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April 10, 2025

**VIA HAND DELIVERY**

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

**REDACTED**

APR 10 PM 4:04  
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") Eight Set of Interrogatories (Nos. 259 and 261) and Eighth Request for Production of Documents (Nos. 100, 101 and 103). 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 of the files in Exhibit A are provided on thumb drives due to the volume and size of the files. 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.

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

Enclosure

Sincerely,

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

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 10, 2025

**FLORIDA POWER & LIGHT COMPANY'S REQUEST FOR CONFIDENTIAL  
CLASSIFICATION OF INFORMATION PROVIDED IN RESPONSE TO THE  
OFFICE OF PUBLIC COUNSEL'S EIGHTH SET OF INTERROGATORIES  
(NOS. 259 AND 261) AND EIGHTH REQUEST FOR PRODUCTION  
OF DOCUMENTS (NOS. 100, 101 AND 103)**

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") Eighth Set of Interrogatories (Nos. 259 and 261) and Eighth Request for Production of Documents (Nos. 100, 101 and 103) ("Confidential Information"). In support of its request, FPL states as follows:

1. FPL served its responses to OPC's Eighth Set of Interrogatories (Nos. 259 and 261) and Eighth Request for Production of Documents (Nos. 100, 101 and 103) on April 10, 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 of the documents in Exhibit A are being provided on a thumb drive due to the volume and size of the documents.

- 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 Joseph Balzano and Timothy Oliver 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. The documents include bids, pricing or other contractual data the disclosure of which would impair the efforts of FPL to contract for goods or services on favorable terms. Additionally, some of the documents also contain information relating competitive interests of FPL, the disclosure of which impair the competitive business interests of FPL or its affiliates. Specifically, the information

contains pricing information related to vendor invoices, purchase orders and payroll expenses, and also contains terms and amounts of loan guarantees made by FPL to its affiliates. The disclosure of this information would impair the competitive business interests of FPL and/or its affiliates. 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 10th 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  
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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 10th 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 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></p>
<p>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></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>

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>	
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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

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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 10, 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 8 <sup>th</sup> INT, No. 259	033974	033974	Terms and Conditions of NEECH Guarantee	1	Y	All	(d)(e)	Joseph Balzano
OPC 8 <sup>th</sup> INT, No. 261	033975	033976	Terms and Conditions of NEECH Guarantee	2	Y	Pg 1, Lns 1-2, Cols B-E, Ln 3, Cols C-D; Pg 2, Lns 4-5 as marked	(d)(e)	Joseph Balzano
OPC 8 <sup>th</sup> POD, No. 100	034575	034575	Voluminous, Invoices, Purchase Orders provided on a single thumb drive	1	Y	All	(d)	Timothy Oliver
OPC 8 <sup>th</sup> POD, No. 101	034576	034576	Voluminous, Invoices, Purchase Orders provided on a single thumb drive	1	Y	All	(d)	Timothy Oliver
OPC 8 <sup>th</sup> POD, No. 103	034036	034059	16406-ED-2021.pdf	24	Y	All	(d)	Timothy Oliver
OPC 8 <sup>th</sup> POD, No. 103	034060	034068	18828-ED-2022.pdf	9	Y	All	(d)	Timothy Oliver
OPC 8 <sup>th</sup> POD, No. 103	034069	034080	20343-ED-2022.pdf	12	Y	All	(d)	Timothy Oliver

Int/POD No.	Begin Bates Number	End Bates Number	Description	No. of Pages	Confidential	Line/Col	F.S. 366.093(3) Subsection	Declarant
OPC 8 <sup>th</sup> POD, No. 103	034081	034083	21025-WD-2022.pdf	3	Y	All	(d)	Timothy Oliver
OPC 8 <sup>th</sup> POD, No. 103	034084	034092	21103-ND-2022.pdf	9	Y	All	(d)	Timothy Oliver
OPC 8 <sup>th</sup> POD, No. 103	034093	034101	21988-ED-2023.pdf	9	Y	All	(d)	Timothy Oliver
OPC 8 <sup>th</sup> POD, No. 103	034102	034114	22083-WD-2023.pdf	13	Y	All	(d)	Timothy Oliver
OPC 8 <sup>th</sup> POD, No. 103	034115	034117	22103-WD-2023.pdf	3	Y	All	(d)	Timothy Oliver
OPC 8 <sup>th</sup> POD, No. 103	034118	034120	22105-ED-2023.pdf	3	Y	All	(d)	Timothy Oliver
OPC 8 <sup>th</sup> POD, No. 103	034121	034123	22107-ED-2023.pdf	3	Y	All	(d)	Timothy Oliver
OPC 8 <sup>th</sup> POD, No. 103	034124	034125	22843-WD-2023.pdf	2	Y	All	(d)	Timothy Oliver
OPC 8 <sup>th</sup> POD, No. 103	034126	034137	23083-ND-2023.pdf	12	Y	All	(d)	Timothy Oliver
OPC 8 <sup>th</sup> POD, No. 103	034138	034149	23503-WD-2023.pdf	12	Y	All	(d)	Timothy Oliver
OPC 8 <sup>th</sup> POD, No. 103	034150	034158	23843-ND-2023.pdf	9	Y	All	(d)	Timothy Oliver
OPC 8 <sup>th</sup> POD, No. 103	034159	034168	24243-WD-2023.pdf	10	Y	All	(d)	Timothy Oliver
OPC 8 <sup>th</sup> POD, No. 103	034169	034177	24263-ND-2023.pdf	9	Y	All	(d)	Timothy Oliver
OPC 8 <sup>th</sup> POD, No. 103	034178	034188	25101-ND-2023.pdf	11	Y	All	(d)	Timothy Oliver

Int/POD No.	Begin Bates Number	End Bates Number	Description	No. of Pages	Confidential	Line/Col	F.S. 366.093(3) Subsection	Declarant
OPC 8 <sup>th</sup> POD, No. 103	034189	034197	25503-WD-2023.pdf	9	Y	All	(d)	Timothy Oliver
OPC 8 <sup>th</sup> POD, No. 103	034198	034124	25505-ED-2023.pdf	17	Y	All	(d)	Timothy Oliver
OPC 8 <sup>th</sup> POD, No. 103	034215	034262	25507-ED-2023.pdf	48	Y	All	(d)	Timothy Oliver
OPC 8 <sup>th</sup> POD, No. 103	034263	034280	25509-ED-2023.pdf	18	Y	All	(d)	Timothy Oliver
OPC 8 <sup>th</sup> POD, No. 103	034281	034283	25511-ED-2023.pdf	3	Y	All	(d)	Timothy Oliver
OPC 8 <sup>th</sup> POD, No. 103	034284	034298	25523-WD-2023.pdf	15	Y	All	(d)	Timothy Oliver
OPC 8 <sup>th</sup> POD, No. 103	034299	034309	25531-ED-2023.pdf	11	Y	All	(d)	Timothy Oliver
OPC 8 <sup>th</sup> POD, No. 103	034310	034333	25533-WD-2023.pdf	24	Y	All	(d)	Timothy Oliver
OPC 8 <sup>th</sup> POD, No. 103	034334	034341	25663-SD-2023.pdf	8	Y	All	(d)	Timothy Oliver
OPC 8 <sup>th</sup> POD, No. 103	034342	034352	26044-WD-2023.pdf	11	Y	All	(d)	Timothy Oliver
OPC 8 <sup>th</sup> POD, No. 103	034353	034378	26063-WD-2023.pdf	26	Y	All	(d)	Timothy Oliver
OPC 8 <sup>th</sup> POD, No. 103	034379	034391	26102-ND-2023.pdf	13	Y	All	(d)	Timothy Oliver
OPC 8 <sup>th</sup> POD, No. 103	034560	034568	26104-ED-2023.pdf	9	Y	All	(d)	Timothy Oliver
OPC 8 <sup>th</sup> POD, No. 103	034392	034400	26123-ED-2023.pdf	9	Y	All	(d)	Timothy Oliver

Int/POD No.	Begin Bates Number	End Bates Number	Description	No. of Pages	Confidential	Line/Col	F.S. 366.093(3) Subsection	Declarant
OPC 8 <sup>th</sup> POD, No. 103	034401	034412	26163-ED-2023.pdf	12	Y	All	(d)	Timothy Oliver
OPC 8 <sup>th</sup> POD, No. 103	034413	034425	26165-ED-2023.pdf	13	Y	All	(d)	Timothy Oliver
OPC 8 <sup>th</sup> POD, No. 103	034426	034448	26183-ED-2023.pdf	23	Y	All	(d)	Timothy Oliver
OPC 8 <sup>th</sup> POD, No. 103	034449	034460	26204-WD-2023.pdf	12	Y	All	(d)	Timothy Oliver
OPC 8 <sup>th</sup> POD, No. 103	034461	034477	26224-ED-2023.pdf	17	Y	All	(d)	Timothy Oliver
OPC 8 <sup>th</sup> POD, No. 103	034478	034489	26544-WD-2024.pdf	12	Y	All	(d)	Timothy Oliver
OPC 8 <sup>th</sup> POD, No. 103	034490	034515	26663-WD-2024.pdf	26	Y	All	(d)	Timothy Oliver
OPC 8 <sup>th</sup> POD, No. 103	034516	034518	26665-WD-2024.pdf	3	Y	All	(d)	Timothy Oliver
OPC 8 <sup>th</sup> POD, No. 103	034519	034527	26903-ED-2024.pdf	9	Y	All	(d)	Timothy Oliver
OPC 8 <sup>th</sup> POD, No. 103	034528	034537	27545-WD-2024.pdf	10	Y	All	(d)	Timothy Oliver
OPC 8 <sup>th</sup> POD, No. 103	034538	034547	27706-SD-2024.pdf	10	Y	All	(d)	Timothy Oliver
OPC 8 <sup>th</sup> POD, No. 103	034548	034559	28923-ND-2024.pdf	12	Y	All	(d)	Timothy Oliver
OPC 8 <sup>th</sup> POD, No. 103	033985	033987	0093-ND-2017.pdf	3	Y	All	(d)	Timothy Oliver
OPC 8 <sup>th</sup> POD, No. 103	033988	033990	0093-ND-2017b.pdf	3	Y	All	(d)	Timothy Oliver

Int/POD No.	Begin Bates Number	End Bates Number	Description	No. of Pages	Confidential	Line/Col	F.S. 366.093(3) Subsection	Declarant
OPC 8 <sup>th</sup> POD, No. 103	033991	033993	0102-WD-2014.pdf	3	Y	All	(d)	Timothy Oliver
OPC 8 <sup>th</sup> POD, No. 103	033994	034010	10700-WD-2019.pdf	17	Y	All	(d)	Timothy Oliver
OPC 8 <sup>th</sup> POD, No. 103	034011	034019	12541-WD-2019.pdf	9	Y	All	(d)	Timothy Oliver
OPC 8 <sup>th</sup> POD, No. 103	034020	034028	15190-ED-2020.pdf	9	Y	All	(d)	Timothy Oliver
OPC 8 <sup>th</sup> POD, No. 103	034029	034031	16014-ND-2020.pdf	3	Y	All	(d)	Timothy Oliver
OPC 8 <sup>th</sup> POD, No. 103	034032	034035	16404-ED-2021.pdf	4	Y	All	(d)	Timothy Oliver

**EXHIBIT D**  
**DECLARATION(S)**

**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 TIMOTHY OLIVER**

1. My name is Timothy Oliver. I am currently employed by Florida Power & Light Company ("FPL") as Vice President of Development. 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 Office of Public Counsel's Eighth Request for Production of Documents, Nos. 100, 101 and 103. The documents or materials that I have reviewed and which are asserted by FPL to be proprietary confidential business information contain information concerning bids or other contractual data, the disclosure of which would impair the efforts of the FPL to contract for goods or services on favorable terms. Specifically, the information contains invoices, purchase orders, and payroll expenses for services provided by third-party 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.



\_\_\_\_\_  
Timothy Oliver

Date: 4/10/25

**EXHIBIT D**

**BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION**

Petition by Florida Power & Light Company for  
Base Rate Increase

Docket No: 20250011-EI

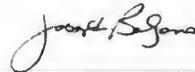
**DECLARATION OF JOSEPH BALZANO**

1. My name is Joseph Balzano. I am currently employed by Florida Power & Light Company (“FPL”) as Vice President, Finance and Assistant Treasurer. 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 Eighth Set of Interrogatories, Nos. 259, and 261. The documents or materials that I have reviewed and which are asserted by FPL to be proprietary confidential business information contain information concerning bids or other contractual data, the disclosure of which would impair the efforts of FPL or its affiliates to contract for goods or services on favorable terms. The documents also contain information relating competitive interests of FPL, the disclosure of which impair the competitive business interests of FPL or its affiliates. Specifically, the information contains the terms and dollar amounts of loan guarantees made by FPL to its affiliates. 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.



\_\_\_\_\_  
Joseph Balzano

Date: April 10, 2025