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August 29, 2025

VIA HAND DELIVERY

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

REDACTED

Docket No. 20250011-EI Re:

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 Sixteenth Request for Production of Documents (Nos. 142, 146 and 148). 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. Certain materials in Exhibit A are being provided in electronic format. 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 declarations 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 1 Exh "B" and 1 reducted USB	Sincerely,
APA I reducted USD	s/ Maria Jose Moncada
ECO	Maria Jose Moncada
ENGEnclosure	Fla. Bar No. 0773301
GCL	
IDMcc: Counsel for Parties of Record (w/	copy of FPL's Request for Confidential Classification)
CLK	

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Petition by Florida Power & Light

Company for Base Rate Increase

Docket No. 20250011-EI

Date: August 29, 2025

FLORIDA POWER & LIGHT COMPANY'S REQUEST FOR CONFIDENTIAL CLASSIFICATION OF INFORMATION PROVIDED IN ITS RESPONSES TO FLORIDA RISING, LEAGUE OF UNITED LATIN AMERICAN CITIZENS AND ENVIRONMENTAL CONFEDERATION OF SOUTHWEST FLORIDA'S SIXTEENTH REQUEST FOR PRODUCTION OF DOCUMENTS (Nos. 142, 146 AND 148)

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") Sixteenth Request for Production of Documents (Nos. 142, 146 and 148) ("Confidential Information"). In support of its request, FPL states as follows:

- 1. FPL served its responses to FL Rising's Fourteenth Request for Production of Documents (Nos. 142-148) on August 29, 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, upon which the confidential information has been highlighted. Certain materials in Exhibit A are being provided in electronic format.
 - 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.

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For the documents that are confidential in their entirety, FPL has included only identifying cover pages in Exhibit B.

- 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 declarants who supports the requested classification.
- d. Exhibit D consists of the declarations of Tiffany Cohen 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 declarations included in Exhibit D, some of 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. Specifically, the information contains an agreement for the purchase and sale of real property. In addition, some of the Confidential Information consists of proprietary confidential business information relating to competitive interests, the disclosure of which impair the competitive business FPL. Specifically, the information relates to FPL's capital budget projections, business strategy for marketing and development, and financial decision making models. 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 29th day of August, 2025,

By: <u>s/Maria Jose Moncada</u>

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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 29th day of August, 2025:

Shaw Stiller Timothy Sparks

Florida Public Service Commission

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Inc., Circle K Stores, Inc., RaceTrac, Inc.
and Wawa, Inc.

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		

The document responsive to FEL's Sixteenth Request for Production of Documents No. 146, Bates Nos. 058694-058697 is confidential in its entirety.

The document responsive to FEL's Sixteenth Request for Production of Documents No. 148, Bates Nos. 058634-058693 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:

August 29, 2025

Int/POD No.	Begin Bates Number	End Bates Number	Description	No. of Pages	Confid- ential	Line/Col	F.S. 366.093(3) Subsection	Declarant
FEL 16 th POD, No. 142	058700	058700	FPL EDM Large Load, "Summary" tab	1	Y	Line 32,34; Cols. G- AF	(e)	Tiffany Cohen
FEL 16 th POD, No. 142	058701	058701	FPL EDM Large Load, "Ramps" tab	1	Y	Lines 44, 47, 50-56; Cols. I- AH	(e)	Tiffany Cohen
FEL 16 th POD, No. 142	058702	058702	FPL EDM Large Load, "Input" tab	1	Y	Lines 14-26; Cols. P, V-Z	(e)	Tiffany Cohen
FEL 16 th POD, No. 142	058703	058703	FPL EDM Large Load, "RevReq" tab	1	Y	Cols. L- AQ, as marked	(e)	Tiffany Cohen
FEL 16 th POD, No. 146	058694	058697	Data Center Update Presentation	4	Y	All	(e)	Tiffany Cohen
FEL 16 th POD, No. 148	058634	058693	Purchase and Sale Agreement	60	Y	All	(d)	Timothy Oliver

EXHIBIT D DECLARATION(S)

EfXHIBIT D

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

Petition by Florida Power & Light Company for Base Rate Increase

DECLARATION OF TIFFANY COHEN

- 1. My name is Tiffany Cohen. I am currently employed by Florida Power & Light Company ("FPL") as Vice President, Financial Planning and Rate Strategy. 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 Sixteenth Request for Production of Documents, Nos. 142 and 146. 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 of FPL. Specifically, the information relates to FPL's capital budget projections, business strategy for marketing and development, and financial decision making models. 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.

Tiffany Cohen		
	Tiffany Cohen	
Datas	08/282025	

Docket No: 20250011-EI

EXHIBIT D

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Petition by Florida Power & Light Company Docket No: 20250011-EI for Base Rate Increase

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 Florida Rising, League of United Latin American Citizens and Environmental Confederation of Southwest Florida's Sixteenth Request for Production of Documents, No.148. 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. Specifically, the information contains an agreement for the purchase and sale of real property. 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.

Date:

8/29/25

Tith Ohi	
Timothy Oliver	