



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 14, 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 14 PM 4:22

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 Office of Public Counsel's ("OPC") Sixth Set of Interrogatories (No. 153) and Sixth Request for Production of Documents (Nos. 67-71). 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 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 14, 2025

**FLORIDA POWER & LIGHT COMPANY'S REQUEST FOR CONFIDENTIAL
CLASSIFICATION OF INFORMATION PROVIDED IN RESPONSE TO THE
OFFICE OF PUBLIC COUNSEL'S SIXTH SET OF INTERROGATORIES
(NO. 153) AND SIXTH REQUEST FOR PRODUCTION
OF DOCUMENTS (NOS. 67-71)**

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") Sixth Set of Interrogatories (No. 153) and Sixth Request for Production of Documents (Nos. 67-71) ("Confidential Information"). In support of its request, FPL states as follows:

1. FPL served its responses to OPC's Sixth Set of Interrogatories (No. 153) and Sixth Request for Production of Documents (Nos. 67-71) on April 14, 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 declarations of Daniel DeBoer and Thomas Broad 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 contains information concerning bids or other contractual data, the disclosure of which would impair the efforts of FPL to contract for goods or services on favorable terms. Specifically, the documents include contracts, containing pricing and other negotiated terms between FPL and vendors. Additionally, the documents also contain information relating to the competitive interests of FPL, the disclosure of which impair the competitive business interests of FPL or the provider of the information. Specifically, the information contains fossil and nuclear budget projections. This information is protected by Sections 366.093(3)(d) and (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 14th 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 14th 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 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
Danielle McManamon 4500 Biscayne Blvd. Suite 201 Miami, Florida 33137 (786) 224-7031 dmcmanamon@earthjustice.org League of United Latin American Citizens of Florida	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

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

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 14, 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 6 th INT, No. 153	034942	034942	Nuclear Projects Budget Projections	1	Y	All	(e)	Daniel DeBoer
OPC 6 th POD, No. 67	035206	035209	PSL Imperia Contract 02458462 Amd 002.pdf	4	Y	All	(d) & (e)	Daniel DeBoer
OPC 6 th POD, No. 67	035210	035213	PSL Imperia Contract 02458462.pdf	4	Y	All	(d) & (e)	Daniel DeBoer
OPC 6 th POD, No. 67	035182	035190	PSL NAS 2471752 amd. 001.pdf	9	Y	All	(d) & (e)	Daniel DeBoer
OPC 6 th POD, No. 67	035132	035166	PSL U2 and Common - 24 Month SOW Rev 5 Final (5-22-24) FRA 2450261 Amd 005.pdf	35	Y	All	(d) & (e)	Daniel DeBoer
OPC 6 th POD, No. 67	035102	035131	PSL Unit 1 24-month SOW - Rev 3 WEC 2454116 Amd 3.pdf	30	Y	All	(d) & (e)	Daniel DeBoer
OPC 6 th POD, No. 67	035070	035101	PSL Unit 2 24-month SOW - Rev 3 WEC 02454121 AMD 3.pdf	32	Y	All	(d) & (e)	Daniel DeBoer
OPC 6 th POD, No. 67	035244	035247	PSL WEC Contract 02454116 Amd 003.pdf	4	Y	All	(d) & (e)	Daniel DeBoer
OPC 6 th POD, No. 67	035248	035251	PSL WEC Contract 02454121 Amd 003_encrypted_.pdf	4	Y	All	(d) & (e)	Daniel DeBoer
OPC 6 th POD, No. 67	035032	035069	PTN 24 Month Cycle Implementation SOW Rev 3 Final 4-29-24 02450262 Amd 003.pdf	38	Y	All	(d) & (e)	Daniel DeBoer

Int/POD No.	Begin Bates Number	End Bates Number	Description	No. of Pages	Confidential	Line/Col	F.S. 366.093(3) Subsection	Declarant
OPC 6 th POD, No. 67	035021	035031	PTN 24-Month Fuel Cycle SOW OARs Rev 0 Approved 2325066-40.pdf	11	Y	All	(d) & (e)	Daniel DeBoer
OPC 6 th POD, No. 67	035234	035243	PTN-24- Months Fuel Cycle U3 U4- REV 1 06-19-2024.xlsx	10	Y	All	(d) & (e)	Daniel DeBoer
OPC 6 th POD, No. 67	035019	035020	SnL Contract 02325066 Rel 00040.pdf	2	Y	All	(d) & (e)	Daniel DeBoer
OPC 6 th POD, No. 67	035001	035018	SOW for PSL 24 Month Cycle Update EAS Imperia 02458462.pdf	18	Y	All	(d) & (e)	Daniel DeBoer
OPC 6 th POD, No. 67	034989	035000	SOW PSL 24-Month Fuel Cycle OARs Rev 0 2325065 Rel 0098.pdf	12	Y	All	(d) & (e)	Daniel DeBoer
OPC 6 th POD, No. 67	034975	034988	SOW PTN NFPA 805 Monitoring Program Updates 24-Mo Project 2458484 rel 1.pdf	14	Y	All	(d) & (e)	Daniel DeBoer
OPC 6 th POD, No. 67	034949	034974	SOW PTN PRA Updates 24-Mo Project 2458484 rel. 2 11-6-23.pdf	26	Y	All	(d) & (e)	Daniel DeBoer
OPC 6 th POD, No. 67	035178	035181	POD 67 - Confidential\Valve Study Contract 2467469 - signed.pdf	4	Y	All	(d) & (e)	Daniel DeBoer
OPC 6 th POD, No. 67	035252	035257	WEC Contract 02450262 Amd 003_encrypted_.pdf	6	Y	All	(d) & (e)	Daniel DeBoer
OPC 6 th POD, No. 67	035214	035223	78 - U1 24 Month Fuel Cycle - REV 0- 07-16-2024.xlsx	10	Y	All	(d) & (e)	Daniel DeBoer
OPC 6 th POD, No. 67	035224	035233	79 - U2 24 Month Fuel Cycle - REV 0 07-16-2024.xlsx	10	Y	All	(d) & (e)	Daniel DeBoer
OPC 6 th POD, No. 67	035191	035195	Contract 02458484 Release 00001 Amendment 001.pdf	5	Y	All	(d) & (e)	Daniel DeBoer
OPC 6 th POD, No. 67	035169	035177	Contract 02458484 Release 00002 Amendment 001.pdf	9	Y	All	(d) & (e)	Daniel DeBoer

Int/POD No.	Begin Bates Number	End Bates Number	Description	No. of Pages	Confidential	Line/Col	F.S. 366.093(3) Subsection	Declarant
OPC 6 th POD, No. 67	035196	035201	Framatome Contract 02450261 Amd 005.pdf	6	Y	All	(d) & (e)	Daniel DeBoer
OPC 6 th POD, No. 67	035702	035705	Imperia Contract 02458463 Amd 002.pdf	4	Y	All	(d) & (e)	Daniel DeBoer
OPC 6 th POD, No. 67	035167	035168	PSL - SnL Contract 02325065 Rel 00098.pdf	2	Y	All	(d) & (e)	Daniel DeBoer
OPC 6 th POD, No. 68	035299	035204	SIMS Contract 02469874.pdf	6	Y	All	(d) & (e)	Daniel DeBoer
OPC 6 th POD, No. 68	035263	035298	SOW RCP Seal Replacement Rev 3 2433532 AMD 8.pdf	36	Y	All	(d) & (e)	Daniel DeBoer
OPC 6 th POD, No. 68	035310	035319	PTN- Rev.3 RCP Rotating Assembly Replacement 2-16-2024.xlsx	10	Y	All	(d) & (e)	Daniel DeBoer
OPC 6 th POD, No. 68	035210	035209	PTN -Rev.7 -U3 & U4 - RCP Seal Replacement 6-13-2024.xlsx	10	Y	All	(d) & (e)	Daniel DeBoer
OPC 6 th POD, No. 68	035339	035348	PTN-2027 to 2029-Post Framatome OEM Seal Conversion Replacement (New) U3& U4 6-17-2024.xlsx	10	Y	All	(d) & (e)	Daniel DeBoer
OPC 6 th POD, No. 68	035258	035262	Exhibit B Compensation Rev 7 20240424.pdf	5	Y	All	(d) & (e)	Daniel DeBoer
OPC 6 th POD, No. 68	035305	035309	Framatome Contract 02433532 Amd 008.pdf	5	Y	All	(d) & (e)	Daniel DeBoer
OPC 6 th POD, No. 69	035350	035352	FP&L 02447981 Rel 00172 Mod 000 1	3	Y	All	(d) & (e)	Daniel DeBoer
OPC 6 th POD, No. 69	035364	035373	CN10934.07 U2 Intergrated Head Assembly 06-18-2024.xlsx	10	Y	All	(d) & (e)	Daniel DeBoer
OPC 6 th POD, No. 69	035346	035347	Exhibit B Compensation PSL Unit 1 02433464 Rev 4.pdf	2	Y	All	(d) & (e)	Daniel DeBoer

Int/POD No.	Begin Bates Number	End Bates Number	Description	No. of Pages	Confidential	Line/Col	F.S. 366.093(3) Subsection	Declarant
OPC 6 th POD, No. 69	035348	035349	Exhibit B Compensation PSL Unit 2 IHA 02433465 Rev 4.pdf	2	Y	All	(d) & (e)	Daniel DeBoer
OPC 6 th POD, No. 69	035353	035357	Framatome Contract 02433464 Amd 004.pdf	5	Y	All	(d) & (e)	Daniel DeBoer
OPC 6 th POD, No. 69	035358	035363	Framatome Contract 02433465 Amd 004.pdf	6	Y	All	(d) & (e)	Daniel DeBoer
OPC 6 th POD, No. 69	035340	035342	10125054-1100_Release 00319 signed.pdf	3	Y	All	(d) & (e)	Daniel DeBoer
OPC 6 th POD, No. 69	035343	035346	10125054-1110_Release 00320 signed.pdf	3	Y	All	(d) & (e)	Daniel DeBoer
OPC 6 th POD, No. 69	035364	035373	CN10934.07 U1 Intergrated Head Assembly 06-19-2024.xlsx	10	Y	All	(d) & (e)	Daniel DeBoer
OPC 6 th POD, No. 70	035394	035403	CN10851.05 U1 Condenser Tube Replacement 8-08-2024	10	Y	All	(d) & (e)	Daniel DeBoer
OPC 6 th POD, No. 70	035384	035393	CN10851.05 U2 Condenser Tube Replacement 8-08-2024	10	Y	All	(d) & (e)	Daniel DeBoer
OPC 6 th POD, No. 71	035408	035408	2026 ST Valves With Totals Only.xlsx	1	Y	All	(e)	Thomas Broad
OPC 6 th POD, No. 71	035409	035409	2027 GE 7FA CT-Gen Major With Totals Only.xlsx	1	Y	All	(e)	Thomas Broad
OPC 6 th POD, No. 71	035410	035410	2027 Siemens CT-Gen Major With Totals Only.xlsx	1	Y	All	(e)	Thomas Broad
OPC 6 th POD, No. 71	035411	035411	2027 ST Maj - Gen Maj With Totals Only.xlsx	1	Y	All	(e)	Thomas Broad
OPC 6 th POD, No. 71	035404	035404	2026 CT Reliability (Annual) With Totals Only.xlsx	1	Y	All	(e)	Thomas Broad

Int/POD No.	Begin Bates Number	End Bates Number	Description	No. of Pages	Confidential	Line/Col	F.S. 366.093(3) Subsection	Declarant
OPC 6 th POD, No. 71	035405	035405	2026 GE 7FA HGP (Peaker) with Totals Only.xlsx	1	Y	All	(e)	Thomas Broad
OPC 6 th POD, No. 71	035406	035406	2026 GE 7HA CT Major With Totals Only.xlsx	1	Y	All	(e)	Thomas Broad
OPC 6 th POD, No. 71	035407	035407	2026 MHI HGP With Totals Only.xlsx	1	Y	All	(e)	Thomas Broad

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 THOMAS BROAD

1. My name is Thomas Broad. I am currently employed by Florida Power & Light Company ("FPL") as Vice President, PGD Fossil Operations and Pipelines. 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 Sixth Request for Production of Documents, No. 71. 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 interests of FPL. Specifically, the information contains information pertaining to fossil plant 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.



Thomas Broad

Date: 4/14/25

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 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 Sixth Set of Interrogatories, No. 153, and Sixth Request for Production of Documents, Nos. 67-70. The documents or materials that I have reviewed and which are proprietary confidential business information contain information concerning bids or other contractual data, the disclosure of which would impair the efforts of FPL to contract for goods or services on favorable terms. In addition, the confidential documents or materials also contain information relating to FPL's competitive interests, the disclosure of which impair the competitive business interests of FPL and the provider of the information. Specifically, the documents contains FPL nuclear budget projections, and contracts with vendors. 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: 4/14/25