

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

May 22, 2025

#### VIA HAND DELIVERY

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

REDACTED

(21) FAY 22 PH 12: 5:

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") First Set of Interrogatories (No. 28) and First Request for Production of Documents (Nos. 30 and 43). 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 being provided in electronic format on a portable electronic storage device 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 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.

AFD 1 reducted EXh " R"	Sincerely,
APA	s/ Maria Jose Moncada
ECO	Maria Jose Moncada
ENGEnclosure	Fla. Bar No. 0773301
GCL	
Cc: Counsel for Parties of Record (	w/ copy of FPL's Request for Confidential Classification)
CLK	

#### BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Petition by Florida Power & Light

Docket No. 20250011-EI

Company for Base Rate Increase

Date: May 22, 2025

FLORIDA POWER & LIGHT COMPANY'S REQUEST FOR CONFIDENTIAL CLASSIFICATION OF INFORMATION PROVIDED IN ITS RESPONSES TO THE OFFICE OF PUBLIC COUNSEL'S FIRST SET OF INTERROGATORIES (No. 28) AND FIRST REQUEST FOR PRODUCTION OF DOCUMENTS (Nos. 30 AND 43)

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 response to the Office of Public Counsel's ("OPC") First Set of Interrogatories (No. 28) and First Request for Production of Documents (Nos. 30 and 43) ("Confidential Information"). In support of its request, FPL states as follows:

- 1. FPL served a response to OPC's First Set of Interrogatories (No. 28) and First Request for Production of Documents (Nos. 30 and 43) on March 31, 2025. This request is being filed 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 or they are confidential in their entirety and are being provided in electronic format on an electronic storage device.
    - b. Exhibit B is a redacted version of the confidential documents. For those documents that are confidential in their entirety, FPL is providing insert pages.

- 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 declaration of Jessica Buttress, Ed De Varona and
   Scott Bores 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 relating to FPL's competitive interests, the disclosure of which impair the competitive business of FPL. Certain of the materials also contain information related to the security measures, systems or procedures of FPL's transmission, substation and distribution facilities. Specifically, the Confidential Information includes information related to employee compensation, which if made public could impact the ability to hire or retain employees on favorable terms for the benefit of its customers. The Confidential Information also includes material non-public information related to the decisions, strategy and planning of the NextEra Energy, Inc. Board of Directors and its committees, as it relates to FPL. Finally, the Confidential Information also includes information that pertains to FPL's non-public transmission system

planning and strategy as well as Critical Energy Infrastructure Information. This information is protected by Sections 366.093(3)(c) and (e), 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 22nd day of May, 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 22nd day of May, 2025:

Shaw Stiller
Timothy Sparks
Florida Public Service Commission
Office of the General Counsel
2540 Shumard Oak Boulevard
Tallahassee, Florida 32399-0850
sstiller@psc.state.fl.us
tsparks@psc.state.fl.us
discovery-gcl@psc.state.fl.us

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michael.rivera.51@us.af.mil
james.ely@us.af.mil
ebony.payton.ctr@us.af.mil
Federal Executive Agencies

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Florida Industrial Power Users Group

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Wessling.Mary@leg.state.fl.us
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of the State of Florida

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Florida Rising, Inc., Environmental
Confederation of Southwest Florida, Inc.,
League of United Latin American Citizens
of Florida

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Florida Retail Federation

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 document responsive to OPC's First

Set of Interrogatories 28,

Bates Nos. 042822-042830, is confidential in its

entirety.

The document responsive to OPC's First
Request for Production of Documents No. 43,
Bates Nos. 042427-42608, are confidential in its
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:

May 22, 2025

Int/POD No.	Begin Bates Number	End Bates Number	Description	No. of Pages	Con fide ntial	Line/Col	Florida Statute 366.093 (3) Subsec tion	Declarant
OPC 1 <sup>st</sup> INT, No. 28	042822	042830	OPC's First INTs No. 28 – Attachment No. 1 - CONFIDENTIAL	9	Y	All	(e)	Jessica Buttress
OPC 1 <sup>st</sup> POD, No.	042609	042611	AC 2022.04.20 Earnings	3	Y	All	(e)	Scott Bores
OPC 1 <sup>st</sup> POD, No.	042612	042615	FI 2023.08.28 Sp_Redacted	4	Y	All	(e)	Scott Bores
OPC 1 <sup>st</sup> POD, No.	042616	042622	NEE 2022.03.18 (BOD)_Redacted.pdf	7	Y	All	(e)	Scott Bores
OPC 1 <sup>st</sup> POD, No.	042623	042632	NEE 2022.05.19 (BOD)_Redacted.pdf	10	Y	All	(e)	Scott Bores
OPC 1 <sup>st</sup> POD, No.	042633	042641	NEE 2022.07.29 (BOD)_Redacted.pdf	9	Y	All	(e)	Scott Bores
OPC 1 <sup>st</sup> POD, No.	042642	042643	NEE 2022.08.12 Sp_Redacted.pdf	2	Y	All	(e)	Scott Bores
OPC 1 <sup>st</sup> POD, No.	042644	042645	NEE 2022.08.19 Sp_Redacted.pdf	2	Y	All	(e)	Scott Bores
OPC 1 <sup>st</sup> POD, No.	042646	042647	NEE 2022.08.30 Sp_Redacted.pdf	2	Y	All	(e)	Scott Bores
OPC 1 <sup>st</sup> POD, No.	042648	042649	NEE 2022.09.23 Sp_Redacted.pdf	2	Y	All	(e)	Scott Bores

Int/POD No.	Begin Bates Number	End Bates Number	Description	No. of Pages	Con fide ntial	Line/Col	Florida Statute 366.093 (3) Subsec	Declarant
OPC 1 <sup>st</sup> POD, No. 30	042650	042655	NEE 2022.10.26 Sp_Redacted.pdf	6	Y	All	(e)	Scott Bores
OPC 1 <sup>st</sup> POD, No. 30	042656	042658	NEE 2022.11.02 Sp_Redacted.pdf	3	Y	All	(e)	Scott Bores
OPC 1 <sup>st</sup> POD, No. 30	042659	042670	NEE 2022.12.16 (CONFIDENTIAL)_Redacted.pdf	12	Y	All	(e)	Scott Bores
OPC 1 <sup>st</sup> POD, No. 30	042671	042673	NEE 2023.01.17 Sp (CONFIDENTIAL)_Redacted.pdf	3	Y	All	(e)	Scott Bores
OPC 1 <sup>st</sup> POD, No. 30	042674	042676	NEE 2023.01.22 Sp (CONFIDENTIAL)_Redacted.pdf	3	Y	All	(e)	Scott Bores
OPC 1 <sup>st</sup> POD, No.	042677	042703	NEE 2023.02.16-17 (BOD)_Redacted.pdf	27	Y	All	(e)	Scott Bores
OPC 1 <sup>st</sup> POD, No.	042704	042708	NEE 2023.03.17 (BOD)_Redacted.pdf	5	Y	All	(e)	Scott Bores
OPC 1 <sup>st</sup> POD, No.	042709	042718	NEE 2023.05.18 (BOD)_Redacted.pdf	10	Y	All	(e)	Scott Bores
OPC 1 <sup>st</sup> POD, No. 30	042719	042720	NEE 2023.05.30 Sp (CONFIDENTIAL)_Redacted.pdf	2	Y	All	(e)	Scott Bores
OPC 1 <sup>st</sup> POD, No. 30	042721	042722	NEE 2023.06.22 Sp.pdf	2	Y	All	(e)	Scott Bores
OPC 1 <sup>st</sup> POD, No.	042723	042729	NEE 2023.07.27 (BOD)_Redacted.pdf	7	Y	All	(e)	Scott Bores
OPC 1 <sup>st</sup> POD, No.	042730	042732	NEE 2023.09.22 Sp_Redacted.pdf	3	Y	All	(e)	Scott Bores
OPC 1st POD, No.	042733	042734	NEE 2023.09.26 Sp_Redacted.pdf	2	Y	All	(e)	Scott Bores

Int/POD No.	Begin Bates Number	End Bates Number	Description	No. of Pages	Con fide ntial	Line/Col	Florida Statute 366.093 (3) Subsec	Declarant
OPC 1 <sup>st</sup> POD, No. 30	042735	042779	NEE 2023.10.12 (BOD)_Redacted.pdf	45	Y	All	(e)	Scott Bores
OPC 1 <sup>st</sup> POD, No.	042780	042781	NEE 2023.11.02 Sp_Redacted.pdf	2	Y	All	(e)	Scott Bores
OPC 1 <sup>st</sup> POD, No. 30	042782	042789	NEE 2023.12.15 (BOD)_Redacted.pdf	8	Y	All	(e)	Scott Bores
OPC 1 <sup>st</sup> POD, No.	042790	042794	NEE 2024.03.15_Redacted.pdf	5	Y	All	(e)	Scott Bores
OPC 1 <sup>st</sup> POD, No.	042795	042806	NEE 2024.05.23_Redacted.pdf	12	Y	All	(e)	Scott Bores
OPC 1 <sup>st</sup> POD, No.	042807	042813	NEE 2024.07.25 (BOD)_Redacted.pdf	7	Y	All	(e)	Scott Bores
OPC 1 <sup>st</sup> POD, No.	042814	042821	NEE 2024.10.24 (BOD)_Redacted.pdf	8	Y	All	(e)	Scott Bores
OPC 1 <sup>st</sup> POD, No.	042832	042871	2. Pimentel FPL BOD Business Review December 2024 v8F Presentation.pdf	40	Y	All	(e)	Scott Bores
OPC 1 <sup>st</sup> POD, No.	042872	042931	2024 Budget Plan (FPL, NEER, NEE)_Redacted.pdf	60	Y	All	(e)	Scott Bores
OPC 1 <sup>st</sup> POD, No.	042932	042990	2025 Budget Plan (FPL, NEER, NEE)_Redacted.pdf	59	Y	All	(e)	Scott Bores
OPC 1 <sup>st</sup> POD, No.	042991	042998	NEE 2024.12.13 (BOD)_Redacted.pdf	8	Y	All	(e)	Scott Bores
OPC 1 <sup>st</sup> POD, No.	042999	043025	Pimentel FPL BOD Business Review December 2023 vF2 Presentation_Redacted.pdf	27	Y	All	(e)	Scott Bores
OPC 1 <sup>st</sup> POD, No.	043026	043064	Pimentel FPL BOD Business Review February 2024 vF2_Redacted.pdf	39	Y	All	(e)	Scott Bores

Int/POD No.	Begin Bates Number	End Bates Number	Description	No. of Pages	Con fide ntial	Line/Col	Florida Statute 366.093 (3) Subsec	Declarant
OPC 1 <sup>st</sup> POD, No. 30	043065	043097	Pimentel FPL BOD Business Review July 2023 vF_Redacted.pdf	33	Y	All	(e)	Scott Bores
OPC 1 <sup>st</sup> POD, No. 30	043098	043138	Pimentel FPL BOD Business Review July 2024 v8F_Redacted.pdf	41	Y	All	(e)	Scott Bores
OPC 1 <sup>st</sup> POD, No. 30	043139	043173	Pimentel FPL BOD Business Review March 2024 v10F.pdf	35	Y	All	(e)	Scott Bores
OPC 1 <sup>st</sup> POD, No.	043174	043232	Pimentel FPL BOD Business Review May 2024 v14F_Redacted.pdf	59	Y	All	(e)	Scott Bores
OPC 1 <sup>st</sup> POD, No.	043233	043277	Pimentel FPL BOD Business Review October 2023 vPresentation_Redacted.pdf	45	Y	All	(e)	Scott Bores
OPC 1 <sup>st</sup> POD, No.	043278	043318	Pimentel FPL BOD Business Review October 2024 v10F_Redacted.pdf	41	Y	All	(e)	Scott Bores
OPC 1 <sup>st</sup> POD, No. 30	043319	043336	Tab 3 - Financial Report vF 05.16 Stk_Redacted.pdf	18	Y	All	(e)	Scott Bores
OPC 1 <sup>st</sup> POD, No.	043337	043354	Tab 3 - Financial Report vF3_Redacted.pdf	18	Y	All	(e)	Scott Bores
OPC 1 <sup>st</sup> POD, No.	043355	043372	Tab 3 - Financial Report vF_Redacted.pdf	18	Y	All	(e)	Scott Bores
OPC 1 <sup>st</sup> POD, No. 30	043373	043390	Tab 3 - NEE BOD 2023 02 February Financial Report vF2_Redacted.pdf	18	Y	All	(e)	Scott Bores
OPC 1 <sup>st</sup> POD, No.	043391	043408	Tab 3 - NEE BOD 2024-09 September Financial Report vF (10-18- 2024)_Redacted.pdf	18	Y	All	(e)	Scott Bores
OPC 1st POD, No.	043409	043426	Tab 4 - Financial Report July 2022_Redacted.pdf	18	Y	All	(e)	Scott Bores
OPC 1 <sup>st</sup> POD, No.	043427	043444	Tab 4 - Financial Report July 2023_Redacted.pdf	18	Y	All	(e)	Scott Bores

Int/POD No.	Begin Bates Number	End Bates Number	Description	No. of Pages	Con fide ntial	Line/Col	Florida Statute 366.093 (3) Subsec	Declarant
OPC 1 <sup>st</sup> POD, No. 30	043445	043462	Tab 4 - Financial Report vF September 2022 - PUSH 10.12.22_Redacted.pdf	18	Y	All	(e)	Scott Bores
OPC 1 <sup>st</sup> POD, No.	043463	043480	Tab 4 - Financial Report_Redacted.pdf	18	Y	All	(e)	Scott Bores
OPC 1 <sup>st</sup> POD, No. 30	043481	043498	Tab 5 - Financial Report vF_Redacted.pdf	18	Y	All	(e)	Scott Bores
OPC 1 <sup>st</sup> POD, No.	043499	043519	Tab 5 - FPL BOD Business Review July 2022 vF.pdf	21	Y	All	(e)	Scott Bores
OPC 1 <sup>st</sup> POD, No.	043520	043538	Tab 5 - FPL BOD Business Review March 2022 vF.pdf	19	Y	All	(e)	Scott Bores
OPC 1 <sup>st</sup> POD, No.	043539	043568	Tab 5 - FPL BOD Business Review October 2022 vF - Push 10.12.2022.pdf	30	Y	All	(e)	Scott Bores
OPC 1 <sup>st</sup> POD, No.	043569	043586	Tab 5 - NEE BOD 2024-06 June Financial Report vF_Redacted.pdf	18	Y	All	(e)	Scott Bores
OPC 1 <sup>st</sup> POD, No.	043587	043602	Tab 5 - NEE BOD 2024-11 November Financial Report - UPDATED Redacted.pdf	16	Y	All	(e)	Scott Bores
OPC 1 <sup>st</sup> POD, No.	043603	043629	Tab 5 - Pimentel FPL BOD Business Review March 2023 vF_Redacted.pdf	27	Y	All	(e)	Scott Bores
OPC 1 <sup>st</sup> POD, No.	043630	043647	Tab 6 - Financial Report - November - Stk 12.13.23 vF4_Redacted.pdf	18	Y	All	(e)	Scott Bores
OPC 1 <sup>st</sup> POD, No.	043648	043665	Tab 6 - Financial Report - November 2022 - PUSH 12.14.22_Redacted.pdf	18	Y	All	(e)	Scott Bores
OPC 1 <sup>st</sup> POD, No.	043666	043681	Tab 6 - NEE BOD 2024-12 December Financial Report vF (2-3- 2025)_Redacted.pdf	16	Y	All	(e)	Scott Bores
OPC 1 <sup>st</sup> POD, No.	043682	043701	Tab 7 - Financial Report vF (006)_Redacted.pdf	20	Y	All	(e)	Scott Bores

Int/POD No.	Begin Bates Number	End Bates Number	Description	No. of Pages	Con fide ntial	Line/Col	Florida Statute 366.093 (3) Subsec	Declarant
OPC 1 <sup>st</sup> POD, No. 30	043702	043723	Tab 7 - FPL Business Review FINAL 12.14.22.pdf	22	Y	All	(e)	Scott Bores
OPC 1 <sup>st</sup> POD, No. 30	043724	043741	Tab 7 - NEE BOD 2022 12 December Financial Report JWK_Redacted.pdf	18	Y	All	(e)	Scott Bores
OPC 1 <sup>st</sup> POD, No. 30	043742	043782	Tab 7 - Pimentel FPL BOD Business Review February 2025 v7F.pdf	41	Y	All	(e)	Scott Bores
OPC 1 <sup>st</sup> POD, No. 30	043783	043814	Tab 7- FPL Business Review May 2023_Redacted.pdf	32	Y	All	(e)	Scott Bores
OPC 1 <sup>st</sup> POD, No.	043815	043832	Tab 8 - Financial Report vF2_Redacted.pdf	18	Y	All	(e)	Scott Bores
OPC 1 <sup>st</sup> POD, No.	043833	043854	Tab 8 - FPL BOD Business Review February 2022 vF JJ.pdf	22	Y	All	(e)	Scott Bores
OPC 1 <sup>st</sup> POD, No.	043855	043879	Tab 8 - FPL BOD Business Review May 2022 vF.pdf	25	Y	All	(e)	Scott Bores
OPC 1 <sup>st</sup> POD, No.	043880	043905	Tab 8 - FPL Business Review February 2023 v18F_Redacted.pdf	26	Y	All	(e)	Scott Bores
OPC 1 <sup>st</sup> POD, No.	043906	043925	Tab 9.1 - FPL Budget.pdf	20	Y	All	(e)	Scott Bores
OPC 1 <sup>st</sup> POD, No.	043926	043938	Tab 9.3 - NEE Budget 2023 Financial Plan_Redacted.pdf	13	Y	All	(e)	Scott Bores
OPC 1 <sup>st</sup> POD, No.	043939	044037	FINAL NCM 03-11-22_Redacted.pdf	99	Y	All	(e)	Scott Bores
OPC 1 <sup>st</sup> POD, No.	044273	044369	FINAL NCM 030824_Redacted.pdf	97	Y	All	(e)	Scott Bores
OPC 1 <sup>st</sup> POD, No.	044370	044488	FINAL NCM 030923_Redacted.pdf	119	Y	All	(e)	Scott Bores

Int/POD No.	Begin Bates Number	End Bates Number	Description	No. of Pages	Con fide ntial	Line/Col	Florida Statute 366.093 (3) Subsec	Declarant
OPC 1 <sup>st</sup> POD, No.	044038	044182	FINAL NCM 07-28-22_Redacted.pdf	145	Y	All	(e)	Scott Bores
OPC 1 <sup>st</sup> POD, No.	044489	044568	FINAL NCM 072424 v3_Redacted.pdf	80	Y	All	(e)	Scott Bores
OPC 1 <sup>st</sup> POD, No.	044569	044662	FINAL NCM 072623_Redacted.pdf	94	Y	All	(e)	Scott Bores
OPC 1 <sup>st</sup> POD, No.	044183	044272	FINAL NCM 10.06.22_Redacted.pdf	90	Y	All	(e)	Scott Bores
OPC 1 <sup>st</sup> POD, No.	044663	044746	FINAL NCM 100523_Redacted.pdf	84	Y	All	(e)	Scott Bores
OPC 1 <sup>st</sup> POD, No.	044747	044822	FINAL NCM 101024_Redacted.pdf	76	Y	All	(e)	Scott Bores
OPC 1 <sup>st</sup> POD, No.	045018	045095	FINAL NCM 12122024 v2_Redacted.pdf	78	Y	All	(e)	Scott Bores
OPC 1 <sup>st</sup> POD, No.	044823	044903	FINAL NCM 121423 (comments removed)_Redacted.pdf	81	Y	All	(e)	Scott Bores
OPC 1 <sup>st</sup> POD, No.	044904	045017	FINAL NCM 121522_Redacted.pdf	114	Y	All	(e)	Scott Bores
OPC 1 <sup>st</sup> POD, No. 43	042427	042608	Power Delivery Expansion Plan 2025- 2034 (December 2024)	182	Y	All	(c) & (e)	Ed De Varona

# EXHIBIT D DECLARATION(S)

#### 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 JESSICA BUTTRESS**

- 1. My name is Jessica Buttress. I am currently employed by Florida Power & Light Company ("FPL") as Senior Director, Executive Services and Compensation. 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 the OPC's First Set of Interrogatories, No. 28. The documents or materials that I have reviewed and which are asserted by FPL to be proprietary competitive business information contain information relating to the competitive interests of FPL, the disclosure of which would impair the competitive business interests of FPL. Specifically, the materials contain information related to employee compensation, which if made public could impact the ability to hire or retain employees on favorable terms for the benefit of its customers. 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.

Jessica Buttress

Date:

#### 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 OPC's First Request for Production of Documents, No. 43. 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. In addition, the materials contain information related to the security measures, systems or procedures of FPL's transmission, substation and distribution facilities. Specifically, the information pertains to FPL's non-public transmission system planning and strategy as well as Critical Energy Infrastructure Information. 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:  $5/21/2\sqrt{7}$ 

#### 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 SCOTT BORES**

- 1. My name is Scot Bores. I am currently employed by Florida Power & Light Company ("FPL") as Vice President, Finance. 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 the OPC's First Request for Production of Documents, No. 30. The documents or materials that I have reviewed and which are asserted by FPL to be proprietary competitive business information contain information relating to the competitive interests of FPL, the disclosure of which would impair its competitive business interests. Specifically, the documents contain material non-public information related to the decisions, strategy and planning of the NextEra Energy, Inc. Board of Directors and its committees, as it relates to FPL. 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.

Scott Bores

Date: \_\_\_\_\_05/21/2025