



**Maria Jose Moncada**  
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April 7, 2025

**VIA HAND DELIVERY**

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

**REDACTED**

2025 APR -7 PM 1:17  
COMMISSION CLERK

**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") Seventh Request for Production of Documents (Nos. 82 and 97). 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 1 Exh "B"
- 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 7, 2025

**FLORIDA POWER & LIGHT COMPANY'S REQUEST FOR CONFIDENTIAL  
CLASSIFICATION OF INFORMATION PROVIDED IN RESPONSE TO  
THE OFFICE OF PUBLIC COUNSEL'S SEVENTH REQUEST FOR  
PRODUCTION OF DOCUMENTS (NOS. 82 AND 97)**

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") Seventh Request for Production of Documents (Nos. 82 and 97) ("Confidential Information"). In support of its request, FPL states as follows:

1. FPL served responses to OPC's Seventh Request for Production of Documents (Nos. 82 and 97) on April 7, 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 declaration of Dawn Nichols 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 also contains proprietary confidential business information regarding competitive business interests of FPL. Specifically, the materials contain information pertaining to the results of focus group and customer surveys conducted by FPL. The disclosure of this information would impair the competitive business interests of FPL. 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 7th day of April, 2025,

By: /s/ Maria Jose Moncada  
John T. Burnett  
Vice President and General Counsel  
Florida Bar No. 173304  
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Maria Jose Moncada  
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Senior Attorney  
Florida Bar No. 0108202  
joel.baker@fpl.com  
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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 7th day of April, 2025:

<p>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</p>	<p>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></p>
<p>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></p>	<p>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  <b>Florida Rising, Inc., Environmental          Confederation of Southwest Florida, Inc.,          League of United Latin American Citizens          of Florida</b></p>
<p>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></p>	<p>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></p>

*/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 documents responsive to OPC's Seventh Request for Production of Documents No. 82, Bates Nos. 021555-021737, are confidential in their entirety.

The document responsive to OPC's Seventh Request for Production of Documents No. 97, Bates Nos. 021738-021744, is 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:** April 7, 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 7 <sup>th</sup> POD, No. 82	021652	021662	FPL_Construction Start Survey_02.05.24_ADA updates_v2	11	Y	All	(e)	Dawn Nichols
OPC 7 <sup>th</sup> POD, No. 82	021663	021671	FPL_Planned Outage Survey_FINAL_04.04.19	9	Y	All	(e)	Dawn Nichols
OPC 7 <sup>th</sup> POD, No. 82	021672	021686	FPL_Programs_Survey-May 5 2023	15	Y	All	(e)	Dawn Nichols
OPC 7 <sup>th</sup> POD, No. 82	021687	021701	FPL_Project Completed Survey_02.05.24_ADA updates_v2	15	Y	All	(e)	Dawn Nichols
OPC 7 <sup>th</sup> POD, No. 82	021702	021712	FPL_Streetlight Issue Survey_FINAL_08.09.21	11	Y	All	(e)	Dawn Nichols
OPC 7 <sup>th</sup> POD, No. 82	021713	021729	FPL_Unplanned Outage Issue Survey_FINAL_01.31.23	17	Y	All	(e)	Dawn Nichols
OPC 7 <sup>th</sup> POD, No. 82	021730	021737	Simplified VoC Survey - Final- Sept 2024	8	Y	All	(e)	Dawn Nichols
OPC 7 <sup>th</sup> POD, No. 82	021555	021578	E200126 Questionnaire Ver 1.0 (Florida Power and Light Corporate Indicator Survey 2021)_FINAL CLEAN 2021	24	Y	All	(e)	Dawn Nichols
OPC 7 <sup>th</sup> POD, No. 82	021579	021602	E210109 Questionnaire Ver 1.7 (Florida Power and Light Corporate Indicator Survey 2022)_FINAL CLEAN 2022	24	Y	All	(e)	Dawn Nichols

<b>Int/POD No.</b>	<b>Begin Bates Number</b>	<b>End Bates Number</b>	<b>Description</b>	<b>No. of Pages</b>	<b>Confidential</b>	<b>Line/Col</b>	<b>F.S. 366.093(3) Subsection</b>	<b>Declarant</b>
OPC 7 <sup>th</sup> POD, No. 82	021603	021627	E220112 Questionnaire Ver 1.4 (Florida Power and Light Corporate Indicator Survey 2023)_FINAL CLEAN 2023	25	Y	All	(e)	Dawn Nichols
OPC 7 <sup>th</sup> POD, No. 82	021628	021651	E230153 FPL Corporate Indicator Survey - Questionnaire v1.1_FINAL CLEAN 2024	24	Y	All	(e)	Dawn Nichols
OPC 7 <sup>th</sup> POD, No. 97	021738	021744	E220065 - FPL Fixed Rate Research Survey FINAL v3.2	7	Y	All	(e)	Dawn Nichols

**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

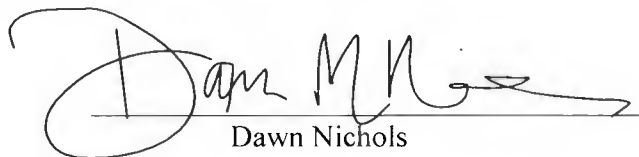
**DECLARATION OF DAWN NICHOLS**

1. My name is Dawn Nichols. I am currently employed by Florida Power & Light Company ("FPL") as Vice President, Customer Service. 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 Seventh Request for Production of Documents, Nos. 82 and 97. 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 the results of focus group and customer surveys. 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.

  
Dawn Nichols

Date: 4/7/25