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July 23, 2025

#### VIA HAND DELIVERY

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

REDACTED

CLERK

2025 IIII 23 PM I: I.I.

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 response to FAIR's First Request for Production of Documents (No. 2). 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 that 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.

AFD 1 reducted  EXH "B"	Sincerely,
APA ZXN D	<i>s/ Maria Jose Moncada</i> Maria Jose Moncada
ENG	Fla. Bar No. 0773301
GCLEnclosure	
IDM Council for Portion of Percent (	w/ same of EDI 's Dequest for Confidential Classification)
CLK 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: July 23, 2025

FLORIDA POWER & LIGHT COMPANY'S REQUEST FOR CONFIDENTIAL CLASSIFICATION OF INFORMATION PROVIDED IN ITS RESPONSE TO FLORIDIANS AGAINST INCREASED RATES, INC.'S FIRST REQUEST FOR PRODUCTION OF DOCUMENTS (No. 2)

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 Floridians Against Increased Rates, Inc.'s ("FAIR") First Request for Production of Documents (No. 2) ("Confidential Information"). In support of its request, FPL states as follows:

- 1. FPL served its response to FAIR's First Request for Production of Documents (No. 2) on July 23, 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 the documents in Exhibit A that are confidential in their entirety, Exhibit B consists of an insert page.
    - c. Exhibit C is a table that identifies the information for which confidential treatment is being sought, references the specific statutory basis for the

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- claim of confidentiality, and identifies the declarants who supports the requested classification.
- d. Exhibit D consists of the declarations of 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 contains proprietary confidential business information, which contains information relating to competitive business interests, the disclosure of which would impair the competitive business of the providers of the information. Specifically, the information contains reports provided to FPL from ratings agencies that are proprietary to those agencies. This information is protected by Section 366.093(3)(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 23rd day of July, 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 23rd day of July, 2025:

Shaw Stiller Timothy Sparks

Florida Public Service Commission

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Inc., Circle K Stores, Inc., RaceTrac, Inc.
and Wawa, Inc.

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			

The documents responsive to FAIR's First Request for Production of Documents, No. 2, Bates No. 058549 - 58575, are confidential in their entirety.

## EXHIBIT C

**JUSTIFICATION TABLE** 

#### **EXHIBIT C**

**COMPANY:** Florida Power & Light Company

Petition by Florida Power & Light Company for Base Rate TITLE:

Increase

**DOCKET NO.:** 20250011-EI

July 23, 2025 **DATE:** 

Int/POD No.	Begin Bates Number	End Bates Number	Description	No. of Pages	Confid- ential	Line/Col	F.S. 366.093(3) Subsection	Declarant
FAIR 1 <sup>ST</sup> POD, No. 2	058549	058562	Fitch – NextEra Energy, Inc. 12JUN25	14	Y	All	(e)	Scott Bores
FAIR 1 <sup>ST</sup> POD, No. 2	058563	058575	Fitch – FPL 12JUN25	13	Y	All	(e)	Scott Bores

# EXHIBIT D DECLARATION(S)

#### EfXHIBIT D

#### BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

Petition by Florida Power & Light Company for Base Rate Increase

Docket No: 20250011-EI

#### DECLARATION OF SCOTT BORES

- 1. My name is Scott 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 document referenced and incorporated in FPL's Request for Confidential Classification, specifically the materials provided in FPL's response to FAIR's First Request for Production, No. 2. The documents or materials that I have reviewed and which are asserted by FPL to be proprietary confidential business information contain information relating competitive interests, the disclosure of which impair the competitive interests of the provider of the information. Specifically, the information contains reports of ratings agencies which are proprietary to those agencies. 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: 1/22/2025