reviewed the documents referenced and incorporated in FPL's Request for Confidential Classification, specifically the materials provided in FPL's response to the FL Rising's Second Request for Production of Documents, No. 39. The documents or materials that I have reviewed and which are asserted by FPL to be proprietary competitive business information contain information relating to competitive interests of FPL, the disclosure of which would impair three competitive business interests of FPL. Specifically, the material contains payroll expenses. To the best of my knowledge, FPL has maintained the confidentiality of these documents and materials.

3. Consistent with the provisions of the Florida Administrative Code, such materials should remain confidential for a period of not less than 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.

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.

  
\_\_\_\_\_  
Jessica Buttress

Date: 4/11/25

**FIRST REVISED EXHIBIT D**

**BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION**

In re: Petition by Florida Power & Light Company  
for Base Rate Increase

Docket No: 20250011-EI

**DECLARATION OF DANIEL DEBOER**

1. My name is Daniel DeBoer. I am currently employed by Florida Power & Light Company ("FPL") as Vice President, Nuclear. I have personal knowledge of the matters stated in this written declaration.

2. I have reviewed the documents referenced and incorporated in FPL's Request for Confidential Classification, specifically the materials provided in response to the FL Rising's Second Set of Interrogatories, No. 26, and Second Request for Production of Documents, Nos. 4 and 14. The documents or materials that I have reviewed and which are asserted by FPL to be proprietary confidential business information contain information relating to FPL's competitive interests, the disclosure of which impair the competitive business interests of FPL. Specifically, the information contains FPL nuclear construction cost projections. To the best of my knowledge, FPL has maintained the confidentiality of these documents and materials.

3. Consistent with the provisions of the Florida Administrative Code, such materials should remain confidential for a period of not less than 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.

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.



\_\_\_\_\_  
Daniel DeBoer

Date: 4/11/25