



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

April 9, 2025

VIA HAND DELIVERY

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

REDACTED

2025 APR -9 PM 4:21
COMMISSION
CLERK

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 responses to the Office of Public Counsel's ("OPC") Fifth Set of Interrogatories (No. 118) and Fifth Request for Production of Documents (No. 58). 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 (some materials in Exhibit A are voluminous and are being provided on a CD marked confidential). 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.

Sincerely,

/s/ Maria Jose Moncada
Maria Jose Moncada
Fla. Bar No. 0773301

COM
AFD 2 redacted USBs
APA
ECO
ENG
GCL
IDM
CLK

Enclosure

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

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

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

Docket No: 20250011-EI

Date: April 9, 2025

**FLORIDA POWER & LIGHT COMPANY'S REQUEST FOR CONFIDENTIAL
CLASSIFICATION OF INFORMATION PROVIDED IN RESPONSE
TO THE OFFICE OF PUBLIC COUNSEL'S FIFTH SET OF
INTERROGATORIES (NO. 118) AND FIFTH REQUEST
FOR PRODUCTION OF DOCUMENTS (NO. 58)**

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 Office of Public Counsel's ("OPC") Fifth Set of Interrogatories (No. 118) and Fifth Request for Production of Documents (No. 58) ("Confidential Information"). In support of its request, FPL states as follows:

1. FPL served responses to OPC's Fifth Set of Interrogatories (No. 118) and Fifth Request for Production of Documents (No. 58) on April 9, 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 on which all information that FPL asserts is confidential has been highlighted. Some materials in Exhibit are voluminous, and they are being provided on a compact disk marked confidential.
- b. Exhibit B is a redacted version of the confidential documents. For documents that are confidential in their entirety, FPL has only included identifying cover pages in Exhibit B.

- c. Exhibit C is a table that identifies the information for which confidential treatment is being sought and references the specific statutory basis for the claim of confidentiality and identifies the declarants who support the requested classification.
- d. Exhibit D consists of the declarations of Timothy Oliver, Dawn Nichols, Eduardo De Varona, and Daniel DeBoer 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, the Confidential Information also contains proprietary confidential business information regarding competitive business interests of FPL. Specifically, the materials contain information related to budget projections and forecasts, transmission project planning, and financial market price projections. The disclosure of this information would impair the competitive business interests of 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 9th day of April, 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 9th day of April, 2025:

Shaw Stiller Timothy Sparks Office of General Counsel Florida Public Service Commission 2540 Shumard Oak Blvd. Tallahassee, Florida 32399-0850 sstiller@psc.state.fl.us tsparks@psc.state.fl.us discovery-gcl@psc.state.fl.us	Walt Trierweiler Mary A. Wessling Office of Public Counsel The Florida Legislature 111 W. Madison Street, Room 812 Tallahassee, Florida 32399 trierweiler.walt@leg.state.fl.us wessling.mary@leg.state.fl.us Office of Public Counsel
L. Newton/A. George/T. Jernigan/J. Ely/ M. Rivera/E. Payton 139 Barnes Drive, Suite 1 Tyndall AFB FL 32403 (850) 283-6347 Ashley.George.4@us.af.mil ebony.payton.ctr@us.af.mil Leslie.Newton.1@us.af.mil Michael.Rivera.51@us.af.mil thomas.jernigan.3@us.af.mil james.ely@us.af.mil Federal Executive Agencies	Bradley Marshall/Jordan Luebke 111 S. Martin Luther King Jr. Blvd. Tallahassee FL 32301 (850) 681-0031 (850) 681-0020 bmarshall@earthjustice.org jluebke@earthjustice.org lcaseupdates@earthjustice.org Florida Rising, Inc., Environmental Confederation of Southwest Florida, Inc., League of United Latin American Citizens of Florida
William C. Garner 3425 Bannerman Road Tallahassee FL 32312 (850) 320-1701 (850) 792-6011 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 (850) 681-3828 (850) 681-8788 jmoyle@moylelaw.com mqualls@moylelaw.com kputnal@moylelaw.com Florida Industrial Power Users Group

/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

✓

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: April 9, 2025

Int/POD No.	Begin Bates Number	End Bates Number	Description	No. of Pages	Confidential	Line/Col	F.S. 366.093(3) Subsection	Declarant
OPC 5 th INT, No. 118	032661	032689	Attachment No. 1.1	29	Y	All	(e)	Dawn Nichols
OPC 5 th INT, No. 118	032690	032696	Attachment No. 3.1 CONFIDENTIAL.xls	7	Y	All	(e)	Timothy Oliver
OPC 5 th INT, No. 118	032697	032702	Attachment No. 3.2 CONFIDENTIAL.xls	6	Y	All	(e)	Timothy Oliver
OPC 5 th INT, No. 118	032703	032709	Attachment No. 3.3 CONFIDENTIAL.xls	7	Y	All	(e)	Timothy Oliver
OPC 5 th INT, No. 118	032710	032715	Attachment No. 3.4 CONFIDENTIAL.xls	6	Y	All	(e)	Timothy Oliver
OPC 5 th INT, No. 118	032716	032719	Attachment No. 3.5 CONFIDENTIAL.xls	4	Y	All	(e)	Timothy Oliver
OPC 5 th INT, No. 118	032720	032725	Attachment No. 3.6 CONFIDENTIAL.xls	6	Y	All	(e)	Timothy Oliver
OPC 5 th INT, No. 118	032726	032730	Attachment No. 3.7 CONFIDENTIAL.xls	5	Y	All	(e)	Timothy Oliver
OPC 5 th INT, No. 118	032731	032734	Attachment No. 3.8 CONFIDENTIAL.xls	4	Y	All	(e)	Timothy Oliver
OPC 5 th INT, No. 118	032735	032739	Attachment No. 3.9 CONFIDENTIAL.xls	5	Y	All	(e)	Timothy Oliver

Int/POD No.	Begin Bates Number	End Bates Number	Description	No. of Pages	Confidential	Line/Col	F.S. 366.093(3) Subsection	Declarant
OPC 5 th INT, No. 118	032740	032744	Attachment No. 3.10 CONFIDENTIAL.xls	5	Y	All	(e)	Timothy Oliver
OPC 5 th INT, No. 118	032745	032748	Attachment No. 3.11 CONFIDENTIAL.xls	4	Y	All	(e)	Timothy Oliver
OPC 5 th INT, No. 118	032749	032752	Attachment No. 3.12 CONFIDENTIAL.xls	4	Y	All	(e)	Timothy Oliver
OPC 5 th INT, No. 118	032752	032757	Attachment No. 3.13 CONFIDENTIAL.xls	6	Y	All	(e)	Timothy Oliver
OPC 5 th INT, No. 118	032758	032762	Attachment No. 3.14 CONFIDENTIAL.xls	5	Y	All	(e)	Timothy Oliver
OPC 5 th INT, No. 118	032763	032768	Attachment No. 3.15 CONFIDENTIAL.xls	6	Y	All	(e)	Timothy Oliver
OPC 5 th INT, No. 118	032769	032777	Attachment No. 3.16 CONFIDENTIAL.xls	9	Y	All	(e)	Timothy Oliver
OPC 5 th INT, No. 118	032805	032805	Attachment No. 3.17 CONFIDENTIAL.xls	1	Y	All	(e)	Timothy Oliver
OPC 5 th INT, No. 118	032778	032787	Attachment No. 3.18 CONFIDENTIAL.xls	10	Y	All	(e)	Timothy Oliver
OPC 5 th INT, No. 118	032788	032797	Attachment No. 3.19 CONFIDENTIAL.xls	10	Y	All	(e)	Timothy Oliver
OPC 5 th INT, No. 118	032798	032794	Attachment No. 3.20 CONFIDENTIAL.xls	7	Y	All	(e)	Timothy Oliver
OPC 5 th INT, No. 118	032806	032812	Attachment No. 3.21 CONFIDENTIAL.xls	7	Y	All	(e)	Timothy Oliver
OPC 5 th INT, No. 118	032813	032819	Attachment No. 3.22 CONFIDENTIAL.xls	7	Y	All	(e)	Timothy Oliver
OPC 5 th INT, No. 118	032820	032823	Attachment No. 3.23 CONFIDENTIAL.xls	4	Y	All	(e)	Timothy Oliver

Int/POD No.	Begin Bates Number	End Bates Number	Description	No. of Pages	Confidential	Line/Col	F.S. 366.093(3) Subsection	Declarant
OPC 5 th INT, No. 118	032824	032827	Attachment No. 3.24 CONFIDENTIAL.xls	4	Y	All	(e)	Timothy Oliver
OPC 5 th INT, No. 118	032828	032829	Attachment No. 3.25 CONFIDENTIAL.xls	2	Y	All	(e)	Timothy Oliver
OPC 5 th INT, No. 118	032830	032831	Attachment No. 3.26 CONFIDENTIAL	2	Y	All	(e)	Timothy Oliver
OPC 5 th INT, No. 118	032832	032834	Attachment No. 3.27 CONFIDENTIAL.xls	3	Y	All	(e)	Timothy Oliver
OPC 5 th INT, No. 118	032835	032838	Attachment No. 3.28 CONFIDENTIAL.xls	4	Y	All	(e)	Timothy Oliver
OPC 5 th INT, No. 118	032839	032844	Attachment No. 3.29 CONFIDENTIAL.xls	6	Y	All	(e)	Timothy Oliver
OPC 5 th INT, No. 118	032845	032848	Attachment No. 3.30 CONFIDENTIAL.xls	4	Y	All	(e)	Timothy Oliver
OPC 5 th INT, No. 118	032849	032852	Attachment No. 3.31 CONFIDENTIAL.xls	4	Y	All	(e)	Timothy Oliver
OPC 5 th INT, No. 118	032853	032856	Attachment No. 3.32 CONFIDENTIAL.xls	4	Y	All	(e)	Timothy Oliver
OPC 5 th INT, No. 118	032857	032863	Attachment No. 3.33 CONFIDENTIAL.xl	7	Y	All	(e)	Timothy Oliver
OPC 5 th INT, No. 118	032864	032870	Attachment No. 3.34 CONFIDENTIAL.xls	7	Y	All	(e)	Timothy Oliver
OPC 5 th INT, No. 118	032871	032876	Attachment No. 3.35 CONFIDENTIAL.xls	6	Y	All	(e)	Timothy Oliver
OPC 5 th INT, No. 118	032877	032882	Attachment No. 3.36 CONFIDENTIAL.xls	6	Y	All	(e)	Timothy Oliver
OPC 5 th INT, No. 118	032883	032889	Attachment No. 3.37 CONFIDENTIAL.xls	7	Y	All	(e)	Timothy Oliver

Int/POD No.	Begin Bates Number	End Bates Number	Description	No. of Pages	Confidential	Line/Col	F.S. 366.093(3) Subsection	Declarant
OPC 5 th INT, No. 118	032890	032895	Attachment No. 3.38 CONFIDENTIAL.xls	6	Y	All	(e)	Timothy Oliver
OPC 5 th INT, No. 118	032896	032899	Attachment No. 6.1 CONFIDENTIAL.xls	6	Y	All	(e)	Daniel DeBoer
OPC 5 th INT, No. 118	032900	032902	Attachment No. 6.2 CONFIDENTIAL.xls	3	Y	All	(e)	Daniel DeBoer
OPC 5 th POD, No. 58	033800	033818	FRCC-TARA Shell p1	19	Y	All	(e)	Eduardo Devarona
OPC 5 th POD, No. 58	033826	033831	Miami-Miami Beach Study Results	6	Y	All	(e)	Eduardo Devarona
OPC 5 th POD, No. 58	033832	033834	SFTCP Study Results	3	Y	All	(e)	Eduardo Devarona
OPC 5 th POD, No. 58	033819	033826	FRCC-Tara Shell p6	7	Y	All	(e)	Eduardo Devarona
OPC 5 th POD, No. 58	033835	033835	SR80 Branch Viol	1	Y	All	(e)	Eduardo Devarona
OPC 5 th POD, No. 58	003836	003836	SR80 Volt Viol	1	Y	All	(e)	Eduardo Devarona
OPC 5 th POD, No. 58	033779	033799	FPL EDMv1 CIS to CAMS	21	Y	pp. 4, 7-9, 15, and 19-20	(e)	Dawn Nichols
OPC 5 th POD, No. 58	033847	003847	Need Determination Filing for Sweatt-Whidden	1	Y	Line 1, as marked	(e)	Eduardo Devarona
OPC 5 th POD, No. 58	003851	003851	Need Determination Filing for Sweatt-Whidden	1	Y	Lines 1-2, as marked	(e)	Eduardo Devarona
OPC 5 th POD, No. 58	003852	003852	Need Determination Filing for Sweatt-Whidden	1	Y	Lines 1-9 as marked	(e)	Eduardo Devarona

Int/POD No.	Begin Bates Number	End Bates Number	Description	No. of Pages	Confidential	Line/Col	F.S. 366.093(3) Subsection	Declarant
OPC 5 th POD, No. 58	003853	003853	Need Determination Filing for Sweatt-Whidden	1	Y	Lines 1-5 as marked	(e)	Eduardo Devarona
OPC 5 th POD, No. 58	003854	003854	Need Determination Filing for Sweatt-Whidden	1	Y	Lines 1-15 as marked	(e)	Eduardo Devarona
OPC 5 th POD, No. 58	003864	003866	Need Determination Filing for Sweatt-Whidden	3	Y	All	(e)	Eduardo Devarona
OPC 5 th POD, No. 58	003881	003881	Need Determination Filing for Sweatt-Whidden	1	Y	All	(e)	Eduardo Devarona
OPC 5 th POD, No. 58	003885	003893	Need Determination Filing for Sweatt-Whidden	9	Y	All	(e)	Eduardo Devarona
OPC 5 th POD, No. 58	003896	003908	Need Determination Filing for Sweatt-Whidden	13	Y	All	(e)	Eduardo Devarona
OPC 5 th POD, No. 58	003911	003923	Need Determination Filing for Sweatt-Whidden	13	Y	All	(e)	Eduardo Devarona
OPC 5 th POD, No. 58	003941	003941	Need Determination Filing for Sweatt-Whidden	1	Y	All	(e)	Eduardo Devarona
OPC 5 th POD, No. 58	003943	003943	Need Determination Filing for Sweatt-Whidden	1	Y	All	(e)	Eduardo Devarona

EXHIBIT D
DECLARATION(S)

FIRST REVISED 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 DANIEL DEBOER

1. My name is Daniel DeBoer. I am currently employed by Florida Power & Light Company ("FPL") as Vice President, Nuclear. 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 response to the Office of Public Counsel's Fifth Set of Interrogatories, No. 118. 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 contains FPL nuclear budget projections. 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.



Daniel DeBoer

Date: 4/8/25

EXHIBIT D

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

Petition by Florida Power & Light Company for
Base Rate Increase

Docket No: 20250011-EI

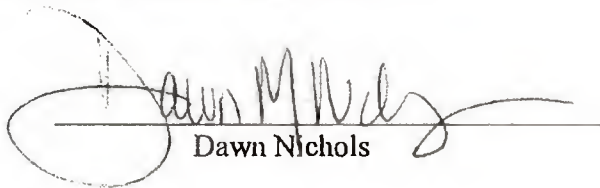
DECLARATION OF DAWN NICHOLS

1. My name is Dawn Nichols. I am currently employed by Florida Power & Light Company ("FPL") as Vice President, Customer Service. 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 OPC's Fifth Set of Interrogatories, No. 118, and OPC's Fifth Request for Production of Documents, No. 58. 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 responsive documents contain information pertaining to FPL budget forecasts, as well as financial market price projections. 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.


Dawn Nichols

Date: 4/9/25

FIRST REVISED 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 response to the Office of Public Counsel's Fifth Set of Interrogatories No.118. 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 contains information related to FPL budget projections. 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.



Timothy Oliver

Date: 4/9/25

FIRST REVISED 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 EDUARDO DE VARONA

1. My name is Eduardo De Varona. I am currently employed by Florida Power & Light Company ("FPL") as Vice President, Power Delivery. 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 response to the Office of Public Counsel's Fifth Request for Production of Documents, No.58. 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 contains information related to FPL transmission project planning. 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.



Eduardo De Varona

Date: 4-8-2025