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June 18, 2025

Via Hand Delivery

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

REDACTED

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COMMISSION
CLERK

Re: Docket No. 20250011-EI - Petition for Rate Increase by Florida Power & Light Company

Dear Mr. Teitzman:

Enclosed for filing in the above-referenced docket on behalf of Florida Energy for Innovation Association, Inc. ("FEIA"), please find FEIA's Request for Confidential Classification of Information Provided in Response to Florida Power & Light Company's First Set of Interrogatories (Nos. 1 and 7) and Motion for Temporary Protective Order ("Request for Confidential Classification and TPO"). The Request for Confidential Classification and TPO includes Exhibits A, B (two copies), C, and D.

Exhibit A consists of the document 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 FEIA asserts is confidential has been redacted. Exhibit C is a justification table in support of FEIA's Request for Confidential Classification and TPO. Exhibit D contains the Declaration of Robert Provine in support of FEIA's Request for Confidential Classification and TPO. In accordance with Rule 25-22.006(3)(d), Florida Administrative Code, FEIA requests confidential treatment of the information in Exhibit A pending disposition of FEIA's Request for Confidential Classification and TPO.

COM _____
AFD 1 redacted Exh "B"
APA _____
ECO _____
ENG _____
GCL _____
IDM _____
CLK _____

Adam J. Teitzman, Esq.
June 18, 2025
Page 2

Should you have any questions regarding this submission, please do not hesitate to contact me.
Thank you for your consideration.

Sincerely yours,

HOLLAND & KNIGHT LLP



Kevin Cox

KC:jg

Encls.

cc: Counsel for parties shown on the attached Certificate of Service.

CERTIFICATE OF SERVICE

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

e-mail this 18th day of June 2025 the following:

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and Timothy Sparks
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By: 
Kevin W. Cox

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Petition for rate increase by Florida
Power & Light Company

Docket No: 20250011-EI

Filed: June 18, 2025

**FLORIDA ENERGY FOR INNOVATION
ASSOCIATION'S REQUEST FOR CONFIDENTIAL CLASSIFICATION
OF INFORMATION PROVIDED IN RESPONSE TO FLORIDA POWER &
LIGHT COMPANY'S FIRST SET OF INTERROGATORIES (NOS. 1 AND 7)
AND MOTION FOR TEMPORARY PROTECTIVE ORDER**

Pursuant to Section 366.093, Florida Statutes, and Rule 25-22.006, Florida Administrative Code ("FAC"), Florida Energy for Innovation Association ("FEIA") hereby requests confidential classification of certain information provided in FEIA's response to Interrogatories Nos. 1 and 7 of Florida Power & Light Company's ("FPL") First Set of Interrogatories (No. 1-10) and moves for a temporary protective order protecting such information from public disclosure. In support of its request and motion, FEIA states as follows:

1. FPL served its First Set of Interrogatories (Nos. 1-10) on FEIA on May 30, 2025, and FEIA is serving its responses to FPL's First Set of Interrogatories (Nos. 1-10) on June 18, 2025. Consistent with Rule 25-22.006(3)(d), FAC, 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 and motion:
- a. Exhibit A consists of a copy of the confidential document on which all information that FEIA asserts is confidential has been highlighted.
 - b. Exhibit B consists of two copies of a redacted version of the confidential document.
 - c. Exhibit C is a table that identifies the information for which confidential

treatment is being sought, 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 Robert Provine in support of this request and motion.

3. FEIA's response to Interrogatory No. 1 contains information regarding the compensation FEIA has agreed to pay its consultants providing expert testimony on behalf of FEIA in this proceeding. FEIA's response to Interrogatory No. 7 contains the FPL customer account number for each FEIA member who receives electric service from FPL.

4. FEIA submits that information regarding the compensation FEIA has agreed to pay its consultants and FEIA members' FPL customer account numbers (together, the "Confidential Information") is intended to be and has been treated and maintained by FEIA and its consultants as confidential business information. The disclosure of the Confidential Information would cause harm to FEIA, its members, and its consultants.

5. Pursuant to section 366.093(1), Florida Statutes, 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.

6. Interrogatory No. 1. As described more fully in the Declaration of Robert Provine included in Exhibit D, the Confidential Information includes information relating to the competitive interests of FEIA and its consultants, the disclosure of which would impair the competitive business of FEIA and its consultants. Specifically, if information regarding the

compensation terms negotiated between FEIA and its consultants was made publicly available, FEIA's competitive interest in obtaining highly-qualified consultants at the best possible rate for FEIA's members would be substantially harmed. The competitive interest of FEIA's consultants would also be substantially harmed because other consultants could use the information to undercut the consultants in competing for engagements. The Commission has previously classified substantially similar information as confidential pursuant to section 366.093(3), Florida Statutes. *See, e.g.,* Order No. PSC-2019-0370-CFO-EG, *In re: Commission review of numeric conservation goals* (Duke Energy Florida, LLC), Docket No. 20190018-EG, 2019 FLA. PUC LEXIS 324 (Fla. Pub. Serv. Comm'n Aug. 29, 2019) (granting request to classify as confidential information regarding consultants fees).

7. Interrogatory No. 7. As described more fully in the Declaration of Robert Provine, the Confidential Information includes customer-specific account information, the disclosure of which would impair the competitive businesses of FEIA and its members. Specifically, if FEIA members' FPL customer account numbers were made public, the members' competitors could use the account numbers to access sensitive information enabling the competitors to profile the production or operation of the members' businesses. This would result in substantial harm to the competitive business interests of FEIA's members. The Commission has previously classified substantially similar information as confidential pursuant to section 366.093(3), Florida Statutes. *See, e.g.,* Order No. PSC-09-0049-CFO-EI, *In re: Petition for rate increase by Tampa Electric Company*, Docket No. 080317-EI, 2009 Fla. PUC LEXIS 177 (Fla. Pub. Serv. Comm'n Jan 20, 2009) (granting request to classify customer account numbers as confidential and granting temporary protective order).

8. 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) months and should be returned to FEIA as soon as it is no longer necessary for the Commission to conduct its business. *See* § 366.093(4), Fla. Stat.

9. Because the Confidential Information will be served on the Office of Public Counsel, FEIA also moves, pursuant to Rule 25-22.006(6)(c), FAC, for entry of a temporary protective order protecting the Confidential Information from public disclosure. The same grounds showing that the Confidential Information should be classified as confidential also support entry of a temporary protective order.

WHEREFORE, for the above and foregoing reasons, FEIA respectfully requests that the Commission classify the Confidential Information as confidential and enter a temporary protective order protecting the Confidential Information from public disclosure.

Respectfully submitted this 18th day of June, 2025.

HOLLAND & KNIGHT LLP

/s/ Kevin W. Cox

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*Attorneys for Florida Energy for Innovation
Association*

CERTIFICATE OF SERVICE

I hereby certify a true and correct copy of the foregoing with Exhibit A omitted has been furnished by electronic mail this 18th day of June, 2025 to the following:

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and Timothy Sparks
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jrb@smxblaw.com
sbn@smxblaw.com

By: /s/ Kevin W. Cox
Kevin W. Cox

EXHIBIT A

A COPY OF THE CONFIDENTIAL DOCUMENT ON WHICH ALL INFORMATION THAT FEIA ASSERTS IS CONFIDENTIAL HAS BEEN HIGHLIGHTED. THIS DOCUMENT IS BEING SUBMITTED HERewith IN AN ENVELOPE MARKED "EXHIBIT A" – CONFIDENTIAL.

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

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

Docket No. 20250011-EI

Served: June 18, 2025

**FLORIDA ENERGY FOR INNOVATION ASSOCIATION'S
RESPONSES AND OBJECTIONS TO FLORIDA POWER & LIGHT COMPANY'S
FIRST SET OF INTERROGATORIES (NOS. 1-10)**

Florida Energy for Innovation Association ("FEIA"), by and through its undersigned counsel, pursuant to Rule 1.340, Florida Rules of Civil Procedure, and Rule 28-106.206, Florida Administrative Code, and the Florida Public Service Commission's Order Establishing Procedure No. PSC-2025-0075-PCO-EI ("Order"), hereby serves its Answers and Objections to the First Set of Interrogatories (Nos. 1-10) to FEIA by Florida Power & Light Company ("FPL").

PRELIMINARY STATEMENT AND OBJECTION

By providing these answers and objections to FPL's Interrogatories ("ROGs"), FEIA does not waive its right to challenge the relevance, materiality, and admissibility of the information or documents provided, or to object to the use of the information or documents in any subsequent proceeding, trial, or hearing in this action.

FEIA's search for information and documents is ongoing. Accordingly, FEIA's answers and objections to these Interrogatories are based on information and documents known to it at this time. FEIA reserves its right to supplement or amend its answers and objections at any time prior to final hearing. These answers and objections are limited to and filed on behalf of FEIA.

GENERAL OBJECTIONS

1. With respect to the "Definitions" and "Instructions" in FPL's Interrogatories, FEIA objects to any definitions or instructions that are inconsistent with FEIA's discovery obligations under applicable rules. If some question arises as to FEIA's discovery obligations, FEIA will

comply with applicable rules and not with any of FPL's definitions or instructions that are inconsistent with those rules.

2. FEIA objects to any definition or Interrogatory that seeks to encompass persons or entities that are not parties to this action or that are not subject to discovery under applicable rules.

3. FEIA also objects to any Interrogatory that purports to require FEIA or its experts to prepare studies, analyses, or to do work for FPL that has not been done for FEIA.

4. FEIA generally objects to each Interrogatory to the extent that it calls for data or information protected by the attorney-client privilege, the work product doctrine, the common interest privilege, the accountant-client privilege, the trade secret privilege, or any other applicable privilege or protection afforded by law.

5. FEIA reserves the right to supplement any of its answers or objections to each Interrogatory if FEIA cannot locate the answers immediately due to its magnitude or the work required to aggregate responsive information, or if FEIA later discovers additional responsive information in the course of this proceeding.

6. FEIA further objects to each Interrogatory on the grounds and to the extent that the instructions impose or attempt to impose obligations greater than those imposed by the Rules of Civil Procedure or other applicable rules that govern this proceeding.

7. FEIA further objects to each Interrogatory on the grounds that it may call for the production of materials or information that constitute trade secrets or other confidential research, development, or commercial information, disclosure of which to competitors or to the public at large would materially harm FEIA's interests.

8. FEIA objects to these Interrogatories, individually and generally, to the extent the requested documents and/or information is in the public domain or equally accessible to FPL.

9. By providing the responses herein, FEIA does not concede that any Interrogatory is relevant to this action or is reasonably calculated to lead to the discovery of admissible evidence. FEIA expressly reserves the right to object to further discovery into the subject matter of any of these Interrogatories, to the introduction of evidence of any response or portion thereof, and to supplement its responses should further investigation disclose responsive information.

10. In responding to FPL's Interrogatories, FEIA has made a reasonable inquiry of those persons likely to possess information responsive to FPL's Interrogatories and has conducted a reasonable search of those records in FEIA's possession, custody, or control where the requested information would likely be maintained in the ordinary course of business. To the extent that any of FPL's Interrogatories ask FEIA to go to greater lengths, FEIA objects thereto because such Interrogatories are overly broad, unduly burdensome, and unreasonable.

**FEIA'S RESPONSES AND SPECIFIC OBJECTIONS TO FPL'S
FIRST SET OF INTERROGATORIES (NOS. 1-10) TO FEIA**

1. Please identify each consultant, expert, witness, or other person who has been retained or engaged to provide testimony, documents, exhibits, or other materials and/or support on behalf of FEIA in this docket.
 - a. For each such person or entity, identify the date initially consulted, the date of formal retention or engagement (if any), and describe the terms of the financial arrangements or agreement pursuant to which that person or entity will be compensated for work and/or services provided in this case.

RESPONSE:

FEIA incorporates the general objections above. FEIA objects to the extent this Interrogatory seeks information that is protected by the attorney-client privilege, the work product doctrine, the common interest privilege, the accountant-client privilege, the trade secret privilege, or any other applicable privilege or protection afforded by law. FEIA objects to the extent this Interrogatory seeks information that is irrelevant to this proceeding. FEIA objects that the financial terms are confidential, proprietary, and commercially sensitive business information of FEIA and its retained consultants, the public disclosure of which would cause harm to FEIA and its retained consultants, and that FEIA and the retained consultants have treated and continue to treat the information as confidential, including entering non-disclosure agreements to protect its confidentiality. Accordingly, FEIA will seek confidential classification of the financial terms and objects to producing the financial terms to any party absent a mutually agreeable agreement to protect their confidentiality.

FEIA identifies the following persons who have been retained or engaged to provide testimony, documents, exhibits, or other materials and/or support on behalf of FEIA in this docket:

- **David Loomis**
 - **Initially consulted on or around May 14, 2025**
 - **Retained by FEIA on May 15, 2025**
 - **Compensated [REDACTED]**
- **Fletcher Mangum**
 - **Initially consulted on or around May 20, 2025**
 - **Retained by FEIA on May 23, 2025**
 - **Compensated [REDACTED]**
- **Mohamed Ahmed**
 - **Initially consulted on or around May 16, 2025**
 - **Retained on May 16, 2025**

- **Compensated** [REDACTED]
- **Walter “Buddy” Rizer**
 - **Initially consulted on or around May 20, 2025**
 - **Retained on May 21, 2025**
 - **Compensated** [REDACTED]

FEIA also states that Robert Provine, its President and Director, has provided testimony in this proceeding, but was not formally retained by FEIA for this purpose and is not being compensated for that testimony.

2. Please identify each consultant, expert, witness, or other person, who has provided testimony, documents, exhibits, or other materials and/or support on behalf of FEIA in any Public Utility Commission or Public Service Commission, the Federal Energy Regulatory Commission, or any other state or federal regulatory body with jurisdiction over the provision of electric power in the last seven (7) years. For each person identified in response to this Interrogatory No. 2, please identify the following:
- a. The witness’s business address;
 - b. Which regulatory or administrative body or court; and
 - c. The caption or style of each proceeding or case, and the date of each appearance, where for purposes of this interrogatory the term “appearance” shall include the submittal of pre-filed testimony, oral testimony, documents, exhibits, or other materials and/or support on behalf of FEIA.

RESPONSE:

FEIA incorporates the general objections above. FEIA objects to the extent this Interrogatory seeks information that is protected by the attorney-client privilege, the work product doctrine, the common interest privilege, the accountant-client privilege, the trade secret privilege, or any other applicable privilege or protection afforded by law. FEIA objects to the extent this Interrogatory seeks information that is irrelevant to this proceeding.

FEIA states that the only testimony provided on behalf of FEIA in any proceeding is limited to the testimony that has been provided in this proceeding—Docket No. 20250011-EI. Names of those witnesses and their addresses are below, although they should only be contacted through counsel for FEIA.

- **David Loomis**
Strategic Economic Research, LLC

**1604 Visa Drive, Suite 1
Normal, IL 61761**

- **Fletcher Mangum**
Mangum Economics
4150 Cox Road Suite 202
Glen Allen, VA 23060
- **Mohamed Ahmed**
Electric Power Engineers LLC
5301 Southwest Parkway, Suite 150
Austin, TX 78735
- **Walter H. Rizer, Jr.**
ATIX, LLC
651 North Broad Street, Suite 20
Middletown, DE 19709
- **Robert Provine**
Florida Energy for Innovation, Inc.
1700 Flamigo Drive
Orlando, FL 32803-1911

3. State in detail the subject matter, positions, and opinions on which each person named in answer to Interrogatory No. 2 above has provided pre-filed testimony, oral testimony, documents, exhibits, or other materials and/or support on behalf of FEIA.

RESPONSE:

FEIA refers FPL to the pre-filed testimony filed in this proceeding on June 9, 2025, which will also be reproduced in connection with FPL's Second Request for Production of Documents to FEIA Nos. 4 and 6.

4. With respect to each witness FEIA intends to have testify or provide pre-filed testimony in this docket of behalf of FEIA, including witnesses who will make public statements at the hearings, and otherwise, please state the following:
 - a. The witness's business address;
 - b. The witness's qualifications;
 - c. The scope of the witness's employment or retention in the pending matter; and

- d. The witness's general litigation experience, including the percentage of work performed for regulatory bodies or intervening participants.

RESPONSE:

FEIA incorporates the general objections above. FEIA objects to the extent this Interrogatory seeks information that is protected by the attorney-client privilege, the work product doctrine, the common interest privilege, the accountant-client privilege, the trade secret privilege, or any other applicable privilege or protection afforded by law. FEIA objects to the extent this Interrogatory seeks information that is irrelevant to this proceeding or whose relevance is disproportionate to the needs of the proceeding.

FEIA refers FPL to its answer to Interrogatory No. 2, and the pre-filed testimony, including CVs, filed in this proceeding on June 9, 2025, which will also be reproduced in connection with FPL's First Request for Production of Documents to FEIA No. 1 and FPL's Second Request for Production of Documents to FEIA Nos. 4 and 6.

5. Regarding the answer to Interrogatory No. 4, please identify with specificity the witness's appearances before regulatory or administrative bodies or courts of law, specifying which regulatory or administrative body or court, the caption or style of each proceeding or case, and the date of each appearance, where for purposes of this interrogatory the term "appearance" shall include the submittal of pre-filed testimony.

RESPONSE:

FEIA refers to the pre-filed testimony filed in this proceeding on June 9, 2025, which will also be reproduced in connection with FPL's First Request for Production of Documents to FEIA No. 1 and FPL's Second Request for Production of Documents to FEIA Nos. 4 and 6.

6. Please describe any bill impact calculations FEIA has performed to assess the impact of FPL's proposed base rate case on FEIA's members.

RESPONSE:

FEIA incorporates the general objections above. FEIA objects to the extent this Interrogatory seeks information that is protected by the attorney-client privilege, the work product doctrine, the common interest privilege, the accountant-client privilege, the trade secret privilege, or any other applicable privilege or protection afforded by law. FEIA objects to the extent this Interrogatory seeks information that is irrelevant

to this proceeding or whose relevance is disproportionate to the needs of the proceeding.

FEIA refers FPL to the pre-filed testimony of Robert Provine, Dr. Mohamed Ahmed, David Loomis, Robert Provine, Buddy Rizer and Fletcher Mangum filed in this proceeding on June 9, 2025, which will also be reproduced in response to FPL's Second Request for Production of Documents to FEIA Nos. 4 and 6.

Mr. Provine's analysis shows that 75 percent of FEIA members are current retail customers of FPL and thus rely on FPL for essential electric service. Mr. Loomis analysis shows that the average base rate increase for FPL's system is 6.10 percent for the 2026 test year, and 5.36 percent for the 2027 test year. Thus, based on the analysis of its consultants, FEIA has concluded that FPL's request to increase base rates overall by approximately \$8.9 Billion will directly impact their cost of electricity. Furthermore, FEIA's consultants (Ahmed and Loomis) explain that data centers' stable, large-scale power demand can enable FPL to spread its fixed costs over a greater volume of electricity sales, thus contributing to lower unit costs of electricity for all of FPL's retail customers. FEIA's consultants (Rizer and Mangum) have concluded that FPL's proposals in this docket will drive data centers away from Florida and thus deprive FPL's retail customers of lower unit costs of electricity.

Moreover, FEIA consultant Dr. David Loomis' analysis shows that FPL's proposed rate increase will substantially impact the large data centers that FEIA members are developing. Today those data centers are classified as GSLD customers and would be charged for electric service at FPL's GSLD-3 rate. Dr. Loomis points out that under FPL's current GSLD-3 Tariff, a large data center would pay FPL approximately 5.98 cents per kWh for electric service pre taxes and fees. Under FPL's proposed LLCS-1 Tariff that same data center would pay, approximately 10.16 cents per kWh pre taxes and fees, which represents an increase in rates of approximately 69%.

7. Provide the following information related to FEIA:
 - a. The current number of active members;
 - b. The names of active members;
 - c. The dates that each person or entity became a member;
 - d. The counties and cities within the state of Florida where those members reside;
 - e. The number of members that are customers of FPL;
 - f. The names of members that are customers of FPL;
 - g. The service address that the member receives electric service from FPL;
 - h. The account number for each member that receives electric service from FPL; and
 - i. The date that the FPL account was established or set up by the member.

RESPONSE:

FEIA incorporates the general objections above. FEIA objects to the extent this Interrogatory seeks information that is protected by law, and will seek confidential classification of account numbers. FEIA objects that the account numbers are confidential, proprietary, and commercially sensitive business information of FEIA's members, the public disclosure of which would cause harm to FEIA's members, and that FEIA and its members have treated and continue to treat the information as confidential. FEIA will not provide account numbers to other intervenors, on the basis that this information is irrelevant and that privacy considerations are disproportionate to any relevance to intervenors. Likewise, FEIA will seek confidential classification from the Commission in order to protect the confidentiality of this information. FEIA objects to the extent this Interrogatory seeks information that is irrelevant to this proceeding or whose relevance is disproportionate to the needs of the proceeding.

FEIA states as follows:

- a. 4**
- b. Timberline Investment Partners, LLC
TLO 12 SunGate LLC
Transportation Financial Services, Inc.
Phillips and Jordan, Inc.**
- c. All became a member on May 7, 2025.**
- d. Timberline Investment Partners, LLC –
Orlando, Orange County
TLO 12 SunGate LLC –
Daytona Beach, Volusia County
Transportation Financial Services, Inc. –
West Palm Beach, Palm Beach County
Phillips and Jordan, Inc. –
South Bay, Palm Beach County**

All members of FEIA are customers of FPL. Three members are current retail electric customers of FPL. Two members are customers of FPL in that they have contracted with, and paid, FPL to perform and provide engineering studies for their data centers.

- e. FEIA members that are current retail electric customers of FPL are:**
 - 1) TLO 12 SunGate LLC**
 - 2) Transportation Financial Services, Inc.**
 - 3) Phillips and Jordan, Inc.**

Members who are engineering study customers of FPL are:

- 1) Timberline Investment Partners, LLC**
- 2) TLO 12 SunGate LLC**

- f. **TLO 12 SunGate LLC –**
3600 Old Deland Rd., Daytona Beach, FL 32124
Transportation Financial Services, Inc. –
1450 Centrepark Blvd Ste 100, West Palm Beach, FL 33401
Phillips and Jordan, Inc. –
12351 US 27 # S-648, South Bay, FL 33493
2540 Stonegate Dr., Wellington, FL 33414
225 S. Latitude Circle, Apt. 401, Delray Beach, FL 33483

- g. **TLO 12 SunGate LLC –**
[REDACTED]
Transportation Financial Services, Inc. –
Account No.
[REDACTED]
Phillips and Jordan, Inc. –
Account Nos.

[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]

- h. **FEIA notes that the account numbers have been provided to FPL which has best access to the date the account was opened.**

- 8. Please confirm that FEIA’s principal address and organizational headquarters is 1700 Flamigo Drive, Orlando, FL 32803-1911.
 - a. If not, please provide the address for FEIA’s organizational headquarters.
 - b. Please explain why FEIA selected this location for its organizational headquarters.

RESPONSE:

FEIA confirms that its principal address and organizational headquarters is 1700 Flamigo Drive, Orlando, FL 32803-1911. As stated in the Prefiled Testimony of Robert Provine submitted on June 9, 2025, FEIA members have data center projects and operations across FPL’s 2 territory, including in Volusia, St. Lucie and Palm Beach Counties. Thus, Orlando is a convenient central location for FEIA’s organizational headquarters.

- 9. Please identify all corporate organizational and formation documents, including, but not limited to, articles of incorporation, bylaws, charters, declarations, operating agreements, resolutions, and other documents or records that establish and regulate a FEIA’s structure,

operations, and ownership.

RESPONSE:

FEIA is producing copies of its Articles of Incorporation, Bylaws, and Written Consent in response to FPL' First Request for Production (Nos. 1-10) .

10. Please provide the following information for all persons that execute the Confidentiality Agreement and/or acknowledged the Electronic Data Room Procedures on behalf of FEIA in this proceeding:
- a. Their names, addresses, occupations, and business addresses;
 - b. Their relationship to FEIA (e.g. officer, employee, attorney, consultant, etc.);
 - c. A summary of their background and qualifications;
 - d. Whether they will provide fact or expert opinions in this proceeding; and
 - e. If they are expected to provide fact or expert opinions, a list of the issues they plan to address.

RESPONSE:

FEIA incorporates the general objections above. FEIA objects to the extent this Interrogatory seeks information that is irrelevant to this proceeding or whose relevance is disproportionate to the needs of the proceeding.

1. **D. Bruce May, Jr.**
 - a. **attorney**
Holland & Knight LLP
315 S. Calhoun St., Suite 600
Tallahassee, FL 32301
 - b. **attorney to FEIA**
 - c. **attorney**
 - d. **no**
 - e. **n/a**
2. **Kevin W. Cox**
 - a. **attorney**
Holland & Knight LLP
315 S. Calhoun St., Suite 600
Tallahassee, FL 32301
 - b. **attorney to FEIA**
 - c. **attorney**
 - d. **no**

- e. n/a
3. **Kathryn Isted**
- a. attorney
Holland & Knight LLP
315 S. Calhoun St., Suite 600
Tallahassee, FL 32301
 - b. attorney to FEIA
 - c. attorney
 - d. no
 - e. n/a
4. **Jennifer O'Shaughnessy**
- a. paralegal
c/o Bruce May
Holland & Knight LLP
315 S. Calhoun St., Suite 600
Tallahassee, FL 32301
 - b. paralegal
 - c. paralegal
 - d. no
 - e. n/a
5. **Jennifer Gillis**
- a. Practice assistant
c/o Bruce May
Holland & Knight LLP
315 S. Calhoun St., Suite 600
Tallahassee, FL 32301
 - b. Practice assistant
 - c. Practice assistant
 - d. no
 - e. n/a
6. **Robert Provine**
- a. President and Director of FEIA
Partner and Chief Operating Officer of Timberline Real Estate
Partners
c/o Bruce May
Holland & Knight LLP
315 S. Calhoun St., Suite 600
Tallahassee, FL 32301
 - b. President and Director of FEIA
 - c. See Curriculum Vitae attached to Mr. Provine's Prefiled Testimony
 - d. Yes
 - e. See Mr. Provine's Prefiled Testimony submitted on June 9, 2025; FEIA

reserves the right for Mr. Provine to supplement his testimony for purposes of rebuttal

7. Stan Nix

- a. Director of FEIA
- b. Employee of Timberline Real Estate Partners
c/o Bruce May
Holland & Knight LLP
315 S. Calhoun St., Suite 600
Tallahassee, FL 32301
- c. Director of FEIA, employee of Timberline Real Estate Partners
- d. Employee of Timberline Real Estate Partners
- e. No
- f. n/a

8. Harsh Sharma

- a. Employee of Timberline Real Estate Partners
c/o Bruce May
Holland & Knight LLP
315 S. Calhoun St., Suite 600
Tallahassee, FL 32301
- b. Employee of Timberline Real Estate Partners
- c. Employee of Timberline Real Estate Partners
- d. No
- e. n/a

9. Owen LaFreniere

- a. In-house attorney of Timberline Real Estate Partners
c/o Bruce May
Holland & Knight LLP
315 S. Calhoun St., Suite 600
Tallahassee, FL 32301
- b. In-house attorney of Timberline Real Estate Partners
- c. In-house attorney of Timberline Real Estate Partners
- d. No
- e. n/a

10. Tarek Salem

- a. Employee of Timberline Real Estate Partners
c/o Bruce May
Holland & Knight LLP
315 S. Calhoun St., Suite 600
Tallahassee, FL 32301
- b. Employee of Timberline Real Estate Partners
- c. Employee of Timberline Real Estate Partners
- d. No

e. n/a

11. Jeff Young

- a. **Affiliate of Timberline Real Estate Partners
c/o Bruce May
Holland & Knight LLP
315 S. Calhoun St., Suite 600
Tallahassee, FL 32301**
- b. **Affiliate of Timberline Real Estate Partners**
- c. **Affiliate of Timberline Real Estate Partners**
- d. **No**
- e. **n/a**

12. Mohamed Ahmed, Ph.D.

- a. **Senior Director of Energy Market Analysis and Project Finance
Electric Power Engineers, LLC
c/o Bruce May
Holland & Knight LLP
315 S. Calhoun St., Suite 600
Tallahassee, FL 32301**
- b. **Consultant to FEIA**
- c. **See Curriculum Vitae attached to Dr. Ahmed's Prefiled Testimony**
- d. **Yes**
- e. **See Dr. Ahmed's Prefiled Testimony submitted on June 9, 2025; FEIA reserves the right for Dr. Ahmed to supplement his testimony for purposes of rebuttal**

13. Bryan Ramler

- a. **Consultant at Electric Power Engineers, LLC
c/o Bruce May
Holland & Knight LLP
315 S. Calhoun St., Suite 600
Tallahassee, FL 32301**
- b. **Consultant to FEIA**
- c. **Consultant at Electric Power Engineers, LLC**
- d. **No**
- e. **n/a**

14. Conrad Fox

- a. **Consultant at Electric Power Engineers, LLC
c/o Bruce May
Holland & Knight LLP
315 S. Calhoun St., Suite 600
Tallahassee, FL 32301**
- b. **Consultant to FEIA**
- c. **Consultant at Electric Power Engineers, LLC**

- d. No
 - e. n/a
- 15. Colton Pankhurst**
- a. **Consultant at Electric Power Engineers, LLC**
c/o Bruce May
Holland & Knight LLP
315 S. Calhoun St., Suite 600
Tallahassee, FL 32301
 - b. **Consultant to FEIA**
 - c. **Consultant at Electric Power Engineers, LLC**
 - d. No
 - e. n/a
- 16. David Loomis**
- a. **President of Strategic Economic Research, LLC**
c/o Bruce May
Holland & Knight LLP
315 S. Calhoun St., Suite 600
Tallahassee, FL 32301
 - b. **Consultant to FEIA**
 - c. **See Curriculum Vitae attached to Dr. Loomis' Prefiled Testimony**
 - d. Yes
 - e. **See Dr. Loomis' Prefiled Testimony submitted on June 9, 2025; FEIA reserves the right for Dr. Loomis to supplement his testimony for purposes of rebuttal**

Respectfully submitted this 18th day of June, 2025.

HOLLAND & KNIGHT LLP

/s/ Kevin W. Cox

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bruce.may@hkllaw.com

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Tallahassee, Florida 32301

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Attorneys for Florida Energy for Innovation Association

DECLARATION

I, Robert Provine, a Director and the President of Florida Energy for Innovation Association (“FEIA”), sponsor FEIA’s responses to **Florida Power & Light Company’s First Set of Interrogatories (Nos. 1-10)** served in Docket No. 20250011, and state that the responses are true and correct based on my personal knowledge.

Under penalties of perjury, I declare that I have read the foregoing interrogatory responses and that the facts stated therein are true.

Robert Provine

Robert Provine

June 18, 2025

Date

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing has been furnished by electronic mail this 18th day of June, 2025 to the following:

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By: /s/ Kevin W. Cox
D. Bruce May, Jr.

EXHIBIT C
JUSTIFICATION TABLE

EXHIBIT C

PARTY: Florida Energy for Innovation Association
TITLE: Petition by Florida Power & Light Company for Base Rate Increase
DOCKET: 20250011-EI
DATE: June 18, 2025

Int.	Begin Bates No.	End Bates No.	Description	No. of Pages	Confidential	366.093(3) Subsection	Page and Line	Declarant
FPL 1 st Int., No. 1	N/A	N/A	FEIA Consultants' Hourly Rates	2	Y	(e)	Pages: 4-5 Line: N/A	Robert Provine
FPL 1 st Int., No. 7	N/A	N/A	FEIA Members' FPL Customer Account Nos.	1	Y	(e)	Page: 10 Line: N/A	Robert Provine

EXHIBIT D
DECLARATION OF ROBERT PROVINE

EXHIBIT D

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Petition for rate increase by Florida
Power & Light Company

Docket No: 20250011-EI

DECLARATION OF ROBERT PROVINE

I, Robert Provine, pursuant to section 95.525, Florida Statutes, and under penalties of perjury declare that the following facts are true:

1. I am over 18 years of age and currently serve as a Director and as the President of Florida Energy for Innovation Association ("FEIA"). I have personal knowledge of the facts stated in this declaration.

2. In this proceeding, Florida Power & Light Company's ("FPL") has served FEIA with its First Set of Interrogatories (Nos. 1-10).

3. In Interrogatory No. 1, FPL is requesting information regarding the compensation FEIA has agreed to pay its consultants providing expert testimony on behalf of FEIA in this proceeding. FEIA is requesting that this information be classified as confidential and protected by a temporary protective order because it contains confidential proprietary business information relating to consultant fees. The disclosure of this information to the public would adversely impact the competitive business interests of FEIA and its consultants.

4. Specifically, the consultants FEIA engages, which are necessary for FEIA to accomplish its mission of ensuring the data center industry has access to fair, just, reasonable and non-discriminatory electricity rates, operate in highly competitive industries and markets. If information regarding the compensation terms negotiated between FEIA and its consultants was made publicly available, FEIA's competitive interest in obtaining highly-qualified consultants at

the best possible rate for FEIA's members would be substantially harmed. The competitive interest of FEIA's consultants would also be substantially harmed because other consultants could use the information to undercut the consultants in competing for engagements.

5. Because of the information's sensitivity for both FEIA and its consultants, FEIA entered into nondisclosure agreements with the consultants, which require information relating to compensation terms, among other information shared between FEIA and the consultants, to be kept strictly confidential. FEIA is under an obligation not to share such information with third parties. At no time since receiving such information has FEIA publicly disclosed the information. Instead, FEIA has treated and continues to treat the information at issue strictly confidential.

6. In Interrogatory No. 7, FPL is requesting the FPL customer specific account number for each FEIA member who receives electric service from FPL. FEIA is requesting that this information be classified as confidential and protected by a temporary protective order because it contains confidential proprietary business information of FEIA's members. The disclosure of this information to the public would adversely impact the competitive business interests of FEIA's members.

7. Specifically, if FEIA members' account numbers were made public, their competitors could use the account numbers to access information disclosing the members' electric consumption and consumption patterns, thus enabling the competitor to profile the production or operation of the members' business. This would result in substantial harm to the competitive business interests of FEIA's members.

8. Because of the information's sensitivity for FEIA's members, FEIA keeps the information strictly confidential and has an obligation to its members not to share such sensitive information with third parties. At no time since receiving such information has FEIA publicly

disclosed the information. Instead, FEIA has treated and continues to treat the information at issue strictly confidential.

Under penalties of perjury, I declare that I have read the foregoing Declaration and that the facts stated in it are true.

Robert Provine

ROBERT PROVINE

Date: 06/18/2025