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April 2, 2025

-VIA HAND DELIVERY -

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

REDACTED

Re: Docket No. 20250001-EI

Dear Mr. Teitzman:

Enclosed for filing on behalf of Florida Power & Light Company ("FPL") is FPL's Request for Confidential Classification of certain information provided in Exhibits (AM-2) and (MVC-1) to the prepared direct testimonies of FPL witnesses Amin Mohomed and Michael V. Cashman, respectively. The request also includes Exhibits A through D.

Exhibit A contains the confidential information that is the subject of FPL's Request for Confidential Classification. 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 FPL asserts is confidential has been redacted. Exhibit C is a justification table in support of the Request for Confidential Classification. Exhibit D contains the declaration of Michael V. Cashman in support of FPL's Request for Confidential Classification. 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 have or your Staff has any questions regarding this filing.

Sincerely,

David M. Lee
Fla. Bar No. 103152

COM

AFD

APA

ECO

ENG

GCL

IDM

CLK

Florida Power & Light Company

700 Universe 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: April 2, 2025

**FLORIDA POWER & LIGHT COMPANY'S
REQUEST FOR CONFIDENTIAL CLASSIFICATION
OF CERTAIN PORTIONS OF EXHIBITS AM-2 AND MVC-1**

Pursuant to Section 366.093, Florida Statutes ("Fla. Stat."), and Rule 25-22.006, Florida Administrative Code ("F.A.C."), Florida Power & Light Company ("FPL") requests confidential classification of certain information provided in exhibits to the prepared direct testimonies of FPL witnesses Amin Mohamed (AM-2) and Michael V. Cashman (MVC-1) (the "Confidential Information"). In support of this request, FPL states as follows:

1. On April 2, 2025, FPL submitted in this docket the prepared testimonies and exhibits of FPL witnesses Amin Mohamed and Michael V. Cashman, including Exhibits AM-2 and MVC-1 which contain the Confidential Information. This Request seeks confidential classification of the Confidential Information consistent with Rule 25-22.006, F.A.C.

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

a. Exhibit A consists of a copy of the confidential material on which all the information that FPL asserts is entitled to confidential treatment has been highlighted.

b. Exhibit B consists of a copy of the confidential material on which all information that FPL asserts is entitled to confidential treatment has been redacted. Copies of the redacted exhibits are also included in the filing versions of the prepared testimonies of FPL witnesses Mohamed and Cashman.

c. Exhibit C is a table that identifies by page, line, or column the Confidential Information, together with references to the specific statutory bases for the claim of confidentiality and identifies the declarant who supports the requested classification.

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

3. The Confidential Information is intended to be and has been treated by FPL as private, its confidentiality has been maintained, and its disclosure would cause harm to FPL and its customers. Pursuant to Section 366.093, Fla. Stat., 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 more fully described in the declaration included in Exhibit D, the documents provided by FPL contain information concerning contractual data, the disclosure of which would impair the efforts of FPL or its affiliates to contract for goods or services on favorable terms. Specifically, the documents contain information related to the pricing for short-term capacity purchases, the disclosure of which would impair FPL's ability to contract for capacity on favorable terms for the benefit of its customers. This information is protected by Sections 366.093(3)(d), Fla. Stat.

5. Additionally, the information relates to competitive interests, the disclosure of which would impair the competitive businesses of FPL or its vendors. Specifically, the documents contain financial details related to FPL's asset optimization activities for natural gas and electric transmission. This information is protected by Section 366.093(3)(e), Fla. Stat.

6. Upon a finding by the Commission that the Confidential Information highlighted in Exhibit A, and referenced in Exhibit C, is proprietary confidential business information within Section 366.093(3), Fla. Stat., such information should not be declassified for a period of at least eighteen (18) months and should be returned to FPL as soon as the information is no longer necessary for the Commission to conduct its business. *See* Section 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
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By: 

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 2nd day of April 2025 to the following:

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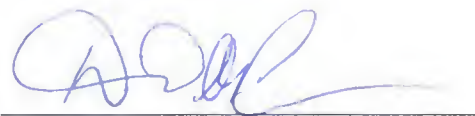
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By: _____



David M. Lee
Florida Bar No. 103152

* Copies of Exhibits C and D are available upon request.

EXHIBIT B

REDACTED

For the Period Ending December 2024

Contract	Counterparty	Identification	Contract Start Date	Contract End Date
1	Solid Waste Authority - 40 MW	Other Entity	January, 2012	March 31, 2032
2	Solid Waste Authority - 70 MW	Other Entity	July, 2015	May 31, 2034
3	Southern Company Services	Other Entity	January, 2024	February, 2024
4	Southern Company Services	Other Entity	June, 2024	April, 2025

2024 Capacity in MW

Contract	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec
1	40	40	40	40	40	40	40	40	40	40	40	40
2	70	70	70	70	70	70	70	70	70	70	70	70
3	250	250	-	-	-	-	-	-	-	-	-	-
4	-	-	-	-	-	215	215	215	215	215	230	230
Total	360	360	110	110	110	325	325	325	325	325	340	340

2024 Capacity in Dollars

	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec
Total	3 960 400	3 960 400	1 460 400	1 460 400	1 460 400	2 952 500	2 952 500	3 104 900	3 003 300	3 003 300	3 107 400	3 107 400

Year-to-date Short Term Capacity Payments	33 533 300
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(1) Total capacity costs do not include payments for the Solid Waste Authority - 70 MW unit. Capacity costs for this unit were recovered through the Energy Conservation Cost Recovery Clause in 2014, consistent with Commission Order No. PSC-11-0293-FOF-EU issued in Docket No. 110018-EU on July 6, 2011.

1

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	A	B	C	D	E	F	G	H	I	J	K	L
Contract	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec
1												
2												
3												
4												
True ups												
1												
2												

ASSET OPTIMIZATION DETAIL
Actual for the Period of January 2024 through December 2024

	(1)	(2)	(3)	(4)	(5)	(6)	(7)	(8)	(9)	(10)	(11)
		Electric Transmission Capacity Release Firm Transmission	Natural Gas Delivered City-Gate Sales	Natural Gas Production Area Sales	Natural Gas Capacity Release Firm Transport	Natural Gas Option Premiums	Natural Gas Storage Optimization	Natural Gas AMA Gains	OBA Service Gains	Solar REC Sales	Total Asset Optimization Gains
	Month	(\$)	(\$)	(\$)	(\$)	(\$)	(\$)	(\$)	(\$)	(\$)	(\$)
A	January										7,169,626
B	February										6,087,346
C	March										5,829,918
D	April										3,355,132
E	May										4,550,459
F	June										3,667,786
G	July										4,763,035
H	August										7,352,733
I	September										4,993,110
J	October										5,120,563
K	November										6,251,284
L	December										9,129,890
	Total	0	3,794,214	1,112,998	5,635,287	21,365,700	2,884,391	13,479,740	48,000	19,950,653	68,270,883

EXHIBIT C

JUSTIFICATION TABLE

EXHIBIT C

COMPANY: Florida Power & Light Company
TITLE: List of Confidential Documents
DOCKET TITLE: Fuel and Purchased Power Cost Recovery Clause with Generating Performance Incentive Factor
DOCKET NO: 20250001-EI
DATE: April 2, 2025

Exhibit No.	Description	Pages	Conf Y/N	Column No./Line No.	Florida Statute 366.093 (3) Subsection	Declarant
AM-2	Schedule A12 - Capacity Costs	1	N Y	Pg. 1-16, and 18 Pg. 17, Lines 1-6, Cols A-L	(d), (e)	Michael V. Cashman
MVC-1	Asset Optimization Detail	1	N Y	Pg. 1-2, and 4 Pg. 3, Lines A-L, Cols 2-10	(e)	Michael V. Cashman

EXHIBIT D

DECLARATIONS

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

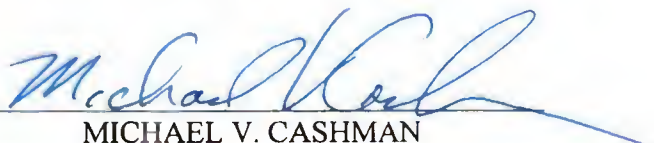
DECLARATION OF MICHAEL V. CASHMAN

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 written declaration.

2. I have reviewed the exhibits to FPL's Request for Confidential Classification of Information included in the testimony of FPL witness Amin A. Mohomed (Exhibit AM-2) and the testimony of FPL witness Michael V. Cashman (Exhibit MVC-1). The documents and materials which are asserted by FPL to be proprietary confidential business information contain or constitute contractual data, the disclosure of which would impair the efforts of FPL to contract for goods or services on favorable terms. Specifically, the documents contain information related to the pricing for short-term capacity purchases, the disclosure of which would impair FPL's ability to contract for capacity on favorable terms for the benefit of its customers. The information provided by FPL also contains information related to the competitive interests of suppliers from whom FPL purchases capacity, the disclosure of which would impair the competitive businesses of the providers of the information. Additionally, the documents contain financial details related to FPL's asset optimization activities for natural gas and electric transmission. The disclosure of this information would impair FPL's ability to execute transactions for natural gas commodity sales, natural gas storage, natural gas transportation, and electricity transmission on favorable terms for the benefit of its customers. Disclosure also would impair the competitive interests of FPL and its vendors and would place FPL at a competitive disadvantage when coupled with other information that is publicly available. 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 eighteen (18) months. In addition, the materials 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: April 2, 2025