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September 2, 2025

#### VIA HAND DELIVERY

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

REDACTED

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25 CSF -2 PM 2: 22

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 Certain Information included in FPL's Revised 2026 Risk Management Plan, which is being filed contemporaneously with this request in Docket 20250001-EI. The request includes Exhibits A, B (two copies), C and D.

Exhibit A consists of the confidential documents, wherein 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. For those documents that are confidential in their entirety, FPL has only included insert pages. 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	- 1		Sincerely,
AFD	124		
APA		edactro	s/ David M. Lee
ECO	Enclos	sure	David M. Lee
<b>ENG</b>			
GCL	cc:	Counsel for Parties of Record (w/ copy of F)	PL's Request for Confidential Classification)
IDM	Florida P	ower & Light Company	
CLK	700 Univ	verse Boulevard, Juno Beach, FL 33408	

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: September 2, 2025

FLORIDA POWER & LIGHT COMPANY'S REQUEST FOR CONFIDENTIAL CLASSIFICATION OF MATERIALS PROVIDED IN ITS REVISED 2026 RISK MANAGEMENT PLAN

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

materials provided in its Revised 2026 Risk Management Plan (the "Confidential Information"),

which is being filed contemporaneously with this request. In support of its Request, FPL states as

follows:

1. On July 25, 2025, FPL filed its 2026 Risk Management Plan as part of FPL's 2025

Actual/Estimated True-up Petition and a request for Confidential Classification for the confidential

portions of 2026 Risk Management Plan. FPL is filing its Revised 2026 Risk Management Plan

contemporaneously with this request. Portions of the Attachments 1 and 2 to the Revised 2026

Risk Management Plan contain confidential information.

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

a. Exhibit A is a copy of the documents on which all of the Confidential

Information has been highlighted.

b. Exhibit B consists of two copies of the documents in Exhibit A on which

all the Confidential Information has been redacted. For the documents in Exhibit A that are

confidential in their entirety, FPL is including only identifying cover pages in Exhibit B.

c. Exhibit C is a table that identifies the specific page and line references for

the information for which confidential treatment is sought, provides a brief description of the

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Confidential Information, references the specific statutory bases for the claim of confidentiality, and lists the declarant who supports the requested classification.

- d. Exhibit D is the declaration of Michael V. 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 determined 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 and described in Exhibit C, the Confidential Information contains or constitutes data pertinent to FPL's procurement activities. Additionally, the confidential information contained in the 2026 Risk Management Plan relates to competitive interests and internal policy and procedures of FPL, the disclosure of which would impair its competitive business as well as the efforts of FPL to contract for goods and services on favorable terms, also to the detriment of FPL and its customers. 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
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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 <u>2nd</u> day of September 2025 to the following:

Florida

Ryan Sandy

Office of General Counsel

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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 C and D are available upon request.

## **Docket No. 20250001-EI**

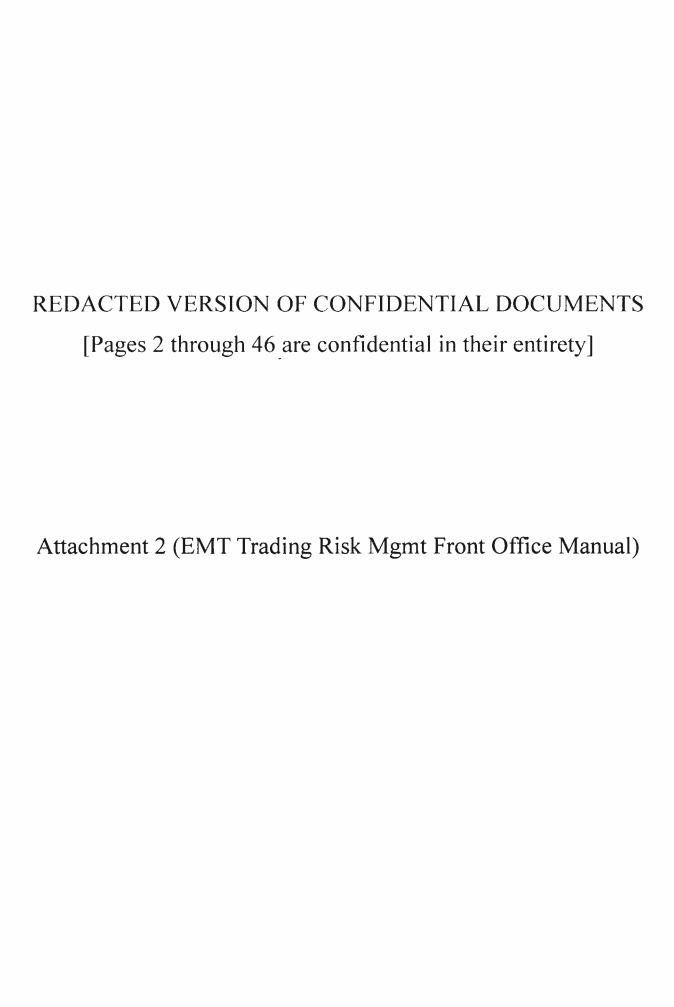
## **EXHIBIT "B"**

### **REDACTED**

## FPL's REVISED RISK MANAGEMENT PLAN ATTACHMENT NOS. 1 AND 2

# REDACTED VERSION OF CONFIDENTIAL DOCUMENTS [Pages 2 through 26 are confidential in their entirety]

Attachment 1 (NextEra Energy, Inc., Risk and Credit Exposure Management Policy)



## **Docket No. 20250001-EI**

## **EXHIBIT "C"**

## FPL's REVISED RISK MANAGEMENT PLAN ATTACHMENT NOS. 1 AND 2

### **EXHIBIT C**

COMPANY:

Florida Power & Light Company List of Confidential Exhibits Fuel and Purchased Power Cost Recovery Clause with Generating

TITLE:

DOCKET TITLE:

**Performance Incentive Factor** 

DOCKET NO:

20250001-EI

DATE:

September 2, 2025

Description	Page Nos.	Column No./Line No.	Florida Statute 366.093 (3) Subsection	Declarant
Attachment 1 (NEE Risk and Credit Exposure Management Policy – March 13, 2023)	2 through 26	ALL	(d), (e)	Michael V. Cashman
Attachment 2 (EMT Trading Risk Mgmt Front Office Manual - May 2025)	2 through 46	ALL	(d), (e)	Michael V. Cashman

## **Docket No. 20250001-EI**

### **EXHIBIT "D"**

## FPL's REVISED RISK MANAGEMENT PLAN ATTACHMENT NOS. 1 AND 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 of Wholesale Operations in the Energy, Marketing and Trading Division. 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 Materials Provided in Its Revised 2026 Risk Management Plan. The documents or materials that I have reviewed, and which are asserted by FPL to be proprietary confidential business information, contain or constitute data pertinent to FPL's procurement activities. Additionally, the confidential information relates to competitive interests and internal policy and procedures of FPL, the disclosure of which would impair its competitive business as well as the efforts of FPL to contract for goods and services on favorable terms, also to the detriment of FPL and its customers. To the best of my knowledge, FPL has maintained the confidentiality of this information.
- 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: