

Maria Jose Moncada Assistant General Counsel Florida Power & Light Company 700 Universe Boulevard Juno Beach, FL 33408-0420 (561) 304-5795 (561) 691-7135 (Facsimile) Email: maria.moncada@fpl.com

September 5, 2025

#### VIA HAND DELIVERY

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



CLERK

2025 SEP -5. PH 3: 55

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 response to the Staff of the Florida Public Service Commission's Twenty-Sixth Set of Interrogatories (No. 557). The request includes Exhibits A, B (two copies), C and D.

Exhibit A consists of documents containing confidential information. The documents are confidential in their entirety and are being provided in electronic format on a portable storage device, marked "EXHIBIT A" – CONFIDENTIAL. Exhibit B is an edited version of Exhibit A, in which the information FPL asserts is confidential has been redacted. As the documents in Exhibit A is 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.

AFD 1 Exh "B"	Sincerely,
APA	s/ Maria Jose Moncada
ECO	Maria Jose Moncada
Enclosure	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: September 5, 2025

FLORIDA POWER & LIGHT COMPANY'S REQUEST FOR CONFIDENTIAL CLASSIFICATION OF INFORMATION PROVIDED IN ITS RESPONSE TO THE STAFF OF THE FLORIDA PUBLIC SERVICE COMMISSION'S

TWENTY-SIXTH SET OF INTERROGATORIES (No. 557)

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 the Staff of the Florida Public

Service Commission's ("Staff") Twenty-Sixth Set of Interrogatories (No. 557) ("Confidential

Information"). In support of its request, FPL states as follows:

1. FPL served its responses to Staff's Twenty-Sixth Set of Interrogatories (Nos. 548-

563) on September 5, 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. The materials in Exhibit A are being

provided in electronic format as they are confidential in their entirety.

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.

As the documents in Exhibit A are confidential in their entirety, FPL has included only

identifying cover page in Exhibit B.

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- 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 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 declaration included in Exhibit D, the of the Confidential Information contains information relating to competitive interests, the disclosure of which would impair the competitive business of FPL to the detriment of FPL and its customers. Specifically, the information contains proprietary financial decision making models prepared by FPL. This information is protected by Section 366.093(3)(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 5th day of September, 2025,

By: s/Maria Jose Moncada

John T. Burnett Vice President and General Counsel Florida Bar No. 173304 john.t.burnett@fpl.com Maria Jose Moncada Assistant General Counsel Florida Bar No. 0773301 maria.moncada@fpl.com Christopher T. Wright Managing Attorney Fla. Auth. House Counsel No. 1007055 chrisopher.wright@fpl.com William P. Cox Senior Counsel Florida Bar No. 0093531 will.p.cox@fpl.com Joel T. Baker Senior Attorney Florida Bar No. 0108202 joel.baker@fpl.com Florida Power & Light Company 700 Universe Boulevard Juno Beach, FL 33408-0420

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 5th day of September, 2025:

Shaw Stiller Timothy Sparks Florida Public Service Commission Office of the General Counsel 2540 Shumard Oak Boulevard Tallahassee, Florida 32399-0850 sstiller@psc.state.fl.us

tsparks@psc.state.fl.us

discovery-gcl@psc.state.fl.us

Leslie R. Newton Ashley N. George Thomas Jernigan Michael A. Rivera James B. Ely Ebony M. Payton 139 Barnes Drive, Suite 1 Tyndall AFB FL 32403 leslie.newton.1@us.af.mil ashley.george.4@us.af.mil thomas.jernigan.3@us.af.mil michael.rivera.51@us.af.mil

james.ely@us.af.mil

ebony.payton.ctr@us.af.mil

**Federal Executive Agencies** 

William C. Garner 3425 Bannerman Road Tallahassee FL 32312 bgarner@wcglawoffice.com

Southern Alliance for Clean Energy

Jon C. Moyle, Jr. Karen A. Putnal c/o Moyle Law Firm 118 North Gadsden Street Tallahassee FL 32301 imoyle@moylelaw.com mqualls@moylelaw.com kputnal@moylelaw.com

Florida Industrial Power Users Group

Walt Trierweiler Mary A. Wessling Office of Public Counsel c/o The Florida Legislature 111 W. Madison St., Rm 812 Tallahassee, Florida 32399-1400 trierweiler.walt@leg.state.fl.us Wessling.Mary@leg.state.fl.us **Attorneys for the Citizens** of the State of Florida

**Bradley Marshall** Jordan Luebkemann 111 S. Martin Luther King Jr. Blvd. Tallahassee FL 32301 bmarshall@earthjustice.org jluebkemann@earthjustice.org flcaseupdates@earthjustice.org Florida Rising, Inc., Environmental Confederation of Southwest Florida, Inc., League of United Latin American Citizens of Florida

Danielle McManamon 4500 Biscayne Blvd. Suite 201 Miami, Florida 33137 dmcmanamon@earthjustice.org League of United Latin American Citizens of Florida

D. Bruce May Kevin W. Cox Kathryn Isted Holland & Knight LLP 315 South Calhoun St, Suite 600 Tallahassee, Florida 32301 bruce.may@hklaw.com kevin.cox@hklaw.com kathryn.isted@hklaw.com Florida Energy for Innovation Association

Nikhil Vijaykar Yonatan Moskowitz Keyes & Fox LLP 580 California Street, 12th Floor San Francisco, CA 94104 nvijaykar@keyesfox.com ymoskowitz@keyesfox.com EVgo Services, LLC

Katelyn Lee, Senior Associate Lindsey Stegall, Senior Manager 1661 E. Franklin Ave. El Segundo, CA 90245 Katelyn.Lee@evgo.com Lindsey.Stegall@evgo.com

Stephen Bright
Jigar J. Shah
1950 Opportunity Way, Suite 1500
Reston, Virginia 20190
steve.bright@electrifyamerica.com
jigar.shah@electrifyamerica.com

**Electrify America, LLC** 

EVgo Services, LLC

Robert E. Montejo Duane Morris LLP 201 S. Biscayne Blvd., Suite 3400 Miami, Florida 33131-4325 REMontejo@duanemorris.com Electrify America, LLC

Robert Scheffel Wright
John T. LaVia, III
Gardner, Bist, Bowden, Dee, LaVia, Wright,
Perry & Harper, P.A.
1300 Thomaswood Drive
Tallahassee, Florida 32308
schef@gbwlegal.com
jlavia@gbwlegal.com
Floridians Against Increased Rates, Inc.

Stephanie U. Eaton Spilman Thomas & Battle, PLLC 110 Oakwood Drive, Suite 500 Winston-Salem, NC 27103 seaton@spilmanlaw.com Walmart, Inc.

Steven W. Lee Spilman Thomas & Battle, PLLC 1100 Bent Creek Boulevard, Suite 101 Mechanicsburg, PA 17050 slee@spilmanlaw.com Walmart, Inc.

Jay Brew
Laura Wynn Baker
Joseph R. Briscar
Sarah B. Newman
1025 Thomas Jefferson Street NW
Suite 800 West
Washington, DC 20007
jbrew@smxblaw.com
lwb@smxblaw.com
jrb@smxblaw.com
sbn@smxblaw.com
Florida Retail Federation

Robert E. Montejo Duane Morris, LLP 201 S. Biscayne Blvd., Suite 3400 Miami, FL 33131-4325 remontejo@duanemorris.com Armstrong World Industries, Inc.

Alexander W. Judd Duane Morris, LLP 100 Pearl Street, 13th Floor Hartford, CT 06103 ajudd@duanemorris.com Armstrong World Industries, Inc.

Brian A. Ardire
Armstrong World Industries, Inc.
2500 Columbia Avenue
Lancaster, PA 17603
baardire@armstrongceilings.com

Floyd R. Self
Ruth Vafek
Berger Singerman, LLP
313 North Monroe Street
Suite 301
Tallahassee, Florida 32301
fself@bergersingerman.com
rvafek@bergersingerman.com
Americans for Affordable Clean Energy,
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

<u>X</u>

Public Version(s) of the Document(s) attached via USB

The documents responsive to Staff's Twenty-Sixth Set of Interrogatories No. 557, Bates Nos. 058844-058858, are confidential in their entirety.

# EXHIBIT C JUSTIFICATION TABLE

# **EXHIBIT C**

**COMPANY:** 

Florida Power & Light Company Petition by Florida Power & Light Company for Base Rate TITLE:

Increase

20250011-EI **DOCKET NO.:** 

DATE: September 5, 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
Staff 26 <sup>th</sup> INT, 557	058858	058858	Attachment No. 3 - Demand Limiter (3 Financial Models)	1	Y	All	(e)	Timothy Oliver
Staff 26 <sup>th</sup> INT, 557	058851	058857	Attachment No. 2 - RS-2EV Financial Model	7	Y	All	(e)	Timothy Oliver
Staff 26 <sup>th</sup> INT, 557	058844	058850	Attachment No. 1 - UEV Financial Model	7	Y	All	(e)	Timothy Oliver

# EXHIBIT D DECLARATION(S)

#### EXHIBIT D

#### BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

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

Docket No: 20250011-EI

## **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 Staff of the Florida Public Service Commission's Twenty-Sixth Request for Production of Documents, No.557. The documents or materials that I have reviewed and which are asserted by FPL to be proprietary confidential business information contain information relating to competitive interests, the disclosure of which would impair the competitive business of FPL to the detriment of FPL and its customers. Specifically, the information contains proprietary financial decision making models prepared 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.

Cimothy Oliver

Date: