



Maria Jose Moncada  
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May 5, 2025

**VIA HAND DELIVERY**

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

**REDACTED**

RECEIVED-PPSC  
2025 MAY -5 PM 4:41  
COMMISSION  
CLERK

**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 response to the Office of Public Counsel's ("OPC") Thirteenth Request for Production of Documents (No. 133). The request includes Exhibits A, B (two copies), C and D.

Exhibit A consists of the documents containing confidential information, and they are confidential in their entirety. Exhibit A is submitted for filing in an envelope marked "EXHIBIT A" – CONFIDENTIAL (the materials for Exhibit A are being provided electronically in native format on a device marked confidential). Exhibit B is an edited version of Exhibit A, in which the information FPL asserts is confidential has been redacted. As the 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.

Sincerely,

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

COM  
AFD 1 redacted  
APA  
ECO  
ENG  
GCL  
IDM  
CLK

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 by Florida Power & Light  
Company for Base Rate Increase

Docket No: 20250011-EI

Date: May 5, 2025

**FLORIDA POWER & LIGHT COMPANY'S REQUEST FOR CONFIDENTIAL  
CLASSIFICATION OF INFORMATION PROVIDED IN ITS RESPONSE  
TO THE OFFICE OF PUBLIC COUNSEL'S THIRTEENTH REQUEST  
PRODUCTION OF DOCUMENTS (NO. 133)**

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 response to the Office of Public Counsel's ("OPC") Thirteenth Request for Production of Documents (No. 133) ("Confidential Information").

In support of its request, FPL states as follows:

1. FPL served a response to OPC's Thirteenth Request for Production of Documents (No. 133) on May 5, 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 which are confidential in their entirety.
- b. Exhibit B is a redacted version of the confidential documents. As the documents in Exhibit A are confidential in their entirety, FPL has included only an identifying cover page 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 declaration of Kieth Ferguson 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 includes information relating to competitive interests of FPL or the provider of the information, the disclosure of which would impair the competitive business interests of FPL or the provider of the information. Specifically, the information contains pricing information related to dismantlement costs 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)(e), Fla. Stat.

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 5th day of May, 2025,

By: /s/ Maria Jose Moncada

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Vice President and General Counsel  
Florida Bar No. 173304  
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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 5th day of May, 2025:

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	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>
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>	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>
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>	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>
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>	Nikhil Vijaykar Keyes & Fox LLP 580 California Street, 12th Floor San Francisco, CA 94104 (408) 621-3256 nvijaykar@keyesfox.com <b>EVgo Services, LLC</b>

James W Brew Laura Wynn Baker Joseph R. Briscar Sarah B. Newman 1025 Thomas Jefferson Street NW Suite 800 West Washington, DC 20007 (202) 342-0800 (202) 342-0807 <a href="mailto:jbrew@smxblaw.com">jbrew@smxblaw.com</a> <a href="mailto:lwb@smxblaw.com">lwb@smxblaw.com</a> <a href="mailto:jrb@smxblaw.com">jrb@smxblaw.com</a> <a href="mailto:sbn@smxblaw.com">sbn@smxblaw.com</a> <b>Florida Retail Federation</b>	Katelyn Lee Senior Associate, Market Development & Public Policy Lindsey Stegall Senior Manager, Market Development & Public Policy EVgo Services, LLC 1661 E. Franklin Ave. El Segundo, CA 90245 (213) 500-9092 <a href="mailto:Katelyn.Lee@evgo.com">Katelyn.Lee@evgo.com</a> <a href="mailto:Lindsey.Stegall@evgo.com">Lindsey.Stegall@evgo.com</a> <b>EVgo Services, LLC</b>
Steven W. Lee Spilman Thomas & Battle, PLLC 1100 Bent Creek Boulevard, Suite 101 Mechanicsburg, PA 17050 (717) 791-2012 (717) 795-2743 <a href="mailto:slee@spilmanlaw.com">slee@spilmanlaw.com</a> <b>Walmart, Inc.</b>	Stephanie U. Eaton Spilman Thomas & Battle, PLLC 110 Oakwood Drive, Suite 500 Winston-Salem, NC 27103 (336) 631-1062 (336) 725-4476 <a href="mailto:seaton@spilmanlaw.com">seaton@spilmanlaw.com</a> <b>Walmart, Inc.</b>
Robert E. Montejo Duane Morris LLP 201 S. Biscayne Blvd., Suite 3400 Miami, Florida 33131-4325 (202) 776-7827 <a href="mailto:REMontejo@duanemorris.com">REMontejo@duanemorris.com</a> <b>Electrify America, LLC</b>	Stephen Bright Jigar J. Shah 1950 Opportunity Way, Suite 1500 Reston, Virginia 20190 (781) 206-7979 (703) 872-7944 <a href="mailto:steve.bright@electrifyamerica.com">steve.bright@electrifyamerica.com</a> <a href="mailto:jigar.shah@electrifyamerica.com">jigar.shah@electrifyamerica.com</a> <b>Electrify America, LLC</b>

*/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   X  

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

The documents responsive to OPC's Thirteenth Request for Production of Documents No. 133, Bates Nos. 039710-040160, 040167-040247 and 040267-040729 are confidential in their entirety.



## **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:** May 5, 2025

Int/POD No.	Begin Bates Number	End Bates Number	Description	No. of Pages	Confidential	Line/Col	F.S. 366.093(3) Subsection	Declarant
OPC 13 <sup>th</sup> POD, No. 133	040045	040062	Hammock.xlsx	18	Y	All	(e)	Keith Ferguson
OPC 13 <sup>th</sup> POD, No. 133	040063	040082	Hibiscus.xlsx	20	Y	All	(e)	Keith Ferguson
OPC 13 <sup>th</sup> POD, No. 133	040083	040100	Horizon.xlsx	18	Y	All	(e)	Keith Ferguson
OPC 13 <sup>th</sup> POD, No. 133	040101	040118	Indian River.xlsx	18	Y	All	(e)	Keith Ferguson
OPC 13 <sup>th</sup> POD, No. 133	040119	040136	Interstate.xlsx	18	Y	All	(e)	Keith Ferguson
OPC 13 <sup>th</sup> POD, No. 133	040137	040160	Lauderdale.xlsx	24	Y	All	(e)	Keith Ferguson
OPC 13 <sup>th</sup> POD, No. 133	040167	040184	Loggerhead.xlsx	18	Y	All	(e)	Keith Ferguson
OPC 13 <sup>th</sup> POD, No. 133	040185	040204	Manatee Battery.xlsx	20	Y	All	(e)	Keith Ferguson
OPC 13 <sup>th</sup> POD, No. 133	040205	040224	Manatee Solar.xlsx	20	Y	All	(e)	Keith Ferguson
OPC 13 <sup>th</sup> POD, No. 133	040225	040247	Manatee.xlsx	23	Y	All	(e)	Keith Ferguson

<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>
OPC 13 <sup>th</sup> POD, No. 133	040265	040290	Martin.xlsx	26	Y	All	(e)	Keith Ferguson
OPC 13 <sup>th</sup> POD, No. 133	040291	040308	Miami Dade.xlsx	18	Y	All	(e)	Keith Ferguson
OPC 13 <sup>th</sup> POD, No. 133	040309	040326	Northern Preserve.xlsx	18	Y	All	(e)	Keith Ferguson
OPC 13 <sup>th</sup> POD, No. 133	040327	040346	Okeechobee Solar.xlsx	20	Y	All	(e)	Keith Ferguson
OPC 13 <sup>th</sup> POD, No. 133	040347	040372	Okeechobee.xlsx	26	Y	All	(e)	Keith Ferguson
OPC 13 <sup>th</sup> POD, No. 133	040373	040398	Pea Ridge.xlsx	26	Y	All	(e)	Keith Ferguson
OPC 13 <sup>th</sup> POD, No. 133	040399	040424	Perdido.xlsx	26	Y	All	(e)	Keith Ferguson
OPC 13 <sup>th</sup> POD, No. 133	040425	040442	Pioneer.xlsx	18	Y	All	(e)	Keith Ferguson
OPC 13 <sup>th</sup> POD, No. 133	040443	040468	Port Everglades.xlsx	26	Y	All	(e)	Keith Ferguson
OPC 13 <sup>th</sup> POD, No. 133	040469	040494	Riviera Beach.xlsx	26	Y	All	(e)	Keith Ferguson
OPC 13 <sup>th</sup> POD, No. 133	040495	040520	Sanford.xlsx	26	Y	All	(e)	Keith Ferguson
OPC 13 <sup>th</sup> POD, No. 133	040521	040549	Scherer.xlsx	29	Y	All	(e)	Keith Ferguson
OPC 13 <sup>th</sup> POD, No. 133	040550	040569	Solar Proxy.xlsx	20	Y	All	(e)	Keith Ferguson
OPC 13 <sup>th</sup> POD, No. 133	040570	040587	Southfork.xlsx	18	Y	All	(e)	Keith Ferguson

<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>
OPC 13 <sup>th</sup> POD, No. 133	040588	040605	Space Coast.xlsx	18	Y	All	(e)	Keith Ferguson
OPC 13 <sup>th</sup> POD, No. 133	040606	040623	Sunshine.xlsx	18	Y	All	(e)	Keith Ferguson
OPC 13 <sup>th</sup> POD, No. 133	040624	040641	Sweetbay.xlsx	18	Y	All	(e)	Keith Ferguson
OPC 13 <sup>th</sup> POD, No. 133	040642	040667	Turkey Point.xlsx	26	Y	All	(e)	Keith Ferguson
OPC 13 <sup>th</sup> POD, No. 133	040668	040685	Twin Lakes.xlsx	18	Y	All	(e)	Keith Ferguson
OPC 13 <sup>th</sup> POD, No. 133	040686	040711	West County.xlsx	26	Y	All	(e)	Keith Ferguson
OPC 13 <sup>th</sup> POD, No. 133	040712	040729	Wildflower.xlsx	18	Y	All	(e)	Keith Ferguson
OPC 13 <sup>th</sup> POD, No. 133	039710	039729	Babcock Preserve.xlsx	20	Y	All	(e)	Keith Ferguson
OPC 13 <sup>th</sup> POD, No. 133	039730	039747	Babcock Ranch.xlsx	18	Y	All	(e)	Keith Ferguson
OPC 13 <sup>th</sup> POD, No. 133	039748	039765	Barefoot Bay.xlsx	18	Y	All	(e)	Keith Ferguson
OPC 13 <sup>th</sup> POD, No. 133	039766	039783	Blue Cypress.xlsx	18	Y	All	(e)	Keith Ferguson
OPC 13 <sup>th</sup> POD, No. 133	039784	039801	Blue Heron.xlsx	18	Y	All	(e)	Keith Ferguson
OPC 13 <sup>th</sup> POD, No. 133	039802	039819	Blue Indigo.xlsx	18	Y	All	(e)	Keith Ferguson
OPC 13 <sup>th</sup> POD, No. 133	039820	039844	Cape Canaveral.xlsx	25	Y	All	(e)	Keith Ferguson



Int/POD No.	Begin Bates Number	End Bates Number	Description	No. of Pages	Confidential	Line/Col	F.S. 366.093(3) Subsection	Declarant
OPC 13 <sup>th</sup> POD, No. 133	039845	039862	Cattle Ranch.xlsx	18	Y	All	(e)	Keith Ferguson
OPC 13 <sup>th</sup> POD, No. 133	039863	039882	Citrus Solar.xlsx	20	Y	All	(e)	Keith Ferguson
OPC 13 <sup>th</sup> POD, No. 133	039883	039900	Coral Farms.xlsx	18	Y	All	(e)	Keith Ferguson
OPC 13 <sup>th</sup> POD, No. 133	039901	039927	Crist.xlsx	27	Y	All	(e)	Keith Ferguson
OPC 13 <sup>th</sup> POD, No. 133	039928	039953	Dania Beach.xlsx	26	Y	All	(e)	Keith Ferguson
OPC 13 <sup>th</sup> POD, No. 133	039954	039971	Desoto.xlsx	18	Y	All	(e)	Keith Ferguson
OPC 13 <sup>th</sup> POD, No. 133	039972	039989	Echo River.xlsx	18	Y	All	(e)	Keith Ferguson
OPC 13 <sup>th</sup> POD, No. 133	039990	040017	Ft. Myers.xlsx	28	Y	All	(e)	Keith Ferguson
OPC 13 <sup>th</sup> POD, No. 133	040018	040044	Gulf Daniel.xlsx	27	Y	All	(e)	Keith Ferguson

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

**EXHIBIT D**

**BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION**

Petition by Florida Power & Light Company for  
Base Rate Increase

Docket No: 20250011-EI

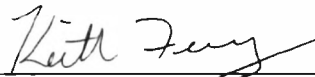
**DECLARATION OF KEITH FERGUSON**

1. My name is Keith Ferguson. I am currently employed by Florida Power & Light Company ("FPL") as Vice President, Accounting and Controller. 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 OPC's Thirteenth Request for Production of Documents, No. 133. The documents or materials that I have reviewed and which are asserted by FPL to be proprietary confidential business information contain information relating to the competitive interests of FPL or the provider of the information, the disclosure of which would impair the competitive business of FPL or the provider of the information. Specifically, the information contains pricing information related to dismantlement costs which would impair the efforts of FPL to contract for goods or services on favorable terms. 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.



Keith Ferguson

Date: May 5, 2025