

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Fuel and Purchased Power Cost Recovery
Clause with Generating Performance Incentive
Factor.

Docket No: 20250001-EI
Date: April 18, 2025

**FLORIDA POWER AND LIGHT COMPANY'S REQUEST FOR
A SECOND EXTENSION OF CONFIDENTIAL CLASSIFICATION OF
INFORMATION PROVIDED IN RESPONSE TO THE OFFICE OF PUBLIC
COUNSEL'S FIRST REQUEST FOR PRODUCTION OF DOCUMENTS (No. 2)**

Pursuant to Section 366.093, Florida Statutes ("Section 366.093"), and Rule 25-22.006, Florida Administrative Code, Florida Power & Light Company ("FPL") hereby submits its Second Request for Extension of Confidential Classification of Information provided in response to the Office of Public Counsel's ("OPC") First Request for Production of Documents, (No. 2) ("Confidential Information"). In support of this request, FPL states as follows:

1. On March 8, 2021, FPL filed a Request for Confidential Classification of the Confidential Information, which included Exhibits A, B, C and D ("March 8, 2021 Request"). By Order No. PSC-2022-0020-CFO-EI, dated January 12, 2022 ("Order 0020"), the Commission granted FPL's March 8, 2021 Request. FPL adopts and incorporates by reference the March 8, 2021 Request and Order 0020.

2. On June 15, 2023, FPL filed a Request for Extension of Confidential Classification of the Confidential Information, which included Revised Exhibits C and D ("June 15, 2023 Request"). By Order No. PSC-2023-0312-CFO-EI, dated October 19, 2023 ("Order 0312"), the Commission granted FPL's June 15, 2023 Request. FPL adopts and incorporates by reference the October 19, 2023 Request and Order 0312.

3. The period of confidential treatment granted by Order 0312 will soon expire. The Confidential Information that was the subject of FPL's June 15, 2023 Request and Order 0312 warrants continued treatment as proprietary and confidential business information within the

meaning of Section 366.093(3). Accordingly, FPL hereby submits its Second Request for Extension of Confidential Classification.

4. All the information designated in Exhibit A to the March 8, 2021 Request remains confidential. Accordingly, Exhibits A and B remain unchanged and will not be reproduced or reattached here.

5. A Second Revised Exhibit C is included to reflect a new declarant. The declaration of Nidhi Purohit in support of this Request is included as Second Revised Exhibit D.

6. The Confidential Information is intended to be and has been treated by FPL as private, its confidentiality has been maintained, and its disclosure would cause harm to FPL and its customers. Pursuant to Section 366.093, 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.

7. As the declaration included in Second Revised Exhibit D indicates, the documents include competitively sensitive information, the disclosure of which would impair the competitive business of FPL and the counterparties to its contracts. Specifically, the confidential documents contain information provided pursuant to FPL's contracts that prohibit FPL from disclosing the subject data. Disclosure of this information would impair FPL's efforts to contract with third parties for their services on favorable terms in the future, to the detriment of FPL's customers. FPL treats such information as confidential and does not disclose it, except as required by law, to entities or persons other than the customer absent the customer's consent. This information is protected pursuant to Section 366.093(3)(e), Fla. Stat.

8. Nothing has changed since the Commission entered Order 0312 to render the Confidential Information stale or public, such that continued confidential treatment would not be appropriate.

9. Pursuant to Section 366.093(4), F.S., the information for which confidential classification is granted remains protected from disclosure up to 18 months unless good cause is shown to grant protection from disclosure for a longer period. The nature of these materials will not change in the next three years. Therefore, to promote administrative efficiency, FPL requests confidential classification for a period of thirty-six (36) months. Upon a finding by the Commission that the Confidential Information remains proprietary and confidential business information, the information should not be declassified for at least an additional thirty-six (36) month period and should be returned to FPL as soon as it is no longer necessary for the Commission to conduct its business. *See* § 366.093(4), Fla. Stat.

WHEREFORE, for the above and foregoing reasons, as more fully set forth in the supporting materials included with or incorporated in this Request, Florida Power & Light Company respectfully requests that its Request for Extension of Confidential Classification be granted.

Respectfully submitted,

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By: /s/ David M. Lee

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CERTIFICATE OF SERVICE
Docket No. 20250001-EI

I HEREBY CERTIFY that a true and correct copy of the foregoing was served by electronic mail this 18th day of April, 2025 to the following:

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SECOND REVISED EXHIBIT “C”

SECOND REVISED EXHIBIT C

COMPANY: Florida Power & Light Company
TITLE: List of Confidential Documents
DOCKET NO.: 20250001-EI
DOCKET TITLE: Fuel and Purchased Power Cost Recovery Clause with Generating Performance Incentive Factor
SUBJECT: FPL's Response to OPC's First Request for Production (No. 2)
DATE: April 18, 2025

* Bold indicates change in declarant.

OPC's First POD's	Bates Nos.	Description	Line No./ Col. No.	Florida Statute 366.093(3) Subsection	Declarant
Request No. 2	FCR-21-000001 through FCR-21-000008	Electric Rotating Stator Generator with Permanent Magnets and Fixed Rotor with Concentrated Windings: Analysis and Study on its Magnetic Circuit	ALL	(e)	Nidhi Purohit
	FCR-21-000009 through FCR-21-000017	7/15/20 ElectroMechanical Engineering Associates, Inc. Review of Analysis of TP 4 PMG Failure Rev 0	ALL		
	FCR-21-000018 through FCR-21-000028	7/15/20 ElectroMechanical Engineering Associates, Inc. Review of Analysis of TP 4 PMG Failure Rev 1	ALL		
	FCR-21-000029 through FCR-21-000057	INPO July 2004 Topical Report TR4-38	ALL		
	FCR-21-000058 through FCR-21-000110	INPO August 2005 Topical Report TR5-48	ALL		
	FCR-21-000111 through FCR-21-000288	EPRI December 2002 Final Report	ALL		
	FCR-21-000289 through FCR-21-000300	12/3/1998 presentation at EPRI - PM and overhaul experience – brushless exciter EPRI report	ALL		
	FCR-21-004003 through FCR-21-004009	Siemen's General Inspection Report	ALL		
	FCR-21-004010 through FCR-21-004127	Siemen's General Inspection / Generator Rotor Bore Inspection Report	ALL		

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SECOND REVISED EXHIBIT “D”

REVISED EXHIBIT D

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Fuel and Purchased Power Cost
Recovery Clause with Generating Performance
Incentive Factor

Docket No: 20250001-EI

DECLARATION OF NIDHI PUROHIT

1. My name is Nidhi Purohit. I am currently employed by Florida Power & Light Company ("FPL") as Principal Business Analyst, Nuclear Finance. I have personal knowledge of the matters stated in this written declaration.

2. I have reviewed Exhibit C and the documents and information included in Exhibit A to FPL's March 8, 2021 Request for Confidential Classification. The documents and materials in Exhibit A which are asserted by FPL to be proprietary confidential business relate to competitive interests of third parties. Specifically, the confidential documents contain information provided pursuant to FPL's contracts that prohibit FPL from disclosing the subject data. Disclosure of this information would impair FPL's efforts to contract with third parties for their services on favorable terms in the future, to the detriment of FPL's customers. To the best of my knowledge, FPL has maintained the confidentiality of this information.

3. Nothing has occurred since the issuance of Order No. PSC-2023-0312-CFO-EI to render the designated information stale or pubic, such that continued confidential treatment would not be appropriate. Therefore, consistent with the provisions of the Florida Administrative Code, such materials should remain confidential for a period of at least an additional thirty-six (36) 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.



Nidhi Purohit

Date: 4/17/2025