



**REDACTED**

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May 28, 2025

**VIA HAND DELIVERY**

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

RECEIVED-FPSC  
2025 MAY 28 PM 1:40  
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 Supplemental Response to the Office of Public Counsel’s (“OPC”) First Request for Production of Documents (No. 27). 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.

Sincerely,

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

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 28, 2025

**FLORIDA POWER & LIGHT COMPANY'S REQUEST FOR CONFIDENTIAL  
CLASSIFICATION OF INFORMATION PROVIDED IN ITS SUPPLEMENTAL  
RESPONSE TO THE OFFICE OF PUBLIC COUNSEL'S FIRST REQUEST  
FOR PRODUCTION OF DOCUMENTS (NO. 27)**

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 Supplemental Response to the Office of Public Counsel's ("OPC") First Request for Production of Documents (No. 27) ("Confidential Information"). In support of its request, FPL states as follows:

1. FPL served its Supplemental Response to OPC's First Request for Production of Documents (No. 27) on May 28, 2025. Consistent with Rule 25-22.006, Florida Administrative Code, this request is being filed contemporaneously with the service of that supplemental response 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.
- 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 declaration of Keith 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 concerning bids or other contractual data, the disclosure of which would impair the efforts of the public utility or its affiliates to contract for goods or services on favorable terms. Specifically, the information contains service charges billed to affiliates, which if publicly disclosed could be used to determine negotiated pricing paid by FPL. This information is protected by Section 366.093(3)(d), 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 28th day of May, 2025,

By: s/ Maria Jose Moncada  
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**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 28th day of May, 2025:

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Timothy Sparks  
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**Florida Energy for Innovation Association**

*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 document responsive to OPC's First Request  
for Production of Documents No. 27  
Supplemental, Bates No. 045436, is confidential  
in its entirety.

The document responsive to OPC's First Request  
for Production of Documents No. 27  
Supplemental, Bates No. 045436, is confidential  
in its 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 27, 2025

Int/POD No.	Begin Bates Number	End Bates Number	Description	No. of Pages	Confidential	Line/Col	Florida Statute 366.093(3) Subsection	Declarant
OPC's 1 <sup>st</sup> POD, No. 27 Supplemental	045436	045436	FPL Corporate Service Charges Billed to Affiliates January – March 2025	1	Y	All	(d)	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

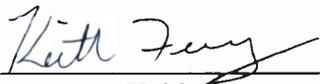
**DECLARATION OF KEITH FERGUSON**

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 Supplemental Response to OPC’s First Request for Production of Documents, No. 27. 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 public utility or its affiliates to contract for goods or services on favorable terms. Specifically, the information contains service charges billed to affiliates, which if publicly disclosed could be used to determine negotiated pricing paid by FPL. 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 25, 2025