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April 28, 2025

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

REDACTED

2025 APR 28 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 Florida Rising, League of United Latin American Citizens and Environmental Confederation of Southwest Florida's Third Set of Interrogatories (No. 66) and Third Request for Production of Documents (Nos. 48, and 51). 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.

- COM _____
 - AFD 2 redacted
 - 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 28, 2025

**FLORIDA POWER & LIGHT COMPANY'S REQUEST FOR CONFIDENTIAL
CLASSIFICATION OF INFORMATION PROVIDED IN IT'S RESPONSE TO
FLORIDA RISING, LEAGUE OF UNITED LATIN AMERICAN CITIZENS AND
ENVIRONMENTAL CONFEDERATION OF SOUTHWEST FLORIDA'S THIRD
SET INTERROGATORIES (NO. 66) AND THIRD REQUEST FOR
PRODUCTION OF DOCUMENTS (NOS. 48 AND 51)**

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 Florida Rising, League of United Latin American Citizens and Environmental Confederation of Southwest Florida's ("FL Rising") Third Set of Interrogatories (No. 66) and Third Request for Production of Documents (Nos. 48 and 51) ("Confidential Information"). In support of its request, FPL states as follows:

1. FPL served its responses to FL Rising's Third Set of Interrogatories (No. 66) and Third Request for Production of Documents (Nos. 48 and 51) on April 28, 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 Daniel DeBoer 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 declarations included in Exhibit D, the Confidential Information contains information concerning security measures, systems or procedures. Specifically, the information contains descriptions of FPL nuclear operations and procedures. This information is protected by Section 366.093(3)(c), Florida Statutes.

5. As described more fully in the declarations included in Exhibit D, the Confidential Information also 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 to competitive interests of FPL or its vendors, the disclosure of which impair the competitive business interests of FPL. Specifically, the information contains pricing terms and Requests for Proposals with vendors. The disclosure of this information would impair the competitive business interests of FPL and its vendors. This information is protected by Sections 366.093(3)(d) and (e), Florida Statutes.

6. 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 28th day of April, 2025,

By: /s/ Maria Jose Moncada
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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 28th day of April, 2025:

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

<p>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 jbrew@smxblaw.com lwb@smxblaw.com jrb@smxblaw.com sbn@smxblaw.com Florida Retail Federation</p>	<p>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 Katelyn.Lee@evgo.com Lindsey.Stegall@evgo.com EVgo Services, LLC</p>
<p>Steven W. Lee Spilman Thomas & Battle, PLLC 1100 Bent Creek Boulevard, Suite 101 Mechanicsburg, PA 17050 (717) 791-2012 (717) 795-2743 slee@spilmanlaw.com Walmart, Inc.</p>	<p>Stephanie U. Eaton Spilman Thomas & Battle, PLLC 110 Oakwood Drive, Suite 500 Winston-Salem, NC 27103 (336) 631-1062 (336) 725-4476 seaton@spilmanlaw.com Walmart, Inc.</p>
<p>Robert E. Montejo Duane Morris LLP 201 S. Biscayne Blvd., Suite 3400 Miami, Florida 33131-4325 (202) 776-7827 REMontejo@duanemorris.com Electrify America, LLC</p>	<p>Stephen Bright Jigar J. Shah 1950 Opportunity Way, Suite 1500 Reston, Virginia 20190 (781) 206-7979 (703) 872-7944 steve.bright@electrifyamerica.com jigar.shah@electrifyamerica.com Electrify America, LLC</p>

/s/ Maria Jose Moncada

Maria Jose Moncada
Assistant General Counsel
Florida Bar No. 0773301

Attorney for Florida Power & Light Company

EXHIBIT A

CONFIDENTIAL

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 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 28, 2025

Int/POD No.	Begin Bates Number	End Bates Number	Description	No. of Pages	Confidential	Line/Col	F.S. 366.093(3) Subsection	Declarant
FEL 3 rd INT, No. 66	039624	039624	Interrogatory 66 Narrative Response	1	Y	Lines 1-17	(c)	Daniel DeBoer
FEL 3 rd POD, No. 48	039673	039679	MWC Pitch Deck	18	Y	Pages 4-8 and 10, All	(d) & (e)	Timothy Oliver
FEL 3 rd POD, No. 48	039659	039669	MDC Commissioner Meetings	16	Y	Pages 6-8, 10 and 13-16, All	(d) & (e)	Timothy Oliver
FEL 3 rd POD, No. 51	039688	039691	AR Report AR02489624	4	Y	All	(c)	Daniel DeBoer
FEL 3 rd POD, No. 51	039697	039701	AR Report AR02490514	5	Y	All	(c)	Daniel DeBoer
FEL 3 rd POD, No. 51	039692	039696	AR Report AR02489625	5	Y	All	(c)	Daniel DeBoer
FEL 3 rd POD, No. 51	039702	039706	Response to Request for More Information	5	Y	All	(c)	Daniel DeBoer
FEL 3 rd POD, No. 51	039707	039709	SCWE RFI Letter to CNO	3	Y	All	(c)	Daniel DeBoer

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 DANIEL DEBOER

1. My name is Daniel DeBoer. I am currently employed by Florida Power & Light Company ("FPL") as Vice President, Nuclear. 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 response to the FL Rising's Third Set of Interrogatories, No. 66, and Third Request for Production of Documents, No. 51. The documents or materials that I have reviewed and which are asserted by FPL to be proprietary confidential business information contain information relating to security measures, systems or procedures. Specifically, the information contains descriptions of FPL nuclear operations and procedures. 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.



Daniel DeBoer

Date: 4/25/25