



Maria Jose Moncada
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April 16, 2025

VIA HAND DELIVERY

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

REDACTED

COMMISSION
CLERK

2025 APR 16 PM 1:41

RECEIVED FPSC

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 Federal Executive Agencies' ("FEA") First Request for Production of Documents (No. 15). 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. 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 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.

Sincerely,

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

COM
AFD 1 redacted
APA Exh "B"
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 16, 2025

**FLORIDA POWER & LIGHT COMPANY'S REQUEST FOR CONFIDENTIAL
CLASSIFICATION OF INFORMATION PROVIDED IN RESPONSE
TO FEDERAL EXECUTIVE AGENCIES' FIRST REQUEST FOR
PRODUCTION OF DOCUMENTS (NO. 15)**

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 Federal Executive Agencies' ("FEA") First Request for Production of Documents (No. 15) ("Confidential Information"). In support of its request, FPL states as follows:

1. FPL served responses to FEA's First Request for Production of Documents (No. 15) on April 16, 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.

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 declarant who supports the requested classification.

d. Exhibit D consists of the declaration of Ned W. Allis 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 Confidential Information includes information concerning security measures, systems or procedures. Specifically, the information contains photographs and locations of sensitive areas of FPL power plants. This information is protected by Section 366.093(3)(c), Fla. Stat.

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 16th day of April, 2025,

By: /s/ Maria Jose Moncada

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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 16th day of April, 2025:

<p>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</p>	<p>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</p>
<p>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</p>	<p>Bradley Marshall/Jordan Luebkmann 111 S. Martin Luther King Jr. Blvd. Tallahassee FL 32301 (850) 681-0031 (850) 681-0020 bmarshall@earthjustice.org jluebkmann@earthjustice.org flcaseupdates@earthjustice.org Florida Rising, Inc., Environmental Confederation of Southwest Florida, Inc., League of United Latin American Citizens of Florida</p>
<p>Danielle McManamon 4500 Biscayne Blvd. Suite 201 Miami, Florida 33137 (786) 224-7031 dmcmamanon@earthjustice.org League of United Latin American Citizens of Florida</p>	<p>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</p>

William C. Garner 3425 Bannerman Road Tallahassee FL 32312 (850) 320-1701 (850) 792-6011 bgarner@wcglawoffice.com Southern Alliance for Clean Energy	
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/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 X

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

The documents responsive to FEA's First Request for Production of Documents No. 15, Bates Nos. 035469-036984, are confidential in their 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: April 16, 2025

Int/POD No.	Begin Bates Number	End Bates Number	Description	No. of Pages	Confidential	Line/Col	F.S. 366.093(3) Subsection	Declarant
FEA 1 st POD, No. 15	036347	036407	Manatee_Combined_Cycle Site Photos.pdf	61	Y	All	(c)	Ned W. Allis
FEA 1 st POD, No. 15	036408	036521	Manatee_Miscellaneous Site Photos.pdf	114	Y	All	(c)	Ned W. Allis
FEA 1 st POD, No. 15	036187	036219	Manatee_Solar_Fields_Site Photos.pdf	33	Y	All	(c)	Ned W. Allis
FEA 1 st POD, No. 15	036106	036186	Okeechobee_Site_Photos.pdf	81	Y	All	(c)	Ned W. Allis
FEA 1 st POD, No. 15	035894	036066	Riviera Site Photos.pdf	173	Y	All	(c)	Ned W. Allis
FEA 1 st POD, No. 15	035469	035581	Scherer Site Photos.pdf	113	Y	All	(c)	Ned W. Allis
FEA 1 st POD, No. 15	035687	035849	West_County_Site_Photos.pdf	163	Y	All	(c)	Ned W. Allis
FEA 1 st POD, No. 15	036522	036984	Dania_Beach_Site_Photos.pdf.crdownload	463	Y	All	(c)	Ned W. Allis
FEA 1 st POD, No. 15	035582	035686	Field Visit 04-04-2024.pdf	105	Y	All	(c)	Ned W. Allis
FEA 1 st POD, No. 15	036067	036105	GF Notes and Diagram.pdf	39	Y	All	(c)	Ned W. Allis

Int/POD No.	Begin Bates Number	End Bates Number	Description	No. of Pages	Confid- ential	Line/Col	F.S. 366.093(3) Subsection	Declarant
FEA 1 st POD, No. 15	036220	036346	Gulf_Clean_Energy_Sit e_Photos.pdf	127	Y	All	(c)	Ned W. Allis
FEA 1 st POD, No. 15	035850	035893	Manatee_Battery_Storag e_Site_Photos.pdf	44	Y	All	(c)	Ned W. Allis

EXHIBIT D
DECLARATION(S)

EXHIBIT D

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

Petition by Florida Power & Light Company for
Base Rate Increase

Docket No: 20250011-EI

DECLARATION OF NED W. ALLIS

1. My name is Ned W. Allis. I am currently employed by Gannett Fleming Valuation and Rate Consultants, LLC, as Vice President. 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 FEA's First Request for Production of Documents, No. 15. The documents or materials that I have reviewed and which are asserted by FPL to be proprietary confidential business information contain information relating to security measures, systems or procedures. Specifically, the information contains photographs and locations of sensitive areas within FPL power plants. 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.

Ned W. Allis

Ned W. Allis

Date: 4/16/2025