



David M. Lee
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Florida Power & Light Company
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August 29, 2025

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

REDACTED

2025 AUG 29 PM 1:40
CLERK

Re: Docket No. 20250001-EI

Dear Mr. Teitzman:

I enclose for filing in the above docket Florida Power & Light Company's ("FPL") Request for Confidential Classification of Materials Provided Pursuant to Audit Control No. 2025-003-1-2. The request includes Exhibits A, B (two copies), C and D.

Exhibit A consists of the confidential documents, and all the information that FPL asserts is entitled to confidential treatment has been highlighted. Exhibit B is an edited version of Exhibit A, in which the information FPL asserts is confidential has been redacted. 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.

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

COM _____
AFD 1 redacted
APA _____
ECO _____
ENG _____
GCL _____
IDM _____
CLK _____

Sincerely,

s/ David M. Lee
David M. Lee

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

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Fuel and purchase power cost recovery
clause with generating performance incentive
factor

Docket No. 20250001-EI

Date: August 29, 2025

**FLORIDA POWER & LIGHT COMPANY'S
REQUEST FOR CONFIDENTIAL CLASSIFICATION OF
MATERIALS PROVIDED PURSUANT TO AUDIT CONTROL NO. 2025-003-1-2**

Pursuant to Section 366.093, Florida Statutes and Rule 25-22.006, Florida Administrative Code, Florida Power & Light Company ("FPL") requests confidential classification of certain material provided to the Staff of the Florida Public Service Commission ("Staff") pursuant to Audit Control No. 2025-003-1-2 ("the Audit"). In support of this request, FPL states as follows:

1. During the Audit, FPL provided Staff with various confidential documents. By letter dated August 11, 2025 Staff indicated its intent to retain certain audit work papers. Pursuant to Rule 25-22.006(3)(a), FPL was given 21 days from the date of the letter to file a formal request for confidential classification with respect to the work papers. Accordingly, FPL files this Request for Confidential Classification to maintain continued confidential handling of the confidential work papers.

2. The following exhibits are included with and made a part of this request:

a. Exhibit A consists of a copy the documents which FPL claims to be confidential, on which all information that is entitled to confidential treatment under Florida law has been highlighted.

b. Exhibit B consists of a copy of the confidential documents, on which all the information that is entitled to confidential treatment under Florida law has been redacted.

c. Exhibit C is a table containing an identification of the information highlighted in Exhibit A by page and line. Exhibit C also references the specific statutory bases

for the claim of confidentiality and identifies the declarant who supports the requested classification.

d. Exhibit D is the declaration Michael Cashman in support of this Request.

3. FPL submits that the highlighted information in Exhibit A is proprietary confidential business information within the meaning of Section 366.093(3), Florida Statutes. This information is intended to be and is treated by FPL as private, and its confidentiality has been maintained. Pursuant to Section 366.093, 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.

4. As described more fully in the declaration included as Exhibit D, the highlighted portions of the documents in Exhibit A contain information concerning bids or other contractual data and relating to competitive interests. Specifically, the confidential documents include information related to the purchase or sale of energy and capacity-related goods or services. The disclosure of this information would impair the efforts of FPL to contract for goods or services on favorable terms for the benefit of FPL and its customers, and it would impair the competitive interests of FPL and its vendors. Certain information in these documents and materials would also place FPL at a disadvantage when coupled with other information that is publicly available. This information is protected by Sections 366.093(3)(d) and (e), Fla. Stat.

5. Upon a finding by the Commission that the Confidential Information remains proprietary and confidential business information, the information should not be declassified for

at least an additional 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* § 366.093(4), Fla. Stat.

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,

Maria Jose Moncada
Assistant General Counsel
David M. Lee
Senior Attorney
Florida Power & Light Company
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Telephone: (561) 691-7263
Facsimile: (561) 691-7135
maria.moncada@fpl.com
david.lee@fpl.com

By: s/ David M. Lee
David M. Lee
Florida Bar No. 103152

CERTIFICATE OF SERVICE

Docket No. 20250001-EI

I HEREBY CERTIFY that a true and correct copy of the foregoing* has been furnished by electronic mail on this 29th day of August 2025 to the following:

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**Attorneys for Florida Industrial Power
Users Group**

By: s/ David M. Lee
David M. Lee
Florida Bar No. 103152

* The exhibits to this Request are not included with the service copies, but copies of Exhibits B, C and D are available upon request.

Docket No. 20250001-EI

EXHIBIT “B”

**FPL’s MATERIALS PROVIDED PURSUANT
TO AUDIT NO. 2025-003-1-2**

Florida Power and Light Company
Capacity Coal Recovery Clause
Twelve Months Period Ended December 31, 2024
DocId: No. 20250001-EL ACN 2025-003-1-2
Description: Capital Investment

[illegible]

PBC

Source: DR No. 8

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A

Florida Power and Light Company
Capacity Cost Recovery Clause
Twelve Month Period Ended December 31, 2024
Docket No. 24250001-EL, ACN 2025-063-1-2

Description: Capital Investment

Tagline	Tagline	Base Case Revisions	Description: Capital Investment					
On June	12/31/2024	FOR FORDS WECO-CTY 5000 REFL						
Cost Element	5750000	On June	On June					
Posting Date	03/01/2024	On June	On June					
For	Cost El.	Cost element descr.	Name	Name of Offsetting Account	Ref/Chg	Vol/COA/Chg	Doc. Date	Posting Date
3	5750000	OUTSIDE SERVICES: Security			22800010	239,088.35	03/01/2024	03/01/2024
3		OUTSIDE SERVICES: Security			22800010	99,822.14	03/01/2024	03/01/2024
3		OUTSIDE SERVICES: Security	2006531580	OUTSIDE SERVICES: Security	13219.8728	299,810.70	03/01/2024	03/01/2024
3	5750000					0.00		
3	5750000	Supp Supp & Eng On-Capital				2,739.42	03/01/2024	03/01/2024
3		Supp Supp & Eng On-Capital				1,308.14	03/01/2024	03/01/2024
3		Supp Supp & Eng On-Capital				561.36	03/01/2024	03/01/2024
3		Supp Supp & Eng On-Capital			23000000	2,208.34	03/01/2024	03/01/2024
3		Supp Supp & Eng On-Capital			23000000	561.36	03/01/2024	03/01/2024
3		Supp Supp & Eng On-Capital			23000000	1,756.42	03/01/2024	03/01/2024
3	5750000					0.00		
3	5750000	ALG Overhead				1,725.76	03/01/2024	03/01/2024
3		ALG Overhead				1,880.41	03/01/2024	03/01/2024
3		ALG Overhead				348.15	03/01/2024	03/01/2024
3		ALG Overhead			23000000	1,388.51	03/01/2024	03/01/2024
3		ALG Overhead			23000000	348.15	03/01/2024	03/01/2024
3		ALG Overhead			23000000	1,725.76	03/01/2024	03/01/2024
3	5750000					0.00		

299,810.70
2,756.42
1,725.76
304,092.88

16-3.4
PBC

Source: DR No. 8

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A B C D E F G H I J K L M N O P

Florida Power & Light Company
Capacity Cost Recovery Clause
Twelve Month Period Ended December 31, 2024
Docket No.: 2022-0001-EI: ACN. 2025-001-2
Description: Transmission Revenue

Parting Statement 802757
 Name: **Paul Coughland**
 Last Name: **Paul Coughland**
 Company: **Coughland Associates**
 Title: **President**
 Address: **10000 1st Ave. N. #200**
 City: **Minneapolis**
 State: **MN**
 Zip: **55412**
 Phone: **612/560-4490**
 Fax: **612/560-4490**
 Email: **pcough@comcast.net**
 Website: **www.coughland.com**
 Notes: **Paul Coughland is the President of Coughland Associates, a company that provides construction management services to the construction industry. He has been in the industry for over 20 years and has a wealth of experience in construction management. He is currently working on several large projects in the Minneapolis area.**

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[illegible]

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Source: DR No. 13

PBC

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Source: DR No. 13

Florida Power & Light Company
Capacity Cost Recovery Clause
Twelve Month Period Ended December 31, 2024
Docket No.: 20250001-EL; ACN: 2025-003-1-2
Description: Purchased Power

HEE Billing Data (A)

Particulars	Capacity Cost Recovery Clause	Serial Key	GL Account	Rate	Reporting Period	2024-12-31	2024-12-31
FPL PPA Activity	Gold Swamp Authority of Palm Beach County	123120-01	0044000	101.00000000000000	Gold Swamp Authority - PPA Capacity		
FPL PPA Purchased	Southwest Company Services, Inc.	3742419-01	0044000	101.00000000000000	FPL PPA Capacity Option		
Overhead Expense							

116-1

Ledger: OL (Leading Ledger) Company Code: 1300 (FLORIDA) GL Account: 5014000 (Pur P... M) Status: AS Items Posting Date: Date Range (02/01/2024...)

Line Items (10) MP PPL Display

Status	Assignment Reference	Journal Entry	Journal	Posting Date	Posting Key	Amount in Company Code	Tax Code	Closing Jt
	Company Code: 1300 - FLORIDA POWER & LIGHT CO							
	GA Account: 5014000 - PUR PPL: Capacity Charge-Pool							
	WBS Element: ML0000010101200					186,205.00	USD	
	WBS Element: ML0000010101201					548,582.78	USD	
	WBS Element: ML0000010101202						USD	
	WBS Element: ML0000010101203						USD	

Standard

Ledger: OL (Leading Ledger) Company Code: 1300 (FLORIDA) GL Account: 5014000 (Pur P... M) Status: AS Items Posting Date: Date Range (02/01/2024...)

Line Items (120) FPLA Schedules

Status	Assignment Reference	Journal Entry	Journal Entry T...	Posting Date	Posting Key	Amount in Company Code	Tax Code	Closing Journal Entry	Profit Center	Segment	Journal Entry Ref Text	Number of Items
	Company Code: 1300 - FLORIDA POWER & LIGHT CO											
	GA Account: 5014000 - PUR PPL: Capacity Charge-Pool											
	WBS Element: ML0000010101200					1,862,050.00	USD					20
	WBS Element: ML0000010101201					2,954,393.38	USD					32
	WBS Element: ML0000010101202						USD					15
	WBS Element: ML0000010101203						USD					7
	WBS Element: ML0000010101204						USD					64
	WBS Element: ML0000010101205						USD					128
	WBS Element: ML0000010101206						USD					128

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Florida Power & Light Company
Capacity Cost Recovery Clause
Twelve Month Period Ended December 31, 2024
Docket No.: 20250001-EI; ACN. 2025-003-1-2
Description: Purchased Power

A

Florida Power & Light Company
Billing Statement
For Purchased Power From
Solid Waste Authority of Palm Beach County
For Transaction Period:
February 1, 2024 through February 29, 2024

QF ID	GENERATION		COST	AMOUNT
6825 Feb 2024	29,167.030 MWH	ENERGY PAYMENT	46-1.2	\$347,164.78 (A) (46)
1		CUSTOMER CHARGE		
2		Monthly Capacity Payment	46-	46.2
3		Amount Previously Billed		
	Total Due			

Execution Date/Time : 03/07/24 at 15:46:22
Invoice ID: 853819

Source: 1 DB NO. 13

PBC

46-1.1

Qualifying Facility Monthly Billing Statement

A

QF ID: 6825

Facility Name: SOLID WASTE AUTHORITY PALM BEACH

Region: Southeast

Billing Month: February, 2024

Number of Hours in Month: 46-1.3 696

Number of Peak Hours in Month: 1 168

Committed Capacity: 40 MW

Excess Energy, All Hours: 4,211.931 MWH

Excess Energy, All Peak Hours: 967.311 MWH

Energy Received, All Hours: 29,157.030
MWH

Energy Received, All Peak Hours: 6,859.167
MWH

Maximum Hourly Energy: 52.143 MWH at 02/09/24: 14

1 Monthly Capacity Factor: [REDACTED] %

2 Monthly Peak Capacity Factor: 46-1.3 [REDACTED] %

3 Annual Capacity Factor: [REDACTED] %

4 Annual Peak Capacity Factor: 46-1.3 [REDACTED] %

5 Applicable Capacity Factor: [REDACTED] %

Monthly Energy Payment: \$347,164.78

(As ('91) Total
Available)

46-1.1 + = 46-1.4 \$347,164.78

6 Monthly Capacity Payment: [REDACTED] 46-1.1

Execution Date/Time: 03/07/24 at 15:46:22

Inv [REDACTED]
Source: DR NO 13

PBC

46-1.2

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Florida Power & Light Company
Capacity Cost Recovery Clause
Twelve Month Period Ended December 31, 2024
Docket No.: 20250001-EI; ACN. 2025-003-1-2
Description: Purchased Power

A B C D E F G

Qualifying Facility Capacity Factor

Facility Name: SOLID WASTE AUTHORITY PALM BEACH
Region: Southeast

All Periods

On Peak Periods

Year/ Month	# of Hours	Total MWH	Monthly CP,FAC	Yearly CP,FAC	# of Hours	Total MWH	Monthly CP,FAC	Yearly CP,FAC
2023-03	743							
2023-04	720							
2023-05	744							
2023-06	720							
2023-07	744							
2023-08	744							
2023-09	720							
2023-10	744							
2023-11	721							
2023-12	744							
2024-01	744							
2024-02	696							
Total	9,456							

46-1.2

Source: 1 DR NO. 43

PBC

46-1.3

A
B C
Daily Energy Payment Summary

QF ID: 6825

Facility Name: SOLID WASTE AUTHORITY PALM BEACH

Report Month: February, 2024

	Date	Energy (MWH)	Payment
1	* 02/01/24		
2	02/02/24		
3	02/03/24		
4	02/04/24		
5	02/05/24		
6	02/06/24		
7	02/07/24		
8	02/08/24		
9	* 02/09/24		
10	02/10/24		
11	02/11/24		
12	02/12/24		
13	* 02/13/24		
14	02/14/24		
15	02/15/24		
16	02/16/24		
17	02/17/24		
18	02/18/24		
19	* 02/19/24		
20	02/20/24		
21	02/21/24		
22	02/22/24		
23	02/23/24		
24	* 02/24/24		
25	02/25/24		
26	02/26/24		
27	02/27/24		
28	02/28/24		
29	02/29/24		
30	Monthly total		

* Traced to Qualifying
Facility Energy Payment
Calculation

HQ-1.2

31
32

Execution Date/Time: 03/07/24 at 15:46:22

Invoice ID: 853819

Source: DR No. 13

PBC

HQ-1.4

7/25
NCH

9.1.9

1

42

Integrated Ring Circuit

Case 11-12007 Document 1-1 Filed 07/25/12 Page 10 of 10

Plan

Release Date: 03/05/2006 Tue

Learning Objectives

Date: 02/20/2004
 Time: 10:00 AM
 Location: 10000
 Name: 10000

Deputy Director

and

3

Source: DR No. 13

Docket No. 20250001-EI

EXHIBIT “C”

**FPL’s MATERIALS PROVIDED PURSUANT
TO AUDIT NO. 2025-003-1-2**

EXHIBIT C

COMPANY: Florida Power & Light Company
TITLE: List of Confidential Workpapers
AUDIT: FPL, Capacity Audit
AUDIT CONTROL NO: 2025-003-1-2
DOCKET NO: 20250001-EI
DATE: August 29, 2025

Workpaper No.	Description	No. of Pages	Conf Y/N	Column No./Line No.	Florida Statute 366.093 (3) Subsection	Declarant
16-1.2	Capital Investments	1	Y	Column A, Rows 1-3 as marked	(d), (e)	Michael Cashman
16-3.5	Capital Investments	1	Y	Column A Row 1 as marked	(d), (e)	Michael Cashman
45.1	Transmission Revenues	1	Y	Columns B-D, Row 1; Columns A-P Rows 2-5 as marked	(d), (e)	Michael Cashman
46.2	Purchased Power	1	Y	Column A, Rows 6-12; Columns B-C Rows 1-5 as marked	(d), (e)	Michael Cashman
46-1.1	Purchased Power	1	Y	Column A Rows 1-3 as marked	(d), (e)	Michael Cashman
46-1.2	Purchased Power	1	Y	Column A Rows 1-6 as marked	(d), (e)	Michael Cashman
46.1.3	Purchased Power	1	Y	Columns A-G Rows 1-13 as marked	(d), (e)	Michael Cashman
46-1.4	Purchased Power	1	Y	Column A, Rows 31-32; Columns B-C Rows 1-30 as marked	(d), (e)	Michael Cashman
46-1.5	Purchased Power	1	Y	Columns O-Q, Row 1; Columns A-B, Row 2; Columns A-Q Row 3 as marked	(d), (e)	Michael Cashman

Docket No. 20250001-EI

EXHIBIT “D”

**FPL’s MATERIALS PROVIDED PURSUANT
TO AUDIT NO. 2023-003-1-2**

EXHIBIT D

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Fuel and Purchase Power Cost Recovery
Clause with Generating Performance Incentive
Factor

Docket No. 20250001-EI


DECLARATION OF MICHAEL V. CASHMAN

1. My name is Michael V. Cashman. I am currently employed by Florida Power & Light Company ("FPL") as Executive Director, Wholesale Operations and Trading. I have personal knowledge of the matters stated in this declaration.

2. I have reviewed Exhibit C, and the documents that are included in Exhibit A to FPL's Request for Confidential Classification of Information Obtained in Connection with Audit No. 2025-003-1-2 for which I am designated as the declarant. The documents or materials that I have reviewed and which are asserted by FPL to be proprietary confidential business information, contain or constitute data such as pricing and other terms, payment records, and vendor and supplier rates. Specifically, the documents include information related to the purchase or sale of energy and capacity, natural gas, and natural gas storage. The disclosure of this information would impair the efforts of FPL to contract for energy and capacity-related goods or services on favorable terms for the benefit of its customers and would impair the competitive interests of FPL and its vendors. Certain information in these documents and materials would also place FPL at a disadvantage when coupled with other information that is publicly available. 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 least 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 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.


Michael V. Cashman

Date: 8/28/2025