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May 2, 2025

REDACTED

VIA HAND DELIVERY

Mr. Adam Teitzman
Division of the Commission Clerk and Administrative Services
Florida Public Service Commission
2540 Shumard Oak Blvd.
Tallahassee, FL 32399-0850

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MAY -2 PM 2:18
COMMISSION
CLERK

Re: **Docket No. 20250001-EI**
Florida Power & Light Company Request for Confidential Classification

Dear Mr. Teitzman:

Enclosed for filing in the above docket is Florida Power & Light Company's ("FPL") Request for Confidential Classification of certain information provided in its response to the Staff of the Florida Public Service Commission ("Staff") First Set of Interrogatories, No. 1. The request includes Exhibits A, B (two copies), C and D.

Exhibit A consists of the confidential documents with all the information that FPL asserts is entitled to confidential treatment highlighted in yellow and are being provided in electronic format on a compact disk labeled confidential. Exhibit B is an insert page indicating that the confidential information is confidential in its entirety. Exhibit C is a justification table in support of FPL's Request for Confidential Classification. Exhibit D contains a declaration in support of FPL's request.

Please contact me if you or your Staff have any questions regarding this filing.

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AFD 1 Exh "B"

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Enclosures

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

Sincerely,

David M. Lee

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: May 2, 2025

**FLORIDA POWER & LIGHT COMPANY'S REQUEST FOR CONFIDENTIAL
CLASSIFICATION OF INFORMATION PROVIDED IN RESPONSE TO THE
STAFF OF THE PUBLIC SERVICE COMMISSION'S FIRST SET
OF INTERROGATORIES (NO. 1)**

Pursuant to Section 366.093, Florida Statutes, and Rule 25-22.006, Florida Administrative Code, Florida Power & Light Company ("FPL") hereby submits its Request for Confidential Classification of certain information provided in its response to the Staff of the Public Service Commission's ("Staff") First Set of Interrogatories (No. 1) ("Confidential Information"). In support of its Request, FPL states as follows:

1. On April 2, 2025, Staff served its First Set of Interrogatories on FPL
2. FPL served its response to Staff's First Set of Interrogatories, No. 1 on May 2, 2025. FPL's Response to Staff's First Set of Interrogatories, No. 1, contained information of a confidential nature within the meaning of Section 366.093(3), Florida Statutes.
3. This request is being filed contemporaneously with the service of the response to request confidential classification of the Confidential Documents consistent with Rule 25-22.006, Florida Administrative Code.
4. The following exhibits are attached to and made a part of this Request:
 - a. Exhibit A consists of a copy of the confidential documents in which all the information that FPL asserts is entitled to confidential treatment is highlighted in yellow.

- b. Exhibit B is an edited version of Exhibit A, in which all the information FPL asserts is entitled to confidential treatment has been redacted. For pages that are entirely confidential, insert pages are provided.
- c. Exhibit C is a table that identifies the confidential information in Exhibit A 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 Charles Rote in support of this Request.

5. 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, 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.

6. As explained more fully in the declaration included in Exhibit D, the documents provided by FPL contain information relating to competitive interests, the disclosure of which would impair the competitive business of the provider of the information. Specifically, the confidential documents contain information provided by a third party, which is proprietary to that party. This information is protected by Section 366.093(3)(e), Fla. Stat.

7. 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 materials and declaration included herewith, Florida Power & Light Company respectfully requests that its Request for Confidential Classification be granted.

Respectfully submitted,

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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 May 2025 to the following:

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By: 

David M. Lee
Florida Bar No. 103152

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

Docket No. 20250001-EI

EXHIBIT “B”

**FPL’s MATERIALS PROVIDED IN RESPONSE
TO STAFF’S FIRST SET OF
INTERROGATORIES NO. 1**

The documents responsive to Staff's First Set of Interrogatories No. 1, Bates Nos. 000001-000034, are confidential in their entirety.

Docket No. 20250001-EI

EXHIBIT “C”

**FPL’s MATERIALS PROVIDED IN RESPONSE
TO STAFF’S FIRST SET OF
INTERROGATORIES NO. 1**

EXHIBIT C

COMPANY: Florida Power & Light Company
TITLE: List of Confidential Documents
DOCKET NO.: 20250001-EI
DOCKET TITLE: Fuel and Purchased Power Cost Recovery Clause with Generating Performance Incentive Factor
SUBJECT: FPL's Responses to Staff's First Set of Interrogatories (No. 1)
DATE: May 2, 2025

Staff's First INTs	Bates Nos.	Description	No. of Pages	Line/Col.	Florida Statute 366.093(3) Subsection	Declarant
Request No. 1	FCR-25-000001 to FCR 25-000006	Attachment 8 - GE Technical Information Letter - 8/3/21	6	ALL	(e)	Charles Rote
Request No. 1	FCR-25-000007 to FCR 25-000012	Attachment 9 - GE Technical Information Letter – 1/27/22	6	ALL	(e)	Charles Rote
Request No. 1	FCR-25-000013 to FCR 25-000017	Attachment 10 - GE Technical Information Letter – 8/2/23	5	ALL	(e)	Charles Rote
Request No. 1	FCR-25-000018 to FCR 25-000023	Attachment 11 - GE Technical Information Letter – 6/24/24	6	ALL	(e)	Charles Rote
Request No. 1	FCR-25-000024 to FCR 25-000034	Attachment 12- GE Technical Information Letter – 9/12/24	11	ALL	(e)	Charles Rote

Docket No. 20250001-EI

EXHIBIT “D”

**FPL’s MATERIALS PROVIDED IN RESPONSE
TO STAFF’S FIRST SET OF
INTERROGATORIES NO. 1**

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 CHARLES ROTE

1. My name is Charles Rote. I am currently employed by Florida Power & Light Company ("FPL") as Director of Business Services, Power Generation. I have personal knowledge of the matters stated in this written declaration.

2. I have reviewed the documents and information included in Exhibit A to FPL's May 2, 2025 Request for Confidential Classification. The documents and materials in Exhibit A which are asserted by FPL to be proprietary confidential business information relate to competitive interests, the disclosure of which would impair the competitive business of the provider of the information. Specifically, the confidential documents contain information provided by a third party, which is proprietary to that party. To the best of my knowledge, FPL has maintained the confidentiality of this information.

3. Therefore, consistent with the provisions of the Florida Administrative Code, such materials should remain confidential for a period of 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.



Charles Rote

Date: _____

5/1/2025