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April 25, 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 25 PM 3:37

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 corrected response to the Office of Public Counsel's ("OPC") First Set of Interrogatories (No. 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 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. 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.

COM \_\_\_\_\_  
AFD 2 redacted  
APA \_\_\_\_\_  
ECO \_\_\_\_\_  
ENG \_\_\_\_\_  
GCL \_\_\_\_\_  
IDM \_\_\_\_\_  
CLK \_\_\_\_\_

Enclosure

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

Sincerely,

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

**BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION**

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

Docket No: 20250011-EI

Date: April 25, 2025

**FLORIDA POWER & LIGHT COMPANY'S REQUEST FOR CONFIDENTIAL  
CLASSIFICATION OF INFORMATION PROVIDED IN ITS CORRECTED  
RESPONSE TO THE OFFICE OF PUBLIC COUNSEL'S  
FIRST SET OF INTERROGATORIES (NO. 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 corrected response to the Office of Public Counsel's ("OPC") First Set of Interrogatories (No. 43) ("Confidential Information"). In support of its request, FPL states as follows:

1. FPL served a corrected response to OPC's First Set of Interrogatories (Nos. 43) on April 25, 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.
- 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 support the requested classification.

- d. Exhibit D consists of the declaration of Liz Fuentes 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 bids or other contractual data, the disclosure of which would impair the efforts of FPL to contract for goods or services on favorable terms. The Confidential Information also contains proprietary confidential business information regarding competitive business interests of FPL. The disclosure of this information would also impair the competitive business interests of FPL. Specifically, the information contains pricing information related to insurance premiums. This information is protected by Sections 366.093(3)(d) 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 25th day of April, 2025,

By: /s/ Maria Jose Moncada  
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Vice President and General Counsel  
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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 25th day of April, 2025:

Shaw Stiller Timothy Sparks <b>Office of General Counsel</b> 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 <b>Office of Public Counsel</b>
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 <b>Federal Executive Agencies</b>	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 flcaseupdates@earthjustice.org <b>Florida Rising, Inc., Environmental Confederation of Southwest Florida, Inc., League of United Latin American Citizens of Florida</b>
Danielle McManamon 4500 Biscayne Blvd. Suite 201 Miami, Florida 33137 (786) 224-7031 dmcmanamon@earthjustice.org <b>League of United Latin American Citizens of Florida</b>	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 <b>Florida Industrial Power Users Group</b>
William C. Garner 3425 Bannerman Road Tallahassee FL 32312 (850) 320-1701 (850) 792-6011 bgarner@wcglawoffice.com <b>Southern Alliance for Clean Energy</b>	Nikhil Vijaykar Keyes & Fox LLP 580 California Street, 12th Floor San Francisco, CA 94104 (408) 621-3256 nvijaykar@keyesfox.com <b>EVgo Services, LLC</b>

James W Brew Laura Wynn Baker Joseph R. Briscar Sarah B. Newman 1025 Thomas Jefferson Street NW Suite 800 West Washington, DC 20007 (202) 342-0800 (202) 342-0807 <a href="mailto:jbrew@smxblaw.com">jbrew@smxblaw.com</a> <a href="mailto:lwb@smxblaw.com">lwb@smxblaw.com</a> <a href="mailto:jrb@smxblaw.com">jrb@smxblaw.com</a> <a href="mailto:sbn@smxblaw.com">sbn@smxblaw.com</a> <b>Florida Retail Federation</b>	Katelyn Lee Senior Associate, Market Development & Public Policy Lindsey Stegall Senior Manager, Market Development & Public Policy EVgo Services, LLC 1661 E. Franklin Ave. El Segundo, CA 90245 (213) 500-9092 <a href="mailto:Katelyn.Lee@evgo.com">Katelyn.Lee@evgo.com</a> <a href="mailto:Lindsey.Stegall@evgo.com">Lindsey.Stegall@evgo.com</a> <b>EVgo Services, LLC</b>
Steven W. Lee Spilman Thomas & Battle, PLLC 1100 Bent Creek Boulevard, Suite 101 Mechanicsburg, PA 17050 (717) 791-2012 (717) 795-2743 <a href="mailto:slee@spilmanlaw.com">slee@spilmanlaw.com</a> <b>Walmart, Inc.</b>	Stephanie U. Eaton Spilman Thomas & Battle, PLLC 110 Oakwood Drive, Suite 500 Winston-Salem, NC 27103 (336) 631-1062 (336) 725-4476 <a href="mailto:seaton@spilmanlaw.com">seaton@spilmanlaw.com</a> <b>Walmart, Inc.</b>
Robert E. Montejo Duane Morris LLP 201 S. Biscayne Blvd., Suite 3400 Miami, Florida 33131-4325 (202) 776-7827 <a href="mailto:REMontejo@duanemorris.com">REMontejo@duanemorris.com</a> <b>Electrify America, LLC</b>	Stephen Bright Jigar J. Shah 1950 Opportunity Way, Suite 1500 Reston, Virginia 20190 (781) 206-7979 (703) 872-7944 <a href="mailto:steve.bright@electrifyamerica.com">steve.bright@electrifyamerica.com</a> <a href="mailto:jigar.shah@electrifyamerica.com">jigar.shah@electrifyamerica.com</a> <b>Electrify America, LLC</b>

/s/ Maria Jose Moncada

Maria Jose Moncada

Assistant General Counsel

Florida Bar No. 0773301

*Attorney for Florida Power & Light Company*

## **EXHIBIT B**

### **REDACTED/PUBLIC VERSION OF THE DOCUMENTS**

**Public Version of the Document(s) attached**

\_\_\_\_\_

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

  X

## **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 25, 2025

Int/POD No.	Begin Bates Number	End Bates Number	Description	No. of Pages	Confid ential	Line/Col	Florida Statute 366.093(3) Subsection	Declarant
OPC 1 <sup>st</sup> INT, No. 43, Corrected Attachment 1	039625	039625	Directors' and Officers' Liability Insurance Premiums	1	Y	Lines 22, 27 and 35; Cols C-L	(d) & (e)	Liz Fuentes

**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 LIZ FUENES**

1. My name is Liz Fuentes. I am currently employed by Florida Power & Light Company ("FPL") as Executive Director, Regulatory Accounting. 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 corrected response to OPC's First Set of Interrogatories, No. 43. The documents or materials that I have reviewed and which are asserted by FPL to be proprietary confidential business information contain contractual pricing information and competitive business information the disclosure of which would impair the competitive business of FPL of the information. Specifically, the materials contain insurance premiums paid by FPL, disclosure of which would impair the efforts of FPL to contract for goods or services on favorable terms. 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.

  
Liz Fuentes

Date: 4/24/2025